Sapphire Hotel Project

Case Number: ENV-2019-4339-MND

Project Location: 1524-1530 North Western Avenue and 5446 West Harold Way, Los Angeles, California, 90027

Community Plan Area: Hollywood

Council District: 13 **–** O'Farrell

Project Description: The Sapphire Hotel Project ("proposed Project" or "Project") proposes the demolition of an existing two-story duplex and surface parking lot; and the construction, use, and maintenance of a new four-story (60-foot), mixed-use boutique hotel with 36 guest rooms, 10 residential apartment units, and an at-grade parking level with one subterranean level. The project will include 47 overall parking spaces with a maximum of 12 residential parking spaces (including two guest spaces) designated for the proposed apartments, 24 bicycle parking spaces, and 1,343 square feet of open space. The site is located on a 14,478 square-foot lot that would include 26,080 square feet of total floor area with a Floor Area Ratio (FAR) of 1.8:1. There are two (2) street trees along Western Avenue that would remain in place during construction. There are four (4) existing trees on the site, which are all unprotected fruit trees that would be removed as part of the project scope. The project would include 4,705 cubic yards of cut and export. The project would cut approximately ten (10) feet below the existing grade in order to accommodate the subterranean parking level.

The applicant is requesting the following approvals from the City: (1) a Conditional Use Permit to allow a hotel within 500 feet from an R Zone; (2) a Conditional Use to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption; (3) a Project Permit Compliance for the demolition of an existing duplex and surface parking lot, and the construction, use, and maintenance of a new four-story (60-foot), mixed-use boutique hotel with 36 guest rooms, 10 residential apartment units, and an at-grade parking level with one subterranean level, within Subarea C (Community Center) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan; (4) a Specific Plan Exception to allow commercial uses above the ground-floor; and (5) a Specific Plan Exception to allow the proposed building to exceed the Transitional Height limits for a project abutting a Subarea A lot. The applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities which may include, but are not limited to, the following: excavation, shoring, grading, foundation, haul route, and removal and replacement of street trees for the project site.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Rincon Consultants, Inc.

APPLICANT:

Phil Patel

August 2021

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study document evaluates potential environmental effects resulting from construction and operation of the proposed Sapphire Hotel Project ("proposed Project" or "Project"). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision makers prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed Projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in Projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a Project's approval even if significant environmental effects are anticipated.

An application for the proposed Project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to CEQA, and the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a Project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

> Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**SAPPHIRE HOTEL PROJECT**
ENVIRONMENTAL CASE NO.	**ENV-2019-4339-MND**
RELATED CASES	APCC-2019-4338-SPE-CU-CUB-SPP

PROJECT LOCATION	**1524-1530 North Western Avenue and 5446 West Harold Way**
COMMUNITY PLAN AREA	HOLLYWOOD
GENERAL PLAN DESIGNATION	HIGHWAY ORIENTED COMMERCIAL
ZONING	C2-1
COUNCIL DISTRICT	13 – O'FARRELL

LEAD AGENCY	**City of Los Angeles**
STAFF CONTACT	JASON HERNÁNDEZ
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APPLICANT	PHIL PATEL
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PHONE NUMBER	323-788-1807

PROJECT DESCRIPTION

The Sapphire Hotel Project ("proposed Project" or "Project") proposes the demolition of an existing two-story duplex and surface parking lot; and the construction, use, and maintenance of a new four-story (60-foot), mixed-use boutique hotel with 36 guest rooms, 10 residential apartment units, and an at-grade parking level with one subterranean level. The project will include 47 overall parking spaces with a maximum of 12 residential parking spaces designated for the proposed apartments (including two guest spaces), 35 hotel parking spaces, 24 bicycle parking spaces, and 1,343 square feet of open space. The site is located on a 14,478 square-foot lot that would include 26,080 square feet of total floor area with a FAR of 1.8:1. The project would include 4,705 cubic yards of cut and export. The project would cut approximately ten (10) feet below the existing grade in order to accommodate the subterranean parking level.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

ENVIRONMENTAL SETTING

The Project site encompasses 0.33 acre (approximately 14,478 square feet) and is identified with Assessor Parcel Numbers (APNs) 5544-022-028, -029, and -030. The Project site is located within the Hollywood Community Plan and Subarea C of the Vermont/Western SNAP. The site is zoned C2-1, designated for Highway Oriented Commercial land uses and is currently developed with a surface parking lot on the portion of the site fronting North Western Avenue and a duplex on the portion of the site fronting West Harold Way.

The surrounding area is characterized by level and sloped topography and improved streets. Properties to the north, west, and south are located within Subarea C of the Vermont/Western SNAP. The property on the southeast corner of West Harold Way and North Western Avenue, to the north and west of the Project site, is a Super 8 Motel with 54 guest rooms and a cocktail bar. To the south is a 56-unit apartment building and corner shopping center containing a Walgreens pharmacy and a Verizon Wireless Retail Store. West of the site, across North Western Avenue, is a WSS Shoe Store that occupies the entire block from West Harold Way to Sunset Boulevard. The property to the east of the Project site is developed with a two-story, 10-unit apartment building and located within Subarea A (Neighborhood Conservation) of the Vermont/Western SNAP.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g., permits, financing approval, or participation agreement)

None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Jason Hernández	City Planning Associate
PRINTED NAME	**TITLE**
SIGNATURE	August 19, 2021
	DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration (CEQA Guidelines §15063 [c][3][D]). In this case, a brief discussion should identify the following:

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

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

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

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

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

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

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Sapphire Hotel Project ("proposed Project" or "Project") proposes the demolition of an existing two-story duplex and surface parking lot; and the construction, use, and maintenance of a new four-story, mixed-use boutique hotel with 36 guest rooms, 10 residential apartment units, and an at-grade parking level with one subterranean level. The project will include 47 overall parking spaces with a maximum of 12 residential parking spaces designated for the proposed apartments (including two guest spaces), 35 hotel parking spaces, 24 bicycle parking spaces, and 1,343 square feet of open space. The site is located on a 14,478 square-foot lot that would include 26,080 square feet of total floor area with a Floor Area Ratio (FAR) of 1.8:1. The project would include 4,705 cubic yards of cut and export. The project would cut approximately ten (10) feet below the existing grade in order to accommodate the subterranean parking level.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project site is located at 1524-1530 North Western Avenue and 5446 West Harold Way in the Hollywood Community Plan Area in the City of Los Angeles and Subarea C of the Vermont/Western SNAP. The Project site is identified with Assessor Parcel Numbers (APNs) 5544-022-028, -029, and -030. The subject property consists of four (4) rectangular shaped lots that create a "L" shaped Project site. The Project site has approximately 75 feet of frontage along the easterly side of Western Avenue and approximately 45 feet of frontage along the southerly side of Harold Way. The Project site is located within approximately 100 feet of the Western/Sunset bus stop for LA Metro Lines 2, 175 and 302 and LADOT Hollywood Clockwise Line and within approximately 0.2 mile of the Western/Hollywood bus stop for LA Metro Lines 207, 757, 180, 282, and 780 and the Metro Red Line at the Hollywood/Western Metro Station. Figure 1 shows the location of the Project site in the region, and Figure 2 shows the site in the local vicinity.

3.2.2 Existing Conditions

The Project site encompasses 0.33 acre (approximately 14,478 square feet) and is currently developed with a surface parking lot on the North Western Avenue frontage and a duplex on the West Harold Way frontage built in 1916. The duplex is currently subject to the Rent Stabilization Ordinance (RSO). The Project site is relatively flat and includes ruderal vegetation and ornamental landscaping. Photos of the existing conditions at the Project site are shown in Figure 3, and photos of the surrounding area are shown in Figure 4.

The Project site is located in the Hollywood Community Plan Area with a land use designation of Highway Oriented Commercial (Figure 5). Highway Oriented Commercial allows corresponding zones of C1, C2, RAS3, RAS4 and P. The site is zoned C2-1. The property is located 1.32 kilometers from Hollywood Fault Zone. The site is not within a designated hillside, airport hazard, coastal zone, farmland, fire hazard severity zone, hazardous waste site, Methane Buffer Zone, Bureau of Engineering's (BOE) Special

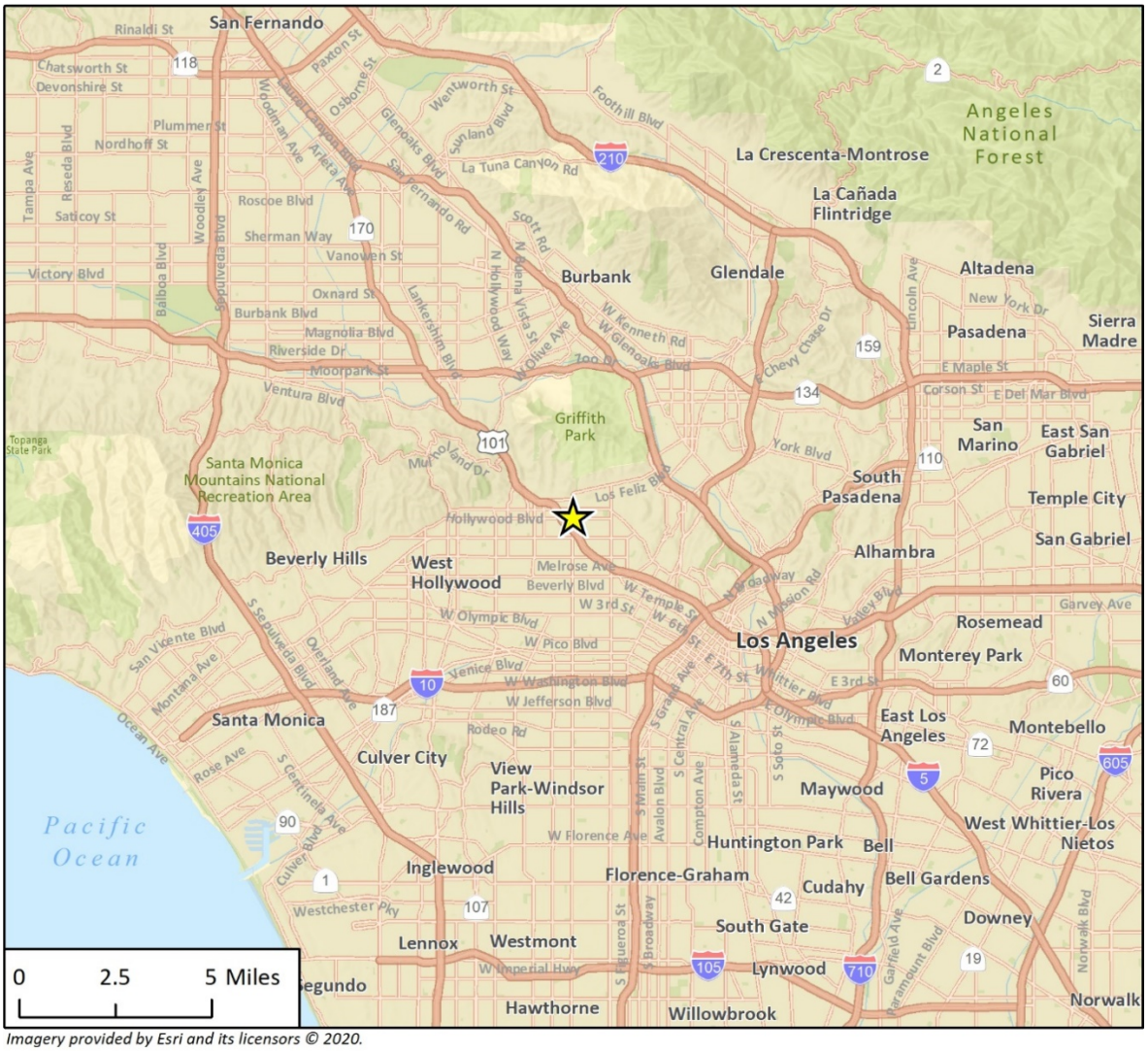
Grading Area, landslide, liquefaction, fault rupture, or tsunami inundation zone. There are two (2) street trees that will be removed as part of the project scope.

3.2.3 Surrounding Land Uses

The site is located within the Hollywood Community Plan Area, approximately 0.26 miles to the east of the 101 Freeway. The Project site is located approximately 720 feet from the Hollywood/Western Metro Red Line Station. Beverly Boulevard is designated as an Avenue II with a designated right-of-way width of 86 feet and designated roadway width of 56 feet. Heliotrope Drive is designated as a Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet. Berendo Street is designated as a Local Street – Standard with a designated right-of-way width of 60 feet and designated roadway width of 36 feet.

The surrounding area is characterized by level topography and improved streets. The property on the southeast corner of West Harold Way and North Western Avenue, to the north and west of the Project site, is a Super 8 Motel with 54 guest rooms and a cocktail bar. To the south is a 56-unit apartment building and corner shopping center containing a Walgreens pharmacy and a Verizon Wireless Retail Store. East of the site is a two-story 10-unit apartment building. West of the site, across North Western Avenue, is a WSS Shoe Store that occupies the entire block from West Harold Way to Sunset Boulevard. Photos of surrounding land uses are shown in Figure 4.

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2020.

Project Location

N

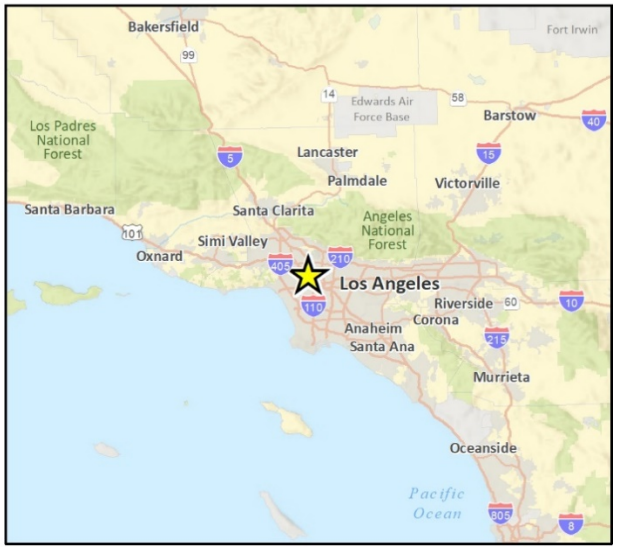


Figure 2 Project Site Location

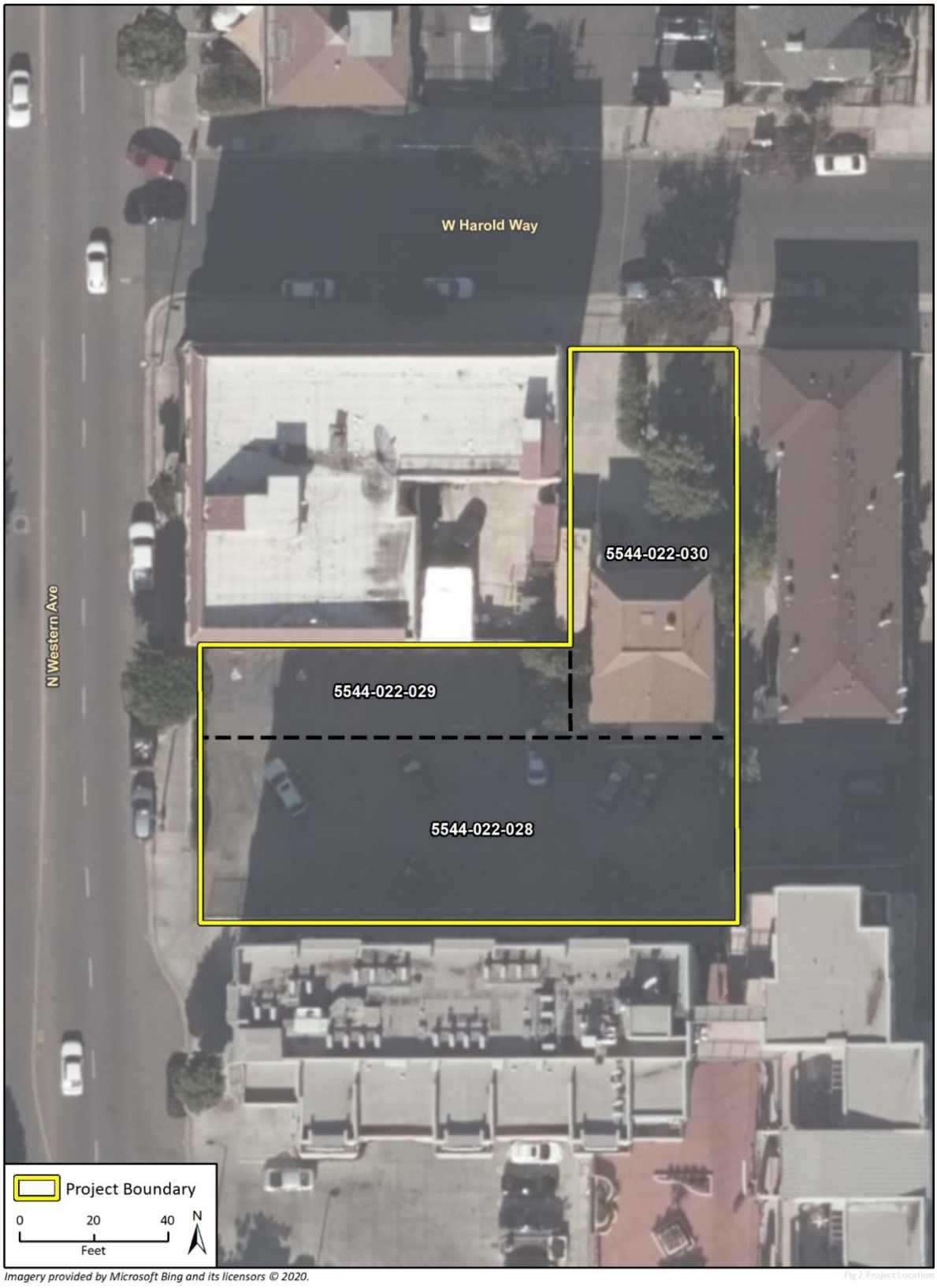


Figure 3 Existing Site Photographs

Photograph 1. View of the existing parking lot fronting North Western Avenue, looking to the east. The existing duplex on the site is shown in the background on the left. Multi-family residences are located south of the Project site, shown on the right side of the photo.

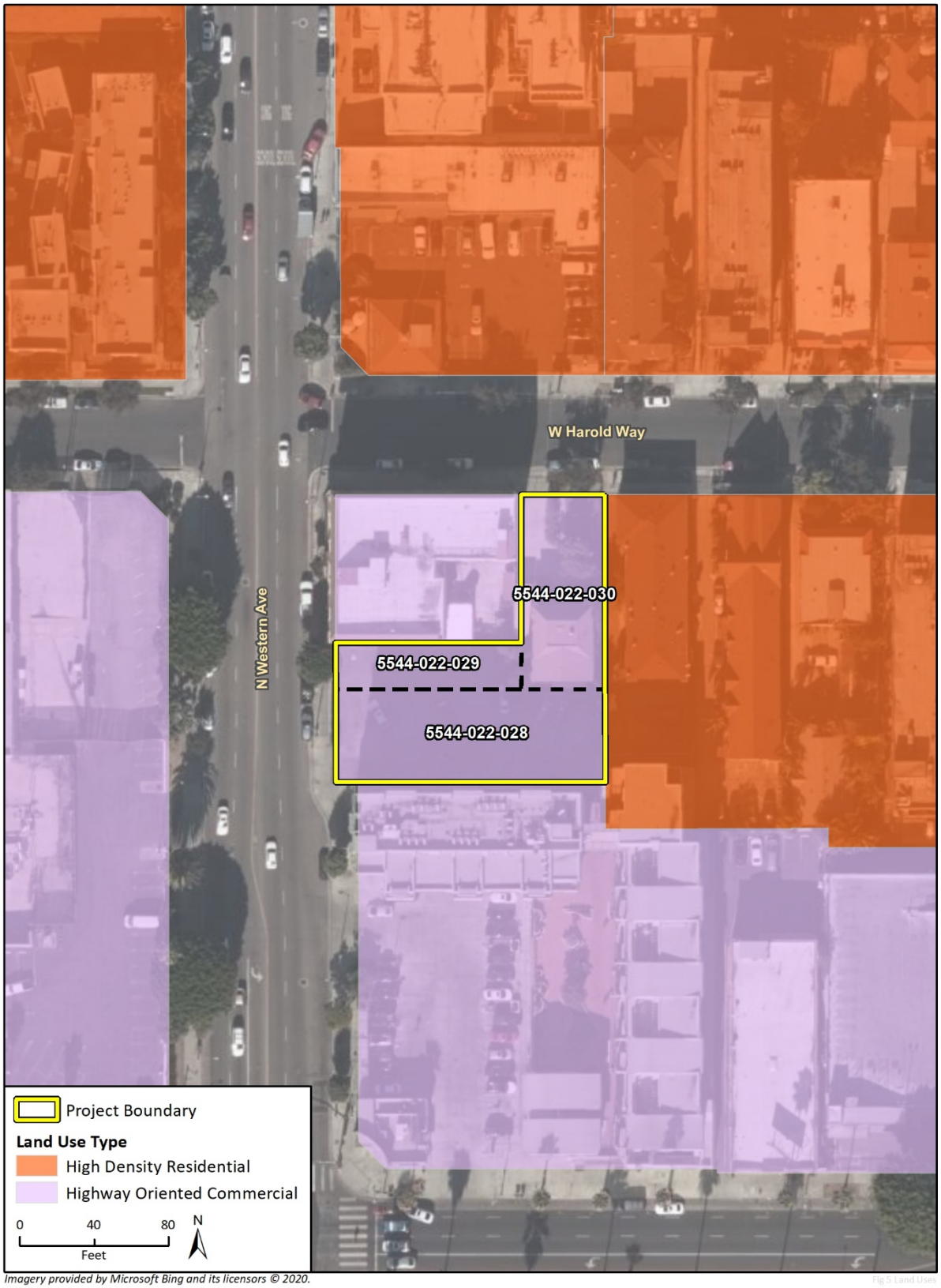
Photograph 2. View of the front of the existing duplex on the site, located at 5446 West Harold Way, looking to the south. The building would be demolished as part of the Project.

Figure 4 Photographs of Surrounding Uses

Photograph 3. View of the intersection of West Harold Way and North Western Avenue, looking to the north/northeast. Commercial uses include restaurants, a smoke shop, and supermarket.

Photograph 4. View of the intersection of West Harold Way and North Western Avenue, looking to the west. The WSS shoe store west of the Project site is located on the left side of the photo, and multi-family residential apartments fronting North Western Avenue are shown in the right side of the photo.

Figure 5 General Plan Land Use Designations



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Additional data provided by LA City, 2019.

3.2.4 Cumulative Development Projects

In addition to the specific impacts of individual Projects, CEQA requires consideration of potential cumulative impacts of the proposed Project. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed Project and other nearby projects. Table 1 provides a list of other development projects in the general vicinity of the proposed Project.

TABLE 1 CUMULATIVE DEVELOPMENT PROJECTS

Project No.	Address	Land Use	Case Number	Application Status
1	1349 North Hobart Boulevard	Demolition of 9 residential units and construction of 29 residential units	ENV-2019-791-EAF	Not complete
2	5506 West Hollywood Boulevard	4,356-sf restaurant and 3,716-sf commercial kitchen with a market	ENV-2018-892-EAF	Not complete
3	5420 West Sunset Boulevard	735 residential units and 95,820 sf of commercial uses	ENV-2017-1084-EIR	Not complete
4	1552 North Western Avenue	Change of use from a market to a trade school	ENV-2017-2782-CE	Not complete
5	5525 West Sunset Boulevard	Demolition of existing commercial building and construction of 412 residential units and 36,000 sf of commercial uses	CPC-2019-4639-CU-DB-SPE-SPP-SPR-DD-MCUP	Not complete
6	5520 West Sunset Boulevard	194,749-sf retail shopping center	CPC-2015-74-GPA-SP-CUB-SPP-SPR	Complete
7	1300 North Western Avenue	475-sf expansion of an existing 2,100-sf convenience store for off-site beer and wine sales	ENV-2019-1143-CE	Not complete
8	5627 West Fernwood Avenue	Demolition of existing commercial building and construction of 59 very low income affordable residential units and one market rate manager's residential unit	ENV-2017-4873-CE	Complete
9	1525 North Hobart Boulevard	21 residential units	ENV-2017-1836-CE	Complete
10	1370 North St. Andrews Place	Demolition of existing building and construction of 35,000 sf addition to existing community house and change of use to office and restaurant	ENV-2016-1531-MND	Complete
11	5600 West Hollywood Boulevard	32 residential units and 1,279 sf of commercial space	ENV-2016-2808-CE	Complete
12	1375 North St. Andrews Place	Demolition of school and daycare center and construction of 185 residential units	ENV-2015-4630-EIR	Complete
sf = square feet				

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The proposed Project involves the construction of a "L" shaped four-story mixed-use building, consisting of a 36-room boutique hotel and 10 apartment units. To accommodate the proposed 60-foot mixed-use building, the Project would require demolition of a duplex (approximately 2,280 sf) at 5446 West Harold Way. Vehicular parking would be provided in a two-story parking garage with one subterranean level and one at-grade level with a total of 47 spaces. The subterranean parking level would contain 25 vehicular parking stalls and 24 bicycle stalls, an elevator run, and support areas (ex. mechanical, storage, trash, electrical). The subterranean parking level would have accessibility to the ground-floor apartment lobby and residential elevator. The ground floor of the building would contain 22 vehicular parking stalls, separate apartment and hotel lobbies, a security/manager's office, and a break and laundry room. Of the total 47 parking spaces, 12 spaces would be for residential use (including two guest spaces), and 35 spaces would be for hotel use. The second floor would contain 10 apartment units, a hotel breakfast/kitchen area, conference room, a second hotel lobby, and an outdoor garden space with seating. The apartment units would not be connected to the hotel amenities and would function separately from the hotel use. The third floor would contain 19 hotel rooms, and the fourth floor would contain 17 hotel rooms and a gym. An outdoor deck and common space area would be provided on the roof of the building. An overview of the Project layout is provided in Table 2, and the proposed site and floor plans are included in Appendix A.

TABLE 2 PROJECT SUMMARY

Overview	Unit
Gross Site Area	14,478 sf (0.33 acre)
Gross Building Area	26,080 sf
Height[1]	60 ft
Density[2]	30.3 units/acre
Floor Area Ratio (FAR) Hotel Residential	 0.6 1.2
Unit Type/Use	
Hotel Rooms	36 rooms - 17,380 sf
Apartments Studios 1 Bedroom	8,700 sf 5 units 5 units
Parking	
Vehicle Hotel Residential	47 stalls (25 subterranean and 22 ground floor) 35 stalls 12 stalls
Bicycle	24 stalls

Residential Open Space	
Required	1,000 sf
Proposed	1,343 sf

sf = square feet; ft = feet, du = dwelling unit
[1] Proposed height calculation includes rooftop equipment, elevator/stair shaft, and rooftop trellis.
[2] Density calculation based on number of proposed residential units.

3.3.2 Design and Architecture

The proposed mixed-use building would be constructed in a "L" shaped design with two separate street frontages, due to the nature of the Project site. The proposed site plan is included in Appendix A. To reduce scale and massing, the façades of the building on the North Western Avenue and West Harold Way would be constructed with a volumetric three-dimensional form design. Exterior architectural finishes would include, but are not limited to, cement plaster, brushed aluminum claddings, greyed cedar matt trespa, and dual glazed glass doors and windows with anodized aluminum frames. Elevation profiles depicting the building's design and architecture are shown in Figure 6 and Figure 7, and conceptual renderings of the building from the street level and aerials are shown in Figure 8 and Figure 9. The massing design was completed in compliance with the requirements of the Vermont/Western SNAP.

3.3.3 Open Space and Landscaping

The proposed Project would provide 1,343 sf of open space, consisting of 763 sf of roof deck area and 580 sf of private balconies. There are two (2) street trees, one evergreen pear (*Pyrus kawakami)* on West Harold Way and one Indian Laurel ficus (*Ficus nitida)* on North Western Avenue; both trees would remain in place during construction. There are four (4) existing trees on the site, which are all unprotected fruit trees that would be removed. Implementation of the Project would include 1,627 sf of landscaping and the planting of 32 on-site trees - three coral bark Japanese maples (*Acer Palmatum*), 15 maidenhair (*Gingko biloba*), and 14 Chinese flame (*Koelreuteria bipinnata*). Ornamental landscaping and shrub plantings would be provided on the ground floor near the entrances/exits, on the second floor along the eastern and southern edges of the building in planters/balconies, and on the roof deck. Landscape plans are provided in Appendix A.

3.3.4 Access, Circulation, and Parking

The Project would include construction of one new ingress/egress point off North Western Avenue to provide ground floor access to the hotel lobby and ground floor hotel parking. A secondary ingress/egress point off West Harold Way would be located at the existing curb ramp but would be excavated to provide subterranean access to the residential lobby and subterranean parking garage. The Project would provide 47 total parking stalls (22 standard, 21 compact, and two handicapped) in the two-level parking garage. Of this total, 12 spaces would be for residential use (including two guest spaces), and 35 spaces would be for hotel use. The subterranean level would provide 25 parking stalls and 24 bicycle stalls. The at-grade level would provide 22 parking stalls. The Project would allocate five percent of the total parking spaces for electric vehicle use/stations, consistent with the City of Los Angeles Green Building Code.

3.3.5 Anticipated Construction Schedule

Construction of the proposed Project is anticipated to occur over an approximately 18- to 24-month period that would begin following entitlement approval. All construction would occur Monday through Friday, consistent with Los Angeles Municipal Code (LAMC)

requirements. Construction phasing would include demolition of an existing two-story residence (2,280 sf), site preparation, grading, building construction, asphalt paving and architectural coating. Once completed, the parking garage would provide staging for construction equipment and parking for construction workers. The Project would require export of approximately 4,705 cubic yards of cut soil to accommodate the subterranean parking garage.

Figure 6 West and South Elevations of the Proposed Project

Source: Alajajian Marcoosi Architects Inc., 2019.

Figure 7 North and East Elevations of the Proposed Project

Source: Alajajian Marcoosi Architects Inc., 2019.

Figure 8 Conceptual Renderings of the Proposed Project from Street Level

① VIEW FROM WESTERN AVENUE

② VIEW FROM HAROLD WAY

Source: Alajajian Marcoosi Architects Inc., 2019.

Figure 9 Conceptual Renderings of the Proposed Project from Aerial View

① BIRD'S-EYE VIEW FROM WESTERN AVENUE

② BIRD'S-EYE VIEW FROM HAROLD WAY

Source: Alajajian Marcoosi Architects Inc., 2019.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requested permits and approvals for the Project. The Initial Study will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to **Los Angeles Municipal Code (LAMC) Section 12.24 24**, a Conditional Use Permit to allow a hotel within 500 feet from a R Zone.
2. Pursuant to **LAMC Section 12.24 1**, a Conditional Use to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption.
3. Pursuant to **LAMC Section 11.5.7 C**, a Project Permit Compliance for the demolition of an existing duplex and surface parking lot, and the construction, use, and maintenance of a new four-story, mixed-use boutique hotel with 36 guest rooms, 10 residential apartment units, and an at-grade parking level with one subterranean level
4. Pursuant to **LAMC Section 11.5.7 F**, a Specific Plan Exception for relief from the following Vermont/Western Station Neighborhood Plan ("SNAP") requirements:
    a. **SNAP Section 9.A.1: Commercial Uses**. To allow commercial uses above the ground-floor; and
    b. **SNAP Section 9.C: Transitional Height**. To allow the proposed building to exceed the Transitional Height limits for a project abutting a Subarea A lot.
5. The Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction actions including, but not limited to, the following: demolition, temporary street closure, excavation, shoring, grading, haul route, foundation, and building.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating Project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center Project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC §21099(a)(7) defines a "transit priority area" as an area within 0.5 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." PRC §21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC §21099(a)(1) defines an "employment center Project" as "a Project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC §21099(a)(4) 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. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information File ZI No. 2452 provides further instruction concerning the definition of transit priority Projects and states that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill Projects within TPAs pursuant to CEQA."[1]

PRC §21099 applies to the Project because the Project is a mixed-use residential Project on an infill site within 0.2 mile of the Hollywood/Western Metro Station, which serves the Metro Red Line. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study is included to discuss what aesthetic impacts would occur from the Project if PRC §21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

[1] City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed April 28, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

No impact. A significant impact would occur if the proposed project would have a substantial adverse effect on a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected. The Conservation Element of the City of Los Angeles General Plan describes scenic vistas as the panoramic public view access to natural features, including views of the ocean, striking natural terrain, or unique urban or historic features (City of Los Angeles 2001a). None of these elements are visible from or through the Project site, which is in an established urban community. The existing views in the Project site are defined primarily by the commercial and residential developments along North Western Avenue. Views through the site are currently blocked due to adjacent buildings, and views of the Santa Monica and Santa Susana Mountains to the west and north and the San Gabriel Mountains to the northeast are limited by topography and intervening multi-family residential and commercial developments surrounding the Project site. Therefore, as an infill project within one-half mile from a major transit stop, the project would not have an adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No impact. A significant impact would occur if the proposed project would substantially damage scenic resources within a State Scenic Highway. The proposed Project is located approximately

0.3 mile east of U.S. Highway 101 and approximately 2.5 miles west of Interstate 5. According to the California Department of Transportation (Caltrans) (2019), neither of these highways are designated as state scenic highways (Caltrans 2019). The City of Los Angeles identifies the segment of North Western Avenue between Franklin Avenue and Los Feliz, located approximately 0.5 mile north of the Project site, as a designated scenic highway in the Mobility Element of its General Plan (City of Los Angeles 2016). The Project site is not visible from this section of North Western Avenue due to existing intervening topography and urban development. In addition, there are no scenic or historic resources located on the site. The proposed Project would not substantially damage scenic resources within view of a scenic highway and, and in accordance with PRC §21099, no impact would occur.

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

Less than significant impact. A significant impact would occur if the proposed project would substantially degrade the existing visual character or quality of the site and its surroundings. The proposed Project involves development of a mixed-use building on an infill site located in an established urban community. Implementation of the Project would change the visual character of the Project site by demolishing a duplex and surface parking lot and introducing a new four-story mixed-use residential and hotel building. As shown in Figure 4 and Figure 8, the Project site is surrounded by commercial and residential developments on all sides, and the Project would be constructed in an "L-shaped" design in between existing development. The Project site currently lacks scenic quality. The Project would introduce new landscaping and tree plantings to the site, which would enhance the scenic quality of the site as compared to existing conditions.

The proposed four-story, 60-foot building would be consistent with the 75-foot height limit for mixed use buildings imposed by the Vermont/Western SNAP Subarea C provisions under Section 9.B.2. As discussed in Section 3, *Project Description*, the applicant is requesting an exception to exceed the transitional height requirements from adjoining properties in Subarea "A" contained in LAMC Section 9.C of the Vermont/Western SNAP. The proposed building would be similar in height to developments in the surrounding area and is consistent with buildings fronting on Western Avenue. The adjacent property to the north and west is developed with a four-story motel, and immediately south of the site is a five-story apartment building. The adjacent property to the east is currently developed with a two-story apartment building; however, the proposed Project design includes a step back from the eastern property line with a landscape buffer to create an adequate transition and separation between the existing apartment building and the proposed mixed-use building. The proposed Project design also includes a step back with landscaping and trees at the second floor along the North Western Avenue frontage to reduce massing along this frontage.

Consistent with the Subarea C Development Standards in the Specific Plan, the Project would include transparent building elements such as windows and doors that occupy at least 50 percent of the exterior wall surface of the ground floor facades for the front and side elevations (i.e., the building's frontages on North Western Avenue and West Harold Way). The proposed Project would be required to comply with all other Area Plan development standards/requirements for Subarea C (including but not limited to signage, architectural colors and materials, building form, etc.), as well as any applicable C2-1 development standards contained in the LAMC. Although the construction of a four-story mixed-use building would modify the visual character of the site, it would not degrade the existing visual character or quality of the site and its immediate

surroundings. Furthermore, the proposed building would be consistent with the City's envisioned visual character and quality of the Project site.

In summary, for the reasons discussed above, the proposed Project would not adversely impact the visual character of the surrounding urban landscape and would be consistent with applicable Specific Plan, General Plan, and LAMC regulations and policies relating to visual character and quality. In accordance with PRC §21099, changes to the visual character and quality of the Project site and surrounding area would be less than significant.

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

Less than significant impact. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions. The proposed Project would develop an infill site for hotel and residential use. The proposed Project would include indoor lighting in hotel rooms, residences, and indoor amenity areas as well as exterior lighting for security, private balconies, and outdoor common spaces, such as the roof deck. The proposed Project would also utilize reflective materials, such as glass surfaces, in its doors and windows, which could create glare during daylight hours. In addition, the proposed Project would generate new vehicle traffic to and from the Project site that would contribute light from vehicle headlamps and glare from vehicle surfaces and windows.

The Project site is in a fully urbanized area in the Hollywood CPA of Los Angeles, which currently experiences relatively high levels of nighttime lighting from passing vehicles. In addition, North Western Avenue and West Harold Way are illuminated by streetlights during nighttime hours. Parking would be provided in an enclosed parking garage, and headlights and glare from vehicles entering and exiting the site would be contained in the building. As a result, new sources of light and glare created by the Project would be minimal and would not adversely affect day or nighttime views in the area.

The proposed Project would be required to comply with the Development Standard for Subarea C of the Vermont/Western SNAP, which regulates on-site light shielding and direction, mounting heights, and colors. LAMC §93.017(b), which is part of the Electrical Code, prohibits any stationary exterior light source that causes direct glare to any exterior window or sliding glass door, any elevated habitable porch, deck, or balcony, or any ground surface intended for use, but not limited to recreation, barbeque, or lawn areas of any other residential property. In addition, the proposed Project would comply with California Green Building Standards Code (CALGreen) §5.106.8, which sets requirements for outdoor lighting to reduce light pollution, including allowable backlight, uplight and glare ratings on outdoor lights. In addition, the Project would be subject to the City's Green Building Code (LAMC Chapter IX, Article 9), which includes provisions for light and glare reduction (LAMC §99.05.106.8). In accordance with PRC §21099, impacts to day or nighttime views due to light or glare would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No impact. A significant impact would occur if the proposed project would convert valued farmland to non-agricultural uses. The Project site is located in an established urban community.

The site is surrounded by a Super 8 Motel to the north and west, residential and commercial uses to the south, residential uses to the east, and commercial uses to the west. The Project site is not mapped by the California Department of Conservation's (DOC) map of Los Angeles County Important Farmland (DOC 2016). The General Plan land use designation for the Project site is Highway Oriented Commercial, which corresponds to the C1 (Limited Commercial), C2 (Commercial), RAS3 (Residential/Accessory), RAS4 (Residential/Accessory), and P (Automobile Parking – Surface and Underground) zones. Additionally, the current zoning for the site is C2. Neither the land use designation nor the zoning for this site are related to agriculture. Furthermore, none of the adjacent properties are designated, zoned for, or in agricultural use. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

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

No impact. A significant impact would occur if the proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The Project site is not zoned for agricultural use or under any Williamson Act contract. The Project site is zoned C2 (Commercial), and none of the adjacent properties are zoned for agricultural use. Furthermore, the Project site and adjacent properties are not in agricultural use or under a Williamson Act contract. Therefore, the proposed Project would not conflict with agricultural zoning or a Williamson Act contract or other conversion of farmland to non-agricultural use. No impact would occur.

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

No impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. Neither the Project site nor adjacent properties contain forest resources or are used for timber production. Additionally, as described above, the Project site is zoned for commercial use and is not designated for forestry or agricultural use. Accordingly, the Project would not conflict with forest land or timberland zoning. No impact would occur.

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

No impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project site and the surrounding area is urbanized and entirely developed with residential and commercial uses. As described above, the Project site is zoned C2. Neither the Project site nor the surrounding properties contain forest land. Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

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

No impact. A significant impact would occur if the proposed project caused the conversion of farmland to non-agricultural use. The proposed Project would redevelop a property that currently contains a residence and a parking lot with hotel and residential uses. The Project site and

adjacent properties do not contain agricultural uses or forest land. Therefore, the proposed Project would not result in changes to the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

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

Air Quality Standards and Attainment

The Project area is within the South Coast Air Basin (SCAB) which is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The SCAB is under the regulatory jurisdiction of the SCAQMD. The local air quality management agency is required to monitor air pollutant levels of ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), suspended particulate matter (PM), hydrogen sulfide, sulfates, and lead to ensure that National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met and, if they are not met, to develop strategies to meet the standards. In an effort to monitor the various concentrations of air pollutants throughout the SCAB, the SCAQMD has divided the region into 38 source receptor areas (SRAs) in which over 30 monitoring stations operate. The Project is located within SRA 1, which covers central Los Angeles.

Depending on whether the NAAQS and CAAQS are met or exceeded, the SCAB is classified as being in “attainment,” “maintenance,” or “nonattainment” for air quality. The SCAB is in nonattainment for the federal standards for O_3 and particulate matter 2.5 microns or less in

diameter ($PM_{2.5}$) and the state standards for O_3, particulate matter 10 microns or less in diameter (PM_{10}), and $PM_{2.5}$. Within the SCAB, most areas are in attainment of the federal standard for lead, except for portions of Los Angeles County (SCAQMD 2017). The SCAB is designated unclassifiable or in attainment for all other federal and state standards. Health impacts associated with criteria pollutants for which the region is in non-attainment are described in Table 3, below.

TABLE 3 HEALTH EFFECTS ASSOCIATED WITH NON-ATTAINMENT CRITERIA POLLUTANTS

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function reductions and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function reductions in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Inhalable particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).
Fine particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.
Source: United States Environmental Protection Agency 2015	

Air Quality Management

Under State law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the SCAB is in nonattainment. The SCAQMD has adopted an air quality management plan (AQMP) that provides a strategy for the attainment of state and federal air quality standards. The SCAQMD updates the AQMP every three years. Each iteration of the AQMP is an update of the previous plan and has a 20-year horizon. The latest AQMP, the 2016 AQMP, was adopted on March 3, 2017. The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal 8-hour O_3 standard of 0.070 parts per million (ppm) finalized in 2015.

The 2016 AQMP builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and O_3 standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The 2016 AQMP also includes attainment demonstrations of the new federal 8-hour O_3 standard and vehicle miles travelled (VMT) emissions offsets, as per recent United States Environmental Protection Agency (USEPA) requirements (SCAQMD 2017).

Air Emission Thresholds

The SCAQMD provides numerical thresholds to analyze the significance of a Project's construction and operational emissions impacts on regional air quality. These thresholds, listed in Table 4, are designed such that a Project consistent with the thresholds would not have an individually or cumulatively significant impact to air quality in the SCAB.

TABLE 4 SCAQMD AIR QUALITY THRESHOLDS OF SIGNIFICANCE

	Mass Daily Thresholds (pounds/day)	
Pollutant	**Construction Thresholds**	**Operational Thresholds**
NO_X	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550
Lead	3	3

NO_X: nitrogen oxides; VOC: volatile organic compounds; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter; SO_X: sulfur oxides; CO: carbon monoxide

Source: SCAQMD 2019

In addition to the above thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the CEQA Air Quality Handbook. LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for nitrogen oxides (NO_X), CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a Project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each SRA, distance to the sensitive receptor, and Project size. LSTs only apply to emissions within a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008). According to the SCAQMD *Final Localized Significant Thresholds Methodology*, the use of LSTs is voluntary, to be implemented at the discretion of local agencies (SCAQMD 2008).

LSTs have been developed for emissions generated by construction sites up to five acres in size. The Project site is located in SRA 1 and is approximately 0.33 acre in size. The SCAQMD provides lookup tables for sites that measure up to one, two, or five acres. Pursuant to SCAQMD guidance, the one-acre LSTs were utilized for this analysis (SCAQMD 2008). LSTs are provided for receptors at a distance of 25 to 500 meters (82 to 1,640 feet) from the Project site boundary. The closest sensitive receptors to the Project site are the multi-family residences located immediately adjacent to the site to the south and the east; therefore, per SCAQMD guidance, LSTs for receptors at a distance of 25 meters were utilized (SCAQMD 2008). LSTs for construction on a 0.33-acre site in SRA 1 for a receptor at 25 meters are shown in Table 5.

TABLE 5 SCAQMD LSTS FOR CONSTRUCTION

Pollutant	Allowable Emissions from a 0.33-acre Site in SRA 1 for a Receptor at 25 Meters (pounds/day)
Gradual conversion of NO_x to NO_2	74
CO	680
PM_{10}	5
$PM_{2.5}$	3

SRA: Source Receptor Area; NO_X: nitrogen oxides; NO_2: nitrogen dioxide; CO: carbon monoxide; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter

Source: SCAQMD 2009

a) Conflict with or obstruct implementation of the applicable air quality plan?

No impact. A Project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and the demographic forecasts contained in the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in its own projections for managing air quality in the SCAB.[2] As such, Projects that propose development that is consistent with the growth anticipated by SCAG's growth projections and/or the General Plan would not conflict with the SCAQMD AQMP. In the event that a Project would propose development that is less dense than anticipated by the growth projections, the Project would likewise be consistent with the AQMP.

The proposed Project involves development of a 36-room hotel with ten residential units on a Project site that currently contains a duplex. The proposed Project would result in a net increase of eight residential units on the Project site. According to data from the California Department of Finance (DOF), the current population of the City is approximately 4,040,079 persons, and the average household size is 2.83 persons (DOF 2019). Therefore, existing residential units on the Project site accommodate approximately six residents (2 units x 2.83 persons/unit). The ten residential units proposed under the Project would accommodate approximately 29 persons (10 units x 2.83 persons/unit), resulting in a net increase of approximately 23 residents on site (DOF 2019). The proposed hotel would not directly increase the City's population given that its purpose is to temporarily house visitors; therefore, it would not generate permanent residents. However, the hotel would provide approximately 12 new employment opportunities, according to applicant provided information. It is likely that not all employees would become new residents of Los Angeles (they may, for example, already live in the City or continue to live outside of the City after they are hired). However, this analysis conservatively assumes that all new employees would become new residents of the City. Therefore, the Project would result in the addition of approximately 35 new residents to the City (23 net new residents + 12 employees).

SCAG estimates the population of the City of Los Angeles is expected to increase to approximately 4,609,400 persons by 2040, which is an increase of approximately 14 percent or 569,321 persons (SCAG 2016). The proposed residential units and new employment

[2] On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). However, the 2016 AQMP was adopted prior to this date and relies on the demographic and growth forecasts of the 2016-2040 RTP/SCS; therefore, these forecasts are utilized in the analysis of the project's consistency with the AQMP.

opportunities would increase the existing population by approximately 35 residents, which would be within SCAG's 2040 population forecast. With regard to employment, SCAG estimated the City's total employment opportunities to be approximately 1,858,972 jobs in 2017 and forecasts an increase to approximately 2,169,100 jobs in 2040 (SCAG 2016 and 2019). Thus, employment is expected to increase by approximately 17 percent or 310,128 jobs between 2017 and 2040 (SCAG 2016 and 2019). The addition of approximately 12 new employees would comprise less than 0.01 percent of this increase. The City of Los Angeles contains approximately 1,500,222 housing units (DOF 2019). SCAG estimates an increase of approximately 1,690,300 housing units by 2040, which is an increase of approximately 13 percent or 190,078 housing units (SCAG 2016). The net increase of eight housing units would represent less than 0.01 percent of the projected housing stock increase, which would not exceed SCAG's 2040 housing units forecast. Therefore, population, housing, and employment growth generated by the Project would be within the respective SCAG growth forecasts. As a result, population, housing, and employment growth generated by the Project would be within the respective SCAG growth forecasts upon which the AQMP relies. Thus, the Project would not conflict with the AQMP. No impact would occur.

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

Less than significant impact. A significant impact would occur if the proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard. Criteria pollutants include O_3, CO, NO_2, PM_{10}, $PM_{2.5}$, SO_2, and lead. As discussed under *Air Quality Standards and Attainment*, the SCAB is a nonattainment area for the federal standards for O_3 and $PM_{2.5}$ and the state standards for O_3, PM_{10}, and $PM_{2.5}$. The Los Angeles County portion of the SCAB is also designated nonattainment for lead (SCAQMD 2017). The SCAB is designated unclassifiable or in attainment for all other federal and state standards. The proposed Project does not include any stationary sources of lead emissions. Therefore, implementation of the Project would not result in substantial emissions of lead and this pollutant is not discussed further in this analysis.

Consistent with CEQA Guidelines §15064(h)(3), SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. If the mass regional emissions calculated for a Project exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining the applicable NAAQS and CAAQS, emissions generated by the Project would be considered cumulatively considerable.

The California Emissions Estimator Model (CalEEMod) version 2016.3.2 was used to estimate air quality impacts from construction and operation of the proposed Project. Compliance with SCAQMD Rule 403, *Fugitive Dust Emissions,* and SCAQMD Rule 1113, *Architectural Coatings*, was included in the model as well as Project-specific features discussed under in Section 3, *Project Description*, and information provided by the applicant. SCAQMD Rule 403 required construction site watering at least twice daily (or implementation of an equivalent dust control measure) in order to control dust from disturbed soil. SCAQMD Rule 1113 requires the use of low-VOC paints.

Construction Emissions

Project construction would generate temporary air pollutant emissions during the approximately 18- to 24-month construction period. These emissions are associated with fugitive dust and

exhaust emissions from heavy construction vehicles, as well as ROGs released during the application of architectural coatings. Grading, excavation, hauling, and site preparation would involve the greatest use of heavy equipment and generation of fugitive dust.

Table 5 summarizes the estimated maximum daily emissions of pollutants during Project construction. As shown therein, construction emissions would not exceed SCAQMD regional thresholds or LSTs. Furthermore, the Project would be required to comply with SCAQMD Rules 403 and 1113 as outlined under Regulatory Compliance Measure (RCM) AQ-1 and RCM-AQ-2. Therefore, Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

TABLE 6 CONSTRUCTION EMISSIONS

	Estimated Maximum Daily Emissions (lbs/day)					
Construction Phase	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
2020	1.1	14.8	9.5	< 0.1	1.4	0.8
2021	0.9	8.7	8.3	< 0.1	0.7	0.5
2022	2.1	9.1	10.0	< 0.1	0.8	0.5
Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum On-site Emissions (lbs/day)	2.0	8.9	9.0	< 0.1	0.8	0.6
Local Significance Thresholds (LSTs) (on-site only)	N/A	74	680	N/A	5	3
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NO_X: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter

See Appendix B for CalEEMod results.

Notes: Emissions presented are the highest of the winter and summer modeled emissions. Due to rounding, numbers may not add up precisely to the totals indicated. Emission data is pulled from "mitigated" results, which include regulatory compliance measures that would be implemented during Project construction, such as watering of soils during construction as required under SCAQMD Rule 403.

Operational Emissions

Long-term emissions associated with Project operation, as shown in Table 7, would include emissions from vehicle trips (mobile sources), natural gas and electricity use (energy sources), and landscape maintenance equipment, consumer products and architectural coating associated with on-site development (area sources). As indicated in Table 7, operational emissions would not exceed SCAQMD regional thresholds for any criteria pollutant. F. Therefore, Project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant.

TABLE 7 OPERATIONAL EMISSIONS

Emission Source	Maximum Daily Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	0.6	< 0.1	0.8	< 0.1	< 0.1	< 0.1
Energy	< 0.1	0.1	0.1	< 0.1	< 0.1	< 0.1
Mobile	0.4	1.7	3.7	< 0.1	1.0	0.3
Project Emissions	**1.0**	**1.8**	**4.7**	**< 0.1**	**1.1**	**0.3**
Existing Emissions	0.6	0.1	1.4	< 0.1	0.2	0.2
Net Emissions (Project — Existing)	**0.4**	**1.7**	**3.3**	**< 0.1**	**0.9**	**0.1**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NO_X: nitrogen oxides; CO: carbon monoxide; SOX: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter

See Appendix B for CalEEMod results.

Notes: Emissions presented are the highest of the winter and summer modeled emissions. Due to rounding, numbers may not add up precisely to the totals indicated. Emission data is pulled from "mitigated" results, which include regulatory compliance measures.

Human Health Impacts

Although Project construction and operational emissions of VOC, $PM_{2.5}$, and PM_{10} would be less than significant, Project construction and operation would temporarily and incrementally increase emissions of these ozone precursors and particulate matter, which would incrementally increase ozone and fugitive dust concentrations in the SCAB and incrementally contribute to the region's existing nonattainment status for the federal standards for ozone and $PM_{2.5}$ and the State standards for ozone, PM_{10}, and $PM_{2.5}$. Nevertheless, these temporary and long-term impacts are not considered significant under the applicable SCAQMD thresholds. For informational purposes, the analysis below describes how the Project's incremental (and less than significant) impacts relate to human health.

The disconnect between the tonnage of pollutants emitted and the localized concentrations of ozone, $PM_{2.5}$, and PM_{10} is important because it is not necessarily the tonnage of pollutants emitted that causes human health effects; rather, it is the concentrations of ozone and PM that cause these effects. In addition, the correlation between air quality impacts and human health and health consequences cannot be technically perfect or based on scientific certainty. Therefore, a general description of the adverse health impacts resulting from the pollutants at issue is all that can be provided at this time. As discussed in Table 3, the health impacts of ozone include respiratory and eye irritation and possible changes in lung functions, and the health impacts of particulate matter include respiratory irritation, reduced lung function, aggravation of cardiovascular disease, and cancer (USEPA 2018). However, because emissions of these criteria pollutants during Project construction and operation would not exceed the SCAQMD's significance thresholds and the Project would incorporate the following RCMs, the Project's incremental contribution to these adverse health impacts would be less than significant.

Regulatory Compliance Measures

RCM-AQ-1: DEMOLITION/RELOCATION, GRADING, AND CONSTRUCTION ACTIVITIES - COMPLIANCE WITH SCAQMD RULE 403

The Project shall comply with all applicable standards of the Southern California Air Quality Management District (SCAQMD), including the following provisions of Rule 403:

- All unpaved demolition/relocation and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

RCM-AQ-2: ARCHITECTURAL COATINGS - COMPLIANCE WITH SCAQMD RULE 1113

The Project shall comply with SCAQMD Rule 1113, which limits the volatile organic compound (VOC) content of architectural coatings.

c) Expose sensitive receptors to substantial pollutant concentrations?

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.

Local Carbon Monoxide Hotspots

Less than significant with mitigation incorporated. A CO hotspot is a localized concentration of CO that is above the state CO one-hour or eight-hour standards of 20.0 ppm and 9.0 ppm, respectively (California Air Resources Board [CARB] 2016). Localized CO hotspots generally occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic volumes are high and there is heavy congestion. The entire SCAB is a federal CO maintenance area and a state CO attainment area. CO concentrations have been reduced to low levels in the past 15 to 20 years such that most air quality monitoring stations in the SCAB no longer report CO levels. No stations within the vicinity of the Project site have monitored CO in the last four years. In 2012, the Los Angeles - North Main Street monitoring station detected an eight-hour maximum CO concentration of 1.91 ppm, which is substantially below the state and federal standard of 9.0 ppm (CARB 2020a).

As shown in Table 6, construction of the Project would generate maximum daily CO emissions of approximately 10 pounds, which is well below SCAQMD regional threshold of 550 pounds, and maximum daily on-site CO emissions of approximately 9nine pounds, which is well below the LST threshold of 680 pounds. Additionally, as shown in Table 7, Project operation would generate maximum daily CO emissions of approximately four pounds, which is well below SCAQMD regional threshold of 550 pounds. Both SCAQMD's regional thresholds and LSTs are designed to be protective of public health. Based on the low background level of CO in the Project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the Project's low level of operational CO emissions, the Project would not create new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hotspots would not occur.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are different than the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Construction of the Project is expected to occur over an approximately 18- to 24-month period and would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities as well as from on-road diesel equipment used to bring materials to and from the Project site. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Additionally, SCAQMD CEQA guidance does not require preparation of a health risk assessment for short-term construction emissions. Therefore, it is not necessary to evaluate long-term cancer impacts from construction activities that occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after Project construction is complete. Furthermore, with ongoing implementation of USEPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, DPM emissions from construction equipment would be substantially reduced. Therefore, Project construction would not expose sensitive receptors to substantial concentrations of TACs, and impacts would be less than significant.

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005). The Project proposes residential and hotel uses, neither of which are land uses that emit substantial TAC concentrations. Therefore, Project operation would not expose sensitive receptors to substantial concentrations of TACs, and no impact would occur.

Asbestos Containing Materials and Lead-Based Paint

As discussed in Section IX, *Hazards and Hazardous Materials*, the existing duplex on the Project site was constructed in 1916. Therefore, building materials containing asbestos (ACMs) and lead-based paint (LBP) may have been used in the construction of the existing building, which could pose hazards to receptors at adjacent land uses during the demolition stage of the Project if these materials become airborne. Therefore, impacts related to ACM and LBP would be potentially significant. Implementation of Mitigation Measure HAZ-1 would be required to test building materials for ACMs and LBP prior to demolition and provide for the proper handling and oversight of demolition activities involving ACMs and LBP. With implementation of mitigation, Project construction would not expose sensitive receptors to substantial concentrations of ACMs and LBP. Therefore, impacts would be less than significant with mitigation incorporated.

Significance Determination: Less than Significant with Mitigation Incorporated

Mitigation Measures: Refer to Mitigation Measure HAZ-1

Significance Determination after Mitigation: Less than Significant

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

Less than significant impact. The potential for an odor impact is dependent on a number of variables including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During Project construction, potential odor sources would include diesel exhaust and fuels associated with construction equipment. Diesel exhaust odors may be noticeable during Project construction; however, construction activities would be temporary, occur only during daytime hours, and limited to the approximately 18- to 24-month construction period. Therefore, Project construction would result in less than significant odor impacts.

The SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints to be agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project would not include any of these uses that are known to generate odors. In addition, the Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, Project operation would result in no odor impact.

IV. BIOLOGICAL RESOURCES

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

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

Less than significant impact. A project would have a significant biological impact through the loss or destruction of individuals of a species or through the degradation of sensitive habitat. Special-status species are plants and animals that are: (1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service

(USFWS) and National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (ESA); (2) listed or proposed for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA); (3) animals recognized as Species of Special Concern (SSC) by the CDFW; (4) animals designated as Fully Protected by the California Fish and Game Code (CFGC); or (5) identified on lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system. While migratory or other common nesting birds are not designated as special-status species, destruction of their eggs, nests, and nestlings is prohibited by the Migratory Bird Treaty Act (MBTA) and CFGC (§3503, §3503.5, §3511, and §3513).

The Project site is located in an urbanized area of the City. The Project site encompasses 0.33 acre and is currently developed with a duplex and parking lot that contain ruderal vegetation and ornamental landscaping. As such, the Project site lacks natural habitat. The surrounding properties have been developed with commercial and residential urban land uses as well as a major transportation corridor. Therefore, no federal- or state-listed endangered, threatened, rare, or otherwise sensitive flora or fauna are located on or adjacent to the Project site.

Nonetheless, there are four (4) fruit trees and two (2) street trees on the Project site that could potentially serve as nesting habitat for raptors and other bird species. The four fruit trees, which include one tropical fruit tree, one guava tree, one citrus tree, and one loquat, would be removed as part of the Project. The two street trees (one evergreen pear on West Harold Way and one Indian laurel ficus on North Western Avenue) would be left in place. Migratory or other common nesting birds, while not designated as special-status species, are protected by the CFGC and MBTA and may nest on site in the existing trees. Therefore, construction of the Project has the potential to directly (e.g., by destroying a nest) or indirectly (e.g., construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. However, because the Project would incorporate RCM-BIO-1, the Project's impacts would be less than significant.

Regulatory Compliance Measure

RCM-BIO-1: NESTING BIRDS

While common bird species are not designated special-status species, destruction of their eggs, nests, or nestlings is prohibited by the Migratory Bird Treaty Act and the California Fish and Game Code (§3503, §3503.5, §3511, and §3513). If site preparation/construction activities including vegetation clearing, vegetation trimming, grading or other ground disturbing activities are initiated during the nesting bird season (February 1 to August 31 for passerines, January 1 to August 31 for raptors), a preconstruction nesting bird survey shall be conducted by a qualified biologist to determine the presence/absence, location, and status of any active nests on site or within 100 feet of the site for nesting passerines or within 250 feet of the site for nesting raptors. In areas where site access is limited or prohibited (e.g., private property), the area shall be surveyed using binoculars. Nesting bird surveys shall be completed not more than 14 days before the start of construction activities.

If active nests are discovered on the Project site, a qualified biologist shall establish a species-specific avoidance buffer around the nest where no construction activity shall be allowed until a qualified biologist has determined that the nest is no longer active. Encroachment into the buffer can occur at the discretion of the qualified biologist with the City's consent.

The City shall be provided with a preconstruction nesting bird survey results report within 48 hours of completion of the survey, if required, prior to obtaining the City issued grading permit, or within two weeks if not required for permit issuance. The report shall include the date of the survey, the

date of the report, authors and affiliations, contact information, methods, study location, results, and discussion/recommendations. If nesting birds are found, a map shall be included with locations, buffers, and recommended measures to avoid impacts to the nests.

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

No impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. Riparian habitats typically exist to a very limited extent along streams and flood channels where there is disturbance. The Project site currently consists of a duplex and a surface parking lot with ruderal and ornamental vegetation. As such, no sensitive natural communities are present on the Project site. The nearest body of water is the Hollywood Reservoir, approximately 2.8 miles northwest of the Project site (USFWS 2019); however, no water bodies or riparian habitats occur on the Project site or in the immediate vicinity. Furthermore, the proposed Project would not result in a substantial change in the urbanized nature of the Project site; therefore, the Project would not result in any indirect effects to surrounding urban and landscaped habitat as compared to existing conditions. Therefore, no impact would occur to riparian habitat or other sensitive natural community.

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

No impact. A significant impact would occur if federally protected wetlands would be modified or removed by a project. The Project site does not contain any surface water bodies or potentially jurisdictional wetlands or waters identified in the National Wetlands Inventory (USFWS 2019). No wetlands are located immediately adjacent to the Project site given that it is surrounded by residential, commercial, and industrial uses. The nearest water feature is the Hollywood Reservoir (designated as a lake habitat), located approximately 2.8 miles northwest of the Project site. The Project would not directly or indirectly have adverse effects on the Hollywood Reservoir or any other state and federally protected wetlands. Therefore, no impact would occur.

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

No impact. A significant impact would occur if the proposed project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. No native resident or migratory fish or wildlife species or native wildlife nursery sites exist on the Project site. Urban land uses surrounding the Project site restrict regional and local wildlife movement. Furthermore, the *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Caltrans & CDFW 2010) does not identify any mapped essential habitat connectivity areas or natural landscape blocks near the Project site. As a result, the Project site is not within an established or recognized native resident or migratory wildlife corridor. Therefore, due to the developed urban nature of the site and surrounding land uses, the Project would not interfere substantially with the movement of any native resident or migratory

fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No impact would occur.

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

No impact. A significant impact would occur if the proposed project would be inconsistent with local regulations pertaining to biological resources. The City of Los Angeles has a tree preservation policy that protects all valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), other native oak species, southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) trees (Ordinance 177404, 2006). Scrub oak (*Quercus dumosa*) is excluded from this tree ordinance. None of these tree species have been identified on-site, and no other local biological resources policies or ordinances apply to the proposed Project. The proposed project would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Both the MBTA and CFGC protect migratory birds that may use trees on or adjacent to the Project site for nesting and that may be disturbed during construction of the proposed project. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands), and no impacts would occur.

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

No impact. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. The Project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, the proposed project would not conflict with the provisions of any adopted conservation plan, and no impacts would occur.

V. CULTURAL RESOURCES

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

Information in this section regarding cultural resources includes data from the Phase I Historical Resource Assessment (HRA) prepared by Rincon Consultants, Inc. for the proposed Project (see Appendix C). The purpose of the report was to determine if the property at 5446 West Harold Way is eligible for federal, state, or local designation as a historical resource, which would therefore qualify it as a historical resource pursuant to CEQA. Assessment methods included archival research and an intensive-level survey of the Project site. The evaluation also utilized the methodology and framework currently being employed by the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR) for its citywide historic resources survey, SurveyLA.

The property at 5446 West Harold Way is a two-story residential duplex exhibiting no discernible architectural style. Rectangular in plan, the building rises from a concrete foundation and is capped with a roof that is hipped in the front, gabled at the rear, and sheathed in asphalt shingles. Smooth stucco envelops the building's wood-frame structural system. The symmetrical, north-facing main façade is punctuated by a centrally-placed front entrance secured with a metal door. This entrance is accessed via a partial-width porch, which is sheltered by a hipped porch roof with evenly-spaced square wood supporting columns. At the rear of the building is a secondary entrance with a solid wood door and pent-roof shelter. The presence of an exterior staircase suggests there is a third entrance on the upper level of the west elevation, but this could not be confirmed due to limited access to the property. Windows are almost exclusively non-original horizontally sliding windows of various configurations. Variations in the texture of the stucco cladding suggest many window openings have been altered or replaced. Additional architectural detailing includes a cornice along the north and west elevations and a vertically-oriented four-pane window located centrally on the upper floor of the main elevation. Alterations include work associated with the aforementioned altered/replaced windows, metal porch rail, exterior staircase, and rear porch roof. A straight concrete walkway bisects a front yard landscaped with a lawn, hedgerow, and shrubs. The park strip in front of the property is planted with a mature tree. A metal rail fence encloses the yard, which is accessed by a swinging gate and a sliding vehicular gate. The property is in overall fair condition.

Background research revealed the subject property was been subject to previous historic resources survey and evaluation efforts. It was first recorded in Hollywood in 1986 as part of a survey completed for the Hollywood Community Redevelopment Agency (CRA). At that time, it

was assigned a status code of 5S3 (appears to be individually eligible for local listing or designation through survey evaluation). A subsequent survey of prepared for the CRA in 2010 recorded the subject property again and assigned it a status code of 6Z (found ineligible for NRHP, CRHR or local designation through survey evaluation).

The proposed Project includes the demolition of the two-story residential duplex and construction of a four-story mixed-use building on the site. For the purpose of this analysis, a significant impact would occur if physical changes to the existing cultural resources on site would result in the following conditions, listed in Appendix G of the CEQA Guidelines:

1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5
3) Disturb any human remains, including those interred outside of formal cemeteries

A "substantial adverse change" in the significance of a historical resource is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." CEQA Guidelines §15064.5(b) states the significance of an historical resource is "materially impaired" when a Project does any of the following:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the CRHR
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources or its identification in an historical resources survey, unless the public agency reviewing the effects of the Project establishes by a preponderance of evidence that the resource is not historically or culturally significant
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA

CEQA Guidelines §15064.5 also states the term "historical resources" shall include the following:

1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in, the CRHR (PRC §5024.1, Title 14 California Code of Regulations §4850 et. seq.).
2) A resource included in a local register of historical resources, as defined in PRC §5020.1(k) or identified as significant in an historical resource survey meeting the requirements of PRC §5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally,

a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC §5024.1, Title 14 California Code of Regulations §4852) as follows:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- Is associated with the lives of persons important in our past
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- Has yielded, or may be likely to yield, information important in prehistory or history (CEQA Guidelines §15064.5)

Properties listed on the NRHP are automatically listed on the CRHR, along with State Landmarks and Points of Interest. The CRHR can also include properties designated under local ordinances or identified through local historical resource surveys.

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

No impact. A significant impact would occur if the proposed project would substantially alter the environmental context of, or remove identified historical resources. As discussed in the Phase I Historical Resource Assessment, the existing residence does not meet the eligibility requirements for listing on the NRHP or CRHR or as a City of Los Angeles Historic-Cultural Monument (Appendix C). As such, the property is not considered a historical resource for the purposes of CEQA. In 2020, the City of Los Angeles CRA published the *Historic Resources Survey Report: Hollywood Redevelopment Plan Area*, which documents the results of a study conducted by Architectural Resources Group, GPA Consulting, and Historic Resources Group between 2018 and 2020. This effort surveyed the entire Hollywood Redevelopment Area Survey Area but only recorded resources constructed between 1850 and 1980 that had been identified as significant within the historic contexts developed for SurveyLA. Per the Historic Resources Survey Plan, the nearest designated historic resource, which consists of residential structures, is located over 400 feet to the east, at 1514 North St. Andrews Place (CRA 2020). The nearest identified potentially historic resource (residential structures) is located at 5432 West Harold Way (CRA 2020). Moreover, the OHR concurred with the Phase I HRA prepared by Rincon Consultants, Inc and concluded on October 1, 2020, that the Project site is not a historical resource for purposes of CEQA. Therefore, no impact to historical resources would occur as a result of the Project.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less than significant. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if the proposed project would significantly affect archaeological resources that fall under either of these categories.

A search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center located at California State University, Fullerton was completed on June 12, 2020. The search was performed to identify previously recorded cultural resources, as

well as previously conducted cultural resources studies within the Project site and a 0.25-mile radius surrounding it. The records search included a review of the National Register of Historic Places, the California Register of Historical Resources, the Office of Historic Preservation Historic Properties Directory, the California Built Environment Resources Directory and the Archaeological Determinations of Eligibility list. Table 8 provides details of the 15 previously recorded cultural resources within a 0.25-mile radius of the Project site.

TABLE 8 PREVIOUSLY RECORDED RESOURCES WITHIN 0.25-MILE OF THE PROJECT SITE

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Status
P-19-003300	CA-LAN-003300H	Historic Site	Historic-period refuse pit dating between 1902-1945 and located beneath Hollywood Boulevard	Turner, Robin and Victoria Avalos (2003)	Insufficient Information
P-19-167072	N/A	Historic Building	Hollywood Western Building, also known as the Mayer Building, constructed in 1928 and located at 5504 Hollywood Boulevard	Sitton, Tom (1976); McAvoy, Christy J. (1994); Srivastava, Samir (2009)	CRHR Status Code 2S2; HRI# 021011
P-19-167527	N/A	Historic Object	Cast iron street lights on Hollywood Boulevard dating to the 1920's	Miller, Denver and Christy Johnson (1979)	CRHR Status Code 6
P-19-167787	N/A	Historic Building – Element of a District	Dunning House constructed in 1905 and located at 5552 Carlton Avenue. Only remaining contributor to the Harold Way, Carlton Way and St. Andrews Place District (19-190048)	Unknown	CRHR Status Code 2S2; HRI# 21759; Los Angeles Historic Cultural Monument No. 441
P-19-167817	N/A	Historic Building	Two-story office building constructed in 1921 and located at 5540 Hollywood Boulevard	Miller, Denver and Christy Johnson (1979); Bourstein, Sharon (1986)	Insufficient Information
P-19-167818	N/A	Historic Building	California Bank, also known as the Precision Auto Building, constructed in 1930 and located at 5618-5628 Hollywood Boulevard	Bourstein, Sharon (1986)	Insufficient Information
P-19-167825	N/A	Historic Building	Grant Elementary School constructed between 1922 and 1925 and located at 1530 Wilton Place	Author Unknown (1995)	CRHR Status Code 2S2

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Status
P-19-167855	N/A	Historic Building	Ten unit apartment complex constructed in 1924 and located at 1603 Hobart Boulevard	Johnson, Christy and Denver Miller (1979)	CRHR Status Code 3
P-19-173426	N/A	Historic Building	Hollywood Professional School constructed in 1925 and located at 5400 Hollywood Boulevard	Bourstein, Sharon (1986)	Insufficient Information
P-19-173429	N/A	Historic Building	Whitehall Manor constructed in 1927 and located at 5272 Hollywood Boulevard	Bourstein, Sharon (1986)	Insufficient Information
P-19-175191	N/A	Historic Building	Bricker Building, also known as the Sprint Telecommunications Facility LA35XC8191, constructed in 1924 and located at 1671 North Western Avenue	Crawford, Kathleen (2005)	CRHR Status Code 6Y; HRI# 097013
P-19-176338	N/A	Historic District	Serrano District constructed between 1919 and 1928 and located at 1500 and 1600 block of North Serrano Avenue	Miller, Denver and Christy Johnson (1979)	CRHR Status Code 2S2
P-19-186730	N/A	Historic Building	St. Francis Hotel, also known as the Gershwin Hotel, constructed circa 1913 and located at 5533 Hollywood Boulevard	Marvin, J. and K. Harper (2002)	HRI# 137691; recommended ineligible for listing in the NRHP
P-19-189999	N/A	Historic District	St. Andrews Bungalow Court consisting of 15 one-story bungalows constructed between 1919 and 1920 and located at 1514 to 1544 North St. Andrews Place	Grimes, Teresa (1997)	NRHP# 98000244; HRI# 112433

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Status
P-19-190048	N/A	Historic District	Harold Way, Carlton Way and St. Andrews Place District located at the 1500 block of St. Andrews Place, 5700 and 5600 Block of Carlton Way and 5500 and 5600 block of Harold Way and constructed between 1906 and 1930	Miller, Denver and Christy Johnson (1979)	CRHR Status Code 3D

NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources; N/A = not applicable; HRI = Historic Resources Inventory

CRHR Status Codes:

- 2S2 = Individually determined eligible for NRHP through Section 106 process and listed in the CRHR
- 3 = Appears eligible for NRHP or CRHR
- 3D = Appears eligible for NRHP as a contributor to an NRHP-eligible multi-component resource through survey evaluation
- 6 = Not eligible for or removed from listing or designation
- 6Y = Determined ineligible for NRHP by consensus through Section 106 process; not evaluated for CRHR or local listing

Source: South Central Coastal Information Center 2020

One archaeological resource was identified within 0.25-mile of the Project site. This resource is a historic-period refuse pit (P-19-003300) that dates to the early 20th century. P-19-003300 is located approximately 905 feet (0.2 mile) to the north of the Project site and is capped by Hollywood Boulevard. No archaeological resources are located within the Project site.

The Project site is developed with a surface parking lot and residence; therefore, some past ground disturbance has occurred during construction of these land uses. However, the proposed Project would require excavation to a depth of approximately 10 feet. According to the CHRIS records search performed for the project as well as the Environmental Impact Report prepared for the Hollywood Community Plan Update, which includes the Project site, there are no known archaeological sites on the Project site (City of Los Angeles 2018a).

However, is possible that unanticipated archaeological resources may be encountered during ground disturbing activities associated with the project. As a result, the City would require the following condition of approval to address potential impacts to unknown archaeological resources, which would reduce impacts to a less-than-significant level.

Condition of Approval

ARCHAEOLOGICAL RESOURCES INADVERTENT DISCOVERY

In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings

as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project site. The records search conducted for this study identified no cultural resources within the project area or vicinity that contained human remains. A significant impact would occur if previously interred human remains are disturbed during excavation of the Project site. While no formal cemeteries, other places of human interment, or burial grounds or sites are known to occur in the Project site or vicinity, there is always a possibility that human remains could be encountered during project construction. If human remains are found, the State of California Health and Safety Code §7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC §5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner would be required to notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD must complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. These regulations would also be required for the project as a condition of approval, as outlined below. As a result, with adherence to existing regulations, impacts to human remains would be less than significant.

Condition of Approval

HUMAN REMAINS INADVERTENT DISCOVERY

In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance actives, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road Los Angeles, CA 90033

  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or

  323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

VI. ENERGY

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

Electricity and Natural Gas

In 2018, California used 285,488 gigawatt-hours (GWh) of electricity, of which 31 percent was generated by (California Energy Commission [CEC] 2019a). California also consumed approximately 12,600 million U.S. therms (MMthm) of natural gas in 2018 (CEC 2018a). Electricity is currently supplied to the Project site by Los Angeles Department of Water and Power (LADWP), and natural gas is provided by Southern California Gas Company (SCG). These utility providers would continue to serve the site under the proposed Project. Table 9 and Table 10 show the electricity and natural gas consumption by sector and total for LADWP and SCG. In 2018, LADWP supplied approximately 8 percent of the total electricity demand in California, and SCG supplied approximately 41 percent of the total natural gas demand in California (CEC 2019a and 2018a). Based on electricity and natural gas use estimated by CalEEMod (see outputs in Appendix B), the existing duplex on-site currently consumes 9 megawatt-hours (MWh) of electricity and 282 therms per year.

TABLE 9 ELECTRICITY CONSUMPTION IN THE LADWP SERVICE AREA IN 2018

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage
18	10,936	923	1,815	248	8,106	118	22,163
Notes: All usage expressed in gigawatt-hours (GWh). Source: CEC 2018b							

TABLE 10 NATURAL GAS CONSUMPTION IN SCG SERVICE AREA IN 2018

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage
78	913	75	1,714	229	2,147	5,156
Notes: All usage expressed in million therms (MMThm) Source: CEC 2018a						

Petroleum

In 2017, approximately 40 percent of the state's energy consumption was used for transportation activities (U.S. Energy Information Administration 2018). Californians presently consume over 19 billion gallons of motor vehicle fuels per year (gasoline and diesel) (CEC 2020). Although California's population and economy are expected to grow, gasoline demand is projected to decline as a result of both increasing vehicle electrification and higher fuel economy for new gasoline vehicles (CEC 2020). Based on annual VMTs estimated by CalEEMod (see outputs in Appendix B), vehicle trips associated with the existing duplex currently consume 1,050 gallons of gasoline and 258 gallons of diesel per year.

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

A significant impact would occur if the project would substantially increase demand for energy resources, which exceeds the available supply.

Construction Energy Demand

During Project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, and vehicles used to deliver materials to the site. The Project would require site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during Project construction was estimated using the assumptions and factors from CalEEMod used to estimate construction air emissions (see Appendix B). Table 11 presents the estimated construction phase energy consumption, indicating Project construction would consume approximately 6,896 gallons of gasoline and 43,131 gallons of diesel fuel over the Project construction period.

TABLE 11 ESTIMATED FUEL CONSUMPTION DURING CONSTRUCTION

	Fuel Consumption (Gallons)	
Source	**Gasoline**	**Diesel**
Construction Equipment & Hauling Trips	–	43,131
Construction Worker Vehicle Trips	6,896	–
See Appendix B for CalEEMod results and energy calculation sheets.		

Less than significant impact. The construction energy estimates represent a conservative assessment because the construction equipment used during each phase of construction was assumed to operate every day of construction. Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction Projects in the region. In addition, the Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, per applicable regulatory requirements, the Project would comply with construction waste

management practices to divert construction and demolition debris. These practices would result in efficient use of energy necessary to construct the Project. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction-related energy impacts would be less than significant.

Operational Energy Demand

Vehicle Fuels

Gasoline consumption for the Project would be attributed to the trips generated from residents and hotel patrons during normal operations and building maintenance employees. The estimated number of average daily trips associated with the Project is used to determine the energy consumption associated with fuel use from the operation of the Project. Most of the fuel consumption would be from motor vehicles traveling to and from the Project site. According to the CalEEMod calculations, the Project would result in 469,332 annual VMT (Appendix B). Table 12 shows the estimated total annual fuel consumption of existing duplex and the Project (see Appendix B). As shown in therein, the proposed Project would result in a net increase in annual fuel consumption of approximately 19,587 gallons of gasoline and 4,815 gallons of diesel.

TABLE 12 ESTIMATED PROJECT ANNUAL TRANSPORTATION ENERGY CONSUMPTION

	Annual Fuel Consumption (Gallons)	
Source	**Gasoline**	**Diesel**
Proposed Project	20,637	5,073
Existing Uses	1,050	258
Net Increase in Fuel Consumption (Project – Existing)	**19,587**	**4,815**
See Appendix B for CalEEMod results and energy calculation sheets.		

The proposed Project would locate residential and hotel uses on-site in close proximity to existing commercial uses and would include 24 bicycle parking spaces, which would reduce trip distances and encourage the use of alternative modes of transportation such as biking and walking. The Project site is also located within 100 feet of the Sunset/Western Metro station for bus line 757 and within 0.2 mile of the Hollywood/Western Metro Red Line Station. These factors would minimize the potential of the Project to result in the wasteful or unnecessary consumption of vehicle fuels. Impacts would be less than significant.

Electricity and Natural Gas

Based on electricity and natural gas use estimated by CalEEMod (see outputs in Appendix B), the existing duplex currently consumes 9 MWh of electricity and 282 therms per year. Operation of the Project would increase area energy demand from greater electricity, natural gas, and gasoline consumption when compared to the operation of the existing duplex on the Project site. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, and water use, among other purposes. The proposed Project would consume approximately 294 MWh of electricity and 5,267 therms per year (Appendix B), which would represent a net increase in annual energy use of approximately 285 MWh and 4,985 therms.

The Project is located within the LADWP service area, which provided 22,163 GWh (22,163,000 MWh) of electricity in 2018 to its total service area; therefore, LADWP would have sufficient supplies for the Project (CEC 2018b). The Project's natural gas demand would be serviced by SCG, which provided 5,156 MMthm (5,156,000,000 therms) of natural gas in 2018 to its service area (CEC 2018a). The Project would comply with standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation**.** The Los Angeles Green Building Code contains mandatory measures for residential and non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems). California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction Projects. Furthermore, the 2019 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. For example, according to the CEC, nonresidential buildings would use about 30 percent less energy due mainly to lighting upgrades (CEC 2018a). Therefore, the Project's conformance with the latest version of the Los Angeles Green Building Code, California's Green Building Standards Code, and California's Building Energy Efficiency Standards (RCM-ENG-1 and RCM-ENG-2), which include measures related to renewable energy, indoor and outdoor water use, water reuse systems, and energy efficient light fixtures, would minimize the potential for Project operation to result in the inefficiency, wasteful, and unnecessary consumption of electricity and natural gas. Impacts would be less than significant.

Regulatory Compliance Measures

RCM-ENG-1: COMPLIANCE WITH THE LOS ANGELES GREEN BUILDING CODE

The Project shall comply with all applicable mandatory provisions of the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9).

RCM-ENG-2: COMPLIANCE WITH THE CALIFORNIA BUILDING CODE

The Project shall comply with all applicable mandatory provisions of the California Green Building Standards Code (CBC Title 24, Part 11) and the 2019 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6).

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

Less than significant impact. The City of Los Angeles adopted *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming* (Green LA), in May 2007. Green LA set the goal of reducing the City's greenhouse gas (GHG) emissions to 35 percent below 1990 levels by 2030. The emphasis of Green LA is on municipal facilities and operations followed by programs to reduce emissions in the community. To facilitate implementation of Green LA, the City adopted the Los Angeles Green Building Code. In addition, LADWP will continue to implement programs to emphasize water conservation and pursue procurements of alternative local water supplies, including recycled water and storm water capture, which would reduce energy consumed by treating and transporting water to the Project site. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multifamily

dwellings, commercial establishments, and restaurants (City of Los Angeles 2006). Under the RENEW LA plan, the City is also developing facilities to convert solid waste to energy without incineration. These measures would serve to reduce overall more efficiently use energy in the City. Green LA is being implemented through Climate LA, which provides detailed information about each action item discussed in the Green LA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption.

On April 8, 2015, Los Angeles released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to GHG emissions reductions, either specifically or by association. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the pLAn, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAn and ensures that the City stays within its carbon budget between 2020 and 2050 (City of Los Angeles 2020). In addition, as demonstrated further in Section VIII, *Greenhouse Gas Emissions*, the proposed Project is consistent with applicable strategies for reducing GHG emissions generated by vehicle fuel consumption from the SCAG 2020-2045 RTP/SCS. Incorporation of Project design features (i.e., proximity to transit and job centers) along with regulatory compliance would ensure that the Project does not conflict with renewable energy and energy efficiency plans adopted by the City. As such, the Project would not conflict with or obstruct a plan for renewable energy or energy efficiency, and impacts would be less than significant.

VII. GEOLOGY AND SOILS

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

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

The project will include 4,705 cubic yards of cut and export. The project will cut approximately ten (10) feet below the existing grade in order to accommodate the subterranean parking level.

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

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

No impact. The Project site is located in a seismically-active area of southern California; however, according to the California Geological Survey (CGS), the Project site is not located in an Alquist-Priolo Fault Zone, a liquefaction zone, or an earthquake-induced landslide zone. The nearest identified Alquist-Priolo Fault Zone, liquefaction zone, and earthquake-induced landslide zone are located 0.5 mile from the Project site, near the base of the Santa Monica Mountains (CGS 2014). There are no faults present on the Project site, and the closest faults to the Project site are the Hollywood Fault located approximately 0.8 mile to the north and west, and the Upper Elysian Park fault located approximately 0.8 mile to the east (United States Geological Survey 2017). Implementation of the Project would not exacerbate the existing risk of earthquake-induced landslides in the immediate vicinity because the Project would not directly result in a seismic event or destabilize soils prone to landslide. In addition, the Project site and the surrounding area are flat. Therefore, because the Project is not located in or near an Alquist-Priolo Fault Zone, a liquefaction zone, or an earthquake-induced landslide zone, the Project would not directly or indirectly cause potential adverse effects related to rupture of a known earthquake fault, liquefaction, or earthquake-induced landslides. No impacts related to fault rupture, liquefaction, and landslides would occur.

ii) Strong seismic ground shaking?

Less than significant impact. A significant impact would occur if the proposed project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The Project site is located in the highly seismic southern California region, where several fault systems are considered to be active or potentially active. Nearby active faults include the Hollywood Fault located approximately 0.8 mile north and west of the Project site and the Upper Elysian Park fault located approximately 0.8 mile to the east (U.S. Geological Survey 2017). Either of these faults are capable of producing substantial ground shaking if a seismic event occurs along the fault. Similarly, a strong seismic event on any other fault system in southern California has the potential to create considerable levels of ground shaking throughout the City. Nevertheless, the Project site would not be subject to unusual levels of ground shaking.

Design and construction of the proposed Project would conform to the current seismic design provisions of the CBC. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety[3]. While the Project would be susceptible to seismic activity given its location within a seismically-active area, implementation of the Project would not exacerbate the existing risk of

[3] At the time of the preparation of this document, the City of Los Angeles's adopted version of the California Building Code is year 2016.

ground shaking potential, and the Project would be required to minimize this risk to the extent feasible through the incorporation of applicable CBC standards. Therefore, because the Project would conform to the CBC standards, it would minimize the exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking. Impacts related to seismic ground shaking would be less than significant.

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

Less than significant impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport off the Project site. Ground-disturbing activities associated with Project implementation would result in the removal of some topsoil in order to excavate the subterranean parking garage and construct the mixed-use building. On-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of LAMC, which addresses grading, excavations, and fills. In accordance with the LAMC, standard construction Best Management Practices (BMP's) would be implemented in order to avoid or minimize soil erosion associated with ground-disturbing activities. As discussed further in Section X, *Hydrology and Water Quality*, implementation of erosion control measures, stated in LAMC §64.72, as well as adherence to requirements provided in the National Pollutant Discharge Elimination System (NPDES) permit for construction activities, would avoid or minimize potential adverse impacts associated with erosion and loss of topsoil. Therefore, impacts associated with soil erosion and loss of topsoil would be less than significant.

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

Less than significant impact. A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. According to the California Seismic Hazard Map, the relatively flat Project site is not located within an earthquake-induced landslide hazard zone (CGS 2014). Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. Collapse is an abrupt depression of the ground cover that is clearly visible to the naked eye, which is also principally caused by the extraction of subsurface liquids or mining of mineral resources. Lateral spreading is the horizontal movement or spreading of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft and recent alluvial deposits exist. Lateral spreading hazards may also be present in areas with liquefaction risks.

The proposed Project does not include installation of new groundwater wells, use of groundwater from existing wells, pumping of oil and gas, or mining. As discussed in *Threshold Ic* in Section I, *Aesthetics*, the Project site is not located in a liquefaction zone or in a hillside area. The Project would be required to implement standard construction practices that would ensure that the integrity of the Project site and proposed structures are maintained. Construction would be required to comply with the CBC and LAMC, which include building foundation requirements appropriate to site conditions that are designed to ensure safe construction. Thus, with implementation of CBC requirements, the potential for landslide, lateral spreading, subsidence,

liquefaction, or collapse would be low, and impacts related to unstable soils would be less than significant.

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

Less than significant impact. A significant impact would occur if the proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils generally consist of a high percentage of clays, which increase in volume when saturated and shrink when dried. Based on the U.S. Department of Agriculture (USDA) Soil Survey, the Project site is immediately underlain by Palmview-Tujunga gravelly complex, which are well-drained soils composed of fine to coarse sandy loam (USDA 2019). Due to the minimal clay content (typically less than 20 percent) of these soils, the potential for expansive soils to occur on-site is unlikely. Nonetheless, the proposed Project would also be designed and constructed to meet CBC requirements, which include provisions for expansion soils. As a result, the Project would not create substantial direct or indirect risks to life or property as a result of expansive soils, and impacts would be less than significant.

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

No impact. A significant impact would occur if the proposed project if adequate wastewater disposal is not available. The Project site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The proposed project would connect to existing sewer lines that serve the Project site and would not use septic tanks or alternative wastewater disposal systems. The proposed Project would not include the installation of new septic tanks or alternative wastewater disposal systems. In a letter dated August 8, 2019, the Bureau of Sanitation reviewed the sewer/storm drains serving the subject tracts and found no potential problems. As such, there would be no impact associated with soil capability for supporting the use of septic tanks or alternative wastewater disposal systems.

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

Less than significant. A significant impact would occur if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features. According to the Environmental Impact Report prepared for the Hollywood Community Plan Update, which includes the Project site, there are no known vertebrate or vertebrate paleontological sites on or adjacent to the site (City of Los Angeles 2018a). The Project site is located in an area where surface sediments have unknown fossil potential for invertebrates, and the nearest vertebrate paleontological site is located approximately 0.75 mile to the southeast (City of Los Angeles 2018a).

The entire site has been previously disturbed from construction of the existing residence and surface parking lot and contains primarily impervious surfaces. Any paleontological resources that may be present beneath the surface have likely been damaged from the site's development history. However, it is possible that unanticipated paleontological resources may be encountered during ground disturbance due to the depth of proposed excavation in order to construct the subterranean parking garage. As such, the possibility of damaging previously undiscovered resources, although unlikely, would be potentially significant. However, the City would require the

following condition of approval, which would avoid and minimize project impacts related to inadvertent discoveries of paleontological resources such that impacts would be less than significant.

Condition of Approval

PALEONTOLOGICAL RESOURCES INADVERTENT DISCOVERY

In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

VIII. GREENHOUSE GAS EMISSIONS

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

Climate Change Background

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of GHGs that contribute to the "greenhouse effect," a natural occurrence that takes place in Earth's atmosphere to help regulate the temperature of the planet. The majority of radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions. However, anthropogenic activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat. Emissions resulting from human activities thereby contribute to an average increase in Earth's temperature.

Significance Thresholds

The majority of individual Projects do not generate sufficient GHG emissions to create significant Project-specific environment effects. However, the environmental effects of a Project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual Project's environmental effects are limited (CEQA Guidelines §15064[h][1]). The issue of a Project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a Project's contribution towards climate change 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, other current Projects, and probable future Projects (CEQA Guidelines, §15064[h][1]).

CEQA Guidelines §15064.4 recommends that lead agencies quantify GHG emissions of Projects and consider several other factors that may be used in the determination of significance of GHG emissions from a Project, including the extent to which the Project may increase or reduce GHG emissions; whether a Project exceeds an applicable significance threshold; and the extent to which the Project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines §15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines §15064.7[c]). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines §15130[f]). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines §15064(h)(3), a Project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the Project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the Project. To qualify, 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. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of less than significant for GHG emissions if a Project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

Recent City of Los Angeles Environmental Documents

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Neither SCAQMD, the California Office of Planning and Research, CARB, the California Air Pollution Control Officers Association (CAPCOA), nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Therefore, in recent environmental impact reports certified by the City of Los Angeles,

the City has evaluated the significance of Projects' potential impacts with regard to GHG emissions and climate change solely on consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. The City has also quantified the Project's GHG emissions for informational purposes but does not compare the quantified GHG emissions to a numeric threshold (City of Los Angeles 2019a, 2019b, and 2019c).

In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines §15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the 2017 Scoping Plan, the 2020-2045 RTP/SCS, the City's LA Green Plan, and the Sustainable City pLAn.

Methodology

As discussed under *Significance Thresholds*, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines §15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Construction and operational GHG emissions are quantified for informational purposes.

Calculations of CO_2, CH_4, and N_2O emissions are provided to estimate the proposed Project's potential GHG emissions. Calculations are based on the methodologies discussed in the CAPCOA CEQA and Climate Change white paper and guidance from CARB. GHG emissions associated with the proposed Project were calculated using the CalEEMod version 2016.3.2 (see Appendix B for CalEEMod results).

Construction Emissions

In accordance with SCAQMD's recommendation, GHG emissions from construction of the proposed Project were amortized over a 30-year period and added to annual operational emissions to determine the Project's total annual GHG emissions.

Energy Emissions

Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt hour (CAPCOA 2017). The Project would be served by LADWP. Therefore, LADWP's specific energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) are used in the calculations of GHG emissions. The energy intensity factors included in CalEEMod are based on 2007 data by default at which time LADWP had only achieved a six percent procurement of renewable energy (City of Los Angeles 2017). Per SB 100, the statewide Renewable Portfolio Standard (RPS) Program requires electricity providers to increase procurement from eligible renewable energy sources to 60 percent by 2030. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by LADWP. LADWP energy intensity factors that include this reduction are shown in Table 13.

TABLE 13 LADWP ENERGY INTENSITY FACTORS

	2007 (lbs/MWh)	2030 (lbs/MWh)[2]
Percent procurement	6%[1]	60%
Carbon dioxide (CO_2)	1,228	522.55
Methane (CH_4)	0.029	0.012
Nitrous oxide (N_2O)	0.006	0.003

lbs/MWh = pounds per megawatt-hour

[1] Source: City of Los Angeles 2017

[2] RPS goal established by SB 100

In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Energy usage from non-residential usage was reduced by 30 percent to account for the requirements of 2019 Title 24 standards (CEC 2019b). In addition, CalEEMod was adjusted to account for the Project's inclusion of energy-efficient appliances.

Area Source Emissions

Area sources include GHG emissions that would occur from the use of landscaping equipment and fireplaces. In accordance with SCAQMD Rule 445, the proposed Project would not include wood-burning devices.

Solid Waste Emissions

The disposal of solid waste produces GHG emissions from the transportation of waste, anaerobic decomposition in landfills, and incineration. According to a California Department of Resources Recycling and Recovery (CalRecycle) report to the Legislature, as of 2013 California had achieved a statewide 50 percent diversion of solid waste from landfills through "reduce/recycle/compost" programs (CalRecycle 2015). However, the City of Los Angeles has achieved a solid waste diversion rate of 76 percent (Los Angeles Sanitation and Environment 2020). Therefore, CalEEMod was adjusted to account for the solid waste diversion rate in the City.

Water and Wastewater Emissions

Operational GHG emissions are generated due to the energy used to supply, convey, and treat water and wastewater. New development would be subject to CALGreen, which requires a 20 percent increase in indoor water use efficiency. However, CalEEMod does not incorporate water use reductions achieved CALGreen (Part 11 of Title 24). Thus, in order to account for compliance with CALGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations. In addition, CalEEMod was adjusted to account for the Project's installation of high efficiency landscape irrigation systems and low-flow indoor fixtures. CalEEMod defaults include septic tanks and anaerobic wastewater treatment; however, wastewater generated by the Project would only be treated using aerobic systems. Therefore, CalEEMod was adjusted to reflect the existing wastewater treatment system in the City.

Mobile Source Emissions

The proposed Project would increase the residential and employment density in an area that is served by high-quality transit and is adjacent to nearby commercial uses and job centers. According to CARB, the Project site is 0.1 mile from the nearest central business district (CARB

2020b). In addition, the site is within approximately 100 feet of the Western/Sunset bus stop and within approximately 0.2 mile of the Hollywood/Western Metro Station for the Metro Red Line and the Western/Hollywood bus stop. Therefore, of the Project's increased density, destination accessibility, and transit accessibility were included in CalEEMod.

Project Without Reduction Features Scenario

The analysis in this section evaluates potential emissions under both the proposed Project and Project Without Reduction Features scenario. The Project Without Reduction Features scenario is used to establish a comparison with GHG emissions generated by the proposed Project. The Project Without Reduction Features scenario does not consider site-specific conditions or Project-specific features. As an example, a Project Without Reduction Features scenario would apply a base trip generation rate for the Project that does not consider site-specific benefits resulting from the Project site's close proximity to high quality public transportation and commercial areas along Hollywood and Sunset Boulevards.

The GHG emissions that would be generated by the Project under the Project Without Reduction Features scenario are quantified in light of relevant state regulations and mandates. Because this comparison is intended to mirror the concepts used in CARB's 2017 Scoping Plan, the GHG emissions for the Project Without Reduction Features scenario are evaluated based on the specific and defined circumstances that CARB relied on when it developed the Reference Scenario for the 2017 Scoping Plan. The Reference Scenario did not include the following statewide GHG reduction measures (CARB 2017):

- Renewable Portfolio Standard (RPS) targets established by SB 350 and SB 100
- Low Carbon Fuel Standard
- Mobile Source Strategy (Cleaner Technology and Fuels [CTF] Scenario)
- Short-Lived Climate Pollutant Strategy (SB 1383)
- California Sustainable Freight Action Plan
- Post-2020 Cap and Trade Program

GHG emissions generated by the Project Without Reduction Features scenario were estimated using CalEEMod with the model inputs adjusted to exclude the statewide GHG reduction measures described above. The analysis assumes the Project Without Reduction Features scenario would incorporate the same land uses and building square footage as the proposed Project.

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

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

Consistency with Applicable Plans and Policies

Assembly Bill 32 and 2017 Scoping Plan

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall state plans and policies are Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and its follow up, SB 32. The goal of AB 32 is

to reduce GHG emissions to 1990 levels by 2020, and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. CARB's 2017 Scoping Plan, which outlines a framework to achieve SB 32's 2030 target, emphasizes innovation, adoption of existing technology, and strategic investment to support its strategies for GHG emissions reductions. Statewide plans and regulations in support of these strategies, such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at a Project level would occur as implementation continues statewide.

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

SB 375, signed in August 2008, directs each of the State's 18 major Metropolitan Planning Organizations (MPOs) to prepare an SCS that contains a growth strategy to meet the GHG emission targets for inclusion in the RTP. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal) to comply with SB 375. The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020).

Table 14 illustrates the Project's consistency with relevant goals and strategies embodied in Chapter 3, A Path to Greater Access, Mobility & Sustainability, of the 2020-2045 RTP/SCS (SCAG 2020). As shown therein in Table 14, the Project is consistent with the applicable strategies in the 2020-2045 RTP/SCS.

TABLE 14 PROJECT CONSISTENCY WITH APPLICABLE SCAG RTP/SCS GHG EMISSION REDUCTION STRATEGIES

Strategy/Action	Project Consistency
Focus Growth Near Destinations & Mobility Options • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies z Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or	**Consistent.** The Project site is located in an HQTA and is approximately 100 feet from the Western/Sunset bus stop and within approximately 0.2 mile of the Hollywood/Western Metro Station for the Metro Red Line and the Western/Hollywood bus stop. The Project would also increase residential density within walking distance of existing commercial uses along Sunset Boulevard and Hollywood Boulevard and would include 6 bicycle parking spaces for residents and 18 bicycle parking spaces for hotel guests. Therefore, the Project would focus growth near destinations and mobility options.

Strategy/Action	Project Consistency
locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	
Promote Diverse Housing Choices. 1. Preserve and rehabilitate affordable housing and prevent displacement 2. Identify funding opportunities for new workforce and affordable housing development 3. Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply 4. Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of GHGs	**Consistent.** The Project site currently contains a duplex that would be demolished to accommodate a mixed-use boutique hotel with 36 guest rooms and 10 residential apartment units, which would result in the loss of applicability of the RSO to the project site. Because the RSO would no longer apply, the proposed residential apartment units may not serve residents of the same income level as the existing duplex, and the Project would therefore result in the net loss of two affordable housing units. However, as discussed under *Threshold XIVa* in Section XIV, *Population and Housing*, the Project would provide a net increase in housing of eight units (10 proposed residential units – 2 existing residential units), which would accommodate approximately 23 additional residents (see discussion under *Threshold XIVa* in *Section XIV, Population and Housing*). Therefore, because the Project would only result in an incremental loss of two affordable housing units and would involve construction of new housing on the same site at a greater density than existing conditions, the Project would increase housing supply and would not result in significant displacement of existing people or housing. Furthermore, the proposed Project would be an infill development in close proximity to existing transit and destinations, which would support the reduction of GHG emissions as discussed above. Therefore, the Project would promote diverse housing choices.
Leverage Technology Innovations • Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** The Project would provide 24 bicycle parking spaces and two electric vehicle parking spaces. In addition, the Project would be required to comply with the Title 24 and Los Angeles Green Building Code standards for installing solar-ready infrastructure in the proposed mixed-use building. Therefore, the Project would leverage technology innovations.
Support Implementation of Sustainability Policies ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	**Consistent.** The design and implementation of the proposed Project would be consistent with Green LA and the Sustainable City pLAn ,as detailed in Table 15 and Table 16, and would be required to comply with CALGreen Building Standards and the Los Angeles Green Building Code, which include measures to reduce

Strategy/Action	Project Consistency
▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	GHG emissions. Therefore, the Project would support implementation of sustainability policies.
Promote a Green Region • Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	**Consistent.** The Project would be an infill development in an urbanized area and would therefore not interfere with regional wildlife connectivity or convert agricultural land. In addition, the Project would be required to comply with the Title 24 and Los Angeles Green Building Code standards for installing solar-ready infrastructure in the proposed mixed-use building. Therefore, the Project would support development of a green region.
Source: SCAG 2020	

Green LA and Sustainable City pLAn

Table 15 and Table 16 summarize the Project's consistency with the Green LA and Sustainable City pLAn, respectively. As discussed therein, the Project would be consistent with the actions and measures contained in these local GHG reduction plans.

TABLE 15 PROJECT CONSISTENCY WITH APPLICABLE GREEN LA ACTIONS

Action	Project Consistency
Energy	
Present a comprehensive set of green building policies to guide and support private sector development.	**Consistent.** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code.
Water	
Meet all additional demand for water resulting from growth through water conservation and recycling.	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features, such as low-flow fixtures, required pursuant to the 2019 California Plumbing Code, 2019 CALGreen, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code. Furthermore, the 2016 CALGreen requirements require a 20 percent increase in indoor water use efficiency relative to previous building code requirements, which would continue to be enforced in the 2019 CALGreen requirements.
Reduce per capita water consumption by 20 percent.	**Consistent.** See discussion above.
Transportation	
Promote walking and biking to work, within neighborhoods, and to large events and venues.	**Consistent.** The Project involves increasing residential density in proximity to existing commercial development, including restaurants, grocery stores, and other retail uses. The Project would be within approximately 100 feet of the Western/Sunset bus stop and within approximately 0.2 mile of the Hollywood/Western Metro Station for the Metro Red Line and the Western/Hollywood bus stop. The Project would also include 24 bicycle parking spaces. Therefore, walking or bicycling would be viable modes of transportation to reach numerous destinations or public transit.
Land Use	
Promote high-density housing close to major transportation arteries.	**Consistent.** The Project is mixed-use hotel and residential development located in within an HQTA. The Project would increase density to approximately 30.3 dwelling units per acre compared to the existing 6.1 dwelling units per acre on the Project site in close proximity to existing residential and commercial development and along a major transportation artery (North Western Avenue). As discussed above, the Project would be within approximately 100 feet of the Western/Sunset bus stop and within approximately 0.2 mile of the Hollywood/Western Metro Station for the Metro Red Line and the Western/Hollywood bus stop. The Project site would be walkable, and pedestrian access to the existing transit would be available. Therefore, the Project would increase housing density close to a major transportation artery.
Waste	
Recycle 70 percent of trash by 2015.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2020). The Project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.
Source: City of Los Angeles 2007	

TABLE 16 PROJECT CONSISTENCY WITH APPLICABLE SUSTAINABLE CITY PLAN MEASURES

Action	Project Consistency
Renewable Energy ▪ LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045. ▪ Increase cumulative megawatts by 2025; 2035; and 2050 of: o Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW. o Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW. o Demand response (DR) programs to 234 MW (2025) and 600 MW (2035).	**Consistent.** The Project would be required to comply with the Title 24 and Los Angeles Green Building Code standards for installing solar-ready infrastructure in the proposed mixed-use building. In addition, the Project would be served by LADWP, which will continue increasing its renewables portfolio in accordance with the California Renewable Portfolio Standards requirements.
Local Water ▪ Source 70% of L.A.'s water locally and capture 150,000 acre-feet per year of stormwater by 2035. ▪ Recycle 100% of all wastewater for beneficial reuse by 2035. ▪ Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050. ▪ Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050 ▪ Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035.	**Consistent.** The Project would be required to comply with the City's water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The Project would also be required to comply with the Title 24 standards for Water Efficiency and Conservation that are in effect at the time of development. These standards include actions such as separate water submeters for subsystems, prescriptive reduced flow rates for water and fixtures, wall-mounted urinals, and plumbing fixtures and fittings.
Clean and Healthy Buildings ▪ All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050. ▪ Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	**Consistent**: The Project would be constructed in accordance with the Title 24 standards for Building Energy Efficiency that are in effect at the time of development. These standards include energy-saving actions such as insulation certified by the Department of Consumer Affairs, Bureau of Home Furnishing and Thermal Insulation to reduce energy necessary to regulate building temperature and natural gas without continuously burning pilot lights.
Mobility & Public Transit ▪ Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050. ▪ Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050. ▪ Ensure Los Angeles is prepared for Autonomous Vehicles (AV) by the 2028 Olympic and Paralympic Games.	**Consistent.** The Project involves increasing residential density in proximity to existing commercial and recreational development, including restaurants, grocery stores, and other retail uses. The Project would be within approximately 100 feet of the Western/Sunset bus stop and within approximately 0.2 mile of the Hollywood/Western Metro Station for the Metro Red Line and the Western/Hollywood bus stop. The Project would also include 24 bicycle parking spaces. Therefore, the Project would support increasing the percentage of trips made by walking, biking, and transit.

Action	Project Consistency
Zero Emissions Vehicles ▪ Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050. ▪ Electrify 100% of LA Metro and LADOT buses by 2030. ▪ Reduce port-related GHG emissions by 80% by 2050.	**Consistent**. In accordance with the Los Angeles Green Building Code, the Project would provide two electric vehicle parking spaces.
Waste and Resource Recovery ▪ Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050 ▪ Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028 ▪ Eliminate organic waste going to landfill by 2028 Increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25% by 2025; and 50% by 2035.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2020). The Project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.
Urban Ecosystems and Resilience ▪ Increase tree canopy in areas of greatest need by at least 50% by 2028. ▪ Complete or initiate restoration identified in the 'ARBOR' Plan by 2035. ▪ Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028. ▪ Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035. ▪ Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050. ▪ Achieve and maintain 'no-net loss' of native biodiversity by 2035.	**Consistent.** The Project would be an infill development in an urbanized area and thus would not adversely impact native biodiversity. In addition, the Project would increase the number of trees on site from four to 32.
Source: City of Los Angeles 2020a	

Conclusion

Less than significant impact. In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the requirements of policies, regulations and GHG reduction actions/strategies outlined in the 2017 Scoping Plan, the 2020-2045 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn. Therefore, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (*Threshold VIII.b*). Consistency with the above plans, policies, regulations and GHG reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions such that the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment (*Threshold VIII.a*). Impacts under both *Threshold VIII.a* and *Threshold VIII.b* would be less than significant.

GHG Emissions Quantification

As discussed under *Methodology*, construction and operational GHG emissions associated with the Project are quantified for informational purposes only.

Baseline Emissions

The existing on-site duplex generates GHG emissions from energy consumption, vehicle trips, water use, and emissions from area sources, such as architectural coatings and landscaping

equipment use. Table 17 summarizes baseline GHG emissions associated with existing land uses, a duplex, on the Project site, as modeled using CalEEMod.

TABLE 17 BASELINE GHG EMISSIONS

Emission Source	Annual Emissions (MT of CO_2e)
Operational	
Area	0.7
Energy	3.6
Solid Waste	0.2
Water	0.8
Mobile	
CO_2 and CH_4	8.4
N_2O	0.6
Total	**14.3**

MT = metric tons; CO_2e = carbon dioxide equivalent
See Appendix B for CalEEMod worksheets.

Construction Emissions

Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches adequately address impacts from temporary construction activity. The CEQA and Climate Change white paper states that additional study is needed to make such an assessment or to develop separate thresholds for construction activity (CAPCOA 2008). Nevertheless, the SCAQMD has recommended amortizing construction-related emissions over a 30-year period in conjunction with the proposed Project's operational emissions. As shown in Table 18, construction of the Project would generate an estimated 403 MT of CO_2e, or 13 MT of CO_2e year when amortized over a 30-year period.

TABLE 18 ESTIMATED CONSTRUCTION GHG EMISSIONS

Year	Emissions (MT of CO_2e)
2020	85.0
2021	181.4
2022	136.9
Total	403.3
Total Amortized over 30 Years	**13.4**

MT = metric tons; CO_2e = carbon dioxide equivalent
See Appendix B for CalEEMod worksheets.

Combined Total Annual Emissions

Table 19 combines the construction, operational, and mobile GHG emissions associated with development of the proposed Project. As shown therein, the Project's emissions would be

approximately 298 MT of CO_2e, or a net increase of approximately 283 MT of CO_2e as compared to baseline conditions on the Project site.

TABLE 19 COMBINED ANNUAL GHG EMISSIONS

Emission Source	Annual Emissions (MT of CO_2e)
Construction	13.4
Operational	
Area	0.2
Energy	91.4
Solid Waste	5.9
Water	5.0
Mobile	
CO_2 and CH_4	174.7
N_2O	6.9
Total	**297.5**
Baseline GHG Emissions	(14.3)
Net Increase in GHG Emissions	**283.2**

MT = metric tons; CO_2e = carbon dioxide equivalent
( ) denotes a negative number.
See Appendix B for CalEEMod worksheets.

Comparison to Project Without Reduction Features Scenario

Less than significant impact. As noted under *Methodology*, GHG emissions from a Project Without Reduction Features scenario were quantified to demonstrate that compliance with applicable plans, policies, and regulations would reduce GHG emissions from the proposed Project. As discussed above, emissions resulting from a Project Without Reduction Features scenario represent the emissions that would be generated by the Project in the absence of certain GHG emission reduction measures, including RPS targets established by SB 100, improving vehicle emission factors, as well as mobile source emissions reductions associated with the Project's increase in density and proximity to transit services. The analysis in this section includes potential emissions under a Project Without Reduction features scenario and emissions generated by the proposed Project based on regulations and mandates expected to be in force by 2030 (the next milestone target year for GHG emission reductions per SB 32).

Table 20 compares GHG emissions from the proposed Project to GHG emissions from the Project Without Reduction Features scenario. As shown therein, net GHG emissions generated by the proposed Project would be approximately 283 MT of CO_2e per year, which is 51 percent less than those generated under the Project Without Reduction Features scenario. Therefore, this analysis demonstrates that compliance with State, regional and local GHG reduction plans would result in a reduction of the Project's incremental contribution of GHG emissions.

As discussed earlier, the Project's consistency with plans, policies, regulations and GHG reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions such that the Project would not generate GHG emissions, either directly or indirectly,

that may have a significant impact on the environment (*Threshold VIII.a*). Impacts under both *Threshold VIII.a* and *Threshold VIII.b* would be less than significant.

TABLE 20 COMPARISON OF PROJECT-RELATED GHG EMISSIONS TO PROJECT WITHOUT REDUCTION FEATURES SCENARIO

Emission Source	Project Without Reduction Features Scenario (MT of CO_2e)	As Proposed Scenario (MT of CO_2e)	Decrease from Project Without Reduction Features Scenario (MT of CO_2e)	Change from Project Without Reduction Features Scenario
Construction[1]	13.4	13.4	0	0%
Operational				
Area	0.2	0.2	0	0%
Energy	121.0	91.4	(29.6)	(22%)
Solid Waste	5.9	5.9	0	0%
Water	9.5	5.0	(4.5)	(47%)
Mobile				
CO_2 and CH_4	434.6	174.7	(259.9)	(60%)
N_2O	8.4	6.9	(1.5)	(18%)
Total	**593.0**	**297.5**	**(295.5)**	**(50%)**
Baseline GHG Emissions	14.3	14.3	0	0%
Net Increase in GHG Emissions	**578.7**	**283.2**	**(295.5)**	**(51%)**

MT: metric tons; CO_2e: carbon dioxide equivalent

[1]Construction emissions were amortized over a 30-year period in accordance with SCAQMD recommendations.

Source: Calculations were made in CalEEMod. See Appendix B for full model output. Some numbers may not add up due to rounding.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less than significant impact. A significant impact would occur if the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the proposed project would involve the use of potentially hazardous materials, such as vehicle fuels and fluids, that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to

occur. Any use of potentially hazardous materials during construction of the proposed Project would comply with all local, state, and federal regulations regarding the handling of potentially hazardous materials. Furthermore, the transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. Operation of the proposed Project would likely involve an incremental increase in the use of common household hazardous materials on the Project site, such as cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular property and landscaping maintenance. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Therefore, given regulatory compliance with RCM-HAZ-1 and RCM-HAZ-2, impacts would be less than significant.

Regulatory Compliance Measures

RCM-HAZ-1: COMPLIANCE WITH FEDERAL HAZARDOUS MATERIALS REGULATIONS

The Project shall comply with all applicable mandatory provisions of the Hazardous Materials Transportation Act and the Resource Conservation and Recovery Act.

RCM-HAZ-2: COMPLIANCE WITH CALIFORNIA HAZARDOUS MATERIALS REGULATIONS

The Project shall comply with all applicable mandatory provisions of the California Hazardous Material Management Act and the California Code of Regulations Title 22.

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

Less than significant with mitigation incorporated. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. As described under *Threshold IXa* in Section IX, *Hazards and Hazardous Materials*, construction of the proposed Project would involve the use of potentially hazardous materials, such as vehicle fuels and fluids, that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. The transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22.

Given that the existing duplex on the Project site was constructed in 1916, building materials may contain ACMs and LBP may have been used for painted surfaces, which could pose hazards to receptors at adjacent land uses during the demolition stage of the Project if these materials become airborne. Therefore, impacts related to the released of hazardous materials would be potentially significant. With implementation of Mitigation Measure HAZ-1, operation of the proposed Project would not create a significant hazard to the public or the environment and would not emit hazardous emissions. With mitigation, potential impacts associated with upset or accident conditions would be less than significant.

Mitigation Measure

HAZ-1 Existing Toxic/Hazardous Materials (Asbestos and Lead)

Prior to the demolition of the existing duplex, all suspect ACMs shall be sampled and analyzed to confirm the absence of asbestos. In the event that any ACMs are discovered during demolition activities, the materials shall be sampled and analyzed for asbestos content prior to any disturbance. Prior to the issuance of the demolition permit, the applicant shall provide a letter from a qualified asbestos abatement consultant that no ACMs are present in the building. If ACMs are found to be present, all asbestos removal operations shall be performed by a California Division of Occupational Safety and Health (Cal/OSHA)-registered and California-licensed asbestos contractor. All disturbances of ACMs, and/or abatement operations, shall be performed under the surveillance of a third-party Cal/OSHA Certified Asbestos Consultant. All disturbances of ACMs, and/or abatement operations, shall be performed in accordance with the Cal/OSHA requirements set forth in 8 California Code of Regulations 1529. Asbestos abatement shall also be performed in accordance with SCAQMD requirements set forth in Rule 1403 as well as all other applicable state and federal rules and regulations.

Any suspect LBP shall be sampled prior to any demolition activities. Prior to the issuance of the demolition permit, the applicant shall provide a letter from a licensed LBP abatement contractor that no LBP is present in the building. If identified, LBP located within building scheduled for renovation or demolition/relocation, or noted to be damaged, shall be abated by a licensed LBP abatement contractor, and disposed of according to all state and local regulations.

All construction work shall be subject to 29 Code of Federal Regulations Part 1926.62 *Lead Exposure in Construction Interim Final Rule*, which was adopted and incorporated into California's own standard 8 California Code of Regulations §1532.1.

Significance Determination: Less than Significant with Mitigation Incorporated

Mitigation Measures: Refer to Mitigation Measure HAZ-1

Significance Determination after Mitigation: Less than Significant

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

No impact. The nearest school to the Project site is Grant Elementary School, located approximately 0.3 mile northwest of the Project site. During construction of the proposed Project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed under *Threshold IXa* in Section IX, *Hazards and Hazardous Materials*, the transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. As a result, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impact would occur.

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

No impact. A significant impact would occur if the Project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. The following databases and listings compiled pursuant to Government Code §65962.5 were checked in March 2020 for known hazardous materials contamination at the Project site:

- USEPA
    - Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)/Superfund Enterprise Management System (SEMS)/Envirofacts database search
- State Water Resources Control Board (SWRCB)
    - GeoTracker search for leaking underground storage tanks (LUST) and other cleanup sites
- Department of Toxic Substances Control (DTSC)
    - EnviroStor database for hazardous waste facilities or known contamination sites
    - Cortese List of Hazardous Waste and Substances Sites

The Project site is not included on any list of hazardous materials sited compiled pursuant to Government Code §65962.5. The SEMS database search did not produce any results associated with the Project site, indicating that the Project site is devoid of known hazards and contaminants (USEPA 2019). The Project site is not located on or directly adjacent to any known hazardous or contaminated sites that are actively being monitored. A search of the Geotracker database shows that the nearest listing to the site is a LUST Cleanup Site located within 0.19 mile of the Project site. This LUST Cleanup Site, referred to as USPS LA North Vehicle Maintenance, is located south of the Project site at 1375 North Western Avenue (SWRCB 2020). The status for this listing is “Completed – Case Closed as of 2/9/2000,” indicating that no hazards remain on-site (SWRCB 2020). Therefore, no impact would occur.

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

No impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The airport or airstrip nearest to the Project site is the Hollywood Burbank Airport, located approximately 8.6 miles north of the Project site. The Project site is not within the airport influence area as defined by the Los Angeles County Airport Land Use Commission (ALUC 2004). Therefore, no impact would occur.

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

No impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. In accordance

with the Safety Element of the City of Los Angeles General Plan (1996), emergency response and evacuation procedures would be developed by the City in coordination with the police and fire departments. The proposed Project would not require the development of additional streets or introduce new structures that would interfere with or obstruct an adopted emergency response plan or emergency evacuation plan. The Project site is located approximately 0.3 mile east of U.S. 101, which is designated by the Los Angeles County Public Works Department as a Freeway Disaster Route (County of Los Angeles 2008). Implementation of the Project would increase traffic to and from the Project site; however, the Project site is surrounded by major roadways, including North Western Avenue, which have sufficient capacity to provide access to and from the Project site. Moreover, the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Referral Form for this Project concluded that an Access, Safety, and Circulation Evaluation is not required for the Project because the Project would not generate a net increase of 250 or more daily vehicle trips (Appendix E). Therefore, no impact would occur.

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

No impact. A significant impact would occur if the proposed project exposed people and structures to high risk of wildfire. The Project site is in an urban area of Los Angeles and is not located in a Fire Hazard Severity Zone or Very High Hazard Severity Zone for wildland fires (California Department of Forestry and Fire Protection [CALFIRE] 2007). The nearest Very High Hazard Severity Zone is located approximately 0.6 mile to the north. Due to the urban nature of the Project site and surrounding area and relative lack of vegetation, there is low potential for wildland fires to occur. Therefore, no impact related to wildland fires would occur.

X. HYDROLOGY AND WATER QUALITY

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

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

Less Than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

Construction

Less than significant impact. During Project construction, particularly during the grading phase, 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. Since Project construction would disturb less than one acre of soil, the Project would not be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. However, the Project would be required to implement BMPs as part of the City's grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sedimentation and erosion (RCM-HWQ-1).

Project construction activities may have the potential to encounter groundwater during excavation for the subterranean parking garage, which could require dewatering. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the LARWQCB Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of site-specific BMPs included as part of the Erosion Control Plan required to comply with the City grading permit regulations, the Project would significantly reduce or eliminate the discharge of potential pollutants from the stormwater runoff. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated. Impacts to water quality during construction of the Project would be less than significant.

Operation

Less than significant impact. Under the City's Low Impact Development (LID) Ordinance, post-construction stormwater runoff from new Projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., first flush). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the majority of potential contaminants are anticipated to be contained within the

"first flush" storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing site is predominantly impervious and consists of buildings, paved surface lots, and landscape areas. The Project would include the installation of a capture and use and/or biofiltration system, which would control stormwater runoff with no increase in runoff resulting from the Project. Therefore, with the incorporation of such LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Given regulatory compliance, impacts to water quality during operation of the Project would be less than significant.

Regulatory Compliance Measure

RCM-HWQ-1: COMPLIANCE WITH LAMC GRADING PERMIT REGULATIONS

The Project shall comply with all applicable mandatory provisions of the City grading permit regulations (LAMC Chapter IX, Division 70), including preparation of an Erosion Control Plan, to reduce the effects of sedimentation and erosion.

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

Less than significant impact. A significant impact would occur if the proposed project would substantially deplete groundwater or interferes with groundwater recharge. The Project site is located in the Hollywood Sub-basin of the Coastal Plain of the Los Angeles Groundwater Basin. The Hollywood Sub-basin is managed by the Water Replenishment District of Southern California, and the City of Beverly Hills is currently the only major pumper of groundwater in the Sub-basin (California Department of Water Resources 2004a). Groundwater from the Los Angeles Coastal Plan Groundwater Basin is not a substantial source of water for the region, and LADWP, who would provide water supply to the Project, does not utilize groundwater from the Sub-basin.

Due to limited local water resources, LADWP depends heavily on imported water purchased from the Metropolitan Water District. However, local groundwater supplies are an important piece of LADWP's water portfolio, providing between 12 and 23 percent of the total water supply (LADWP 2016). Because the southern California region is water-limited, groundwater resources are tightly managed to prevent over-extraction and depletion of groundwater supplies. The City of Los Angeles is entitled to extract approximately 109,809 acre-feet per year (AFY) from the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins, of which, approximately 87,000 AFY, are from the San Fernando Basin. Water levels in the San Fernando Basin have been stable over about the past 20 years since adjudication of the basin. Hydrographs indicate variations in water levels of five to 40 feet in the western part of the basin, a variation of about 40 feet in the southern and northern parts of the basin, and a variation of about 80 feet in the eastern part of the basin (CWR 2004b). However, groundwater quality issues have prevented LADWP from extracting its entitled amounts. LADWP is investing in efforts to increase groundwater supplies through treatment, cleanup, and enhanced groundwater recharge systems.

Due to the highly-regulated nature of groundwater resources in southern California and the diverse water supply portfolio of LADWP, the proposed Project would not result in a substantial depletion of groundwater supplies.

Construction activities for the Project would include demolition of an existing duplex residence, site preparation and grading to level the site, and excavation to accommodate the subterranean parking garage. Temporary dewatering operations may be required if groundwater is encountered during excavation for the subterranean parking garage. If groundwater is encountered during construction, minor dewatering of groundwater seepage via gravel-filled trenches would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With regard to groundwater recharge, the site is currently developed with predominantly impervious surfaces and provides little groundwater recharge potential. The proposed Project would result in minor changes to the percentage of impervious surfaces on the Project site (currently approximately 90 percent of the Project site), which would remain mostly impermeable, aside from planter boxes, trees, and other landscaping. Thus, the groundwater recharge potential of the Project site would remain minimal. Because the Project would not substantially impact the amount of groundwater recharge occurring on-site and would not result in a lowering of the local groundwater table, this impact would be less than significant.

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

i. Result in substantial erosion or siltation on- or off-site;

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

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

iv. Impede or redirect flood flows?

Less than significant impact. The Project site is in an established urban community in the Hollywood CPA. The proposed Project would redevelop the site with a four-story mixed-use building and subterranean parking garage. The proposed Project would not substantially alter the existing drainage patterns on the site because the site includes a residence and surface parking lot and currently contains mostly impervious surfaces. Implementation of the Project would not alter the course of a stream or river. The minor alterations in drainage patterns (changes to the distribution of impervious and pervious surfaces across the site) would be required comply with LAMC Chapter 6, Public Works and Property, Article 4.4, Stormwater and Urban Runoff Pollution Control, which includes regulations to prohibit discharge of pollutants into storm drains and receiving waters as well as stormwater pollution control measures for development planning and construction activities (LAMC §64.72; see RCM-HWQ-2). LAMC §64.72 includes LID requirements that would apply to construction and operation of the proposed Project, such as preparation of a LID plan to achieve full capture and treatment of stormwater runoff on-site for a design storm event or 24-hour runoff event, and minimization of impacts to natural drainage systems. The Project Site is not located within a 100-year or 500-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles (FEMA 2008; City of Los Angeles 1996). Thus, the Project would not impede or redirect flood

flows. Project compliance with RCM-HWQ-2 would reduce potential impacts to a less than significant level.

Regulatory Compliance Measure

RCM-HWQ-2: COMPLIANCE WITH LAMC §64.72

The Project shall comply with LAMC §64.72, which includes regulations to prohibit discharge of pollutants into storm drains and receiving waters as well as stormwater pollution control measures for development planning and construction activities.

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

Less than significant impact. A significant impact would occur if the proposed project would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. As discussed above, the Project Site is not located within a 100-year flood hazard area. The Project site is located in Zone X of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (Map # 06037C1610F, dated September 26, 2008) (FEMA 2008). Zone X is characterized as an area determined to be outside the 0.2 percent annual chance floodplain. As a result, the Project site would not be subject to inundation due to flooding hazards.

The Project site is located approximately 12 miles east of the Pacific Ocean and is not located in area subject to tsunami hazard. As a result, the Project site would not be subject to inundation due to tsunami hazards. The nearest body of water is the Hollywood Reservoir, located approximately 2.8 miles to the north, and the site is located outside of the dam's potential inundation hazard area (City of Los Angeles 1996). Because the Project site is not located in flood hazard, tsunami, or seiche zones, the Project would not risk release of pollutants due to Project inundation. Impacts would be less than significant.

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

Surface Water

Less than significant impact. As required by the California Water Code, the LARWQCB has adopted a plan entitled *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). Specifically, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan. The Basin Plan is a resource for the LARWQCB and others who use water and/or discharge wastewater in the Los Angeles Region. Other agencies and organizations involved in environmental permitting and resource management activities also use the Basin Plan. Finally, the Basin Plan provides valuable information to the public about local water quality issues.

Under §303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list

are subject to the development of a Total Maximum Daily Load (TMDL). The Project site is located within the Ballona Creek Watershed. The constituents of concern listed for Ballona Creek under California's Clean Water Act §303(d) List include Cadmium, Chlordane, Copper, Lead, Polychlorinated Biphenyls (PCBs), Silver, Zinc, and trash (USEPA 2016).

As discussed in *Threshold Xa*, in Section X, *Hydrology and Water Quality*, the Project would be required to comply with the City's LID regulations, which ensure that Projects address potential runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of storm water flows. Compliance with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) would reduce the Project's potential impacts related to surface water quality to less than significant levels.

Groundwater

No impact. On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package, collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.

The Project site is located in the Hollywood Sub-basin of the Los Angeles Coastal Plain Groundwater Basin, which is not a high or medium priority basin. As such, there is not a groundwater sustainability plan applicable to the Project. As discussed under *Threshold Xb* in Section X, *Hydrology and Water Quality*, temporary dewatering operations may be required if groundwater is encountered during excavation for the subterranean parking garage. If groundwater is encountered during construction, minor dewatering of groundwater seepage via gravel-filled trenches would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. As such, the Project would not conflict with plans for sustainable groundwater management. No impact would occur.

XI. LAND USE AND PLANNING

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

a) Physically divide an established community?

Less than significant impact. A significant impact would occur if the proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. The Project site is currently developed with an existing two-story duplex and surface parking lot. The Project site is located in the established urban community of the Hollywood CPA and is surrounded by residential and commercial uses in each direction. The proposed Project would involve demolishing a duplex for construction of a four-story, mixed-use building that would be nestled between existing structures (see Figure 6, Figure 7, and Figure 8). The proposed Project would be developed on an infill site and would not involve construction of any new infrastructure with the potential divide the surrounding area (such as a new road). There are no vacant or undeveloped areas around the Project Site, such that development of the Project could possibly divide an established community or result in a separation of uses or disruption of access between land uses around the Project site. As previously stated, implementation of the Project would result in further infill of an already developed community and on a site that is already built out with a two-story duplex. Therefore, the Project would not physically divide an established community, and no impact would occur.

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

Less than significant impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The determination of consistency with applicable land use policies and ordinances is based upon a review of the planning and zoning documents that regulate land use or guide land use decisions pertaining to the site, including the City's General Plan and the Vermont/Western SNAP. A Project is considered consistent with the provisions and general policies of applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of their primary goals. A conflict between a Project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency would result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines §15382.

As discussed below, the Project would be substantially consistent with all of the applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect

associated with development of the Project. Therefore, impacts related to land use and planning would be less than significant.

General Plan and Zoning

The City of Los Angeles General Plan and each of the elements were established to provide guidelines for the implementation of regulatory policy and provide a path for reasonable land use development. The General Plan defers to the LAMC for its specific implementation and application via code requirements. In this case, the proposed mixed-use building is seeking a Conditional Use Permit. The Hollywood Community Plan designates the subject site for Highway Oriented Commercial land uses with corresponding zones of C1, C2, P, RAS3 and RAS4 Zones. The proposed use of the land as a boutique hotel and residential apartments is consistent with permitted uses in the land use designation and corresponding zones.

Approval of the Conditional Use Permit requested by the applicant ensures that the use is established in a way that is compatible with the surrounding uses and supports elements of the City's General Plan. The Housing Element encourages the development of new dwelling units by facilitating new construction that addresses the particular needs of the City's households. Goals and Objectives of the General Plan also include encouraging community-based services in an effort to create small business growth and expand opportunities for residential development, particularly in designated Centers and Transit Oriented Districts and along Mixed-Use Boulevards. The granting of the requested Specific Plan exceptions, as discussed in the Section 3.4, *Requested Permits and Approvals*, would provide the opportunity to develop a boutique hotel with residential units and provide hotel guest rooms near transit at an affordable rate.

Framework Element

Adopted in December 1996 and readopted in August 2001, the City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan (City of Los Angeles 2001b). The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework sets forth a conceptual relationship between land use and transportation and encourages new development to be developed near transit. The General Plan Framework also calls for commercial development along the City's arterial corridors to be intensified with new Projects that integrate commercial and residential uses.

The consistency of the Project with applicable objectives and policies in the General Plan Framework is presented in Table 21. As shown, the Project would be consistent with the applicable objectives in the General Plan Framework.

TABLE 21 PROJECT CONSISTENCY WITH APPLICABLE OBJECTIVES OF THE GENERAL PLAN FRAMEWORK

Objective	Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Project would develop a mixed-use building with residential units and a boutique hotel, which would contribute to the diversity of land uses in the area and support the needs of the City's existing and future residents, businesses, and visitors.

Objective	Project Consistency
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution.	**Consistent.** The Project site is located within a TPA and is within approximately 100 feet of the Western/Sunset bus stop and within approximately 0.2 mile of the Hollywood/Western Metro Station for the Metro Red Line and the Western/Hollywood bus stop. The Project would also include 24 bicycle parking spaces. As such, the Project would support the reduction of vehicle trips, VMT, and air pollution.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** The Project includes a mixed-use development with residential units and a boutique hotel consistent with existing land uses in the Vermont/Western SNAP, which includes a mix of commercial, residential, and office land uses. The Project would provide additional housing on a site that contains one residence. The Project would also help to revitalize an area located along a transit corridor.
Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.	**Consistent.** The Project site is located within a TPA and is within 0.25 mile of the Hollywood/Western Metro Red Line Station. The Sunset/Western Metro station for bus line 757 is located approximately 100 feet south of the site. The Project would not encroach on low-density neighborhoods.
Objective 3.17: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** The Project includes a mixed-use building within close proximity to the Hollywood/Western Metro Red Line Station on an infill site, which would enhance pedestrian activity. Landscaping would be provided in planters along the street frontages on North Western Avenue and West Harold Way to provide a more pedestrian-friendly frontage.
Housing Chapter	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** The Project includes construction of a mixed-use development with residential units and a boutique hotel consistent with existing land uses in the Vermont/Western SNAP. The Project site is located within a TPA and is within 0.25 mile of the Hollywood/Western Metro Red Line Station. The Sunset/Western Metro station for bus line 757 is located approximately 100 feet south of the site. Therefore, the Project would be located in proximity to transit stations. As discussed in Section I, *Aesthetics*, the adjacent property to the east is currently developed with a two-story apartment building; however, the proposed Project design includes a step back from the eastern property line with a landscape buffer to create an adequate transition and separation between the existing apartment building and the proposed mixed-use building. The proposed Project design also includes a step back with landscaping and trees at the second floor along the North Western Avenue frontage to reduce massing along this frontage.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** The Project would provide a mixed-use development with residential units and a boutique hotel consistent with existing land uses in the Vermont/Western SNAP. The Project site is located within a TPA and is within 0.25 mile of the Hollywood/Western Metro Red Line Station. The Sunset/Western Metro station operating bus line 757 is located approximately 100 feet south of the site. Therefore, the Project would be located along a corridor served by transit that functions as a center for the surrounding community.

Objective	Project Consistency
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**Consistent.** The Project includes a boutique hotel with residential uses which would serve to establish a balance of land uses that provides for both residential and commercial development.
Source: City of Los Angeles 2001b	

Vermont/Western Station Neighborhood Area Plan

Less than significant impact. The Project site is also located within the Vermont/Western SNAP, Subarea C. The Plan was created for the purposes of making the neighborhood more livable and economically viable and facilitating transit and pedestrian activity following the disruption of the 1990s due to riots and the Northridge earthquake. The plan encourages improvement of housing stock along transportation corridors, pedestrian-oriented design elements, and well-planned commercial and residential uses. As discussed in Section I, *Aesthetics*, the Project would be required to adhere to the Vermont/Western SNAP Development Standards and Design Guidelines governing scenic quality and land use development. Subarea C of the SNAP limits the Floor Area Ratio (FAR) for a mixed-use building to a maximum of 3 to 1 and the commercial component to 1.5 to 1. The Project proposes a total floor area of 26,080 square feet, resulting in a residential FAR of 0.06 to 1 and a commercial FAR of 1.2 to 1, for an overall FAR of 1.8:1.

The applicant has requested two (2) Specific Plan Exceptions to the Specific Plan to allow a commercial use (hotel) above the ground floor (including a rooftop lounge) in a mixed-use development and to allow the building height to exceed the transitional height requirements from lots in the Subarea "A" adjoining properties. As discussed in Section I, *Aesthetics*, the proposed Project design includes a step back from the eastern property line with a landscape buffer to create an adequate transition and separation between the existing apartment building and the proposed mixed-use building. The proposed Project design also includes a step back with landscaping and trees at the second floor along the North Western Avenue frontage to reduce massing along this frontage. In addition, due to its mixed-use nature, the Project would serve both temporary tourist and business visitors as well as permanent residents and would create a transition between commercial uses along North Western Ave. and residential uses along West Harold Way. Therefore, granting of the requested exceptions is consistent with the principles and goals of the Vermont/Western SNAP by providing housing and viable commercial hotel. The Project would also provide hotel guest rooms at affordable rates compared to other higher end hotels in the area and would create permanent job opportunities as well as opportunities to work and live in the same building.

Based on the consistency analysis provided above, the proposed Project would be consistent with the City General Plan and Framework Element, LAMC, and Vermont/Western SNAP. As a result, the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect conflict with any applicable land use plan, policy, or regulation. Impacts would be less than significant.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The Project site is located in a highly urbanized portion of the City and is not used for mineral resource extraction. No State-designated or locally designated mineral resource zones exist in the City. According to the Conservation Element of the City of Los Angeles General Plan, Mineral Resources, Exhibit A, the Project Site is not classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use (City of Los Angeles 2001a). Thus, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of local importance or value to the region or to the residents of the State. No impact would occur and no mitigation measures are required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. No mineral extraction operations currently occur on the Project site. 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 (City of Los Angeles 2001a and 2001b; DOC 2012). The Project site is also not located within a City-designated oil field or oil drilling area (City of Los Angeles 1996; California Division of Oil, Gas and Geothermal Resources 2017). Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Noise Overview

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called "A-weighting" is used to filter noise frequencies that are not audible to the human ear. A-weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the "A-weighted" levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving the human perception of noise. In this analysis, all noise levels are A-weighted, and "dBA" is understood to identify the A-weighted decibel.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been

developed. The noise descriptors used for this analysis are the one-hour equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL).

- The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period. Typically, the L_{eq} is equivalent to a one-hour period, even when measured for shorter durations because the average noise level of a 10- to 30-minute period would be the same as the average hourly noise level if the noise source is relatively steady. L_{max} is the highest root mean squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007).
- The CNEL is a 24-hour equivalent sound level with an additional 5-dBA penalty for noise occurring during evening hours (between 7:00 p.m. and 10:00 p.m.) and an additional 10-dBA penalty for noise occurring during nighttime hours (between 10:00 p.m. and 7:00 a.m.) to account for the added sensitivity of humans to noise during these hours. Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 70+ CNEL range.

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The way noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound travels, site conditions, and obstructions. Noise levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at a rate of 3 dBA per doubling of distance (Caltrans 2020).

Vibration

Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). Vibration may also damage infrastructure when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. Particle velocity is the velocity at which the ground moves. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the greatest magnitude

of particle velocity associated with a vibration event. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Damage to structures can occurs when vibration levels range from 2 to 6 in/sec PPV. One half this minimum threshold, or 1 in/sec PPV, is considered a safe criterion that would protect modern structures (i.e., post-1975 construction in California) against structural damage (Caltrans 2020).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. In a sense, the human body responds to average vibration amplitude. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over a one-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018).

Vibration significance ranges from approximately 50 VdB (the typical background vibration-velocity level) to 100 VdB, the general threshold where minor damage can occur in fragile buildings (FTA 2018). The general human response to different levels of groundborne vibration velocity levels is described in Table 22.

TABLE 22 HUMAN RESPONSE TO DIFFERENT LEVELS OF GROUNDBORNE VIBRATION

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable
85 VdB	Vibration acceptable only if there are an infrequent number of events per day

VdB = vibration decibels
Source: FTA 2018

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Sensitive Receivers

Noise exposure goals for land use types reflect the varying noise sensitivities associated with those uses. According to the City of Los Angeles Noise Element, the following land uses are considered noise-sensitive: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses, houses of worship, hospitals, libraries, schools, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, and parks (City of Los Angeles 1999). The sensitive receivers nearest to the Project site include the Super 8 Motel immediately to the north and west, multi-family residences located adjacent to the south and east, and multi-family residences approximately 70 feet to the north. Figure 10 shows a map of the nearest sensitive receivers.

Figure 10 Sensitive Receiver Locations

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Ambient Noise Levels

The most common source of noise in the Project site vicinity is vehicular traffic on North Western Avenue and West Harold Way. Ambient noise levels are generally highest during the daytime and rush hour unless congestion substantially slows speeds. Existing ambient noise levels in the Hollywood CPA are summarized in Table 23.[4] As shown therein, ambient noise levels near the Project site range between approximately 59 and 77 dBA L_{eq}.

TABLE 23 NOISE LEVEL MONITORING RESULTS

Location[1]	General Plan Land Use Designation	Existing Land Use Description	dBA $L_{eq\ (15)}$[2]
1262 North Mariposa Avenue	Medium Residential	Multi-Family Residential	67.0
990 North Western Avenue	Neighborhood Office Commercial	Restaurant	70.3
6611 Selma Avenue	Public Facilities/Regional Center Commercial	School	60.4
6255 Sunset Boulevard	Regional Center Commercial	Mixed-Use	69.8
6051 Hollywood Boulevard	Highway Oriented/Regional Center Commercial	Strip Mall	69.9
950 Vine Street	Highway Oriented Commercial/Public Facilities	Strip Mall	69.7
5925 Santa Monica Boulevard	Commercial Manufacturing/Highway Oriented Commercial	Commercial	76.9
946 North Mariposa Avenue	Low Medium II Residential	Multi-Family Residential	58.9

dBA = A-weighted decibel; $L_{eq(15)}$ = average equivalent noise level over a 15-minute period.

[1] Noise measurement locations were selected based on proximity to the Project site and similar land uses.

[2] The equivalent noise level (L_{eq}) is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period (essentially, the average noise level). For this measurement, the L_{eq} was over a 15-minute period (L_{eq}[15]).

Note: Noise measurements were taken during daytime hours on November 9, 2016 and November 15, 2016 for the Hollywood CPA Update Environmental Impact Report.

Source: City of Los Angeles 2018a

Regulatory Setting

City of Los Angeles Noise Element

The goals, policies, and actions contained in the City of Los Angeles General Plan Noise Element focus on establishing and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise, especially at sensitive receivers. In addition,

4 Due to the Executive Order N-33-20, which was in effect at the time of this study, noise measurements were not taken at the project site because this activity does not fall under a critical infrastructure sector and therefore Rincon staff were not exempt from stay-at-home requirements.

consistent with state noise insulation standards (CBC Title 24), the City's Noise Element requires that interior noise not exceed 45 CNEL in any habitable room (City of Los Angeles 1999).

Los Angeles Municipal Code

The City implements and enforces construction and operational noise regulations through the LAMC. LAMC §112.05 limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA between 7:00 a.m. and 10:00 p.m., as measured at 50 feet from the source, (i.e., construction site) unless compliance is technically infeasible. Technical infeasibility means that noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of construction equipment. LAMC §41.40 also restricts construction activity to the hours below:

- Monday through Friday between 7:00 a.m. and 9:00 p.m.
- Saturdays and National Holidays between 8:00 a.m. and 6:00 p.m.
- No construction on Sundays except for residents

LAMC §112.01 prohibits noise from radios, musical instruments, television sets, and other sound-amplifying devices from being audible at a distance in excess of 150 feet from the property line of the noise source within 500 feet of any residential zone or from exceeding the ambient noise level on the premises of any other occupied property. LAMC §112.02 prohibits the operation of air conditioning, refrigeration, heating, pumping, and filtering equipment associated with any residence or other structure from exceeding the ambient noise level of any other occupied property by more than 5 dBA. Consistent with the City's Noise Element (1999), LAMC §91.1207.14.2 requires that interior noise levels not exceed 45 CNEL in any habitable room.

LAMC §112.04 prohibits the operation of any lawn mower, backpack blower, lawn edger, riding tractor, or any other machinery equipment, or other mechanical or electrical device, or any hand tool which creates a loud, raucous or impulsive sound, within any residential zone or within 500 feet of a residence between 10:00 p.m. and 7:00 a.m.

LAMC §114.03 prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. A significant impact would occur if the project would generate a substantial temporary or permanent increased in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction Noise

Less than significant impact. Temporary noise levels produced by construction activity would be a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of noise-generating activities. Construction noise was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) Version 1.1. RCNM predicts construction noise levels for a variety of construction

operations based on empirical data and the application of acoustical propagation formulas. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Construction noise was modeled from the center of on-site construction activity to the property line of the nearest noise-sensitive receivers. The reminder of the immediate Project area consists of commercial uses, which are not considered noise-sensitive receivers and are not included in this analysis. Construction noise was modeled at a distance of 50 feet in accordance with LAMC §112.05, which evaluates construction noise at a distance of 50 feet.

The demolition, site preparation, and grading phases of construction tend to create the highest temporary noise levels because of the operation of heavy equipment, which commonly include backhoes, bulldozers, concrete saws, graders, cranes, rollers, pavers, and stationary equipment, such as compressors. For assessment purposes, the loudest phase has been used for this assessment (i.e., demolition and grading), and it has assumed that the three loudest mobile pieces of equipment and all stationary equipment would operate simultaneously (i.e., a dozer, an excavator, and a loader).[5] It is assumed that diesel engines would power all construction equipment. Construction noise levels at the nearest receivers are shown in Table 24.

TABLE 24 CONSTRUCTION NOISE LEVELS

Construction Equipment	Approximate Noise Level at 50 Feet (dBA L_{eq})
Backhoe Concrete Saw, Dozer	84
dBA = A-weighted decibel; $L_{eq($ = average equivalent noise level; RCNM = Roadway Construction Noise Model See Appendix D for RCNM data sheets and assumptions.	

Maximum hourly noise levels during Project construction, which would occur during the demolition and grading phases of construction, were calculated at approximately 84 dBA L_{eq} at the nearest noise-sensitive receivers. Per LAMC standards, construction noise would be significant if it exceeds a maximum hourly noise level of 75 dBA between 7:00 a.m. and 10:00 p.m. when measured at 50 feet from the source within 500 feet of a residential zone.[6] Based on the RCNM results, noise levels from most construction phases would exceed 75 dBA at 50 feet. Therefore, construction noise impacts would be potentially significant and implementation of Mitigation Measure NOI-1 would be required. Implementation of this Mitigation Measure would reduce maximum hourly noise levels (which would occur during demolition and grading) to 69 dBA L_{eq} by requiring the use of mufflers capable of reducing noise levels by 15 dBA (see Appendix D for RCNM calculations). In addition, the applicant would be required to comply with RCM-NOI-1 and RCM-NOI-2, which would reduce temporary construction noise impacts to below 75 dBA. Therefore, with implementation of Mitigation Measure NOI-1, RCM-NOI-1, and RCM-NOI-2, Project construction would not generate a substantial temporary increase in ambient noise levels in the vicinity of the Project site, and impacts would be less than significant with mitigation incorporated.

[5] Given the small size of the project site, it is unlikely that more than three pieces of construction equipment would operate simultaneously.

[6] Although multi-family residences immediately to the south are zoned C2-1 (Commercial), this analysis conservatively assumes that these uses are located in a residential zone.

Regulatory Compliance Measures

RCM-NOI-1: CONSTRUCTION HOURS

The proposed Project shall comply with LAMC §41.40, which restricts construction activities to the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday and national holidays with no construction occurring on Sunday.

RCM-NOI-2: CONSTRUCTION SITE NOTICING

The proposed Project shall comply with the City's Building Regulations Ordinance No. 178.048, which 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 or owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and the City's telephone number where violations can be reported. The notice shall 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 and approved by the City's Department of Building and Safety.

Mitigation Measure

NOI-1: Construction Noise Reduction Measures

The proposed Project shall comply with the City of Los Angeles General Plan Noise Element, the City of Los Angeles Noise Ordinance, and any subsequent ordinances that prohibit the emission or creation of noise beyond certain levels at adjacent uses. To achieve compliance with the LAMC 75 dBA noise standard, the Project shall implement the following specific noise-reducing practices during construction:

- Schedule construction activities to avoid operating several pieces of equipment simultaneously, which can cause high noise levels.
- Retrofit the following equipment with an industrial grade muffler or muffler of similar capacity, capable of reducing engine noise by at least 15 dBA: backhoes, concrete saws, dozers, graders, pavers, and rollers (see Appendix D for specifications and noise reduction calculations).
- Locate all construction areas for staging and warming up as far as possible from adjacent residential buildings and sensitive receptors.

Significance Determination: Less than Significant with Mitigation Incorporated

Mitigation Measures: Refer to Mitigation Measure NOI-1

Significance Determination after Mitigation: Less than Significant

On-Site Operational Noise

Less than significant impact. The primary on-site noise sources associated with Project operation would include noise from rooftop-mounted heating, ventilation, and air conditioning (HVAC) equipment, delivery trucks, trash hauling trucks, and typical noise associated with the proposed residential, hotel, and open space uses (i.e., conversations, music, light recreation, live music at rooftop lounge). The following discussion addresses each noise source separately.

Fixed Mechanical Equipment

The Project would include rooftop HVAC equipment. HVAC equipment is a continuous noise source, and noise levels can reach up to 70 dBA L_{eq} at a distance of 15 feet from the source.[7] Rooftop equipment would be located as close as 62 feet from the Project site's southern property line.[8] Assuming approximately one ton of HVAC systems would be required for every 600 sf of residential floor space, the Project would require approximately 44 tons of HVAC systems, or approximately 9 five-ton HVAC units.[9] To accommodate these on the roof, approximately one HVAC unit would be placed every 320 sf, or approximately every 14 linear feet on the rooftop.[10] Therefore, the southernmost portion of the proposed building, which is the closest part of the building to the adjacent property line, would accommodate approximately five HVAC units.[11] Assuming worst-case exposure of noise from up to five HVAC units at any point on the adjacent property, noise levels generated by HVAC equipment would be approximately 65 dBA at 60 feet.[12] As shown in Table 23, ambient noise levels along transportation arteries in the Hollywood CPA (i.e., Western Avenue, Sunset Boulevard, and Hollywood Boulevard) are approximately 70 dBA L_{eq}. When combined with ambient noise levels of 70 dBA L_{eq}, HVAC equipment would increase ambient noise levels to approximately 71 dBA L_{eq}. As a result, HVAC equipment noise would not increase the existing ambient noise level by more than 5 dBA in accordance with LAMC §112.02. Therefore, impacts related to HVAC equipment noise would be less than significant.

Delivery and Trash-Hauling Trucks

Other operational noise sources associated with on-site vehicle circulation, including delivery trucks and trash-hauling trucks. The average noise level for a single idling truck is generally 70 dBA at 25 feet (Charles M. Salter Associates, Inc. 2017). However, noise associated with commercial and trash-hauling trucks would be intermittent and are already a common occurrence in the surrounding urban area due to existing residential and commercial uses. Furthermore, the Project would be require to comply with LAMC §114.03 (see RCNM-NOI-4), which prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which cause any impulsive sound or raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m. Therefore, operational noise impacts associated with delivery and trash-hauling trucks would be less than significant.

Outdoor Use Areas

Outdoor uses associated with the proposed Project would include outdoor use areas at the second floor along the North Western Avenue and West Harold Way frontages and a roof top lounge. Conversations in the outdoor use areas would generate similar noise levels as existing residential and hotel uses adjacent to the site. Operational noise associated with use of rooftop lounge would include social conversations and live music events two to three times per week.

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7 Illingworth & Rodkin, Inc. 2009. Wal-Mart Expansion, Williamson Ranch Plaza (Antioch, California) Environmental Noise Assessment. http://www.ci.antioch.ca.us/CityGov/CommDev/PlanningDivision/docs/Walmart/DEIR-VOLII-APPENDICES-C-H/Appendix%20G%20Noise%20Assessment.pdf (accessed August 2019).

8 Diagonal distance between rooftop HVAC units and the property line, assuming a building height of 60 feet and a setback of 15 feet.

9 26,080 net residential sf divided by 600 sf per ton of HVAC system

10 2,882 sf of rooftop area divided by 9 HVAC units

11 70 feet divided by 14 feet per HVAC unit

12 All other HVAC units would be located at a greater distance from the adjacent residential property line and would therefore not generate substantial noise levels as compared to those located along the southernmost edge of the rooftop.

However, noise from social conversations, live music, or other sound-generating equipment would be an intermittent and temporary noise source and is within 1,00 feet of similar uses including a bar, cocktail lounge, and two restaurants. In addition, LAMC §112.01 (see RCNM-NOI-5), which prohibits noise from radios, musical instruments, television sets, and other sound-amplifying devices from being audible at a distance in excess of 150 feet from the property line of the noise source within 500 feet of any residential zone or from exceeding the ambient noise level on the premises of any other occupied property. Therefore, operational noise impacts associated with the proposed outdoor uses would be less than significant.

Summary

Overall, operation of the proposed Project would not generate sources of noise that are new to the existing urban area considering the existing residential and commercial uses. Therefore, on-site operational noise would not generate a substantial permanent increase in ambient noise levels in the vicinity of the Project site, and impacts would be less than significant.

Regulatory Compliance Measures

RCM-NOI-4: VEHICLES LOADING/UNLOADING - COMPLIANCE WITH LAMC SECTION 114.03

The Project shall comply with LAMC §114.03, which prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m.

RCM-NOI-5: RADIOS, TELEVISION SETS, AND SIMILAR DEVICES - COMPLIANCE WITH LAMC SECTION 112.01

The Project shall comply with LAMC §112.01, which prohibits noise from radios, musical instruments, television sets, and other sound-amplifying devices from being audible at a distance in excess of 150 feet from the property line of the noise source within 500 feet of any residential zone or from exceeding the ambient noise level on the premises of any other occupied property.

Off-site Traffic Noise

Less than significant impact. The Project would generate vehicle trips and increase traffic on area roadways, particularly along West Harold Way and North Western Avenue. According to the Project's LADOT Referral Form, the proposed Project would generate approximately 224 net new daily trips.

A Project would result in a significant off-site traffic noise impact if it would cause the ambient noise level measured at the property line of affected uses to increase by 3 CNEL, which is a barely perceptible increase in noise levels. As discussed under *Noise Overview*, a doubling of traffic volumes would increase noise levels by approximately 3 dBA. The Project would generate approximately 224 net new daily trips. In order to double existing traffic volumes on West Harold Way or North Western Avenue, existing volumes would need to be equal to or less than 448 daily trips. Based on the nature of these roadways and their highly urban locations, it is very likely that existing traffic volumes are far greater than 448 daily trips (approximately 18 trips per hour over a 24-hour period).13 Therefore, the Project would not double existing traffic volumes on

13 Due to the Executive Order N-33-20, which was in effect at the time of this study, existing traffic counts were not taken at the project site because this activity does not fall under a critical infrastructure sector and therefore Rincon staff were not exempt from stay-at-home requirements.

surrounding roadways and would not increase ambient noise levels by more than 3 dBA. Therefore, off-site traffic noise impacts would be less than significant.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

Less than significant impact. As a mixed-use hotel and residential Project, the proposed Project does not include substantial on-site vibration sources (e.g., heavy industrial equipment or operations) associated with operation. Therefore, construction activities have the greatest potential to generate groundborne vibration affecting nearby receivers. Construction of the proposed Project is expected to utilize vibratory equipment including bulldozers, concrete industrial saws, loaded trucks, and a vibratory roller. Table 25 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Table 25 Typical Vibration Levels during Construction Activities at 25 Feet

	Vibration Levels at 25 Feet	
Equipment	**PPV (in/sec)**	**L_v (VdB)**
Large Bulldozer	0.089	87
Loaded Truck	0.076	86
Concrete Industrial Saw[1]	0.035	79
Vibratory Roller	0.21	94

PPV = peak particle velocity; in/sec = inches per second; L_V = vibration velocity level; VdB = vibration decibels

[1] Vibration levels from a jackhammer used as a proxy for the concrete industrial saw.

Source: FTA 2018

The City has not adopted a significance threshold to assess vibration impacts during construction. Therefore, the American Association of State Highway and Transportation Officials (AASHTO) criteria are used to evaluate potential construction vibration impacts related to potential building damage. Based on AASHTO criteria, construction vibration impacts would be significant if vibration levels exceed 0.5 in/sec PPV for residential structures and 1.0 in/sec PPV for commercial and industrial structures (i.e., engineered structures), which are the limits at which minor architectural damage may occur to each type of building.

Since groundborne vibration could cause physical damage to structures, vibration levels were modeled based on the distance from the location of vibration-intensive construction activities (assumed to be at edge of the Project site) to the edge of the nearest off-site residential, industrial, and commercial structures. Table 26 shows estimated groundborne vibration levels at the nearest receivers.

TABLE 26 VIBRATION LEVELS DURING PROJECT CONSTRUCTION AT NEAREST RECEIVERS

Equipment	Vibration Levels (PPV, in/sec)	
	Super 8 Motel at 30 Feet	Multi-family Residences at 45 Feet
Large Bulldozer	0.073	0.047
Loaded Truck	0.062	0.040
Jackhammer	0.029	0.018
Vibratory Roller	0.172	0.110
Threshold	**1.0**	**0.5**
Threshold Exceeded?	**No**	**No**
PPV = peak particle velocity; in/sec = inches per second See Appendix D for vibration analysis worksheets.		

As shown in Table 26, groundborne vibration from typical construction equipment would not exceed the threshold of 0.5 in/sec PPV at existing residences or 1.0 in/sec PPV at the Super 8 Motel. Furthermore, the proposed Project would not include stationary sources of vibration, such as heavy equipment or press operations. Therefore, construction and operational vibration impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. As discussed in Section IX, *Hazards and Hazardous Materials*, the airport or airstrip nearest to the Project site is the Hollywood Burbank Airport, located approximately 8.6 miles north of the Project site. The Project site is not within the airport influence area as defined by the Los Angeles County Airport Land Use Commission (ALUC 2004). While the proposed Project would be subject to temporary and intermittent noise from aircraft overflights, the Project would not expose people residing or working in the Project area to excessive noise levels. No impact would occur.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than significant impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude. The City of Los Angeles has a current population of 4,040,079 persons with an average household size of 2.83 persons (DOF 2019). SCAG forecasts the population of Los Angeles would increase to approximately 4,609,400 persons by 2040, which is an increase of approximately 569,321 persons, or 14 percent (SCAG 2016). The proposed Project would involve demolishing a duplex and a surface parking lot to construct an "L-shaped" building consisting of a four-story, mixed-use boutique hotel with 36 guest rooms and 10 residential apartment units. According to the average household size reported by the DOF, approximately six people currently reside on-site.[14] The proposed 10 residential apartment units would accommodate approximately 29 residents[15], or a net increase of 23 persons when compared to the existing on-site population. Additionally, the hotel would accommodate approximately 12 new employment opportunities. According to applicant-provided information, the hotel would have approximately 12 employees. It is likely that not all employees would become new residents of Los Angeles (they may, for example, already live in the City or continue to live outside of the City after they are hired). However, this analysis conservatively assumes that all new employees would become new residents of the City. Therefore, the Project would result in the addition of approximately 35 new residents to the City (23 net new residents + 12 employees).

The addition of 35 persons would increase the City's existing population by less than 0.1 percent to approximately 4,040,114 persons, which would be within SCAG's 2040 population forecast of 4,609,400 persons (SCAG 2016). In addition, according to DOF estimates, the City has an existing housing stock of approximately 1,500,222 housing units, and SCAG forecasts an

[14] Based on an average household size of 2.83 persons per household (DOF 2019) multiplied by 2 residences (1 duplex) ≈ 6 persons.

[15] Based on an average household size of 2.83 persons per household (DOF 2019) multiplied by 10 apartment units ≈ 29 persons.

increase in housing of approximately 190,078 units (an approximately 13 percent increase) to 1,690,300 units by 2040 (DOF 2019; SCAG 2016). The proposed Project would result in a net increase of eight residential units (10 proposed residential units – 2 existing residential units), which would represent less than 0.01 percent of the projected housing stock increase and would not exceed SCAG's 2040 housing units forecast. Therefore, the proposed Project would not cause a substantial increase in population or induce unplanned population growth, and impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less than significant impact. The Project site currently contains a duplex that would be demolished to accommodate a mixed-use boutique hotel with 36 guest rooms and 10 residential apartment units, which would result in the loss of applicability of the RSO to the project site. Because the RSO would no longer apply, the proposed residential apartment units may not serve residents of the same income level as the existing duplex, and the Project would therefore result in the net loss of two affordable housing units. However, as discussed under *Threshold XIVa* in Section XIV, *Population and Housing*, the Project would provide a net increase in housing of eight units (10 proposed residential units – 2 existing residential units), which would accommodate approximately 23 additional residents (see discussion under *Threshold XIVa* in Section XIV, *Population and Housing*). Therefore, because the Project would only result in an incremental loss of two affordable housing units and would involve construction of new housing on the same site at a greater density than existing conditions, the Project would not necessitate the construction of a substantial quantity of replacement housing elsewhere. Therefore, impacts associated with the displacement of existing people or housing would be less than significant.

XV. PUBLIC SERVICES

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less than significant impact. A significant impact would occur if the Los Angeles Fire Department (LAFD) could not adequately serve the proposed project, necessitating a new or physically altered station. Fire protection in the City is provided by the LAFD. In particular, the

primary duties of the LAFD Fire Development Services Unit is to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections, which aim to enforce applicable standards of the California Fire Code (Title 24, Part 9), California Code of Regulations Title 19, Los Angeles Fire Code (LAMC Chapter 5, Article 7), and LAMC §57.09.03, §57.09.06 and §57.09.07 concerning new construction and remodeling. Furthermore, the LAFD Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement.

The proposed Project is within the existing service area of LAFD Fire Station No. 82, which. Fire Station No. 82 is located approximately 0.6-mile (driving distance) northwest of the Project site at 5769 Hollywood Boulevard. In 2019, the average response times for Fire Station No. 82 were approximately 6.5 minutes for emergency medical services and non-emergency medical services and five minutes for structure fires (LAFD 2020). Although the proposed Project would not cause significant growth in the City's population (see discussion under *Threshold XIVa* in Section XIV, *Population and Housing*), the Project would result in an increase of on-site residents as compared to existing conditions, which would incrementally increase demand and call load for fire protection services. The LAFD Fire Prevention Bureau was contacted via certified mail on April 15, 2020 to determine whether the proposed Project would have an adverse impact on the provision of fire services within the City. A response had not been received to date. However, based on verbal communication with the LAFD Fire Prevention Bureau, the LAFD works with the City's Planning Department to review and make recommendations relating to all land use cases, including development projects, in the City (LAFD 2019). Therefore, the proposed Project would be required to comply with applicable fire and life safety standards and code requirements, such as fire hydrant flows, hydrant spacing, adequate fire lane turning-radius, access, and design in accordance with LAFD's fire protection requirements, as well as standard design requirements (e.g., fire sprinklers and fire alarm devices) in accordance with the CBC. Upon implementation of LAFD requirements per RCM-PS-1, the proposed Project would not place an unanticipated burden on fire protection services and would therefore not affect response times or service ratios such that new or expanded fire facilities would be needed. Impacts would be less than significant.

Regulatory Compliance Measure

RCM-PS-1: Compliance with LAFD Fire and Life Safety Standards

The Project shall comply with all applicable standards required by the LAFD as a result of the Fire Life Safety Plan Checks and Fire Life Safety Inspections processes.

b) Police protection?

Less than significant impact. A significant impact would occur if the Los Angeles Police Department (LAPD) could not adequately serve the proposed project, necessitating a new or physically altered station. Police protection services in the City are provided by the LAPD, which consists of 9,990 sworn police officers and 2,961 civilian personnel (LAPD 2020). Based on a current City population of 4,040,079 persons (DOF 2019), the current officer to population ratio is approximately 2.47 sworn officers per 1,000 residents. The proposed Project is within the existing service area of the LAPD Hollywood Station, located at 1358 North Wilcox Avenue, approximately 1.5 miles (driving distance) southwest of the Project site. The Project would result in an increase of on-site residents and employees as compared to existing conditions, which would incrementally increase demand for police protection services. According to email communication with Captain Steve Lurie, LAPD Commanding Officer of the Hollywood Area, the proposed Project would not place an unanticipated burden on police protection services and would therefore not affect response times or service ratios such that new or expanded police facilities would be needed

(Lurie 2020). Upon implementation of LAPD requirements per RCM-PS-2, the Project would result in a less than significant impact to police protection services.

Regulatory Compliance Measure

The applicant would comply with RCM-PS-2 (Compliance with LAPD Standards).

RCM-PS-2: Compliance with LAPD Standards

The Project shall comply with all applicable standards required by the LAPD as a result of the plan check process.

c) Schools?

Less than significant impact. A significant impact would occur if the proposed project would include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the school district. The Project site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The proposed Project would involve the construction of a mixed-use boutique hotel and residential building, which would include 36 hotel rooms, five studio apartments, and five one-bedroom apartments. Although the proposed Project would not cause significant growth in the City's population (see *Threshold XIVa* in Section XIV, *Population and Housing*), the Project would result in an increase of on-site residents, which could potentially include school-age children, as compared to existing conditions. Therefore, students generated by the proposed Project would represent an incremental increase in the students served by LAUSD. However, in accordance with state law, the applicant would be required to pay school impact fees. Pursuant to §65995(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, with payment of school impact fees, the proposed Project would not place an unanticipated burden on fire protection services and would therefore not affect service ratios such that new or expanded schools would be needed. Impacts would be less than significant.

d) Parks?

Less than significant impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. The City's Department of Recreation and Parks provides stewardship over more than 16,000 acres of parkland, including 446 parks, 312 athletic fields, 423 playgrounds, 184 community and recreation centers, and 30 senior centers (City of Los Angeles 2018b). Based on an existing population of 4,040,079 residents, the City's current parkland ratio is approximately 3.96 acres of parkland per 1,000 residents (DOF 2019). The desired standard stated in the 1975 Quimby Act is three acres of parkland per 1,000 residents. By this guideline standard, the City of Los Angeles has an adequate amount of open space on a per capita basis.

As discussed in Section XIV, *Population and Housing*, the proposed Project would result in a net increase in the City's population of approximately 35 residents (including residents and employees of the hotel) and would incrementally increase the demand for usage of existing parks in the City. The proposed Project would provide 1,343 sf of open space for the residential units and would include 763 sf of roof deck area and 580 sf of private balconies, which would offset some demand on park and recreational facilities in the City. Furthermore, the Project site is located approximately 0.5 mile northwest of La Mirada Avenue Park, which includes outdoor

fitness equipment and a children's play area, and one mile southeast of the Barnsdall Art Park, which includes greenspace, a weekly farmer's market, art galleries, and performance spaces (City of Los Angeles 2020a and 2020b). The City's population with the proposed Project would be approximately 4,040,114 persons, which would result in the same parkland ratio as existing conditions of 3.96 acres of parkland per 1,000 residents. Because the City is well-served by open space on a per population basis, the proposed Project would not create unanticipated demand on City parks or cause substantial deterioration of existing parks such that new park facilities would be needed. Additionally, in accordance with the Quimby Act, the City assesses open space development fees for new residential development. Per LAMC §12.33, the proposed Project would be subject to a fee payment prior to the issuance of a certificate of occupancy for the purpose of acquiring, expanding and improving park and recreational facilities for new residents. The fee would be calculated by the City's Department of Recreation and Parks by determining the number of new non-exempt (pursuant to LAMC §12.33) residential units in the proposed Project and multiplying the number of units by the park fee per residential unit. Therefore, because the Project provides open space, would contribute to Quimby funds for the City via open space development fees (RCM-PS-3), and would not substantially impact the existing per capita parkland ratio, the proposed Project would not result in a need for new or physically altered parks. Impacts would be less than significant.

Regulatory Compliance Measures

RCM-PS-3: QUIMBY ACT - COMPLIANCE WITH LAMC SECTION 12.33

The Project shall comply with LAMC §12.33, which requires fee payment prior to issuance of a certificate of occupancy for the purpose of acquiring, expanding and improving park and recreational facilities for new residents.

e) Other public facilities?

Less than significant impact. A significant impact would occur if the proposed project would result in substantial employment or population growth that could generate a demand for other public facilities, including libraries, which exceed the capacity available to serve the Project site, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. Development of the proposed Project would result in incremental impacts to other City public services and facilities. Other commonly-used public facilities include libraries and medical facilities. As estimated in Section XIV, *Population and Housing*, the proposed Project would result in a net increase in the City population of approximately 23 residents. However, the Project site is in an urban area of Los Angeles, which is currently served by existing public libraries and public medical facilities, such as the Hollywood Regional Branch Library and Kaiser Permanente Medical Center, located approximately 1.4 miles and 0.9 mile (driving distance) from the Project site, respectively. Therefore, the proposed Project would not generate significant impacts to other public facilities and impacts to public facilities would be less than significant.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than significant impact. As discussed in Section XV, *Public Services*, the City's Department of Recreation and Parks provides stewardship over more than 16,000 acres of parkland, including 446 parks, 312 athletic fields, 423 playgrounds, 184 community and recreation centers, and 30 senior centers (City of Los Angeles 2018b). Based on an existing population of 4,040,079 residents (DOF 2019), the City's current parkland ratio is approximately 3.96 acres of parkland per 1,000 residents. The desired standard stated in the 1975 Quimby Act is three acres of parkland per 1,000 residents. By this guideline standard, the City of Los Angeles has an adequate amount of open space on a per capita basis.

As estimated in Section XIV, *Population and Housing*, the proposed Project would result in a net increase in the City's population of approximately 35 residents (including residents and employees of the hotel) and would therefore incrementally increase the demand for usage of existing parks in the City. The proposed Project would include approximately 1,343 sf of common open space (i.e., rooftop deck open space) and 546 sf of private open space (i.e., unit balconies) which would offset some demand for park and recreational facilities. Furthermore, the Project site is surrounded by a variety of parks including La Miranda Park and Barnsdall Art Park. The Project site is located approximately 0.5 mile northwest of La Mirada Avenue Park, which includes outdoor fitness equipment and a children's play area, and 1.0 mile southeast of the Barnsdall Art Park, which includes greenspace, a weekly farmer's market, art galleries, and performance spaces (City of Los Angeles 2020a and 2020b).

Because the City is well-served by open space on a per population basis, the proposed Project would not create unanticipated demand on City parks or cause substantial deterioration of existing parks such that new park facilities would be needed. With the proposed Project, the parkland ratio would remain at 3.96 acres of parkland per 1,000 residents. Additionally, in accordance with the Quimby Act, the City assesses open space development fees for new residential development.

Per LAMC §12.33, the proposed Project would be subject to a fee payment prior to the issuance of a certificate of occupancy for the purpose of acquiring, expanding and improving park and recreational facilities for new residents. The fee would be calculated by the City's Department of Recreation and Parks by determining the number of new non-exempt (pursuant to LAMC §12.33) residential units in the proposed Project and multiplying the number of units by the park fee per residential unit. Therefore, because the Project provides open space, would contribute to Quimby funds for the City via open space development fees, and would not substantially impact the existing per capita parkland ratio, implementation of the Project would not cause physical deterioration or require the expansion of existing recreational facilities. Impacts would be less than significant.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than significant impact. A significant impact may occur if the project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The Project would require general construction activities (i.e. grading, paving, building construction), which would require temporary worker vehicle trips and deliveries of materials to the site. These trips are expected to be nominal and temporary, lasting only the length of construction. The LADOT reviewed the proposed Project and determined that operation of the Project would result in a net increase of approximately 224 daily trips. Therefore, no Transportation or Access, Safety, and Circulation Assessment is required (Appendix E). As such, the Project would have a less than significant impact on the roadway circulation network.

Both North Western Avenue and West Harold Way include existing sidewalk infrastructure, although there are no existing bicycle lanes/facilities on North Western Avenue or West Harold Way. The nearest public transit stop is the Western/Sunset Metro station, located 100 feet south of the site and the Hollywood/Western Metro Red Line Station is located 0.2 mile north of the site. The Project would leave in place sidewalks along the Project frontages on North Western Avenue

and West Harold Way. The Project would not introduce features that would conflict with existing policies, plans, or programs for pedestrian, bicycle, or public transit services or reduce the performance or safety of such facilities. Furthermore, the number of additional transit users accommodated by the Project's residential and hotel uses would be nominal and would not impact the capacity of existing transit service. Because the Project would not conflict with any programs, plans or ordinances related to transit, bicycle or pedestrian facilities, no impact would occur.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than significant impact. SB 743 mandates that the CEQA Guidelines be amended to provide an alternative to level of service (LOS) for evaluating transportation impacts. The amended CEQA guidelines, specifically §15064.3, recommend the use of VMT for evaluating the transportation impacts of land use development. Currently, agencies may opt-in to applying VMT as the primary metric for transportation impact analysis; however, implementation is required statewide by July 1, 2020. The City of Los Angeles has recently implemented the VMT metric ahead of the July 1, 2020 compliance date.

The LADOT reviewed the proposed Project and determined that, although operation of the Project would result in a net increase in daily VMT of 224 daily trips as compared to existing conditions, no Transportation or VMT assessment is required because the Project would not generate a net increase of 250 or more daily vehicle trips (Appendix E). Therefore, the nominal amount of VMT generated by the Project would not result in a significant impact related to VMT. As such, because the Project would not conflict or be inconsistent with SB 743 and CEQA Guidelines §15064.3(b), this impact would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

d) Result in inadequate emergency access?

Less than significant impact. A significant impact could occur if a project include a new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project site access or other features were designed in such a way as to create hazard conditions. The LADOT reviewed the proposed Project and determined that the Project does not require an Access, Safety, and Circulation Assessment because the Project would not generate a net increase of 250 or more daily vehicle trips (Appendix E). No roads would be permanently closed as a result of construction or operation of the proposed Project, and no new intersections or roadways are proposed. The Project would construct two access ramps/driveways - one located off North Western Avenue to enter the ground floor parking lot and one on West Harold Way to access the subterranean parking garage. The access ramp/driveway on West Harold Way would be located at the existing curb cut, and the access ramp/driveway on North Western Avenue would require a new curb cut because the existing ingress/egress point is located further north than the proposed location of the new access ramp/driveway. The Project would be subject to LAFD review and approval of site plans to ensure that all required fire protection safety features, including adequate driveway access and emergency access, are included. Therefore, the proposed Project would not result in inadequate emergency access or introduce any design features or incompatible uses, such as sharp curves or dangerous intersections, that would substantially increase hazards. Furthermore, with implementation of RCM-TRA-1 and RCM-TRA-2, the Project's impacts related to site access, design hazards or incompatible uses would be less than significant.

Regulatory Compliance Measures

RCM-TRA-1: COMPLIANCE WITH THE LOS ANGELES PUBLIC WORKS DEPARTMENT

All roadway design, traffic signing and striping, and traffic control improvements relating to the proposed Project shall be constructed in accordance with applicable engineering standards and to the satisfaction of the City of Los Angeles Public Works Department. On-site traffic signing and striping plans should be submitted for City of Los Angeles approval in conjunction with detailed construction plans for the Project.

RCM-TRA-2: SIGHT DISTANCE STANDARDS

The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met in accordance with applicable City of Los Angeles/California Department of Transportation sight distance standards.

XVIII. TRIBAL CULTURAL RESOURCES

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

As of July 1, 2015, AB 52 of 2014 was enacted to expand CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "a Project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a Project that may have a significant effect on the environment" (PRC §21084.2). It further states that the

lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC §21084.3).

PRC §21074 (a)(1)(A) and (B) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC §5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC §5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project." Native American tribes to be included in the process are those that have requested notice of Projects proposed within the jurisdiction of the lead agency.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Less Than Significant Impact. AB 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site. An informational letter was mailed to a total of 11 Tribes known to have resources in this area, on May 14, 2020, describing the project and requesting any information regarding resources that may exist on or near the Project site. On May 29, 2020, one tribal response was received from the Gabrieleño Band of Mission Indians – Kizh Nation who submitted a formal request for tribal consultation under the provisions of CEQA for the mitigation of potential impacts to tribal cultural resources. On August 5, 2020, at approximately 1:00 pm, the City of Los Angeles Department of City Planning (Lead Agency) and the Gabrieleño Band of Mission Indians – Kizh Nation conducted an AB 52 Tribal Consultation that lasted approximately one hour. No mutual agreement was reached during the tribal consultation, and the City requested the Tribe provide substantial evidence in writing that the project location and trade route relative to the Project site is listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in PRC Section 5020.1(k) or that this resource was determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in

subdivision (c) of PRC Section 5024.1. The Tribe provided the City with additional maps, documents, and proposed mitigation measures for the proposed project on August 17, 2020. The City reviewed the additional information provided by the Tribe and determined that no substantial evidence was presented. No further consultation was conducted and the consultation was closed on October 21, 2020.

According to the Phase I Historical Resource Assessment prepared by Rincon Consultants, Inc, the existing duplex does not meet the eligibility requirements for listing on the NRHP or CRHR or as a City of Los Angeles Historic-Cultural Monument (Appendix C). As such, the property is not considered a historical resource for the purposes of CEQA. Moreover, the OHR concurred with the Phase I HRA prepared by Rincon Consultants, Inc and concluded on October 1, 2020, that the Project site is not a historical resource for purposes of CEQA. Therefore, no impact to historical resources would occur as a result of the Project. In 2020, the City of Los Angeles CRA published the *Historic Resources Survey Report: Hollywood Redevelopment Plan Area*, which documents the results of a study conducted by Architectural Resources Group, GPA Consulting, and Historic Resources Group between 2018 and 2020. This effort surveyed the entire Hollywood Redevelopment Area Survey Area but only recorded resources constructed between 1850 and 1980 that had been identified as significant within the historic contexts developed for SurveyLA. Per the Historic Resources Survey Plan, the nearest designated historic resource, which consists of residential structures, is located over 400 feet to the east, at 1514 North St. Andrews Place (City of Los Angeles CRA 2020). The nearest identified potentially historic resource (residential structures) is located at 5432 West Harold Way (City of Los Angeles CRA 2020). Due to the distance of the Project site, implementation of the Project would not alter any of the physical characteristics of the nearby historic resources, including through construction activities, vibration from off-road equipment, and operation of the proposed Project. Because the Project site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, the City would require conditions of approvals to avoid and minimize project impacts related to inadvertent discoveries of archaeological and paleontological resources and human remains. In addition, the City would require implementation of the following condition of approval to minimize project impacts related to inadvertent discoveries of tribal cultural resources. The required compliance with these conditions would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Therefore, impacts would be less than significant, and no mitigation measures are required.

Condition of Approval

TRIBAL CULTURAL RESOURCE INADVERTENT DISCOVERY

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities[16], all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: all California

16 Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity.

Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project.

- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Project permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
- The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
- Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as

part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the Project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. As discussed under Finding (a), above, the City conducted a consultation with the Gabrieleño Band of Mission Indians – Kizh Nation on August 5, 2020 beginning at approximately 1:00 p.m. and lasting for one hour. Upon review of supplemental materials submitted by the Tribe on August 17, 2020, the City determined that no substantial evidence was presented. No further consultation was conducted, and the consultation was closed on October 21, 2020. Because the Project site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, adherence to the conditions of approval for archeological resources, paleontological resources, tribal cultural resources, and human would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources, would be avoided or reduced to less-than-significant levels. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC §21083.2. Therefore, impacts would be less than significant, and no mitigation measures are required.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Less than significant impact. LADWP supplies water inside City limits. LADWP water sources between 2010 and 2014 included the Los Angeles Aqueducts (average of 29 percent), local groundwater (average of 12 percent), the Metropolitan Water District (average of 57 percent) and recycled water (two percent; LADWP 2016). The City of Los Angeles' 2015 Urban Water Management Plan (UWMP) reports total citywide water demand for 2015 totaled 513,540 acre-feet (AF) with 10 percent from the Los Angeles Aqueducts, 17 percent from local groundwater, 71 percent from Metropolitan Water District, and 2 percent from recycled water (LADWP 2016). The City's yearly water demand during an average weather year is projected to increase by 162,160 AF (or approximately 32 percent) to 675,700 AF in 2040. According to the 2015 UWMP,

the City expects to meet Project demand needs for the next 25 years (LADWP 2016). The proposed Project would demand an estimated 1.5 million gallons of water per year (4.6 AFY) according to CalEEMod estimates (Appendix B). The Project's water demand would represent approximately 0.003 percent of the projected increase in water demand of 162,160 AFY in 2040. Therefore, the proposed Project's water demand is within forecasted water supply required to for the service area and would not require the construction of new water supply facilities, or expansion of existing facilities. Impacts would be less than significant.

Wastewater

Less than significant impact. The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers in a 600-square-mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (mgd) of wastewater. The Project site lies within the area serviced by the Hyperion Sanitary Sewer System. Currently, the Hyperion Treatment Plant treats an average daily flow of 275 mgd on a dry weather day and has capacity to treat 450 mgd (LASAN 2020). Therefore, the remaining capacity of the Hyperion Treatment Plant is approximately 175 mgd.

The LAMC includes regulations that allow the City to assure available sewer capacity for new Projects by assessing fees for improvements to the infrastructure system. LAMC §64.15 requires that the City perform a Sewer Availability Request (SCAR) when any person seeks a sewer permit to connect a property to the City's sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR is an analysis of the existing sewer collection system to determine if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant. LAMC §64.11.2 requires the payment of a Sewerage Facilities Charge for new connections to the sewer system to assure the sufficiency of sewer infrastructure. In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. S006-0691). Per this Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.

Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution and minor off-site work associated with connections to the public main. Operation of the proposed Project would create demand for an estimated 1.0 million gallons of indoor water use per year, or approximately 2,744 gallons per day, according to CalEEMod estimates (see Appendix B). Assuming that 100 percent of indoor water use would subsequently be treated as wastewater, the 2,744 gallons of wastewater generated by the proposed Project would represent approximately 0.002 percent of the daily excess treatment capacity of 175 mgd at the Hyperion Treatment Plant. Therefore, the proposed Project would not require the construction of new treatment facilities, and existing wastewater treatment facilities would have adequate capacity to treat the wastewater produced by the proposed Project. Impacts would be less than significant.

Stormwater Drainage

Less than significant impact. As discussed in Section X, *Hydrology and Water Quality*, the proposed Project would comply with current regulations pertaining to retention/detention of site runoff into storm drains and receiving waters, as well as LID requirements that would apply to the construction and operation of the proposed Project to further reduce storm water runoff. Compliance with these requirements would reduce potential impacts to local storm water drainage facilities to a less than significant level and no new conveyance infrastructure would be required. Impacts would be less than significant.

Electric Power, Natural Gas, Telecommunications

Less than significant impact. The Project site is located in an existing developed area of the City of Los Angeles, which has existing infrastructure for electric power, natural gas, and telecommunications services. The proposed Project would involve construction of a four-story mixed-use building consistent with the site's zoning (see Section XI, *Land Use and Planning*). It would not cause substantial unplanned population growth (see Section XIV, *Population and Housing*), would not result in wasteful or inefficient use or energy (see Section VI, *Energy*), and would not require or result in the construction of new electric power, natural gas, or telecommunication facilities or expansion of existing facilities. As such, although the proposed Project would create an incremental increase in demand on these facilities but would not require new or expanded electric power, natural gas, or telecommunications facilities to serve the Project. Impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than significant impact. As discussed under *Threshold XIXa* in Section XIX, *Utilities and Service Systems*, LADWP supplies water inside City limits. As shown in Table 27, LADWP projects that water supplies will be sufficient to meet all demands through the year 2040 during normal, single dry year, and multiple dry year hydrologic conditions (LADWP 2016).

TABLE 27 WATER SUPPLY AND DEMAND IN SINGLE AND MULTIPLE DRY YEARS (AFY)

Year-Type	2020	2025	2030	2035	2040
Average Year					
Total Supplies	611,800	644,700	652,900	661,800	675,700
Total Demands	611,800	644,700	652,900	661,800	675,700
Single Dry Year					
Total Supplies	642,400	676,900	685,500	694,900	709.500
Total Demands	642,400	676,900	685,500	694,900	709.500
Multiple Dry Year (1st, 2nd, and 3rd Year Supply)					
Total Supplies	642,400	676,900	685,500	694,900	709.500
Total Demands	642,400	676,900	685,500	694,900	709.500

Note: Units are in acre-feet per year (AFY)
Source: LADWP 2016

The existing duplex on-site currently demands an estimated 0.2 million gallons of water per year (approximately 0.6 AFY), according to CalEEMod estimates (see Appendix B). The proposed pwould demand an estimated 4.6 AFY, according to CalEEMod estimations (Appendix B). Project water demand would represent approximately 0.003 percent of the projected increase in water demand of 162,160 AF from 2015 to 2040 for an average year. The Project would result in an estimated net increase in water demand which would comprise a very small fraction of the City's water demand. As discussed in Section XIV, *Population and Housing*, the anticipated population increase resulting from the Project has been accounted for in City and regional forecasts, therefore the anticipated water demand increase associated with the Project has been accounted for in the UWMP. Therefore, the proposed Project's projected water demand is within forecasted water supply. According to the 2015 UWMP, the City expects to meet Project demand needs for the next 25 years (LADWP 2016). Because sufficient water is available to serve the Project during average, single and multiple dry year conditions, new sources of water supply would be not required to meet Project water needs. Impact would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than significant impact. As discussed under *Threshold XIXa* in Section XIX, *Utilities and Service Systems*, the Project would create generate approximately 2,744 gallons of wastewater per day, according to CalEEMod estimates (see Appendix B). Currently, the Hyperion Treatment Plant treats an average daily flow of 275 mgd on a dry weather day and has capacity to treat 450 mgd City of Los Angeles (City of Angeles 2020). Therefore, the remaining capacity of the Hyperion Treatment Plant is approximately 175 mgd. The projected 2,744 gallons of wastewater generated by the proposed Project would represent approximately 0.002 percent of the daily treatment of 175 mgd of wastewater at the Hyperion Treatment Plant. Therefore, the Hyperion Treatment Plant would have adequate capacity to serve the Project, and impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than significant impact. LASAN manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN provides collection services primarily to single-family residences, while multi-family residences, such as apartments (e.g., the proposed Project), contract with a private company to collect and transport their materials for disposal or recycling.

The proposed Project has two components (construction and operation) that would result in the generation of solid waste. The handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project site. Construction of the proposed Project would also involve site preparation activities that would generate waste materials; however, construction would be temporary. In addition, the proposed Project would be required to comply with the City's Construction and Demolition (C&D) Waste Recycling Ordinance. All construction and demolition waste generated by the proposed Project would be required to be taken to a certified C&D waste processor.

Solid waste generated in the City is currently disposed of at the Sunshine Canyon Landfill. Table 28 summarizes the permitted daily throughput, estimated average waste quantities disposed, remaining capacity, and closure date for the landfill.

TABLE 28 SOLID WASTE DISPOSAL FACILITIES

Facility	Permitted Daily Throughput (tons/day)	Average Daily Waste Quantities Disposed (tons/day)	Estimated Remaining Daily Capacity (tons/day)[1]	Estimated Closure Date
Sunshine Canyon Landfill	12,100	6,469	5,631	2037

[1] Estimated remaining daily capacity was calculated by subtracting the average daily waste quantities disposed from the permitted daily throughput.

Sources: County of Los Angeles 2019; CalRecycle 2019

According to CalEEMod, existing uses generate approximately 0.4 ton of solid waste per year, and the proposed Project would generate approximately 11.7 tons of solid waste per year (see Appendix B). Therefore, the Project would result in a net increase of approximately 11.3 tons of solid waste disposal per year, or 0.03 ton per day. Solid waste generated by the Project would represent less than 0.01 percent of the estimated remaining daily capacity of 5,631 tons of waste per day at Sunshine Canyon Landfill. Furthermore, the proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, such as AB 939. Given that there is adequate remaining daily landfill capacity in the region to accommodate Project-generated waste, impacts related to solid waste and waste facilities would be less than significant.

Regulatory Compliance Measures

RCM-UTIL-1: COMPLIANCE WITH C&D WASTE RECYCLING ORDINANCE

The Project shall comply with the City's C&D Waste Recycling Ordinance, which requires all construction and demolition waste generated by the proposed Project to be taken to a certified C&D waste processor.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

The Project site is in an urban area of the Los Angeles and is not located in proximity to undeveloped wildland areas. According to CALFIRE, the Project site is not located in a Fire Hazard Severity Zone or Very High Hazard Severity Zone for wildland fires (CALFIRE 2007). The nearest Very High Hazard Severity Zone is located approximately 0.6 mile to the north. Therefore, the Project site is not located in or near a State Responsibility Area nor is the site classified as having a high fire hazard.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No impact. As discussed in Section XV, *Public Services*, the LAFD provides fire protection services and emergency response for the Project site and greater Los Angeles area. The LAFD also provides several fire development services to the City, including Fire Life Safety Plan Checks and Fire Life Safety Inspections which aim to enforce applicable standards of the California Fire Code (Title 24 Part 9) and the Los Angeles Fire Code concerning new construction and remodeling. Furthermore, the LAFD Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. In addition, as noted in Section IX, *Hazards and Hazardous Materials*, the Project site is located approximately 0.3 mile east of U.S. 101, which is designated by the Los Angeles County Public Works Department as a Freeway Disaster Route (County of Los Angeles 2008). Through site plan review, the proposed Project would maintain

adequate emergency access to the site and would not interfere with an emergency response plan or emergency evacuation plan. No impact would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No impact. Undeveloped wildland areas, streams, or rivers are not located on or adjacent to the Project site, and the Project site and surrounding areas do not experience high wind speeds, downslopes, downstream flooding, or landslides; therefore, the Project would not exacerbate wildfire risk or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Furthermore, the Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. No impacts would occur under *Threshold XX.b*, *Threshold XX.c*, and *Threshold XX.d*.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than significant impact. As discussed in Section IV, *Biological Resources*, the Project site lacks native habitat and does not include any mapped essential habitat connectivity areas in the immediate vicinity of the Project site. In addition, as discussed in Section V, *Cultural Resources*, Section VII, *Geology and Soils*, and Section XVIII, *Tribal Cultural Resources*, no known historical, archaeological or tribal cultural resources exist on the Project site. Therefore, the Project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than significant impact. Cumulative impacts are defined as two or more individual (and potentially less than significant) Project effects that, when considered together or in concert with other Projects, combine to result in a significant impact within an identified geographic area. In order for a Project to contribute to cumulative impacts, it must result in some level of impact on a Project-specific level. Additional pending Projects in the City of Los Angeles are included in Table 1 in Section 3.2.4, *Cumulative Development Projects*. The nearest Project in the immediate vicinity of the Project site is located at 1552 North Western Avenue and includes a change of use from a market to a trade school. The next closest Project is located at 1300 North Western Avenue and includes a 475-sf expansion of an existing 2,100-sf convenience store for off-site beer and wine sales.

As concluded in Sections I through XX, the Project would have no impact or a less than significant impact with respect to all environmental issues considered in this document. Cumulative impacts of several resource areas have been addressed in the individual resource sections, including air quality, greenhouse gases, noise, and transportation. As discussed in Section III, *Air Quality* and Section VIII, *Greenhouse Gas Emissions*, the proposed Project would result in less than significant impacts with respect to the generation of criteria air quality pollutants and GHG emissions. Therefore, the Project would not contribute to cumulative impacts related to these issues. As discussed in Section XIII, *Noise*, and Section XVII, *Transportation*, the Project would not generate a substantial number of vehicle trips. As such, the Project's contribution to cumulative noise and traffic impacts from additional vehicle trips would not be cumulatively considerable. Some of the other resource areas (agricultural and mineral) were determined to have no impact in comparison to existing conditions. As such, the Project would not contribute to cumulative impacts related to these types of issues. Other issues location specific impacts (e.g., geology, hazards, and hazardous materials) are by their nature Project specific to the area and impacts at one location do not add to impacts at other locations or create additive impacts. As such, the Project's contribution to cumulative impacts would be less than significant (not cumulatively considerable).

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than significant with mitigation incorporated. In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise. As detailed in the analysis in Section XIII, *Noise*, the proposed Project would not result, either directly or indirectly, in adverse hazards related to noise with implementation of Mitigation Measure NOI-1. As discussed in Section III, *Air Quality*, and Section IX, *Hazards and Hazardous Materials*, implementation of Mitigation Measure HAZ-1 would be required to minimize potential exposure of nearby sensitive receptors to ACMs and LBP during demolition activities. Therefore, with mitigation incorporated, the Project would have less than significant impacts on human beings.

Significance Determination: Less than Significant with Mitigation Incorporated

Mitigation Measures: Refer to Mitigation Measures HAZ-1 and NOI-1

Significance Determination after Mitigation: Less than Significant

INITIAL STUDY

5 PREPARERS AND PERSONS CONSULTED

Rincon Consultants, Inc. prepared this Initial Study. Persons involved in data gathering analysis, project management, and quality control are listed below. In addition, preparers of technical reports/studies for use in this Initial Study are included below.

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INITIAL STUDY

6 REFERENCES, ACRONYMS AND ABBREVIATIONS

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