



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

Sustainable Communities Environmental Assessment

Sunset Vine—SV2 Project

Case Number: ENV-2021-10589-SCEA

Project Location: 6260–6290 West Sunset Boulevard, 1460–1480 North Vine Street, and 6251–6165 Leland Way, Los Angeles, CA, 90028

Community Plan Area: Hollywood

Council District: 13—Soto-Martinez

Project Description: The Project includes the development of a new 201,134-square-foot, eight-story mixed-use building with a maximum height of approximately 98 feet. The new mixed-use building would include 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 reserved for Low Income units for a total of 34 affordable units) and 16,680 square feet of ground-floor commercial space within a 75,938-square-foot (1.74-acre) site located in the Hollywood Community Plan (Community Plan) area of the City of Los Angeles (City). The Project Site is currently developed with a 19-story tower located at the corner of Vine Street and Sunset Boulevard with 64 live-work units and 9,263 square feet of ground floor retail; a one-story commercial building fronting on Sunset Boulevard occupied by one restaurant space; a two-story commercial building along Sunset Boulevard occupied by two restaurant spaces; a two-story vacant commercial building (formerly Morgan Camera Shop) along Sunset Boulevard; a one-story vacant commercial building fronting on Vine Street; a one-story vacant commercial building fronting on Leland Way; and a one-story vacant duplex building on Leland Way. As part of the Project, the two commercial buildings fronting Sunset Boulevard, the one-story vacant commercial building fronting on Vine Street, the one-story vacant commercial building fronting on Leland Way, and the one-story vacant duplex on Leland Way would be demolished. The Project would retain the existing nineteen-story tower located at the corner of Vine Street and Sunset Boulevard and the former Morgan Camera Shop building. The Project would provide a total of 284 new parking spaces within two screened above grade parking levels and two subterranean parking levels. In addition, a total of 24,997 square feet of open space would be provided throughout the Project Site. Upon completion of the Project, total Project Site development, including existing uses to remain, would be 284,909 square feet of floor area with a site-wide FAR of 3.88:1.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

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September 2024

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1 INTRODUCTION

An application for the proposed Sunset Vine—SV2 Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA).

This Sustainable Communities Environmental Assessment (SCEA) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. As part of this SCEA, an Initial Study has been prepared (refer to Section 5, Environmental Impact Analysis) in accordance with CEQA (Public Resources Code [PRC] Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City used Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in this document.

Based on the analysis provided within this SCEA, the City has concluded that the Project qualifies as a Transit Priority Project (TPP), is consistent with an adopted Sustainable Communities Strategy (SCS) that has been accepted by the California Air Resources Board (CARB) as meeting the State's greenhouse gas (GHG) reduction targets, and that the Project would not result in significant impacts on the environment. This SCEA is intended as an informational document, which is ultimately required to be considered and adopted by the decision-making body of the City in conjunction with approval of the Project.

1.1 PURPOSE

CEQA was enacted in 1970 with several basic purposes, including: (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.

Public Resources Code Section 21155.2(b)(1) requires that an Initial Study be prepared for a SCEA. 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 a qualifying project meets certain criteria described below and the Initial Study shows that any potential significant effects would be avoided or mitigated to a point where clearly no significant effects would occur through project mitigation measures, a SCEA may be prepared. If it is determined in the Initial Study that there is

substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, an Environmental Impact Report (EIR) is normally required.¹

1.1.1 Senate Bill 375

The State of California adopted Senate Bill (SB) 375, also known as the “Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s GHG emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations to incorporate an SCS into the regional transportation plans to achieve their respective region’s GHG emission reduction targets set by the CARB. Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria. The SCEA is one of these streamlining tools.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On September 3, 2020, SCAG’s Regional Council adopted Resolution 20-624-1, which approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS, also known as Connect SoCal) in its entirety. For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035. SCAG’s resolution adopting the 2020–2045 RTP/SCS also determined that the SCS includes strategies to meet the requirements of SB 375 to achieve these GHG emission reduction goals and directed SCAG staff to submit the 2020–2045 RTP/SCS to CARB for review and certification in this regard. On October 30, 2020, pursuant to Executive Order No. G-20-239, CARB “accept[ed] the SCAG determination that its 2020 SCS would, when implemented, meet the emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels.”

On April 4, 2024, SCAG’s Regional Council adopted the 2024–2050 RTP/SCS (also known as Connect SoCal 2024). CARB has not accepted SCAG’s determination that the 2024–2050 RTP/SCS would meet the region’s GHG emissions reduction targets.

SB 375 allows the City, acting as Lead Agency, to prepare a SCEA as the environmental CEQA clearance for Transit Priority Projects (TPPs), as described below, that are consistent with the applicable RTP/SCS. As discussed above, CARB has yet to accept SCAG’s determination regarding the 2024–2050 RTP/SCS. As such, an analysis of the Project’s consistency with the 2024–2050 RTP/SCS in addition to the 2020–2045 RTP/SCS is also included herein for informational purposes.

¹ State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the lead agency when there is substantial evidence that the project may cause a significant effect on the environment: (A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project’s effects were adequately examined by an earlier EIR or negative declaration.

1.1.2 Purpose and Content of a SCEA

The purpose of a SCEA is to evaluate the environmental effects of a project in accordance with CEQA and PRC Sections 21155 and 21155.2. In addition, a SCEA must evaluate a project's consistency with SCAG's RTP/SCS and incorporate feasible mitigation measures, performance standards, and/or criteria from prior applicable EIRs into the proposed project.

The SCEA form of CEQA documentation was established by SB 375 to provide streamlined environmental review for certain TPPs. TPPs are residential or mixed-use residential projects that provide a minimum net density of 20 dwelling units per acre and are located within one-half mile of a major transit stop or high-quality transit corridor (Public Resources Code Section 21155(b)). The intent of the CEQA streamlining provisions is to reduce documentation and redundancy and to provide an incentive for TPPs that are consistent with a larger effort to reduce GHG emissions by integrating transportation and land use planning.

A SCEA is comparable to a Mitigated Negative Declaration (MND) in that the lead agency must find that all potentially significant impacts of a project have been identified, adequately analyzed, and mitigated to a less than significant level. A SCEA must also identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be considered cumulatively considerable. Also, a SCEA is not required to reference, describe, or discuss growth-inducing impacts and project-specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network.

A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA. The lead agency's decision to review and approve a project with a SCEA shall be reviewed under the substantial evidence standard.

1.2 ORGANIZATION OF THE SCEA

This SCEA is organized as follows:

1 INTRODUCTION

The Introduction describes the purpose and content of the SCEA and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

The Executive Summary provides Project information, identifies key areas of environmental concern, and includes a determination of whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

This section provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 SCEA CRITERIA AND CONSISTENCY ANALYSIS

The SCEA Criteria and Consistency Analysis demonstrates that the Project qualifies as a Transit Priority Project and is consistent with the Sustainable Communities Strategy.

5 EVALUATION OF ENVIRONMENTAL IMPACTS

The Evaluation of Environmental Impacts contains the completed Initial Study Checklist and the environmental factors that would be potentially affected by the Project. The Initial Study Checklist includes existing mitigation measures from the RTP/SCS and any other relevant plans and demonstrates why they have or have not been incorporated into the Project.

6 MITIGATION MONITORING PROGRAM

Outlines the implementation of the Project's mitigation measures and project design features and identifies enforcement and monitoring agencies responsibilities.

7 APPENDICES

Includes various documents, technical reports, and information used in preparation of the SCEA and can be found in the case file at the City of Los Angeles Department of City Planning.

1.3 CEQA PROCESS

Below is a general background and overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (<https://opr.ca.gov/ceqa/guidelines/>).

The City has prepared this SCEA to determine if the Project qualifies as a TPP, is consistent with the SCS, and if it may have a significant effect on the environment. This SCEA determined that the Project meets the criteria for a SCEA and would not have a significant effect on the environment. A Notice of Completion and Availability (NOC/NOA) is circulated to notify public agencies and the general public that a draft of the SCEA is available for review and comment for a period of at least 30 days. CEQA requires that the legislative body (i.e., City Council) or planning commission of the lead agency conduct a public hearing and consider all comments received prior to acting on the SCEA. The lead agency may then adopt the SCEA, provided it finds the following:

- a. All potentially significant or significant effects required to be identified in the Initial Study have been identified and analyzed, and
- b. With respect to each significant effect on the environment required to be identified in the Initial Study, either of the following apply:
 - i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
 - ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

2 EXECUTIVE SUMMARY

PROJECT TITLE	Sunset Vine—SV2 Project
ENVIRONMENTAL CASE NO.	ENV-2021-10589-SCEA
RELATED CASES	CPC-2021-10588-SPR-MCUP-VHCA-DB
PROJECT LOCATION	6260–6290 W. Sunset Boulevard, 1460–1480 N. Vine Street, and 6251–6165 Leland Way, Los Angeles, CA 90028
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Regional Center Commercial
ZONING	C4-2D-SN, [Q]C4-2D-SN and R4-2D
COUNCIL DISTRICT	Council District 13
LEAD AGENCY	City of Los Angeles
CITY DEPARTMENT	Department of City Planning
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the environmental factors listed below would be potentially affected by the Project, as indicated by the checklist on the following pages (refer to Section 5, Environmental Impact Analysis, of this SCEA).

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Mandatory Findings of Significance |
| | | <input checked="" type="checkbox"/> None Identified |

DETERMINATION

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 the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified “residential or mixed use residential project” that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

Heather Bleemers, Senior City Planner
PRINTED NAME, TITLE

September 24, 2024
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 than 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. Section 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 which 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 significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Sunset Vine—SV2 Project (Project) includes the development of a new 201,134-square-foot, eight-story mixed-use building consisting of 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 reserved for Low Income units for a total of 34 affordable units) and 16,680 square feet of ground-floor commercial space within a 75,938-square-foot (1.74 acres) site located at 6260–6290 W. Sunset Boulevard, 1460–1480 N. Vine Street, and 6251–6165 Leland Way (Project Site) in the Hollywood Community Plan area of the City of Los Angeles (City).

The Project Site is currently developed with a 19-story tower located at the corner of Vine Street and Sunset Boulevard with 64 live-work units and 9,263 square feet of ground floor retail; a one-story commercial building fronting Sunset Boulevard occupied by one restaurant; a two-story commercial building along Sunset Boulevard occupied by two restaurants; a two-story vacant commercial building (known as the Morgan Camera Shop building) along Sunset Boulevard; a one-story vacant commercial building fronting on Vine Street; a one-story vacant commercial building fronting on Leland Way; and a one-story vacant duplex on Leland Way.

The Project would include the demolition of the two commercial buildings on Sunset Boulevard, the one-story vacant commercial building on Vine Street, the one-story vacant commercial building on Leland Way, and the one-story vacant duplex on Leland Way. The Project would retain the existing 19-story tower located at the corner of Vine Street and Sunset Boulevard and the vacant commercial building along Sunset Boulevard (the Morgan Camera Shop building). The Project would provide a total of 284 parking spaces located in two screened above-grade levels and two subterranean parking levels. In addition, a total of 24,997 square feet of open space would be provided throughout the Project Site, in compliance with the Los Angeles Municipal Code (LAMC) open space requirements. Upon completion of the Project, total Project Site development, including existing uses to remain, would be 284,909 square feet of floor area with a site-wide floor area ratio (FAR) of 3.88:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site consists of nine adjoining parcels located at 6260–6290 W. Sunset Boulevard, 1460–1480 N. Vine Street, and 6251–6165 Leland Way within the Hollywood Community Plan area of the City. As shown in Figure 1 on page 9, the Project Site is bounded by Sunset Boulevard to the north, Leland Way to the south, Vine Street to the west, and a multi-family residential apartment building east of the Project Site.

Primary regional access is provided by the Hollywood Freeway (US-101), located approximately 0.45 mile north of the Project Site. Major arterials providing regional access to the Project Site include Sunset Boulevard and Vine Street. The Project Site also has convenient access to a variety of public transit options provided by the Los Angeles Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, the Project Site is located near several bus lines,

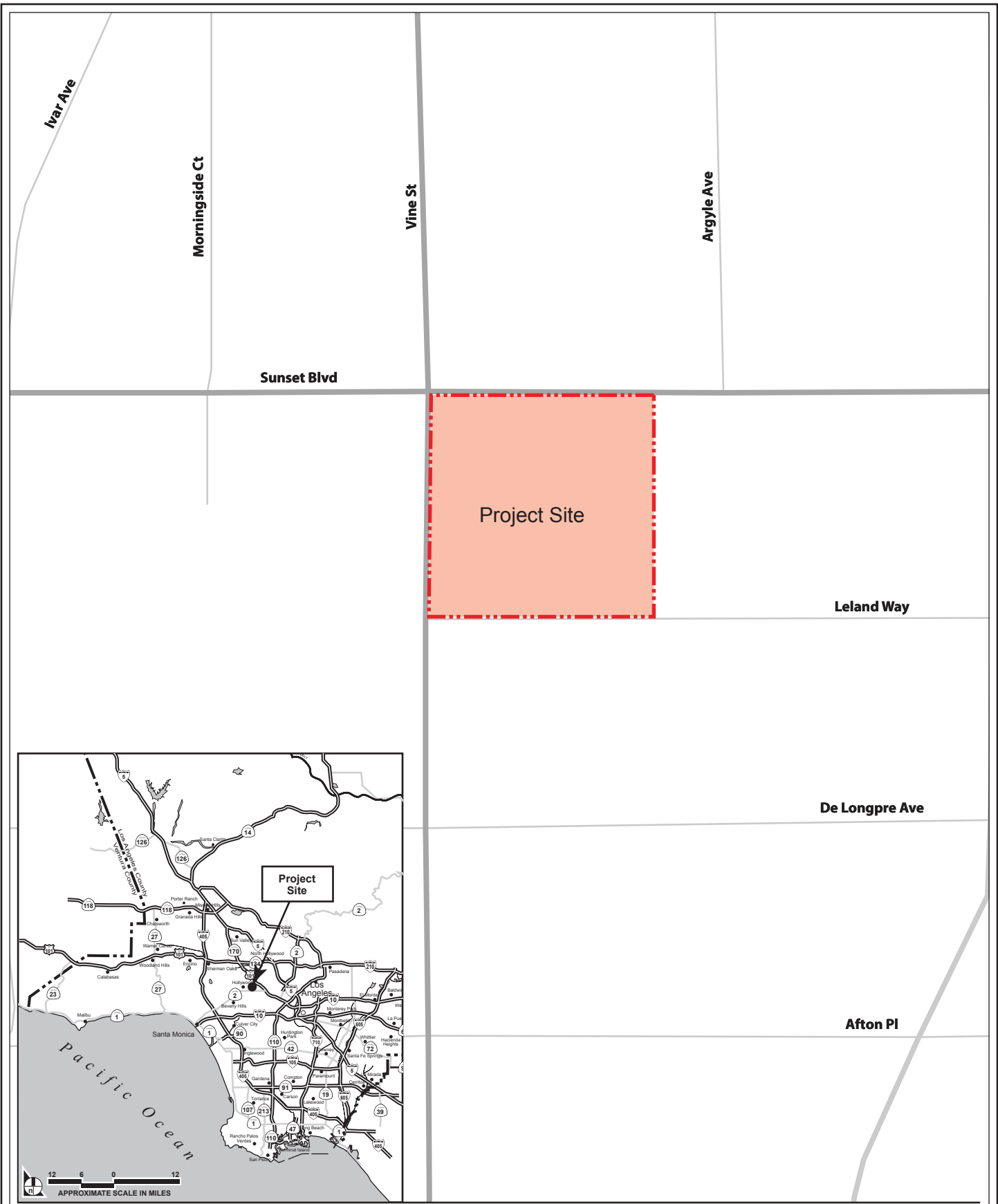


Figure 1
Project Location Map

Source: Google Earth Pro of Google Maps, 2024.

including Metro Bus Lines 2 (USC-Westwood via Sunset Boulevard); 180 (Hollywood-Glendale-Pasadena via Los Feliz-Colorado); 210 (Hollywood/Vine Station-La Cienega Station via Hollywood Boulevard-Fairfax Avenue); and 222 (Lankershim/Tuxford-Burbank Airport-Hollywood Way and Cahuenga Boulevard). Additional transit options include LADOT DASH Bus Service lines BC (Beachwood Canyon), HW (Hollywood), and HWL (Hollywood/Wilshire) and Metro Rail B (Downtown Los Angeles-North Hollywood) Line.

3.2.2 Existing Conditions

As shown in Figure 2 on page 11, the Project Site is currently developed with a 19-story tower located at the corner of Vine Street and Sunset Boulevard with 64 live-work units (69,468 square feet of residential floor area) and 9,263 square feet of ground floor retail; two commercial buildings fronting on Sunset Boulevard occupied by restaurants that together comprise approximately 6,202 square feet; a two-story vacant commercial building (the Morgan Camera Shop building) fronting Sunset Boulevard comprising approximately 5,044 square feet; a one-story vacant commercial building with approximately 3,234 square feet of floor area fronting on Vine Street; a one-story vacant commercial building fronting on Leland Way comprising approximately 1,652 square feet; and a one-story vacant duplex building on Leland Way comprising approximately 2,174 square feet.

The Project Site is located within the Hollywood Community Plan area and has a General Plan land use designation of Regional Center Commercial. The Project Site is comprised of three zoning designations: C4-2D-SN (Commercial, Height District 2 with Development Limitation, Sign District), [Q]C4-2D-SN (Q Condition, Commercial, Height District 2 with Development Limitation, Sign District), and R4-2D (Residential and Height District 2 with Development Limitation). The C4 zone permits a wide array of land uses including commercial, office, multi-family residential, retail, and hotel uses, while the R4 zone permits high-density residential uses. The SN designation indicates that the Project Site is located within the Hollywood Signage Supplemental Use District. The [Q] conditions permit adaptive reuse of the existing nineteen-story tower into live-work units and for construction of new ground floor retail. The “D” limitation restricts the floor area ratio to 2.3 times the buildable area on the portion of the Project Site zoned [Q]C4-2D-SN and restricts the floor area ratio to 2 times the buildable area on the remaining portions of the Project Site zoned C4-2D-SN and R4-2D.

The Project Site is also located within a Transit Priority Area pursuant to Senate Bill 743,² the Hollywood Redevelopment Project Area, the Los Angeles State Enterprise Zone, and a Tier 3 Transit Oriented Communities (TOC) Area.

² SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code Section 21099(d) states: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” TPAs are areas within one-half mile of a major transit stop that are existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.

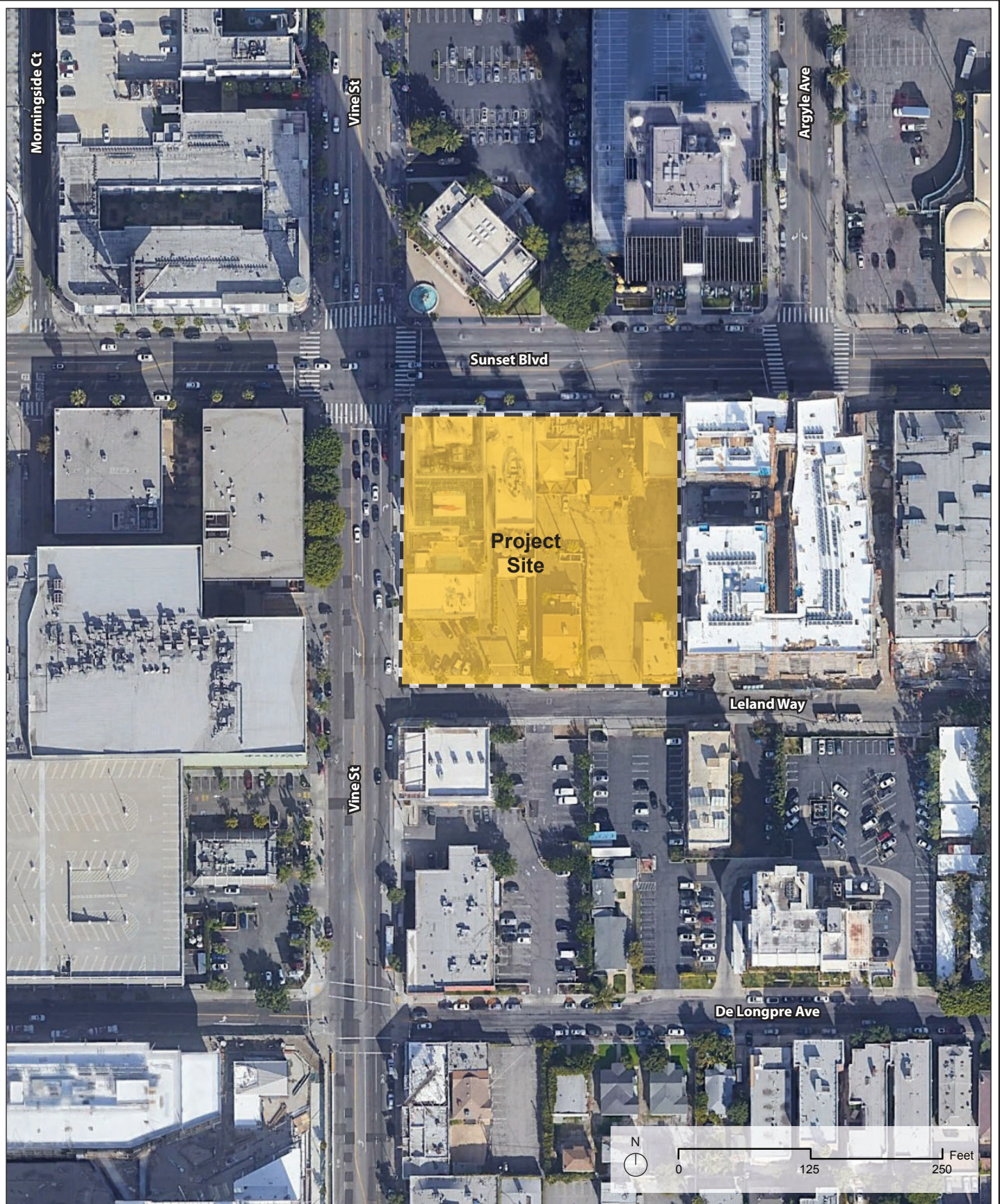


Figure 2
Aerial Photograph of the Project Site and Vicinity

Additionally, per Assembly Bill (AB) 2097, the Project is not required to provide parking as it is a mixed-use project with residential and commercial uses. Specifically, on September 22, 2022, AB 2097 was adopted by the State of California and subsequently added to California Government Code Section 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within 0.5 mile of a major transit stop.³

3.2.3 Surrounding Land Uses

The Project Site is located within the vibrant commercial area along Sunset Boulevard in the Hollywood Community Plan area. As illustrated in Figure 2 on page 11, the area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential and commercial uses. Specifically, land uses located adjacent to the Project Site include a Chase Bank and the 21-story Sunset Media Center office building to the north, across Sunset Boulevard; a multi-family residential apartment building directly east of the Project Site; a FedEx Office Print and Ship Center to the south, across Leland Way; and the Bank of America Financial Center and Arclight Cinemas located west of the Project, across Vine Street. The surrounding uses are designated as Regional Commercial and are zoned [Q]C4-2D-SN, C4-2D-SN, and R4-2D.

3.3 DESCRIPTION OF PROJECT

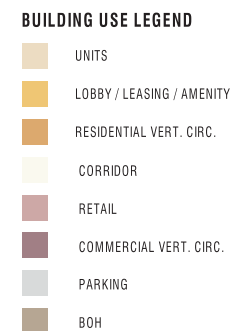
3.3.1 Project Overview

The Project includes the development of a new 201,134-square-foot mixed-use building consisting of 170 new residential units (including 26 Very Low-Income units and 8 Low Income units) and approximately 16,680 square feet of ground-floor commercial space, as summarized in Table 1 on page 12. The residential uses would be comprised of 28 studio units, 96 one-bedroom units, and 46 two-bedroom units. As shown on Figure 3 on page 14, the 8-story mixed-use building would rise to a maximum of 98 feet in height. As shown in Figure 4 on page 15, the ground floor level of the proposed building would contain commercial space as well as ancillary residential uses, including lobby areas and a mail room. The residential units and amenities would be provided primarily on Levels 3 through 8 as shown on Figure 5 on page 16. The Project would provide a total of 284 parking spaces located in two above-grade retail designated parking levels and two subterranean residential designated parking levels. Additionally, the Project would provide a total of 24,997 square feet of open space throughout the Project Site.

³ AB 2097 defines a major transit stop as a site containing any of the following: i) an existing rail or bus rapid transit station; ii) a ferry terminal served by either a bus or rail transit service, or iii) 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 hours 6:00 a.m. and 9:00 a.m. and between 3:00 p.m. and 7:00 p.m. For overlapping local/express/bus rapid transit lines, SCAG and the City of Los Angeles recognize the combined routes to calculate the headway frequency ("Methodology for Determining Bus Transit Service Levels; Implementation of Rapid Bus Provisions of the Transit Oriented Communities Program," Los Angeles Department of City Planning, April 16, 2024). As previously described, the Project Site is served by a variety of public transit options, including Metro Bus Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line. All public transit options are within 0.5 mile from the Project Site and provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.

Table 1
Summary of Proposed Floor Area

Land Use	Floor Area^a (sf)
Existing	
Sunset and Vine Tower	Residential: 69,468 sf (64 live-work units) Commercial: 9,263 sf
Other Residential Use within Project Site (vacant duplex)	2,174 sf (2 units)
Other Commercial Uses within Project Site	16,132 sf ^b
Existing to be Removed^c	
Commercial	11,088 sf
Residential (vacant duplex)	2,174 sf (2 du)
Existing to be Retained	
Sunset and Vine Tower	Residential: 69,468 sf (64 live-work units) Commercial: 9,263 sf
Other Commercial Use within Project Site (Morgan Camera Shop building)	5,044 sf
Proposed	
Residential	184,454 sf (170 du)
Retail	16,680 sf
Total Net New Floor Area	201,134 sf
Total Project Floor Area within Project Site	284,909 sf
<p><i>sf = square feet</i> <i>du = dwelling unit</i></p> <p>^a Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</p> <p>^b Includes: two commercial buildings fronting Sunset Boulevard that are currently occupied by restaurants and that together comprise approximately 6,202 square feet; a two-story vacant commercial building (the Morgan Camera Shop building) fronting Sunset Boulevard that comprises approximately 5,044 square feet; a one-story vacant commercial building fronting Vine Street that comprises approximately 3,234 square feet; and a one-story vacant commercial building fronting Leland Way that comprises approximately 1,652 square feet.</p> <p>^c For purposes of the environmental impact analyses included in Section 5, Environmental Impact Analysis, of this SCEA, when accounting for the existing uses to be removed, only the buildings that are currently occupied or that were occupied within the last year are considered and “credit” is taken for their removal. This includes the two commercial buildings fronting Sunset Boulevard that are currently occupied by restaurants and that together comprise approximately 6,202 square feet; a one-story vacant commercial building fronting Vine Street that comprises approximately 3,234 square feet; and a one-story vacant commercial building fronting Leland Way that comprises approximately 1,652 square feet (vacant since May 2023).</p> <p>Source: Eyestone Environmental, 2024.</p>	



Page 16

The Project would include the demolition of the two commercial buildings on Sunset Boulevard occupied by restaurants, the one-story vacant commercial building on Vine Street, the one-story vacant commercial building on Leland Way, and the one-story vacant duplex on Leland Way. The Project would retain the existing 19-story tower located at the corner of Vine Street and Sunset Boulevard and the vacant commercial building along Sunset Boulevard (formerly the Morgan Camera Shop). Upon completion of the Project, total Project Site floor area, including existing uses to remain, would be 284,909 square feet with a site-wide FAR of 3.88:1.

3.3.2 Design and Architecture

As shown in Figure 6 and Figure 7 on pages 18 and 19, the proposed mixed-use building would create a cohesive and modernized architectural development compatible with the existing buildings to remain. The mixed-use building would include ground floor floor-to-ceiling glass windows, unified landscaping along the perimeter of the Project Site, glass railings for balconies on the upper levels. In particular, the building would be designed as an extension of the existing Sunset and Vine tower located at the northwest portion of the Project Site. An external bridge would connect the existing Sunset and Vine tower mezzanine level to the mixed-use building's courtyard on Level 3 to allow residents of the existing tower to use the new amenities. The Project would feature various openings throughout the building in the form of amenity terraces and balconies to create a cascading edge similar to the retail and residential uses in the vicinity of the Project Site. Open-air common spaces with landscaped and programmed elements would be scattered throughout the building. The design alternates between different textures, colors, materials, and distinctive architectural treatments including aluminum, glass, concrete, and metal design elements.

3.3.3 Open Space and Landscaping

LAMC Section 12.21 G requires open space for new developments with six or more dwelling units. Per LAMC Section 12.21 G, there shall be 100 square feet of open space provided for each residential unit having less than three habitable rooms; 125 square feet of open space provided for each residential unit containing three habitable rooms; and 175 square feet of open space provided for each residential unit containing more than three habitable rooms. The Project is required to provide a total of 18,150 square feet of open space. The Project would provide a minimum of 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck on Level 3, and 4,538 square feet of interior tenant resident common areas on Levels 3 and 5, which could include a clubroom, clubhouse, and fitness center. As shown in Figure 8 on page 20, an external bridge would connect the existing Sunset and Vine tower mezzanine level to the proposed mixed-use building's courtyard on Level 3 to allow residents of the existing tower to use the new amenities.

Pursuant to LAMC Section 12.21.G.2(a)(3), a minimum of 25 percent of the required common open space must be landscaped. Therefore, approximately 2,269 square feet of landscaped area is required and would be provided as part of the Project. Extensive landscaping would be provided at the Project's ground floor, including along the sidewalk and in the required front yards. In addition, the Project's interior courtyard and pool deck courtyard would be landscaped with ornamental trees and/or other plantings.



Figure 6
Conceptual Rendering of Corner of Vine Street and Leland Way



Figure 7
Conceptual Rendering of Sunset Boulevard



Figure 8
Conceptual Rendering—Courtyard

The Project would remove four existing on-site trees and four street trees, none of which are protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873. Pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the on-site trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. Overall, the Project would provide 56 new trees on the ground level and Level 3. No street trees may be removed without prior approval of Urban Forestry based on compliance with LAMC Section 62.169 and 62.170 and applicable findings.

3.3.4 Access, Circulation, and Parking

Vehicular access to the proposed parking would be provided off two driveways on Leland Way located to the south of the Project Site, where one parking entry would be designated for residential uses and the other parking entry would be designated for commercial uses. Primary pedestrian access to the residential uses would be provided along Leland Way.

As discussed above, per AB 2097, the Project is not required to provide parking as it is a mixed-use project with residential and commercial uses. However, the Project would provide a total of 284 new vehicular parking spaces within two screened above-grade parking levels and within two subterranean parking levels. Further, 70 of the Project's 284 parking spaces would be designated as electric vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 37 of the spaces would be equipped with EV Charging Stations. In addition, in accordance with the requirements of the LAMC, 120 residential bicycle parking spaces (including 10 short-term and 110 long-term spaces) and 18 commercial bicycle parking spaces (including 9 short-term and 9 long-term) would be provided.

3.3.5 Density, FAR, and Setbacks

The permitted density for a mixed-use project in the C4 zone is one unit per 200 feet of lot area, pursuant to LAMC Section 12.22.A.18. The permitted density in the R4 zone portion of the Project Site is one dwelling unit per 200 square feet of lot area.⁴ Accordingly, 347 base dwelling units are permitted on the Project Site. As illustrated in Table 2 on page 22, the Project Site's density of 234 units (170 new units plus the 64 existing units to remain) is below the permitted base density for the Project Site.

The FAR in the C4-2D-SN and R4-2D zones is limited to 2 times the buildable area, pursuant to Ordinance No. 165652 (effective May 9, 1990). In the C4-2D-SN zone, buildable area is the same as lot area. In the R4-2D zone, buildable area is the lot area excluding those portions of the lot which must be reserved for setbacks based on a one-story building. The permitted floor area in the [Q]C4-2D-SN zone is 2.3 times the buildable area based on the "D" limitation established in Case No. APCC-2002-7302-ZC-SPE-SPP. In the [Q]C4-2D-SN zone, buildable area is the same as lot area. As discussed below, the Project would use an off menu density bonus incentive to permit a floor area ratio of 3.88:1 in lieu of the otherwise permitted 2:1. The Project requests an on menu density bonus incentive to average floor area across the Project Site's different zoning designations.

⁴ The Project Site, including the R4 zoned portion, is designated Regional Center Commercial, which permits a density of one unit per 200 square feet of lot area for a mixed-use development. Pursuant to State Density Bonus law, the permitted density is the greater of the zoning or general plan. In this case, the general plan permits greater density than the underlying zoning.

Table 2
Permitted Residential Density

Zone Designation	Lot Area	Density Ratio	Base Density
[Q]C4-2D-SN	32,628 sf	1 du per 200 sf	164 du
C4-2D-SN	22,889 sf	1 du per 200 sf	115 du
R4-2D	13,632 sf	1 du per 200 sf	67 du
Totals	69,149 sf	—	347du
<hr/> <i>du = dwelling units</i> <i>sf = square feet</i> <i>Source: Eyestone Environmental, 2024.</i>			

As determined by the City Department of Building and Safety, Sunset Boulevard and Leland Way are the front yards, and Vine Street and the eastern property line are side yards. No yard is required for the portion of the Project Site on Sunset Boulevard and Leland Way located within the C4 zones. A 15-foot front yard is required and provided on the portion of the Project Site zoned R4 along Leland Way.

No side yard is required along Vine Street for ground floor commercial use. Pursuant to LAMC Section 12.22.A.18(c)(3), no yard requirements apply to the residential portions of mixed-use buildings in the C4 zone that abut a street provided that the first floor is used for commercial uses or for access to the residential portions of such buildings. Along the eastern property line, the Project requests a density bonus waiver of development standard to permit a 0-foot side yard setback in the C4 zoned portion.

3.3.6 Lighting and Signage

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto neighboring properties. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include digital, flashing or mechanical signage. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating offsite glare. Illumination used for Project signage would comply with light intensity limits set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

3.3.7 Site Security

The Project would include various security features throughout the Project Site. A closed-circuit camera system would be installed, and a keycard would be required for the residential uses. In addition, the building, walkways, and entry points would be properly lit to further the safety and visibility of the Project Site. Furthermore, the design of the Project would enhance safety by reducing dark corners and inconspicuous areas. In addition, the Project would provide a vehicle gate at the transition from commercial parking to residential parking areas of the structure.

3.3.8 Sustainability Features

The Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would also comply with the City's Ordinance No. 187,714 (passed in December 2022), which requires all newly constructed buildings to be all electric. Cooking equipment contained within kitchens in a public use area, such as restaurants, commissaries, cafeterias, and community kitchens is exempt as long as electrical infrastructure is installed. The sustainability features to be incorporated into the Project would include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star-labeled appliances; and drought tolerant planting. Moreover, the Project would increase electrification by installing space heating and residential appliances (cooking, clothes dryers) powered by electricity while restaurant cooking will be powered by natural gas. In addition, the Project would comply with the City's EV charging station requirements, which exceed California Building Code Title 24 requirements.

3.3.9 Anticipated Construction Schedule and Parking Phasing

Construction of the Project would commence with demolition of the existing buildings and surface parking areas. This phase would be followed by grading and excavation for the subterranean parking, which would extend to a depth of up to 28 feet below existing grades for the subterranean levels and building foundations. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2024 and be completed in 2026. It is estimated that approximately 40,123 cubic yards of earth materials would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.22.A.25, Density Bonus Compliance Review, in exchange for setting aside a minimum of 15 percent of the proposed density, equal to a minimum of 26

units for Very Low Income Households, 8 units for Low Income Households, and with the following incentives and waivers:

- On-menu incentive to average the floor area, density, open space and parking over the Project Site, and permit vehicular access from a less restrictive zone to a more restrictive zone;
 - Off-menu incentive to permit a floor area ratio of 3.88:1 in lieu of the otherwise permitted 2:1;
 - Off-menu incentive to permit greater than 10,000 square feet of non-residential floor area on the portion of the project subject to the D Limitation is Ordinance 177584;
 - Waiver of Development Standard to permit a 0-foot side yard in lieu of 11 feet otherwise required along the easterly property line;
 - Waiver of Development Standard to permit a reduced building separation between the existing buildings and the new building of 0 feet in lieu of the 22 feet separation otherwise required.
 - Waiver of Development Standard to permit vehicular access from a less restrictive zone (C4 zone) to a more restrictive zone (R4 zone).
- Pursuant to LAMC Section 12.24.W.1 a Main Conditional Use Permit for the onsite sale and consumption of alcoholic beverages within the Project’s new commercial spaces.
 - Pursuant to LAMC Section 16.05, Site Plan Review for a project which creates, or results in an increase of 50 or more dwelling units;
 - Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route approval, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). No responsible agency has been identified for the Project.

4 SCEA CRITERIA AND CONSISTENCY ANALYSIS

4.1 TRANSIT PRIORITY PROJECT CRITERIA

Senate Bill (SB) 375 provides CEQA streamlining benefits to qualifying Transit Priority Projects (TPPs). Section 21155(b) of the Public Resources Code defines a TPP for SCEA purposes as a project that meets the following three criteria:

1. Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75);
2. Provides a minimum net density of at least 20 dwelling units per acre; and
3. Is located within one-half mile of a “major transit stop” or “high-quality transit corridor” included in SCAG’s RTP/SCS.

Consistency with Criterion #1: Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75)

The Project would construct a new mixed-use building on the Project Site that would contain a floor area of 201,134 square feet, including 184,454 square feet of residential uses (170 new residential units) and 16,680 square feet of commercial space. Based on the proposed uses, the Project contains approximately 91.7 percent residential use ($184,454 \text{ square feet} \div 201,134 \text{ square feet} = 0.917 \times 100 = 91.7\%$) and 8.3 percent non-residential uses ($16,680 \text{ square feet} \div 201,134 \text{ square feet} = 0.0829 \times 100 = 8.29\%$). ***Thus, the Project would contain at least 50 percent residential use based on total building square footage and would be consistent with Criterion #1.***

Consistency with Criterion #2: Provides a minimum net density of at least 20 units per acre.

The Project proposes 170 dwelling units on a 1.74 acre (75,938 square-foot) site, resulting in an overall net residential density of 97.7 units per acre ($170 \text{ units} \div 1.74 \text{ acres} = 97.7 \text{ units per acre}$). ***Thus, the Project would provide a minimum net density of at least 20 units per acre and would be consistent with Criterion #2.***

Consistency with Criterion #3: Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

A major transit stop is defined in PRC Section 21064.3 as a stop containing a rail or bus rapid transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with headways of 15 minutes or less during the morning and afternoon peak hours of 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M. For overlapping local/express/bus rapid transit lines, SCAG

and the City of Los Angeles recognize the combined routes to calculate the headway frequency.⁵ Furthermore, pursuant to PRC Section 21155(b), major transit stops that are identified in the applicable regional transportation plan are also included. A high-quality transit corridor is defined in PRC Section 21155(b) as “[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.”

As previously described, the Project Site is served by a variety of public transit options, including Metro Bus Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line. All public transit options are within 0.5 mile from the Project Site and provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. (See the Transportation Assessment included in Appendix L.1 of this SCEA). ***Accordingly, the Project meets the statutory definition of being located within 0.5 mile from a high quality transit corridor and the Project is consistent with Criterion #3.***

4.2 SUSTAINABILITY COMMUNITIES CONSISTENCY ANALYSIS

SB 375 provides CEQA streamlining benefits to qualifying TPPs which demonstrate consistency with a Sustainable Communities Strategy (SCS), which, if implemented, would achieve the State’s greenhouse gas (GHG) reduction targets. For purposes of projects in the SCAG region, a qualifying TPP must demonstrate consistency with the general use designation, density, building intensity, and applicable policies specified for the project area in SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

SCAG’s 2020–2045 RTP/SCS was adopted by SCAG’s Regional Council on September 3, 2020, and on October 30, 2020, the California Air Resources Board (CARB) accepted SCAG’s determination that the 2020–2045 RTP/SCS would, if implemented, achieve the GHG emission reduction targets for year 2035.

On April 4, 2024, SCAG’s Regional Council adopted the 2024–2050 RTP/SCS (also known as Connect SoCal 2024). However, CARB has not yet accepted SCAG’s determination that the 2024–2050 RTP/SCS would, if implemented, achieve the GHG emission reduction targets. As such, both SCAG’s 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are considered in this discussion and throughout this SCEA.

SCAG’s RTP/SCS presents strategies and measures that are consistent with local jurisdictions’ land use policies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). It is important to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about what type of development goes where.

⁵ Los Angeles Department of City Planning, Methodology for Determining Bus Transit Service Levels; Implementation of Rapid Bus Provisions of the Transit Oriented Communities Program, April 16, 2024.

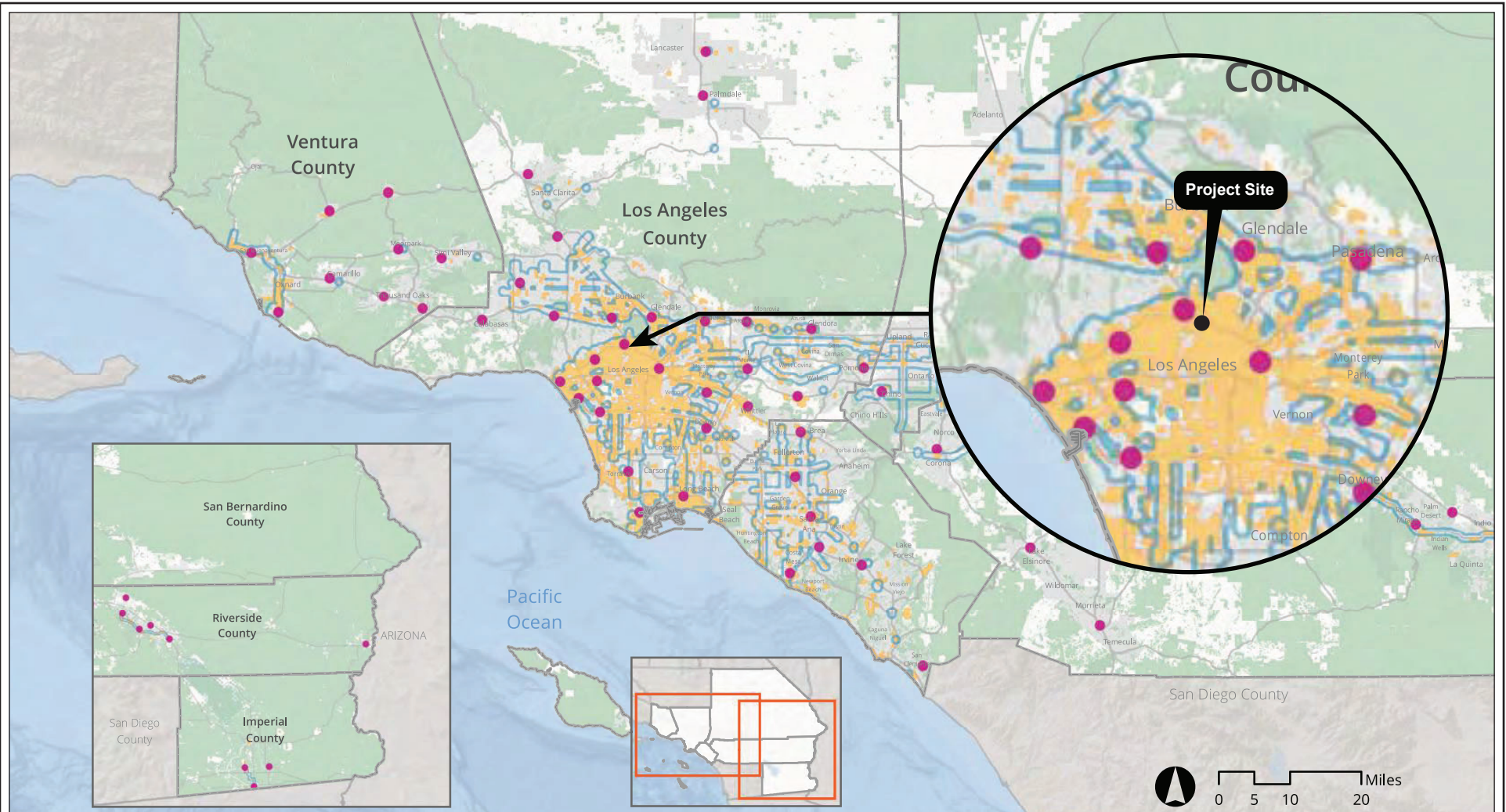
4.2.1 Use Designation, Density, and Building Intensity

2020–2045 RTP/SCS

The 2020–2045 RTP/SCS incorporates center focused placemaking as a land use tool to create dynamic, connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced GHG. This approach supports attractive and functional places for residents of the region to live, work, and play, with priority placed on urban and suburban infill sites in existing/planned service areas. These centers are typically human-scale, compact, and pedestrian oriented with a variety and housing types and affordability options. To facilitate center focused placemaking, the 2020–2045 RTP/SCS identifies Priority Growth Areas (PGAs) across the SCAG region. PGAs are locations where many of the 2020–2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs). According to the 2020–2045 RTP/SCS, PGAs account for only 4 percent of region's total land area; however, implementation of SCAG's recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. The more compact form of regional development implemented through PGAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resources. PGAs do not limit any particular development project from being built in any particular location. However, they are intended to guide general growth patterns, which the City of Los Angeles accomplishes through its General Plan and Community Plans. In addition, while the 2020–2045 RTP/SCS does not require individual TPPs to be located within PGAs, the expectation is that most of the more intensive development in the region would be within one or more PGAs. The PGAs are shown in Exhibit 3.4 through Exhibit 3.10 of the 2020–2045 RTP/SCS.

The Project Site's location relative to each of the PGAs is shown in Figure 9 through Figure 15 on pages 28 through 34 of this SCEA. As shown in Figure 11 through Figure 15 on pages 30 through 34, the Project Site is located within a Job Center, TPA, HQTA, NMA, and a Livable Corridor.

- **Job Centers:** Job Centers are where regional strategies that support economic prosperity can be deployed in catalytic ways. Job Centers have been identified in all six counties in the SCAG region and represent areas that have a significantly higher employment density than surrounding areas. Job Centers represent areas with local employment peaks rather than simply places with the most jobs. Identified Job Centers are present in over 60 percent of the region's cities and contain about one-third of Southern California's jobs—but only cover less than 1 percent of the region's land area. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced. As shown in Figure 11 on page 30, the Project Site is located within a Job Center.



Priority Growth Areas vs. Regional Growth Constraints

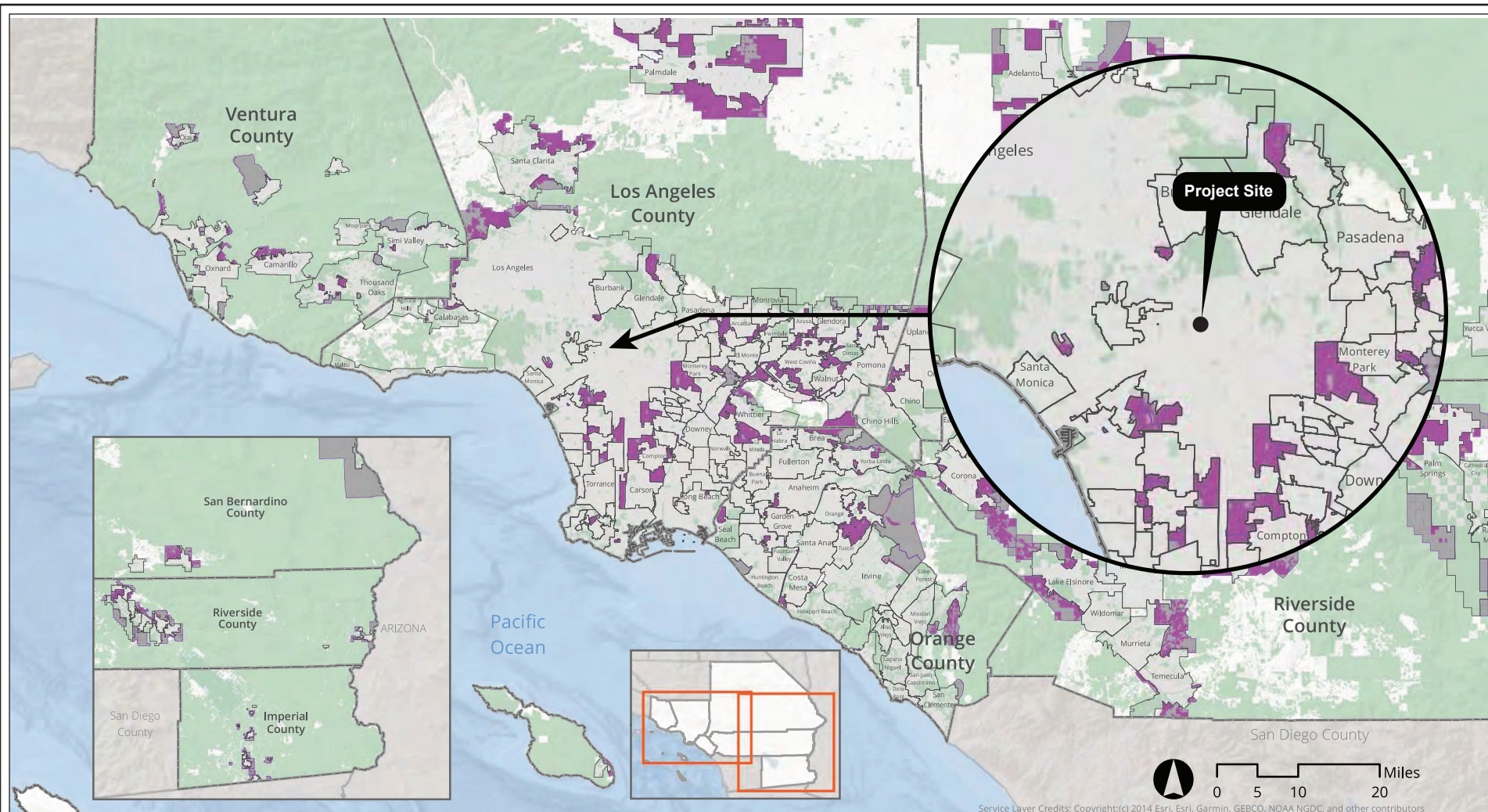
- Job Center
- Neighborhood Mobility Areas
- High Quality Transit Area
- Regional Growth Constraints

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

Figure 9

Priority Growth Areas vs. Regional Growth Constraints

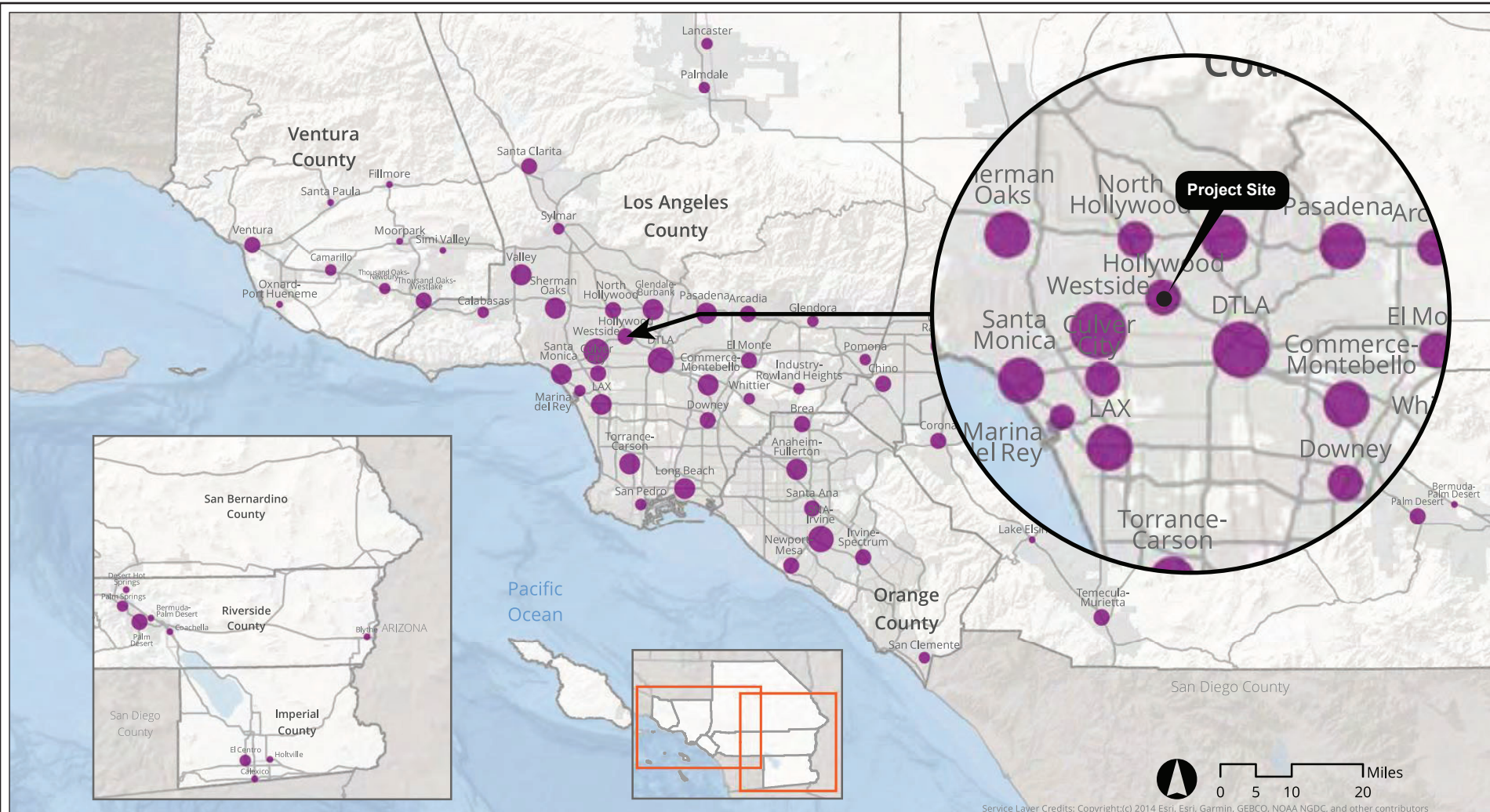


- County Boundaries
- Sphere of Influence
- City Boundaries
- Regional Growth Constraints

Source: Counties and local jurisdictions LAFCO in SCAG region, 2018

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

Figure 10
Priority Growth Area—Spheres of Influence



SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

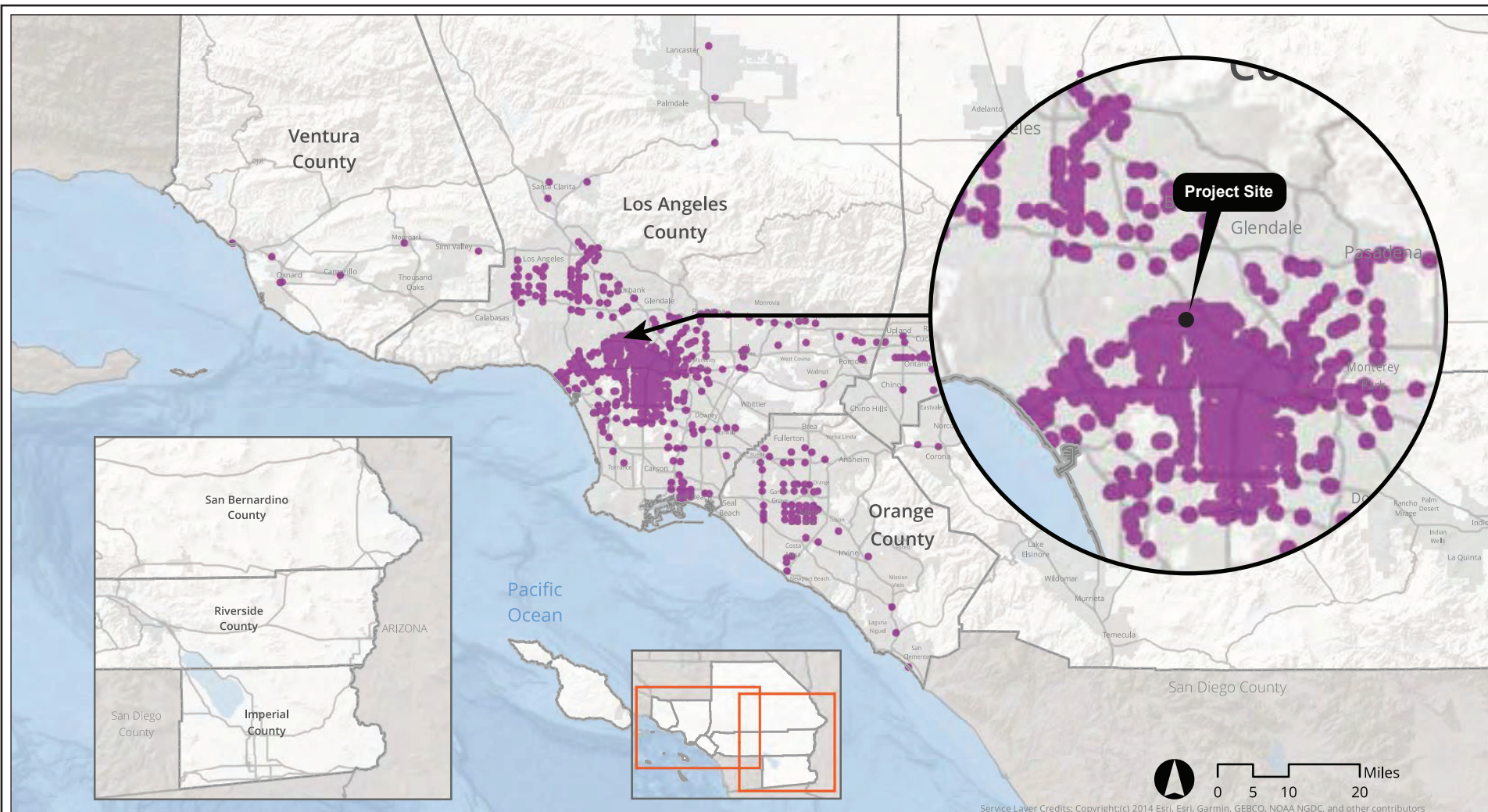
- Less than 10,001 (17)
- 10,001 - 25,000 (22)
- 25,001 - 50,000 (19)
- 50,001 - 150,000 (11)
- More than 150,000 (3)

Source: SCAG, 2019

Notes:

- (1) Centers are areas with denser employment than their surroundings.
- (2) Dots represent the total employment in each center, not center boundaries.
- (3) Names are intended to be illustrative and may not reflect all the jurisdictions in which a center fully lies.

Figure 11
Priority Growth Area—Job Centers



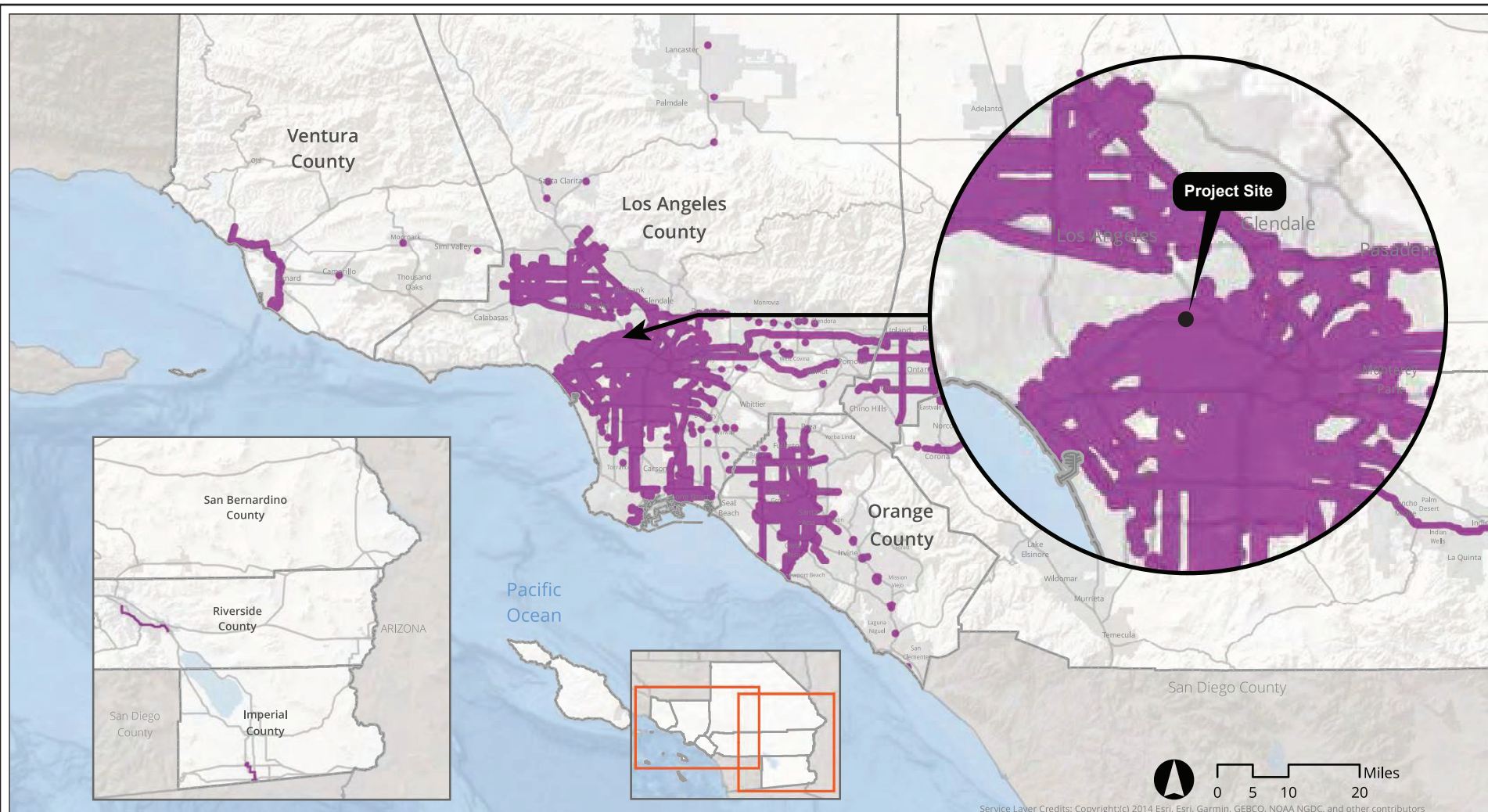
Transit Priority Areas (2045)

■ TPA

Source: County Transportation Commissions, SCAG, 2019

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

Figure 12
Priority Growth Area—Transit Priority Areas



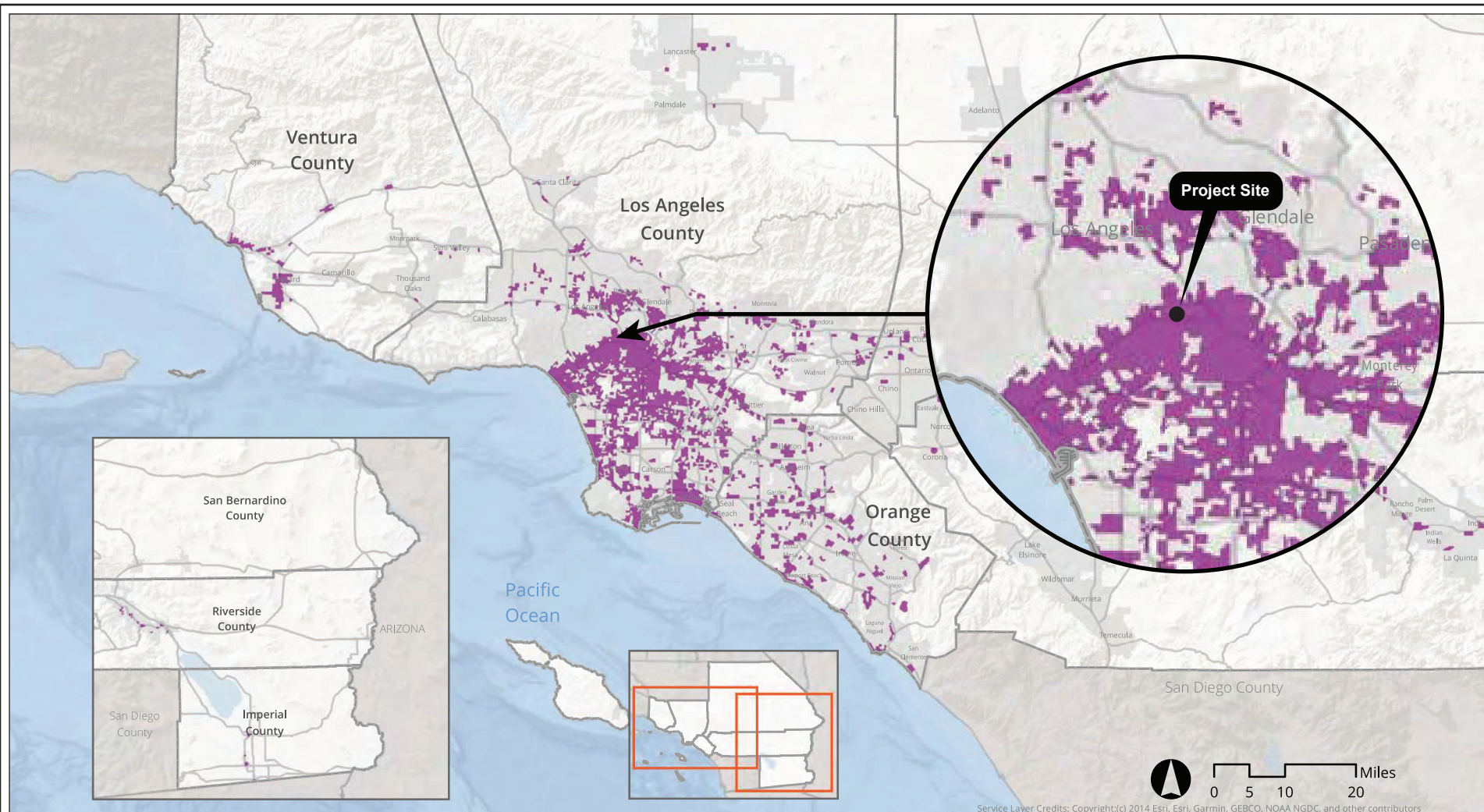
High Quality Transit Areas (2045)

■ HQTAs

Source: County Transportation Commissions, SCAG, 2019

Note: SCAG's High Quality Transit Area (HQTAs) is within one-half mile from major transit stops and high quality transit corridors (HQTAs). SCAG identifies major transit stops and HQTAs using the methodology described in the Transit Technical Report. Major transit stops and HQTAs are extracted from 2045 plan year data of Connect SoCal.

Figure 13
Priority Growth Area—High Quality Transit Areas



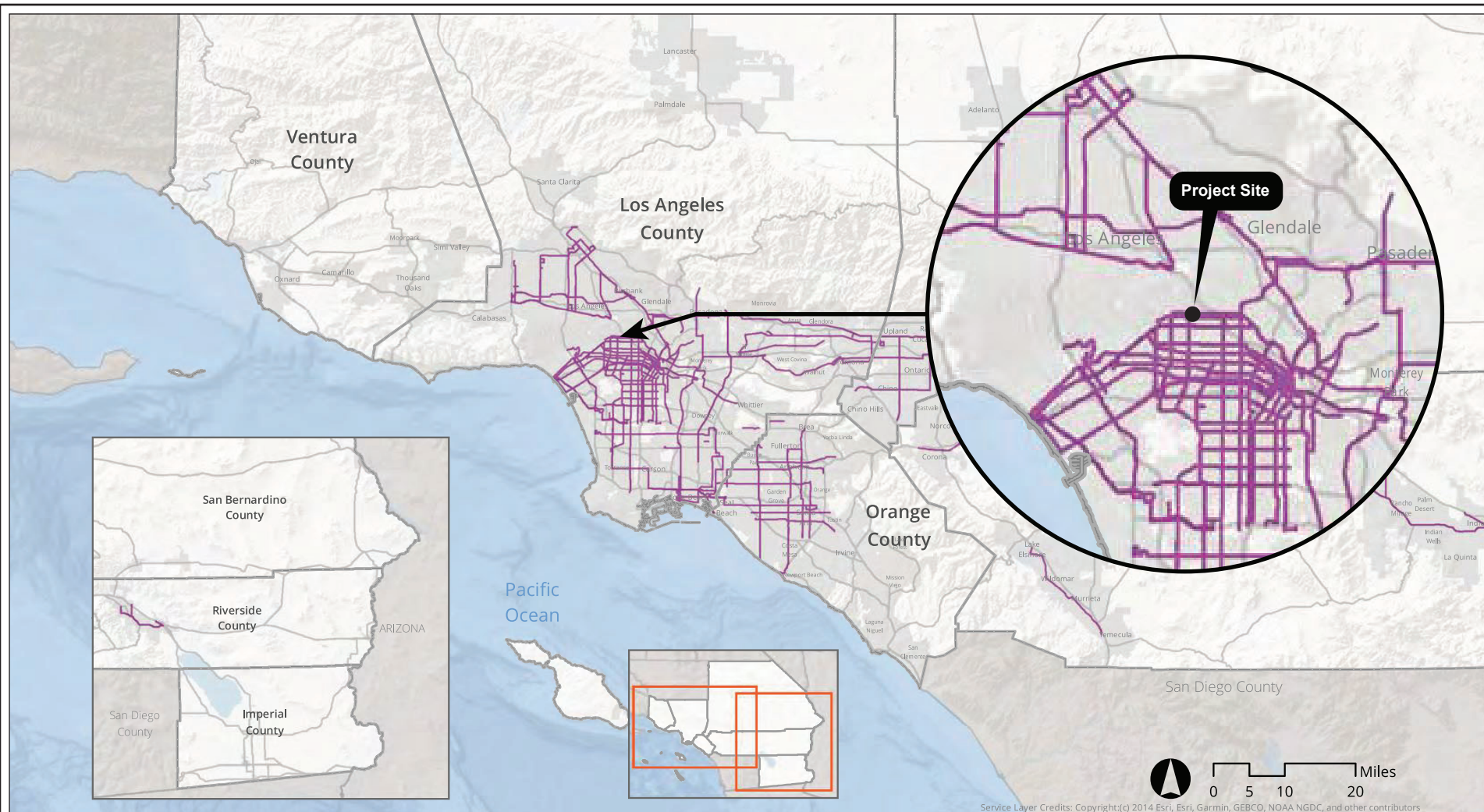
Neighborhood Mobility Areas (NMA)

■ NMA

Source: SCAG, 2019

Note: Neighborhood Mobility Areas (NMA) were identified by analyzing and assigning z-scores four measures at the Tier 2 TAZ level, and subsequently summing the z-scores. TAZs that scored at the 80th percentile or higher for the composite score were considered NMAs.

Figure 14
Priority Growth Area—Neighborhood Mobility Areas



Livable Corridors

— Livable Corridors

Source: SCAG, 2019

Figure 15
Priority Growth Area—Livable Corridors

- Transit Priority Areas: TPAs are Priority Growth Areas that are within one half mile of existing or planned 'major' transit stops in the region. A 'major' transit stop is defined as a site containing an existing or planned rail or bus rapid 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. TPAs are where people can live, work and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives. As shown in Figure 12 on page 31, the Project Site is located within a TPA due to its proximity to the intersection of Sunset Boulevard, which has transit routes with a 15 minute or less service frequency during peak commute hours.
- High Quality Transit Areas: HQTAs are corridor-focused PGAs within one-half mile of an existing or planned fixed transit stop or bus transit corridor where buses operate at a frequency of at least every 15 minutes during peak commute hours. HQTAs represent under 3 percent of the region's acreage but are projected to be home to over 51 percent of new households between 2016 and 2045. New developments within HQTAs should respond to the existing physical conditions of the surrounding area, preserving existing development patterns and neighborhood character while providing a balance of modal and housing choices. As shown in Figure 13 on page 32, the Project Site is located within a HQTA due to its proximity to Sunset Boulevard (a High Quality Transit Corridor with less than 15 minute peak hour bus service).
- Neighborhood Mobility Areas: NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds, with a focus on creating, improving, restoring, and enhancing safe and convenient connections to a variety of land uses (e.g., schools, shopping, services, places of worship, parks, and greenways). Safer and shorter multimodal trips are encouraged to reduce the reliance on single occupancy vehicles. This is achieved in NMAs through increased density, mixed land uses, neighborhood design, enhanced destination accessibility, and reduced distance to transit. As shown in Figure 14 on page 33, the Project Site is located within a mapped NMA.
- Livable Corridors: Livable Corridors strategy encourages increased density at nodes along key corridors. This strategy focuses on transit improvements, which include dedicated or semi-dedicated bus lanes, enhanced bus shelters, real-time travel information, and off-bus ticketing; active transportation improvements, which would support safe bicycling and walking; and land use policies, which includes developing mixed-use retail centers at key nodes and increasing neighborhood-oriented retail at intersections. The Project Site is located along Sunset Boulevard, a designated Livable Corridor, as shown in Figure 15 on page 34.

The Project's location, scale, and mixture of land uses would be consistent with its designation within the PGAs, which, in turn, indicates consistency with the use designations, density, and buildings intensity of the SCS. Specifically, the Project Site is located in an urbanized area within the Hollywood Community Plan area of the City. The Project would respond to and complement the existing development pattern in the area, which is characterized by residential, office, commercial, uses. The Project is a mixed-use development that would include 170 residential units (including 26 units reserved for Very Low Income Households and 8 Low Income units), and 16,680 square feet of commercial uses on a site that is well-served by transit.

As discussed above, the Project is approximately 91.7 percent residential, with the residential component consisting entirely of multi-family dwelling units. The Project would contain a total of 201,134 square feet with a total proposed sitewide floor area ratio (FAR) of 3.88:1 and an overall net residential density of 97.70 units per acre. The Project would increase the housing supply in the Project Site vicinity, as well as housing diversity and affordability in the PGAs in which the Project Site is located. Of the Project's proposed 170 residential dwelling units, 26 would be reserved for Very Low-Income affordable units and 8 units would be reserved for Low-Income affordable units. In addition, the 170 residential units would include studios, one-bedroom units, and two-bedroom units. The existing units to remain include 56 studios and 8 two-bedroom units. Therefore, upon completion of the Project, a total of 234 units housing units of varying sizes and configurations and offered at varying rental prices, would be provided within the Project Site, thereby supporting housing diversity.

The Project Site is served by a variety of public transit options operated by Metro and LADOT. Specifically, the Project Site is served by Metro Bus Lines 2, 180, 210, and 222 and the Metro Rail B Line. Additional transit options include LADOT DASH Bus service lines BC, HW, and HWL. Thus, the mixed-use nature of the Project in an urban area near transit would provide opportunities for Project residents, visitors, and employees to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus reducing GHG emissions.

In addition, the Project would provide 120 residential bicycle parking spaces (including 110 long-term spaces and 10 short term spaces) and 18 commercial bicycle parking spaces (inclusive of 9 short-term and 9 long-term spaces). The Project would enhance the surrounding streetscapes with new street trees and landscaping. Overall, a pedestrian-scaled design and pedestrian and bicycle amenities would also encourage the use of alternative modes of travel, thereby further reducing reliance on automobile travel and resulting GHG emissions.

In summary, the location of the Project Site along a primary transit corridor, mix of uses, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PGAs. Furthermore, the Project would be consistent with the intent of the specific PGAs in which it is located (i.e., HQT, NMA, and Livable Corridor). As such, the Project would be consistent with SCAG's 2020–2045 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development.

2024–2050 RTP/SCS

SCAG's 2024–2050 RTP/SCS introduces Priority Development Areas (PDAs) as areas within the SCAG region where future growth can be located to help the region reach the 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool used for different purposes, such as growth visioning, performance measurement or grant applications. However, as a general principle, development in overlapping PDAs indicates a greater alignment with the 2024–2050 RTP/SCS goals. PDAs in the 2024–2050 RTP/SCS include NMAs, TPAs, Livable Corridors, and SOIs (in unincorporated areas only).

PDAs follow the principles of center-focused placemaking, providing locations where many of the 2024–2050 RTP/SCS strategies can be fully realized. According to the 2024–2050 RTP/SCS, PDAs account

for only 8.2 percent of the region's total land area; however, implementation of SCAG's recommended growth strategies will help these areas accommodate 66 percent of forecasted household growth and 54 percent of forecasted employment growth between 2019 and 2050. The more compact form of regional development implemented through PDAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. The PDAs are shown in Map 3.4 of the 2024–2050 RTP/SCS.

The Project's location relative to PDAs, including NMAs, TPAs, Livable Corridors, and SOIs, is shown in Figure 16 on page 38 of this SCEA. As shown in Figure 16, the Project Site is located within the boundaries of a TPA and an NMA, and near a Livable Corridor, as described below:

- Transit Priority Areas: TPAs are areas within 0.5 mile of existing or planned major transit stops in the region. A major transit stop is defined in state statute as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either 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. TPAs are where people can live, work and play in higher-density, compact communities that are conducive to complete streets that facilitate access to high frequency transit with safe and comfortable walking and biking networks. The Project Site is located within a TPA due to its proximity to the intersection of Sunset Boulevard, which has transit routes with a 15 minute or less service frequency during peak commute hours.
- Neighborhood Mobility Areas: NMAs include four elements that reflect potential to improve, restore and enhance safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways and other destinations. The four elements of an NMA are: 1) intersection density, 2) low-speed streets, 3) land use diversity, and 4) accessibility to amenities within one mile using street network distances.
- Livable Corridors: Livable Corridors are areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. This strategy integrates transit improvements and certain active transportation improvements to support safe bicycling and walking.

The Project's location, scale, and mixture of land uses would be consistent with its designation within these three PDAs, which, in turn, indicates consistency with the use designations, density, and buildings intensity of the SCS. As previously discussed, the Project Site is located in an urbanized area within the Hollywood Community Plan Area of the City. The Project would respond to and complement the existing development pattern in the area, which is characterized by a mix of low- to high-intensity residential and commercial uses. The Project includes the development of a new 201,134-square-foot mixed-use building consisting of 170 new residential units (including 26 Very Low-Income units and 8 Low Income units) and approximately 16,680 square feet of ground-floor commercial space on a site that is well-served by transit. As noted above, the Project is approximately 91.7 percent residential, with the residential component of the Project consisting of 28 studio units, 96 one-bedroom units, and 46 two-bedroom units, thereby providing housing diversity. The Project would contain a total of 284,909 square feet with a site-wide FAR of 3.88:1. The Project would increase the housing supply in the Project area, as well as housing diversity and affordability in the PDAs in which the Project Site is located. The Project Site is located near several bus lines, including Metro Bus Lines 2 (USC-Westwood via Sunset Boulevard); 180 (Hollywood-Glendale-Pasadena via Los Feliz-Colorado);

210 (Hollywood/Vine Station-La Cienega Station via Hollywood Boulevard-Fairfax Avenue); and 222 (Lankershim/Tuxford-Burbank Airport-Hollywood Way and Cahuenga Boulevard). Additional transit options include LADOT DASH Bus Service lines BC, HW, and HWL and Metro Rail B (Downtown Los Angeles-North Hollywood) Line, several of which lines provide peak commute hour headways of 15 minutes or less, thereby providing nearby high-frequency and high-quality transit options. Thus, the mixed-use nature of the Project in an urban area near transit would provide opportunities for Project residents, visitors, and employees to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus, reducing GHG emissions.

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck on Level 3, and 4,538 square feet of interior tenant resident common areas on Levels 3 and 5, which could include a clubroom, clubhouse, and fitness center. As described in Section 3, Project Description, of this SCEA, an external bridge would connect the existing Sunset and Vine tower mezzanine level to the proposed mixed-use building's courtyard on Level 3 to allow residents of the existing tower to use the new amenities. In addition, in accordance with the requirements of the LAMC, the Project would provide 120 residential bicycle parking spaces (including 10 short-term and 110 long-term spaces) and 18 commercial bicycle parking spaces (including 9 short-term and 9 long-term). The pedestrian-scaled design of the Project and pedestrian and bicycle amenities would encourage the use of alternative modes of travel, thereby further reducing reliance on automobile travel and resulting GHG emissions.

Overall, the nature of the Project, including the location, mix of uses, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PDAs. Furthermore, the Project would be consistent with the intent of the specific PDAs in which it is located or adjacent to (i.e., TPA, NMA, and Livable Corridor). As such, the Project would be consistent with the 2024–2050 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development.

4.2.2 Sustainable Communities Strategy Policy Consistency

2020–2045 RTP/SCS

Chapter 3, *A Path to Greater Access, Mobility, and Sustainability*, of the 2020–2045 RTP/SCS outlines strategies and measures included in the SCS Technical Report that are intended to be supportive of implementing the regional SCS. Several are directly tied to supporting related GHG reductions while others support the broader goals of the 2020–2045 RTP/SCS. As outlined below in Table 3 on page 40, the Project would be consistent with applicable measures of the SCS. A discussion of the Project's consistency with the applicable goals and strategies of the 2020–2045 RTP/SCS is included in Table 23 on page 275 in Part 5, Evaluation of Environmental Impacts, of this SCEA.

Table 3
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
Strategy: Focus Growth Near Destinations and Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	Consistent. The Project would consist of a mixed-use development including market-rate and affordable residential units and commercial uses within a PGA. Consistent with the Project Site's location within a Job Center, TPA, HQTA, and NMA and adjacent to a Livable Corridor, residents and employees of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations. Therefore, the Project would be consistent with this strategy.
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.	Consistent. The Project would contribute to a balance between jobs and housing in the region by providing 170 new market-rate and affordable residential dwelling units within the Hollywood Community Plan area of the City. The Project Site is in an urban area near commercial and job centers. Furthermore, The Project Site is served by a variety of transit options served by Metro and LADOT. Specifically, the Project Site is served by Metro Bus Lines 2, 180, 210, and 222 and the Metro Rail B Line. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL. The public transit options in the vicinity of the Project Site provide peak commute hour headways of 15 minutes or less. Therefore, the Project would be consistent with this strategy.
Plan for growth near transit investments and support implementation of first/last mile strategies	Consistent. As discussed above, the Project Site is served by a variety of public transit options, including Metro Bus Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line. Thus, the Project would provide for growth near transit. First/last mile strategies are designed to increase transit usage by making it more convenient and safer to walk or bicycle to and from transit stations. The Project would promote first/last mile infrastructure by providing 120 bicycle parking spaces (110 long-term spaces and 10 short term spaces), easy bicycle accessibility to the Project Site to encourage alternative mobility for employees and visitors to the Project Site. Therefore, the Project would be consistent with this strategy.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	Consistent. While this measure is directed toward public agencies, the Project would support its implementation. The Project would replace underperforming and vacant commercial uses with a new mixed-use building with multi-family residential units and ground floor commercial uses. Specifically, the Project would include the development of a new 201,134-square-foot, eight-story mixed-use building consisting of 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 reserved for Low Income households) and 16,680 square feet of ground-floor commercial space within a 75,938-square-foot (1.74 acres) site. The Project would be designed to complement adjacent uses and enhance the surrounding area, creating an

Table 3 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
	inviting atmosphere. Therefore, the Project would be consistent with this strategy.
<p>Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods</p>	<p>Consistent. The Project would replace commercial uses with a new mixed-use building with multi-family residential units and ground floor commercial uses. Specifically, the Project would include the development of a new 201,134-square-foot, eight-story mixed-use building consisting of 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 reserved for Low Income households) and 16,680 square feet of ground-floor commercial space within a 75,938-square-foot (1.74 acres) site. The Project would provide a minimum of 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck on Level 3, and 4,538 square feet of interior tenant resident common areas on Levels 3 and 5, which includes a clubroom, clubhouse, and fitness center. An external bridge would connect the existing Sunset and Vine tower mezzanine level to the mixed-use building's courtyard on Level 3 to allow residents of the existing tower to use the new amenities. Thus, the Project would represent infill development that would accommodate growth, increase amenities, and enhance connectivity to existing neighborhoods. Therefore, the Project would be consistent with this strategy.</p>
<p>Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).</p>	<p>Consistent. The Project has been designed to incorporate a variety of strategies that would reduce the reliance on, and number of, solo car trips. The Project would include a mix of uses, including 170 residential apartment units (inclusive of 26 Very Low-Income Households and 8 reserved for Low Income households) and 16,680 square feet of ground-floor commercial space that would be located in an area that is well-served by transit and that has been identified by a PGA. The Project would provide a minimum of 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck on Level 3, and 4,538 square feet of interior tenant resident common areas on Levels 3 and 5, which includes a clubroom, clubhouse, and fitness center. An external bridge would connect the existing Sunset and Vine tower mezzanine level to the mixed-use building's courtyard on Level 3 to allow residents of the existing tower to use the new amenities. In addition, extensive landscaping would be provided at the Project's ground floor, including along the sidewalk and in the required front yards. In addition, the Project would provide 120 bicycle parking spaces (110 long-term spaces and 10 short-term spaces) to encourage bicycling and walking for residents, employees, and visitors to the Project Site. Furthermore, the Project would expand residential and employment opportunities in proximity of residential and commercial areas, destinations, and other neighborhood</p>

Table 3 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
	services in a diverse urban area. Therefore, the Project would be consistent with this strategy.
Strategy: Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	Consistent. As previously described, the Project Site is currently developed with a nineteen story tower located at the corner of Vine Street and Sunset Boulevard with 64 live-work units and 9,263 square feet of ground floor retail. This use would be retained as part of the Project. The Project Site also includes a vacant one-story duplex building on Leland Way, which is proposed to be removed as part of the Project. Although the Project would demolish this existing duplex, the building is vacant and the Project would result in a net increase in units on the Project Site, including 26 Very-Low Income and 8 Low Income housing units. Thus, the Project would not displace any existing occupied housing. Therefore, the Project would be consistent with this strategy.
Identify funding opportunities for new workforce and affordable housing development.	Consistent. While this measure is directed toward public agencies, the Project would support its implementation by including 26 Very-Low Income and 8 Low-Income units. In addition, the Project would include 16,680 square feet of commercial space, which would generate new employment opportunities. Therefore, the Project would be consistent with this strategy.
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply	Not Applicable. This measure is directed toward public agencies. However, the Project would increase the housing supply by providing 170 new market-rate and affordable multi-family residential units.
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	Consistent. This measure is directed toward public agencies and does not apply to individual projects. However, the Project would support the reduction of GHG emissions by concentrating new residential development on an infill site with access to transit. In addition, the provision of pedestrian features and bicycle amenities would further expand multimodal transportation options, thereby reducing VMT and resulting GHG emissions. Additional sustainability features that would reduce GHG emissions would be incorporated into the Project, including but not limited to, LEED Silver equivalency, parking spaces with electric vehicle charging equipment, lighting that meets current Title 24 Energy Standards, photovoltaic system ready, highly efficient HVAC systems, energy-efficient wall insulation and glazing units, WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems, Energy Star-labeled all-electric appliances, and drought-tolerant planting. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable. Therefore, the Project would be consistent with this strategy.

Table 3 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
Strategy: 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	Consistent. The Project would utilize low-emission technologies, including dedicated parking spaces with electric vehicle charging equipment consistent with CALGreen and LA Green Building Code requirements. Therefore, the Project would be consistent with this strategy.
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	Not Applicable. This measure is directed toward public agencies as a policy strategy and does not apply to individual projects.
Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation	Not Applicable. This measure is directed toward public agencies as a policy strategy and does not apply to individual projects.
Strategy: Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions	Consistent. While this measure is directed toward public agencies, the Project would support its implementation. The Project would include a variety of sustainability measures that would reduce GHG emissions, as outlined above in Section 3, Project Description, of this SCEA. Therefore, the Project would be consistent with this strategy.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	Consistent. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. However, the Project would support its implementation. The Project would be located within an HQT, Job Center, TPA, and NMA and adjacent to a Livable Corridor based on the 0.5 mile walking distance to the various transit options including the Metro Bus Lines, LADOT DASH, and Metro Rail B Line. Therefore, the Project would be consistent with this strategy.
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	Not Applicable. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Work with local jurisdictions/ communities to identify opportunities and assess barriers to implement sustainability strategies	Not Applicable. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	Not Applicable. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.

Table 3 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
Continue to support long range planning efforts by local jurisdictions	Not Applicable. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	Not Applicable. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Strategy: Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	Not Applicable. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	Consistent. While this measure is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. With regard to urban heat islands, the Project would include extensive landscaping, thereby reducing the potential for urban heat islands. In addition, 70 of the Project's parking spaces would be designated as EV spaces capable of supporting future EVSE and 37 of the spaces would be equipped with EV Charging Stations. The Project would also comply with the City's All-Electric Ordinance and would not include natural gas uses (except for restaurant uses as allowed for in the City's All-Electric Ordinance). Therefore, the Project would be consistent with this strategy.
Integrate local food production into the regional landscape	Not Applicable. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. Furthermore, the Project area is an urbanized area, and the Project Site is not zoned, or suitable for, agricultural uses.
Promote more resource efficient development focused on conservation, recycling and reclamation.	Consistent. The Project is an infill development located in an urbanized area that is served by existing infrastructure. Thus, the Project would not result in the loss of previously undeveloped land or land intended for conservation. Furthermore, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), the Project would provide a designated recycling area for Project residents and visitors. The Project would promote resource efficient development. Therefore, the Project would be consistent with this strategy.
Preserve, enhance, and restore regional wildlife connectivity.	Not Applicable. This measure is directed toward public agencies. Furthermore, the Project Site does not serve as a regional wildlife connector, and as discussed under Item IV, Biological Resources, in Section 5, Environmental Impact

Table 3 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
	Analysis, of this SCEA, the Project would not interfere with wildlife corridors.
Reduce consumption of resource areas, including agricultural land.	Consistent. The Project would be developed on a site that is located in an urbanized area with existing commercial and residential uses. The Project Site is comprised of three zoning designations: C4-2D-SN, [Q]C4-2D-SN, and R4-2D. No resource areas or agricultural lands would be impacted by the Project. Therefore, the Project would be consistent with this strategy.
<hr/> Source: SCAG, 2020–2045 RTP/SCS, September 2020; Eyestone Environmental, 2024.	

2024–2050 RTP/SCS

Chapter 3, *The Plan*, of the 2024–2050 RTP/SCS outlines goals and subgoals that are intended to help the SCAG region achieve a healthy, prosperous, accessible, and connected region for a more resilient and equitable future. As outlined in Table 4 on page 46, the Project would be consistent with applicable goals and subgoals of the 2024–2050 RTP/SCS. A discussion of the Project’s consistency with the applicable goals and subgoals, as well as a more general discussion of the Project’s consistency with the applicable policies, of the 2020–2045 RTP/SCS is included in Table 14 on page 236 in Section 5, Evaluation of Environmental Impacts, of this SCEA.

Table 4
Consistency with 2024–2050 RTP/SCS Goals and Subgoals

Goal	Consistency Assessment
<p>Mobility: Build and maintain an integrated multimodal transportation network.</p>	<p>Consistent. While this goal is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. The Project would be developed within an existing urbanized area that has an established multimodal transportation network. As previously discussed, the Project Site is served by a variety of public transit options, including Metro Bus Lines 2, 180, 210, and 222 and the Metro Rail B Line. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL. Consistent with the Project Site’s location within a PDA, residents and employees of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations. Therefore, the Project would be consistent with this goal.</p>
<p>Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.</p>	<p>Consistent. While this goal is directed toward local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. As discussed under Item III, Air Quality, and Item VIII, Greenhouse Gas Emissions, in Section 5, Evaluation of Environmental Impacts, of this SCEA, the Project would result in less-than-significant impacts related to air quality and GHG emissions during construction and operation. As previously discussed, the Project would construct a new mixed-use development within a City-designated TPA and a SCAG-designated PDA. Specifically, the Project Site is served by a variety of public transit options, including Metro Bus Lines 2, 180, 210, and 222 and the Metro Rail B Line. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL. The Project would support and promote environmental sustainability by complying with regulatory requirements and the sustainability intent of the U.S. Green Building Council’s LEED Silver or equivalent green building standards. These features include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star–labeled appliances; and drought tolerant planting. In addition, the Project would comply with the California Building Code Title 24 requirements. Furthermore, the Project would include the provision of 120 residential bicycle parking spaces (including 10 short-term and 110 long-term spaces) and 18 commercial bicycle parking spaces (including 9 short-term and 9 long-term). These features would reduce GHG emissions and improve air quality. Therefore, the Project would be consistent with this subgoal.</p>
<p>Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.</p>	<p>Consistent. While this subgoal is directed toward local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. As discussed above, the Project Site is</p>

Table 4 (Continued)
Consistency with 2024–2050 RTP/SCS Goals and Subgoals

Goal	Consistency Assessment
	served by a variety of public transit options, including Metro Bus Lines 2, 180, 210, and 222 and the Metro Rail B Line. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL. The Project would also include the provision of 120 residential bicycle parking spaces (including 10 short-term and 110 long-term spaces) and 18 commercial bicycle parking spaces (including 9 short-term and 9 long-term). Therefore, the Project would be consistent with this subgoal.
Support planning for people of all ages, abilities and backgrounds.	Not Applicable. This subgoal is directed toward public agencies as a policy strategy and does not apply to individual projects.
Communities: Develop, connect and sustain livable and thriving communities.	Consistent. While this goal is directed toward local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. The Project would consist of a new mixed-use building with multi-family residential units and ground floor commercial uses within a PDA. Given the Project Site's location in an urbanized area, the Project would be located in proximity to employment, destinations, and other neighborhood services, and transit. Therefore, the Project would be consistent with this goal.
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	Consistent. The Project would consist of a mixed-use development that would include market-rate and affordable residential units and commercial uses on an already developed urban infill site in a highly developed area of the City. The Project would be located in proximity to employment, destinations, and other neighborhood services, and transit, resulting in a synergistic development where people can live, work, and be entertained. In addition, the Project would promote use of bicycles by providing 120 residential bicycle parking spaces (including 10 short-term and 110 long-term spaces) and 18 commercial bicycle parking spaces (including 9 short-term and 9 long-term). Overall, the Project's design and proximity to transit and other uses would increase mobility options and reduce travel distances. Therefore, the Project would be consistent with this subgoal.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	Consistent. The Project would provide a range of unit types and sizes. Specifically, the Project would provide 170 new residential units (including 26 Very Low-Income units and 8 Low Income units) comprising 28 studio units, 96 one-bedroom units, and 46 two-bedroom units. The Project Site includes a vacant duplex that will be demolished as part of the Project. As this residential use is vacant, the Project would not displace any existing people. As such, the Project would produce diverse housing types in an effort to improve affordability, accessibility and opportunities for all

Table 4 (Continued)
Consistency with 2024–2050 RTP/SCS Goals and Subgoals

Goal	Consistency Assessment
	households. Therefore, the Project would be consistent with this subgoal.
<p>Environment: Create a healthy region for the people of today and tomorrow.</p> <p>Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.</p> <p>Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.</p>	<p>Consistent. While this goal and these subgoals are directed toward SCAG and/or public agencies as policy strategies and do not apply to individual projects, the Project would support their implementation. The Project's location, land use characteristics, and design render it consistent with Statewide, regional, and local climate change mandates, plans, policies, and recommendations. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols equivalent to a Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen Code. These standards would reduce energy and water usage and waste and, thereby, improve climate resiliency and reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. Sustainability features include, but would not be limited to: high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star-labeled appliances; and drought tolerant planting. Some of these measures are consistent with the requirements of the Los Angeles Green Building Code, while some exceed code requirements. These measures would also support resource efficiency by conserving water and energy. Therefore, the Project would be consistent with this goal and these subgoals.</p>
<p>Conserve the region's resources.</p>	<p>Consistent. While this subgoal is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. As previously discussed, the Project would consist of a mixed-use development that would include market-rate and affordable residential units and commercial uses on an already developed urban infill site in a highly developed area of the City. It would not include development of an undeveloped site; therefore, the Project would support conservation of natural areas and open space. In addition, the Project would comply with applicable energy, water, and other conservation requirements. Specifically, the Project would incorporate energy, water, and other natural resource conservation features into the Project equivalent to a Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction protocols required by State Title 24 (CALGreen Code) and the City of</p>

Table 4 (Continued)
Consistency with 2024–2050 RTP/SCS Goals and Subgoals

Goal	Consistency Assessment
	<p>Los Angeles Building Code. The Project would also implement the additional sustainability features outlined in Section 3, Project Description, of this SCEA.</p> <p>Based on the above, the Project would be consistent with this subgoal.</p>
<p>Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.</p>	<p>Consistent. While this goal and subgoal is directed toward SCAG as a policy strategy and does not apply to individual projects, the Project would support its implementation. The Project would consist of a mixed-use development including market-rate and affordable live/work residential units and commercial uses on an urban infill site within a highly urbanized area of the City. These uses would provide increased housing, employment, and entertainment opportunities to the area. Therefore, the Project would be consistent with this goal.</p>
<p>Improve access to jobs and educational resources.</p>	<p>Not Applicable. This subgoal is directed toward public agencies as a policy strategy and does not apply to individual projects.</p>
<p>Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.</p>	<p>Not Applicable. This subgoal is directed toward SCAG as a policy strategy and does not apply to individual projects.</p>
<p>Source: SCAG, 2024–2050 RTP/SCS, April 2024; Eyestone Environmental, 2024.</p>	

5. ENVIRONMENTAL IMPACT ANALYSIS

5.1 SCOPE OF ANALYSIS

This section of the Sustainable Communities Environmental Assessment (SCEA) contains an assessment and discussion of impacts associated with issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines [California Code of Regulations Title 14, Chapter 3, 15000–15387]). Pursuant to Public Resources Code (PRC) Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the Project, other than those that do not need to be reviewed pursuant to PRC Section 21159.28 based on substantial evidence considering the whole record.

As the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura), the Southern California Association of Governments (SCAG) is required under Senate Bill 375 to incorporate a Sustainable Communities Strategy into its regional transportation plans. On September 3, 2020, SCAG approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS, also known as Connect SoCal). As an update to the 2020–2045 RTP/SCS, SCAG’s Regional Council adopted the 2024–2050 RTP/SCS (also known as Connect SoCal 2024) on April 4, 2024. However, CARB has not yet accepted SCAG’s determination that the 2024–2050 RTP/SCS would, if implemented, meet the region’s GHG emissions reduction targets. As such, both SCAG’s 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are considered in this discussion and throughout this SCEA.

Program Environmental Impact Reports (PEIR) were prepared to evaluate the potential environmental impacts of SCAG’s 2020–2045 RTP/SCS⁶ as well as SCAG’s 2024–2050 RTP/SCS⁷ Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

As part of the PEIRs, mitigation measures were included that would reduce potentially significant impacts identified in the PEIRs. The complete list of the mitigation measures identified in the PEIRs are included in Exhibits A, Mitigation Monitoring and Reporting Program (MMRP), of the 2020–2045 and 2024–2050 RTP/SCS Final PEIRs. The mitigation measures in the PEIRs are divided into two categories: SCAG mitigation measures (referred to in the MMRP as SMM) and project-level mitigation measures (referred to in the MMRP as PMM). SCAG mitigation measures are intended to be implemented by SCAG over the lifetime of the RTP/SCS. Project-level mitigation measures (PMMs) are intended to be considered by lead agencies for projects proposing to streamline the environmental review process pursuant to Senate Bill (SB) 375, SB 743, or SB 226, such as the Project.

Project-level mitigation measures outlined in the 2020–2045 and 2024–2050 RTP/SCS PEIRs should be considered and implemented by a lead agency and project applicant during project-specific environmental reviews, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. However, since SCAG has no authority to impose mitigation measures, a lead agency must use its independent discretion to determine whether mitigation measures

⁶ SCAG, Certified Final PEIR for the 2020–2045 RTP/SCS, May 2020.

⁷ SCAG, Certified Final PEIR for the 2024–2050 RTP/SCS, April 2024.

are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use the mitigation measures identified in the 2020–2045 and 2024–2050 RTP/SCS PEIRs as appropriate to address project-specific conditions. In compliance with PRC Section 21151.2, the City has reviewed all of the mitigation measures in SCAG’s 2020–2045 and 2024–2050 RTP/SCS PEIR MMRP and determined their potential applicability to the Project. This applicability analysis is included in the analysis below for each environmental issue identified under Appendix G of the of the State CEQA Guidelines. For each mitigation measure, the City determined whether to use: (1) SCAG’s MMRP mitigation measure; (2) an equally effective City mitigation measure (consistent with the MMRP mitigation measures); (3) federal, state, regional, or City regulation; or (4) no mitigation, as there was no potential for a significant environmental effect. Where applicable, any new project design features (PDFs) and/or mitigation measures shall be identified in this section to help reduce or avoid all potentially significant impacts on the environment.

The SCEA is also required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs. Where it has been determined that a cumulative effect has been adequately addressed and mitigated, the cumulative effect shall not be treated as cumulatively considerable. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to “be guided by the standards of practicality and reasonableness.” The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to “be guided by the standards of practicality and reasonableness.”

The analysis of cumulative impacts provided herein is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of related projects is based on information provided by the City of Los Angeles Department of Transportation (LADOT) and the City of Los Angeles Department of City Planning and includes developments within a 0.5 mile radius of the Project Site (which is within a 0.25-mile radius of the farthest outlying intersection, as recommended by LADOT’s Transportation Assessment Guidelines). The list of related projects is provided in Table 33 on page 367 and shown in Figure 17 on page 370 under Item XXI, Mandatory Findings of Significance, of this SCEA. Although these projects serve as context for the development environment in the vicinity of the Project Site, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. The cumulative analyses for each environmental issue are provided below following the assessment of Project impacts.

I. AESTHETICS

SB 743 [PRC Section 21099(d)] sets forth 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 shall not be considered significant impacts on the environment.” PRC Section 21099(a) defines a “transit priority area” (TPA) 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 or applicable regional transportation plan.” PRC Section 21064.3 defines “major transit stop” as “a site containing any of the following: (a) [a]n existing rail or bus rapid transit station, (b) [a] ferry terminal served by either a bus or rail transit service, or (c) [t]he 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 Section 21099 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 (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and 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.”⁸

PRC Section 21099 applies to the Project. Specifically, the Project is a mixed-use residential project that would be located within an infill site and approximately 0.25-mile walking distance of Sunset Boulevard, which has transit routes with a 15 minute or less service frequency during peak commute hours. Therefore, the Project’s aesthetic impacts would not be considered a significant impact on the environment.

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁸ City of Los Angeles Department of City Planning, ZI File ZA No. 2452, TPAs/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
- b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
- c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.
- d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
- e) Retain or replace trees bordering highways, so that clear-cutting is not evident.
- f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
- g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;
- h) Use see-through safety barrier designs (e.g. railings rather than walls).

Applicability to the Project

As analyzed below, the Project would not have a substantial adverse effect on a scenic vista and, therefore, Mitigation Measure PMM AES-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project. However, consistent with Mitigation Measure PMM AES-1 from the 2020–2045 RTP/SCS PEIR as well as standard industry practice, construction fencing would be installed along the perimeter of the Project Site during construction of the Project, which would screen construction activities from view.

PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.

- b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.
- c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
- d) Design projects consistent with design guidelines of applicable general plans.
- e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.
- f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:
 - use transparent panels to preserve views where sound walls would block views from residences;
 - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;
 - construct sound walls of materials whose color and texture complements the surrounding landscape and development;
- g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas

Applicability to the Project

The Project Site is located within an urbanized area and, thus, pursuant to Aesthetics Threshold (c), the analysis included herein is focused on whether the Project would conflict with applicable zoning and other regulations governing scenic quality rather than on visual character. Thus, as Mitigation Measure PMM AES-2 from the 2020–2045 RTP/SCS PEIR addresses visual character, it is not applicable to the Project. However, the Project would incorporate some of the design elements outlined in this mitigation measure, including minimizing contrasts in scale and massing with the surrounding area, designing the Project consistent with applicable design guidelines, and maintaining the Project Site such that blight or nuisance conditions do not occur.

PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Use lighting fixtures that are adequately shielded to a point below the light build and reflector and that prevent unnecessary glare onto adjacent properties.
- b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.
- c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
- d) Use unidirectional lighting to avoid light trespass onto adjacent properties.
- e) Design exterior lighting to confine illumination to the Project Site, and/or to areas which do not include light sensitive uses. Ongoing over the life of the plan Lead Agency Revised MMRP for the Connect SoCal Plan, Exhibit A Resolution No. 20-624-1 Impact Sciences, Inc. 4 Revised MMRP for the Connect SoCal Plan, Exhibit A 1329.001 September 2020 Mitigation Measure Mitigation Monitoring Timing Responsible Monitoring Entity
- f) Provide structural and/or vegetative screening from light-sensitive uses.
- g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
- h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
- i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

Applicability to the Project

As analyzed below, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Compliance with regulatory requirements would further ensure that impacts associated with light and glare would be less than significant. As such, Mitigation Measure PMM AES-3 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project. However, as part of the Project, some of the design elements outlined in Mitigation Measure PMM AES-3 from the 2020–2045 RTP/SCS PEIR would be incorporated, including use of shielded light fixtures with low reflectivity, limiting construction activities to the permitted construction hours, incorporating lighting to minimize off-site light pollution, and use of low-reflective glass.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM AES-1: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
- b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.

- c) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
- d) Retain or replace trees bordering highways, so that clear-cutting is not evident.
- e) Provide new corridor landscaping that provides appropriate transitions to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
- f) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity.
- g) Use see-through safety barrier designs (e.g., railings rather than walls), as appropriate.

Applicability to the Project

As analyzed below, the Project would not have a substantial adverse effect on a scenic vista and, therefore, Mitigation Measure PMM AES-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project. However, consistent with Mitigation Measure PMM AES-1 (f) from the 2024–2050 RTP/SCS PEIR as well as standard industry practice, construction fencing would be installed along the perimeter of the Project Site during construction of the Project to screen construction activities from view.

PMM AES-2: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
- b) Design landscaping along highway corridors to add substantial natural elements and visual interest to soften the hard-edged, linear transportation corridors.
- c) Develop design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
- d) Design projects consistent with design guidelines of applicable general plans.
- e) Keep sites in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.

- f) Where sound walls are proposed, account for visual impacts during sound wall construction and design methods as follows:
 - use transparent panels to preserve views where sound walls would block views from residences;
 - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;
 - construct sound walls of materials whose color and texture complements the surrounding landscape and development;
- g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.

Applicability to the Project

The Project Site is located within an urbanized area and, thus, pursuant to Aesthetics Threshold (c), the analysis included herein is focused on whether the Project would conflict with applicable zoning and other regulations governing scenic quality rather than on visual character. Thus, as Mitigation Measure PMM AES-2 from the 2024–2050 RTP/SCS PEIR addresses visual character, it is not applicable to the Project. However, the Project would incorporate some of the design elements outlined in this mitigation measure, including minimizing contrasts in scale and massing with the surrounding area, designing the Project consistent with applicable design guidelines, and maintaining the Project Site such that blight or nuisance conditions do not occur.

- PMM AES-3:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Use lighting fixtures that are shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
 - b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7 a.m. to 10 p.m.
 - c) Use energy-efficient, low-glare fixtures for outdoor lighting.
 - d) Use unidirectional lighting to avoid light trespass onto adjacent properties.
 - e) Design exterior lighting to confine illumination to the project site, and/or to areas that do not include light-sensitive uses.
 - f) Provide structural and/or vegetative screening from light-sensitive uses.
 - g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
 - h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.

- i) Direct architectural lighting onto the building surfaces and have low reflectivity to minimize glare and limit light spillover onto adjacent properties.

Applicability to the Project

As analyzed below, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Compliance with regulatory requirements would further ensure that impacts associated with light and glare would be less than significant. As such, Mitigation Measure PMM AES-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project. However, as part of the Project, some of the design elements outlined in Mitigation Measure PMM AES-3 from the 2024–2050 RTP/SCS would be incorporated, including use of shielded light fixtures with low reflectivity, limiting construction activities to the permitted construction hours, incorporating lighting to minimize off-site light pollution, and use of low-reflective glass.

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista is a panoramic view of a valued visual resource. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.

Valued visual resources in the vicinity of the Project Site include the Hollywood Hills to the distant north. In the immediate vicinity of the Project Site, public views of the Hollywood Hills are limited due to distance and intervening development blocking such views. Views of the Hollywood Hills to the distant north would continue to be available on an intermittent basis along nearby roadway segments following development of the Project. In particular, given the Project's Site's location, the Project would not block existing views of the Hollywood Hills that may be available along Sunset Boulevard. ***Therefore, the Project would not have a substantial adverse effect on existing views of the Hollywood Hills. Moreover, pursuant to PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered a significant impact on the environment and therefore do not have to be evaluated under CEQA. No impact would occur.***

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

No Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), which lies approximately 15 miles northeast of the Project Site.⁹ ***Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to or in the immediate vicinity of the Project Site. Moreover, pursuant to PRC Section 21099(d)(1), the Project's***

⁹ California Department of Transportation, Scenic Highways, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed August 8, 2024.

aesthetic impacts shall not be considered a significant impact on the environment and therefore do not have to be evaluated under CEQA. No impact would occur.

c. In non-urbanized areas, would the project 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?

No Impact. As discussed above, pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered a significant impact on the environment and therefore do not have to be evaluated under CEQA. Notwithstanding, a brief discussion of the Project's general consistency with applicable zoning and other regulations governing scenic quality is provided below.¹⁰

With regard to zoning, the proposed residential and commercial uses would be consistent with the types of uses permitted in the C4 zone of the Project Site, which include commercial, office, multi-family residential, retail, and hotel uses. As such, the Project would not conflict with applicable zoning.

Local land use plans applicable to the Project Site that include policies that address scenic quality include the Los Angeles Municipal Code (LAMC), the City of Los Angeles General Plan Framework Element (Framework Element), the Hollywood Community Plan (Community Plan), and the Citywide Design Guidelines. These plans, policies, and regulations are discussed in more detail below.

General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City's vision for future development in the City. Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts. The Project design would contribute to the overall quality of the visual environment and would not contrast with the varying design elements of the uses adjacent to the Project Site. The Project would not conflict with the applicable goals, policies, and objectives set forth in the Framework Element regarding scenic quality.

Hollywood Community Plan

As it relates to scenic quality, the Hollywood Community Plan¹¹ includes Objective 7, which encourages the preservation of open space consistent with property rights when privately owned and to promote

¹⁰ Pursuant to Public Resources Code Section 21071, an "urbanized area" can be defined as an incorporated city that has a population of at least 100,000 persons. The Project Site is located within the City of Los Angeles, which is an incorporated city with a population well over 100,000 persons.

¹¹ On May 3, 2023, the Los Angeles City Council adopted the Hollywood Community Plan Update. Following adoption of the updated Hollywood Community Plan, the implementing ordinances will be reviewed and finalized by the City Attorney, to ensure clarity of regulations and consistency with state law, which can take approximately six months to a year. After this process is complete, the updated Hollywood Community Plan will be brought into effect by the City Council. However, (Footnote continued on next page)

the preservation of views, natural character, and topography of mountainous parts of the Community for the enjoyment of both residents and persons throughout the Los Angeles region. As previously discussed, the area surrounding the Project Site is fully developed and highly urbanized, and no panoramic views of valued visual resources are currently available from the Project Site. Also, the existing limited and intermittent views of the Hollywood Hills to the distant north would not be affected by the Project and would continue to be available along segments of Sunset Boulevard. Thus, the Project would not conflict with the applicable objective set forth in the Community Plan regarding scenic quality.

Citywide Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines. In particular, the Project would support Guideline 1 to promote a safe, comfortable, and accessible pedestrian experience for all by incorporating a design that would provide a safe, comfortable, and accessible environment. Specifically, the Project would install landscaping along the Project Site perimeter, including new trees and plantings which would integrate the Project with the surrounding uses and activate the streetscape. Access points would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. The Project would also comply with Americans with Disabilities Act (ADA) requirements. Furthermore, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Similarly, the Project would support Guideline 2 to carefully incorporate vehicular access such that it does not degrade the pedestrian experience as well as Guideline 3 that calls for designing projects to actively engage with streets and public space and maintain human scale. Additionally, as the scale, massing, and location of the Project would respond to the surrounding urban context, the Project would support Guideline 4 to organize and shape projects to recognize and respect surrounding context.

The Project would further support Guideline 5, which calls for projects to express a clear and coherent architectural idea. In particular, the Project design would express an active, pedestrian-friendly, compatible design that would complement the varying design elements of the uses adjacent to the Project Site. The Project would also support Guideline 6 to provide amenities that support community building and provide an inviting, comfortable user experience. As previously discussed, the Project would enhance the streetscape adjacent to the Project Site by developing an active ground floor commercial space and installing new landscaping. In addition, the Project would provide a minimum of 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck on Level 3, and 4,538 square feet of interior tenant resident common areas on Levels 3 and 5, which includes a clubroom, clubhouse, and fitness center. As also previously described above, the Project would support Guideline 7 to carefully arrange design elements and uses to protect site users by ensuring that the proposed driveways be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and incorporating

as the Project has a vested right under SB 330, the current Hollywood Community Plan would continue to apply to the Project instead of the updated Hollywood Community Plan.

pedestrian warning systems along the proposed driveways. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry to the commercial and residential uses.

Lastly, the Project would support Guideline 8 to protect the site's natural resources and features; Guideline 9 to configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users; and Guideline 10 to enhance green features to increase opportunities to capture stormwater and promote habitat. Specifically, the Project would comply with the City's standards regarding tree replacement for any trees removed and would include additional trees and landscaping as well as open space in accordance with LAMC requirements. The Project has also been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code. The Project would also comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff.

Based on the above, the Project would not conflict with applicable regulations governing scenic quality. Moreover, pursuant to PRC Section 21099(d)(1), the Project's aesthetics impacts shall not be considered a significant impact on the environment. Therefore, no impacts would occur.

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

No Impact. Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the vicinity of the Project Site. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas. Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation 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 from which the sun can reflect, particularly following sunrise and prior to sunset. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

Construction

While most Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary, for a short duration while construction activities conclude for the day, and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance

with LAMC light intensity requirements.¹² Additionally, as part of the Project, construction lighting would be shielded to minimize the potential for light spillover to affect adjacent residential properties.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. Minor amounts of glare could also occur due to on-site vehicles. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur.

Operation

All Project lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. The Project would also not include signage with flashing or mechanical properties. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

As it relates to glare, sun reflection from Project development could occur when the sun is low on the horizon, and motor vehicle operations could be affected when the point of reflection within the Project Site is in front of the driver. The Project would feature a variety of surface materials, including, but not limited to, glass, concrete, timber, and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight. Nighttime glare could result primarily from on-site illumination and vehicle headlights. As described above, the Project's illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area.

Based on the above, construction and operation of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered a significant impact on the environment and therefore do not have to be evaluated under CEQA. No impacts would occur.

Cumulative Impact

Less Than Significant Impact. A cumulative analysis of aesthetic impacts includes the related projects that would be sufficiently close to influence the aesthetics of the immediate area surrounding the Project

¹² LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

Site, that fall within the same viewshed as the Project, or that affect the same off-site sensitive uses. As shown in Figure 17 on page 370, of this SCEA, only Related Project No. 2 and Related Project No. 3 are close enough to the Project Site to be considered in the cumulative analysis of aesthetics. Related Project No. 2 is located at 1400 N. Vine Street and involves the development of 200 apartment units and 4,700 square feet of retail space. Related Project No. 3 is located at 1360 N. Vine Street and involves the development of 463,521 square feet of office space, 11,914 square feet of restaurant space, and 8,988 square feet of rehabilitated uses (residential, restaurant, or office uses). Like the Project, pursuant to PRC Section 21099, Related Project Nos. 2 and 3 are mixed-use residential projects that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the aesthetic impacts of the Project and these two related projects would not be considered significant impacts on the environment. **Therefore, the Project's contribution to cumulative impacts regarding aesthetics would not be cumulatively considerable and cumulative impacts would be less than significant.**

II. AGRICULTURE AND FOREST 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential.
- b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
- c) Maintain and expand agricultural land protections such as urban growth boundaries.
- d) Provide for mitigation fees to support a mitigation bank¹³ that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.
- e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

Applicability to the Project

As analyzed below, the Project would not convert farmland to non-agricultural use, and therefore, Mitigation Measure PMM AG-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as

¹³ The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see www.wildlife.ca.gov/Conservation/Planning/Banking).

determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
- b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection

Applicability to the Project

The Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site. Thus, Mitigation Measure PMM AG-2 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.

Applicability to the Project

The Project Site does not contain and is not near agricultural or forestry resources, and therefore, Mitigation Measure PMM AG-3 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
- b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
- c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other

infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.

Applicability to the Project

The Project Site is not zoned for agricultural uses and there is no farmland on the Project Site. Thus, Mitigation Measure PMM AG-4 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

Applicability to the Project

The Project Site is not zoned for agricultural uses and is not located adjacent to agricultural uses. Thus, Mitigation Measure PMM AG-5 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM AG-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Provide permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential to mitigate for loss of farmland.
- b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
- c) Maintain and expand agricultural land protections such as urban growth boundaries.
- d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.

- e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

Applicability to the Project

As analyzed below, the Project would not convert farmland to a non-agricultural use; therefore, Mitigation Measure PMM AG-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM AG-2: Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:

- a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
- b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10- year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.

Applicability to the Project

The Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site. Thus, Mitigation Measure PMM AG-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM AG-3: Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of forest land to maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:

- a) Minimize construction related impacts to forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with forestry resources.
- b) Acquire conservation easements for the loss of forestland.
- c) Coordinate with responsible agencies including the United States Forest Service and Bureau of Land Management, as appropriate, regarding applicable requirements for transportation and urban land use projects within designated National Monuments in the SCAG region.

Applicability to the Project

The Project Site does not contain forest land; therefore, Mitigation Measure PMM AG-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM AG-4: Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:

- a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
- b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
- c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.

Applicability to the Project

The Project Site is not zoned for agricultural uses and there is no farmland on the Project Site. Thus, Mitigation Measure PMM AG-4 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM AG-5: Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures:

- a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

Applicability to the Project

The Project Site is not zoned for agricultural uses and is not located adjacent to agricultural uses. Thus, Mitigation Measure PMM AG-5 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

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

No Impact. The Project Site is located in an urbanized area of the City and is designated Regional Center Commercial and is zoned for commercial and residential uses (C4-2D-SN, [Q]C4-2D-SN, and R4-2D). As discussed in Section 3, Project Description, of this SCEA, the Project Site is currently developed with residential, commercial, retail, and restaurant uses. No agricultural uses or operations occur on-site or directly adjacent to the Project Site. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation or the City.^{14,15} ***Thus, the Project would not convert farmland to a non-agricultural use and no impact would occur.***

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. As discussed above, the Project Site is zoned for commercial and residential uses and does not include zoning for agricultural uses. The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) enables local governments to enter contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Project Site and surrounding area are not enrolled under a Williamson Act Contract.¹⁶ ***Therefore, the Project would not conflict with any existing zoning for agricultural uses, or a Williamson Act Contract, and no impact would occur.***

c. Would the project 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. As previously discussed, the Project Site is located in an urbanized area and is currently developed with residential, commercial, retail, and restaurant uses. The Project Site is designated as

¹⁴ California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed August 8, 2024.

¹⁵ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031.

¹⁶ California Department of Conservation, The Williamson Act Status Report 2020–2021.

Regional Center Commercial and is zoned for commercial and residential uses (C4-2D-SN, [Q]C4-2D-SN, and R4-2D). The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial and residential uses and is not zoned and/or used as forest land.¹⁷ ***Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by Public Resources Code section 12220(g), Public Resources Code Section 4526, and Government Code Section 51104(g), and no impact would occur.***

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is located in an urbanized area and is not designated, zoned, or used as forest land. The Project Site is currently developed with residential, commercial, retail, and restaurant uses. ***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. Would the project 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. As described above, the Project Site is located within an urbanized area, and there is no farmland or forest land on or near the Project Site. ***Therefore, the Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use and no impact would occur.***

Cumulative Impacts

No Impact. The geographic context for a cumulative impact analysis on agriculture resources is the County of Los Angeles (County), and the geographic context for the cumulative analysis on forest resources is CAL FIRE's 19.9-million-acre South Coast area, which encompasses four national forests (Angeles, Cleveland, Los Padres, and San Bernardino) and other federal, state, and privately-owned land. The Project and related projects are located within a developed, urbanized area of the City generally zoned for commercial and residential uses and do not support existing farming, agricultural, or forest-related uses or operations. Thus, development of the Project and related projects would not result in the conversion of State-designed agricultural land from an agricultural use to a non-agricultural use or result in the loss of forest land or the conversion of forest land to non-forest use. ***Therefore, the Project's contribution to cumulate impacts regarding agricultural resources would not be cumulatively considerable and no cumulative impacts would occur.***

¹⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031.

III. AIR QUALITY

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Minimize land disturbance.
- b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
- c) Cover trucks when hauling dirt.
- d) Stabilize the surface of dirt piles if not removed immediately.
- e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads
- f) Minimize unnecessary vehicular and machinery activities.
- g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- i) On Caltrans projects, Caltrans Standard Specifications 10—Dust Control, 17—Watering, and 18—Dust Palliative shall be incorporated into project specifications.
- j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be

used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required.

- k) Ensure that all construction equipment is properly tuned and maintained.
- l) Minimize idling time to 5 minutes or beyond regulatory requirements—saves fuel and reduces emissions.
- m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.
- p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
- q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.
- r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.

- s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.
- t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
- u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- v) As applicable for airport projects, the following measures should be considered:
 - a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxiing, if feasible as allowed per Federal Aviation Administration guidelines.
 - b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
 - c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.
- w) As applicable for port projects, the following measures should be considered:
 - a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).
 - b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.
 - c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.
 - d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.
 - e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.
 - f. Encourage the participation in the Green Ship Incentives.
 - g. Offer incentives to encourage the use of on-dock rail.
- x) As applicable for rail projects, the following measures should be considered:
 - a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.

- y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.
- z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.
 - a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
 - b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
 - c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents.
 - d. Provide information to residents on where MERV filters can be purchased.
 - e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
 - f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
 - g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
 - h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
 - i. Develop a process for evaluating the effectiveness of the enhanced filtration units.
- aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities
- bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:
 - Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
 - Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. diesel engines on site shall be Tier 2 or higher.
 - Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85%

for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.

- Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
 - Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less
 - The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
 - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
 - ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
 - iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
 - The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
 - The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator on-site, includes:
 - i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
 - ii. Any problems with the equipment or emission controls.
 - iii. Certified copies of fuel deliveries for the time period that identify:
 - 1. Source of supply
 - 2. Quantity of fuel
 - 3. Quantity of fuel, including sulfur content (percent by weight)
- cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:
- Install programmable thermostat timers
 - Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).

- Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
- Install higher efficacy public street and area lighting
- Limit outdoor lighting requirements
- Replace traffic lights with LED traffic lights
- Establish on-site renewable or carbon neutral energy systems—generic, solar power and wind power
- Utilize a combined heat and power system
- Establish methane recovery in Landfills and Wastewater Treatment Plants.
- Locate project near bike path/bike lane
- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.
- Provide traffic calming measures, such as:
 - i. Marked crosswalks
 - ii. Count-down signal timers
 - iii. Curb extensions
 - iv. Speed tables
 - v. Raised crosswalks
 - vi. Raised intersections
 - vii. Median islands
 - viii. Tight corner radii
 - ix. Roundabouts or mini-circles
 - x. On-street parking
 - xi. Chicanes/chokers
- Create urban non-motorized zones
- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:
 - i. Elimination (or reduction) of minimum parking requirements
 - ii. Creation of maximum parking requirements
 - iii. Provision of shared parking
- Require residential area parking permit.
- Provide ride-sharing programs

- i. Designate a certain percentage of parking spacing for ride sharing vehicles
- ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
- iii. Providing a web site or messaging board for coordinating rides
- iv. Permanent transportation management association membership and finding requirement.

Applicability to the Project

Mitigation Measure PMM AQ-1(q) from the 2020–2045 RTP/SCS PEIR MMRP, which requires Tier 4 Final equipment or better for all engines above 50 horsepower would exceed regulatory requirements. However, as analyzed under Air Quality Threshold (b) below, air quality impacts with regard to the Project's short-term regional construction emissions would be less than significant without implementation of mitigation measures. Therefore, Mitigation Measure PMM-AQ-1(q) would not be necessary. The remainder of the measures included in Mitigation Measure PMM AQ-1 are not applicable to the Project, as existing regulatory measures that would apply to the Project, including those identified by the California Air Resources Board (CARB) and SCAG to facilitate consistency with applicable air quality plans, as discussed below, are equal to or more effective than the remaining measures of Mitigation Measure PMM AQ-1 from the 2020–2045 RTP/SCS PEIR MMRP.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce significant adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Minimize land disturbance.
- b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
- c) Cover trucks when hauling dirt.
- d) Stabilize the surface of dirt piles if not removed immediately.
- e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads
- f) Minimize unnecessary vehicular and machinery activities.
- g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
- j) Assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile)

equipment (50 horsepower [hp] and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.

- k) Ensure that all construction equipment is properly tuned and maintained.
- l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.
- m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
- p) Obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site.
- q) Use Tier 4 Final equipment or better for all engines above 50 hp. In the event that construction equipment cannot meet to Tier 4 Final or better engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the project's lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 Final or better engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible.
- r) Projects located within the South Coast Air Basin and the Coachella Valley should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NO_x emissions from in-use off-road diesel vehicles.

- s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for identification of additional feasible mitigation that can be applied to individual projects.
- t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
- u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- v) As applicable for airport projects, the following measures should be considered:
 - Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxiing, if feasible as allowed per Federal Aviation Administration guidelines.
 - Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
 - Use ground service equipment (GSE) that can operate on battery-power. If using electric equipment is not feasible, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4 Final, at a minimum.
- w) As applicable for port projects, the following measures should be considered:
 - Develop specific timelines for transitioning to zero-emissions cargo handling equipment (CHE).
 - Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.
 - Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.
 - Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.
 - Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.
 - Encourage the participation in the Green Ship Incentives.
 - Offer incentives to encourage the use of on-dock rail.
- x) As applicable for rail projects, the following measures should be considered:
 - Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.
- y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high-efficiency or enhanced filtration

units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

- z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.
 - Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
 - Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
 - Disclose the potential increase in energy costs for running the HVAC system to prospective residents.
 - Provide information to residents on where MERV filters can be purchased.
 - Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
 - Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
 - Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
 - Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
 - Develop a process for evaluating the effectiveness of the enhanced filtration units.
- aa) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on the SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color.
- bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:
 - Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
 - Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
 - Nonroad diesel engines on site shall be Tier 2 or higher.
 - Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions

by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.

- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
 - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
 - ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
 - iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
 - Establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
 - Maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:
 - i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
 - ii. Any problems with the equipment or emission controls.
 - iii. Certified copies of fuel deliveries for the time period that identify:
 - 1. Source of supply
 - 2. Quantity of fuel
 - 3. Quantity of fuel, including sulfur content (percent by weight)
- cc) Promote energy efficiency and exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code):
- Install programmable thermostat timers
 - Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).
 - Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
 - Install higher efficacy public street and area lighting
 - Limit outdoor lighting requirements
 - Replace traffic lights with LED traffic lights
 - Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power

- Utilize a combined heat and power system.
- dd) Promote transportation efficiency. The following measures can be used to increase transportation efficiency:
- Locate project near bike path/bike lane
 - Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers
 - Provide traffic calming measures, such as:
 - i. Marked crosswalks
 - ii. Count-down signal timers
 - iii. Curb extensions
 - iv. Speed tables
 - v. Raised crosswalks
 - vi. Raised intersections
 - vii. Median islands
 - viii. Tight corner radii
 - ix. Roundabouts or mini-circles
 - x. On-street parking
 - xi. Chicanes/chokers
 - Create urban non-motorized zones
 - Provide bike parking in non-residential and multi-unit residential projects
 - Dedicate land for bike trails
 - Limit parking supply through:
 - i. Elimination (or reduction) of minimum parking requirements
 - ii. Creation of maximum parking requirements
 - iii. Provision of shared parking
 - Require residential area parking permit.
 - Provide ride-sharing programs
 - i. Designate a certain percentage of parking spacing for ride sharing vehicles
 - ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
 - iii. Providing a web site or messaging board for coordinating rides
 - iv. Permanent transportation management association membership and finding requirement.
- ee) Lengthen the construction period during smog season (May through October) by extending the construction hours per workday or number of days worked

per week, to minimize the number of vehicles and equipment operating at the same time.

- ff) Install signage containing the complaint number of the local air district where construction activities are located at the construction sites.

Applicability to the Project

Mitigation Measure PMM AQ-1(q) from the 2024–2050 RTP/SCS PEIR MMRP, which requires Tier 4 Final equipment or better for all engines above 50 horsepower would exceed regulatory requirements. However, as analyzed under Air Quality Threshold (b) below, air quality impacts with regard to the Project's short-term regional construction emissions would be less than significant without implementation of mitigation measures. Therefore, Mitigation Measure PMM-AQ-1(q) would not be necessary. The remainder of the measures included in Mitigation Measure PMM AQ-1 are not applicable to the Project, as existing regulatory measures that would apply to the Project, including those identified by the California Air Resources Board (CARB) and SCAG to facilitate consistency with applicable air quality plans, as discussed below, are equal to or more effective than the remaining measures of Mitigation Measure PMM AQ-1 from the 2024–2050 RTP/SCS PEIR MMRP.

- PMM AQ-2:** For projects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one quarter mile (1,320 feet) of a sensitive land use, project leads, should prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project should incorporate feasible mitigation measures to reduce air pollutant emissions.

Applicability to the Project

Consistent with Mitigation Measure PMM AQ-2 from the 2024–2050 RTP/SCS PEIR, potential localized air quality impacts were evaluated in conformance with SCAQMD's methodology for assessing localized significance thresholds (LST) air quality impacts. As analyzed below, the construction and operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds. As no Project-specific impact related to localized emissions would occur, Mitigation Measure PMM AQ-2 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

- PMM AQ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to other emissions (such as those leading to odors) adversely affecting a substantial number of people. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Implement an odor management plan that consistent with the requirements from the local air quality management district or air pollution control district.
 - b) Implement an odor control technique(s) or strategy(ies) consistent with the requirements from the local air quality management district or air pollution control district. Odor control techniques or strategies may include air filters,

air scrubbers, enclosures, buzzer zones, physical barriers, housekeeping practices, or other techniques or strategies.

Applicability to the Project

As discussed below, the Project would not create or result in other emissions, such as those leading to objectionable odors. As no Project-specific impact would occur, Mitigation Measure PMM AQ-3 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O₃]). SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2022 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.¹⁸ With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP.

The 2022 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2020–2045 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are consistent with the plan and would not interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

¹⁸ SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

As described in detail in Section 3, Project Description, of this SCEA, the Project would include the development of a new 201,134-square-foot mixed-use building that would include new residential and retail/restaurant uses. Specifically, the Project would provide 170 residential units, including 34 affordable housing units, and 16,680 square feet of retail uses.

As discussed below under Item XIV, Population and Housing, the Project would increase the residential population as well as the daytime population (employees) within the Project Site. Specifically, based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 383 residents.¹⁹ The Project's 16,680 square feet of ground-floor commercial space would generate approximately 33 new employees based on employee generation rates developed by the LADOT.²⁰ This increase in population and employees would be well within the existing population and employment projections for the community and region and would be able to be accommodated by vacancies in the housing stock and new residential units currently being developed in the region, as detailed below under Item XIV, Population and Housing. Furthermore, while the Project would generate jobs associated with construction of the Project, these employment opportunities would be short-term opportunities during construction and are employment positions that circulate throughout the region based on the construction site. Therefore, due to the Project's minimal increase in population and employment in the City, the Project would be consistent with the demographic projections set forth in SCAG's 2020-2045 RTP/SCS, which were also used in the 2022 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2022 AQMP.

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. With regard to consistency with growth projections for the 2024–2050 RTP/SCS, as discussed below in Section XIV, Population and Housing, the Project would represent approximately 1.03 percent of the projected growth in the SCAG region between 2023 and 2026 (i.e., the Project's baseline and anticipated buildout year) and approximately 0.11 percent of the projected employment growth in the SCAG Region between 2023 and 2026. Therefore, the Project's contribution to population and employment growth would be also consistent with projections contained in the 2024–2050 RTP/SCS.

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

¹⁹ City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.

²⁰ Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 2 employees per 1,000 square feet of "General Retail."

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

As previously noted, the Project would add new residential and commercial uses within the Project Site resulting in increases in residential population and employees. The Project Site's location within the existing highly urbanized Hollywood Community Plan area would reduce per capita vehicle miles traveled (VMT) and related vehicle emissions in comparison to a project located in a non-urban environment, as discussed further under Item XVII, Transportation, and in the Transportation Assessment included as Appendix L.1 of this SCEA (which includes the VMT Calculator analysis for the Project).²¹ High population density would result in employees potentially living closer to the Project Site, reducing travel distances and overall VMT. The Project's 170 residential units, including the 34 affordable units, would provide the opportunity for workers to live within proximity to their place of employment. In addition, the Project would be developed in an urban area within proximity to other residential and commercial uses and along an active transportation corridor with various public transit options and would include short- and long-term bicycle parking spaces for the proposed uses. The Project would also include primary entrances for pedestrians and bicyclists that would be safe and easily accessible. As such, the Project would promote the use of alternative modes of transportation and would facilitate a reduction in VMT, as discussed under Item XVII, Transportation, and the Transportation Assessment.

As shown in Table 5 through Table 8 on pages 87 through 90, respectively, in the analysis below, Project implementation would not exceed California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}), the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2022 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP. ***Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP, and impacts would be less than significant.***

²¹ Gibson Transportation Consultants, Inc., Supplemental Transportation Assessment for the Refined Sunset Vine 2 Project, Hollywood, California, March 16, 2023. See Appendix L.1 of this SCEA.

Table 5
Winter Regional and Localized Unmitigated Construction Emissions^a
(pounds per day)

Emission Type	VOC ^b	NO _x	CO	SO _x	PM ₁₀ ^c	PM _{2.5} ^c
Regional Emissions						
2024 ^d	3	38	35	<1	8	2
2025	5	27	61	<1	13	3
2026	4	24	58	<1	13	3
Maximum Regional Emissions	5	38	61	<1	13	3
Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(70)	(62)	(489)	(150)	(137)	(52)
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
2024 ^d	—	21	26	—	4	<1
2025	—	20	21	—	4	<1
2026	—	16	17	—	3	<1
Maximum Localized Emissions	—	21	26	—	4	<1
Localized Significance Threshold^e	—	70	928	—	9	4
Over/(Under) Threshold	—	(49)	(902)	—	(5)	(3)
Exceed Threshold?	—	No	No	—	No	No
<p>^a Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix A of this SCEA. CalEEMod modeling outputs are also provided in Appendix A of this SCEA. Numbers may not add up exactly due to rounding.</p> <p>^b CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.</p> <p>^c PM₁₀ and PM_{2.5} emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.</p> <p>^d For purposes of conservatively analyzing construction impacts, it was assumed that the Project's construction could start in 2024 with buildout in 2026. Based on SCAQMD factors, the construction equipment and truck fleet mix will emit less pollution in future years due to more stringent emissions control regulations. As construction activities for the Project are evaluated based on an earlier start date, the emissions presented are more conservative.</p> <p>^e The SCAQMD LSTs are based on Source Receptor Area No. 1 (Central LA) for a 1.74-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located adjacent to the Project Site. Refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.</p> <p>Source: Eyestone Environmental, September 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.</p>						

Table 6
Summer Regional and Localized Unmitigated Construction Emissions^a
(pounds per day)

Emission Type	VOC ^b	NO _x	CO	SO _x	PM ₁₀ ^c	PM _{2.5} ^c
Regional Emissions						
2024 ^d	3	37	35	<1	8	2
2025	5	24	68	<1	13	3
2026	19	23	64	<1	13	3
Maximum Regional Emissions	19	37	68	<1	13	3
Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(56)	(63)	(482)	(150)	(137)	(52)
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
2024 ^d	—	21	26	—	4	<1
2025	—	16	17	—	3	<1
2026	—	16	17	—	3	<1
Maximum Localized Emissions	—	21	26	—	4	<1
Localized Significance Threshold^e	—	70	928	—	9	4
Over/(Under) Threshold	—	(49)	(902)	—	(5)	(3)
Exceed Threshold?	—	No	No	—	No	No
<p>^a Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix A of this SCEA. CalEEMod modeling outputs are also provided in Appendix A of this SCEA. Numbers may not add up exactly due to rounding.</p> <p>^b CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.</p> <p>^c PM₁₀ and PM_{2.5} emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.</p> <p>^d For purposes of conservatively analyzing construction impacts, it was assumed that the Project's construction could start in 2024 with buildout in 2026. Based on SCAQMD factors, the construction equipment and truck fleet mix will emit less pollution in future years due to more stringent emissions control regulations. As construction activities for the Project are evaluated based on an earlier start date, the emissions presented are more conservative.</p> <p>^e The SCAQMD LSTs are based on Source Receptor Area No. 1 (Central LA) for a 1.74-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located adjacent to the Project Site. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.</p> <p>Source: Eyestone Environmental, September 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.</p>						

Table 7
Winter Project-Related Operational Emissions^a
(pounds per day)

Emission Type/Source	VOC ^b	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Operational Emissions						
Area	3	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	3	2	17	<1	4	<1
Stationary (Emergency Generator)	<1	1	1	<1	<1	<1
Project Regional Emissions	6	3	17	<1	4	<1
Regional Significance Threshold	55	55	550	150	150	55
Over/(Under)	(49)	(52)	(533)	(150)	(146)	(54)
Exceed Threshold?	No	No	No	No	No	No
Project Localized Emissions ^c	—	1	<1	—	<1	<1
Localized Significance Threshold^d	—	70	928	—	2	1
Over/(Under) Threshold	—	(68)	(928)	—	(2)	(2)
Exceed Threshold?	—	No	No	—	No	No
<p><i>Note: Numbers may not add up exactly due to rounding</i></p> <p>^a Worksheets and modeling output files are provided in Appendix A of this SCEA.</p> <p>^b CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.</p> <p>^c Localized emissions include area, energy and stationary sources.</p> <p>^d The SCAQMD LSTs are based on Source Receptor Area No. 1 (Central LA) for a 1.74-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located adjacent to the Project Site. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.</p> <p>Source: Eyestone Environmental, September 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.</p>						

Table 8
Summer Project-Related Operational Emissions^a
(pounds per day)

Emission Type/Source	VOC ^b	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Operational Emissions						
Area	5	<1	14	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	3	2	18	<1	4	<1
Stationary (Emergency Generator)	<1	1	1	<1	<1	<1
Project Regional Emissions	8	3	33	<1	4	<1
Regional Significance Threshold	55	55	550	150	150	55
Over/(Under)	(47)	(52)	(517)	(150)	(146)	(54)
Exceed Threshold?	No	No	No	No	No	No
Project Localized Emissions ^c	—	1	15	—	<1	<1
Localized Significance Threshold^d	—	70	928	—	2	1
Over/(Under) Threshold	—	(68)	(913)	—	(2)	(2)
Exceed Threshold?	—	No	No	—	No	No
<p><i>Note: Numbers may not add up exactly due to rounding</i></p> <p>^a Worksheets and modeling output files are provided in Appendix A of this SCEA.</p> <p>^b CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.</p> <p>^c Localized emissions include area, energy and stationary sources.</p> <p>^d The SCAQMD LSTs are based on Source Receptor Area No. 1 (Central LA) for a 1.74-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located adjacent to the Project Site. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.</p> <p>Source: Eyestone Environmental, 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.</p>						

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

Less Than Significant Impact. As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively moderate air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The monitoring station most representative of the Project Site is the Central LA Station, located at 1360 North Main Street in the City of Los Angeles, approximately 6.0 miles southeast of the Project Site. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily

significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.²²

Construction

Construction of the Project has the potential to create regional air quality impacts by heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from site preparation, grading, and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides (NO_x) would result from the use of construction equipment such as loaders, excavators, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for NO_x; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides (SO_x); (5) 150 pounds per day for PM₁₀; and (6) 55 pounds per day for PM_{2.5}.²³

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over an approximately 30-month period (e.g., approximately 2024 through 2026). Construction would require approximately 40,123 cubic yards of total soil export.

Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod) Version 2022.1. Model results are provided in Appendix A of this SCEA. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of unmitigated maximum daily regional emissions for Project construction is presented in Table 5 and Table 6 on pages 87 and 88, along with the regional significance thresholds for each air pollutant. As shown in Table 5 and Table 6, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. As a result, regional construction emissions generated by the Project would result in a less than significant impact, and no mitigation measures are required.

²² SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed August 8, 2024.

²³ SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed August 8, 2024.

Localized Impacts

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.²⁴ SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, or PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. As the Project Site is 1.74-acres an interpolation between the 1 -acre and 2 -acre LSTs were used.

Estimates of maximum construction-related localized (on-site) daily emissions for NO_x, CO, PM₁₀, or PM_{2.5} are presented in Table 5 and Table 6 on pages 87 and 88. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 5 and Table 6. The nearest residential uses are located to the east of the Project Site. Consistent with SCAQMD guidance, a 25-meter (82-foot) receptor distance was used to evaluate impacts at these receptors.²⁵ As presented in Table 5 and Table 6, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, localized construction emissions resulting from the Project would result in less than significant impacts, and no mitigation measures are required.

Operation

SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy, water usage, and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the trip generation and VMT analysis included in the Transportation Assessment, included as Appendix L.1 of this SCEA. The VMT analysis is based on the LADOT VMT Calculator methodology and contains trip generation and daily VMT for the Project. In addition, the proposed land uses would result in an increase in emissions generated by energy sources (e.g., natural

²⁴ SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.

²⁵ SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.

gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings).

Regional Impacts

The results of the modeled emissions calculations are provided in Table 7 and Table 8 on pages 89 and 90, and CalEEMod model output files are provided in Appendix A of this SCEA. As indicated therein, the Project would result in an increase in criteria pollutant (VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}.) emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

The operation of the Project would not introduce any major new sources of air pollution within the Project Site. Localized emissions estimates for criteria air pollutants from on-site sources are presented in Table 7 and Table 8. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table 7 and Table 8, on-site localized operational emissions would not exceed any of the LSTs for NO_x, CO, PM₁₀, or PM_{2.5}.

Under existing conditions, CO levels in the Project area are substantially below the federal and state standards.²⁶ No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Air quality data from the SCAQMD Central LA monitoring station between years 2019-2021 indicate that the maximum CO levels in recent years are 1.5 ppm (1-hour average) and 1.0 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).²⁷

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project-impacted intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMP. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

²⁶ SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year, accessed May 5, 2023.

²⁷ SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year, accessed May 5, 2023.

SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.²⁸ Table 4-10 in Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue.²⁹ The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.³⁰ The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. Metro evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard and Veteran Avenue intersection and found it to be LOS E at peak morning traffic and LOS F at peak afternoon traffic.³¹ As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot.

At buildout of the Project, the Project is projected to have a net increase of 844 daily trips as calculated by the City's VMT Calculator as discussed under Item XVII, Transportation, and the Transportation Assessment, included in Appendix L.1 of this SCEA. The addition of these trips to any of the nearest study intersections would not result in an average daily traffic volume anywhere near the volumes analyzed in the 2003 AQMP. Therefore, the Project does not trigger the need for CO hotspots modeling and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Thus, impacts would be less than significant, and no Project mitigation would be required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) childcare centers; and (9) athletic fields. As previously described, the nearest sensitive

²⁸ SCAQMD, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

²⁹ The 8-hour average is based on a 0.7 persistence factor, as recommended by SCAQMD.

³⁰ Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

³¹ Metropolitan Transportation Authority. 2004. Congestion Management Program for Los Angeles County. Exhibit 2-6 and Appendix A.

receptor with respect to air quality are residential uses located adjacent to the Project Site (to the east of the Project Site).

As discussed above, construction and operation of the Project would result in less than significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which 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). Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The greatest potential for TAC emissions would generally involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxins are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events; thus, construction activities would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require an HRA for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. As such, given the short-term nature of these activities, TAC emission impacts during construction would be less than significant.

The Project would not include any sources of TACs such as generators, boilers or any other combustion sources. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site, and the Project does not propose any such uses. As such, an HRA was not required for the Project.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

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

Less Than Significant Impact. No objectionable odors are anticipated because of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses as it would include residential, retail, and restaurant uses. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

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

Based on the above, construction and operation of the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. According to SCAQMD, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As discussed above, the Project's construction-related and operational air quality emissions would be less than significant. Therefore, the Project's contribution to cumulative air quality impacts due to air emissions would not be cumulatively considerable and, therefore, would be less than significant.

Similar to the Project, the greatest potential for TAC emissions at each related project would generally involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Construction activities are temporary and short-term events; thus, construction activities at each related project would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require an HRA for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur

over relatively short durations. As such, given the short-term nature of these activities, cumulative TAC emission impacts during construction would be less than significant.

With respect to TAC emissions during operations, neither the Project nor any of the 45 related projects (which are largely residential, retail/commercial, and institutional), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. However, the Project and related projects would be subject to SCAQMD permitting and best available control technology (BACT) requirements to limit pollutant emissions. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB’s Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. The related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, as discussed above, the Project would not result in any substantial sources of TACs that have been identified by the CARB’s Land Use Guidelines and thus, would not contribute to a cumulative impact.

In conclusion, during construction and operation, the Project’s regional, localized, and TAC emissions would not be cumulatively considerable, and cumulative impacts would be less than significant.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
- b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include:
 - i. Impact minimization strategies
 - ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts
 - iii. Use of in-kind mitigation bank credits
 - iv. Funding of research and recovery efforts
 - v. Habitat restoration
 - vi. Establishment of conservation easements
 - vii. Permanent dedication of in-kind habitat.
- c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.

- d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.
- e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
- f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
- g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- h) Appoint a qualified biologist to monitor implementation of mitigation measures.
- i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
- j) Develop an invasive species control plan associated with project construction.
- k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.
- l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
- m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.
- n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.
- o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species

Applicability to the Project

As discussed below, the Project Site is fully developed and situated within an urban environment, and no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the vicinity of the Project Site. However, the Project would result in the removal of existing trees from the Project Site where migratory birds and other species (i.e., bats) could potentially nest or roost. Accordingly, as discussed below, and consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2020–2045 RTP/SCS PEIR provided below, the Project would adhere to regulatory compliance measures in accordance with the Migratory Bird Treaty Act and California Fish and Game Code, which are equal to or more effective than the relevant measures under Mitigation Measure PMM BIO-1, and which would ensure that the Project would not have a substantial adverse effect on species

covered under these regulations. Notwithstanding, the Project would incorporate relevant measures from Mitigation Measure PMM BIO-1 from the 2020–2045 RTP/SCS PEIR, which would be applicable to protected species that are not covered under existing regulatory measures (e.g., bats). Specifically, the Project would incorporate Mitigation Measures PMM BIO-1(g) and PMM BIO-1(i) from the 2020–2045 RTP/SCS PEIR, which would address potential impacts to other species that could potentially be affected due to the removal of the existing trees and ensure that potential impacts would be reduced to less than significant levels. The remainder of the measures included in Mitigation Measure PMM BIO-1 are not applicable to the Project due to the lack of other potential habitat on or in the vicinity of the Project Site.

PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.
- b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
- c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.
- d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.
- e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.
- g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.
- h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural

communities and riparian habitats and develop appropriate compensatory mitigation, where required.

- i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.
- j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.
- k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.
- m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.
- n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.
- o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.
- p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist
- q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).
- r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

Applicability to the Project

As discussed below, no riparian or other sensitive natural community exists on or near the Project Site or in the vicinity of the Project Site. Therefore, Mitigation Measure PMM BIO-2 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.

- a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.
- b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.
- c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:
 - Permittee-responsible mitigation
 - Contribution of in-kind in-lieu fees
 - Use of in-kind mitigation bank credits
 - Where avoidance is determined to be infeasible and
- d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
 - Avoidance
 - Impact Minimization On-site alternatives
 - On-site alternatives
 - Off-site alternatives
- e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether

aquatic resources will be affected and, if necessary, perform formal wetland delineation.

Applicability to the Project

As analyzed below, no water bodies or state and federally protected wetlands exist on or near the Project Site. Therefore, Mitigation Measure PMM BIO-3 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
- b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.
- c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
- d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at Project Sites from February 1 through August 31.
- e) Prohibit construction activities within 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
- f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
- g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.
- h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.
- i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.
- j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.

- k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore off-site habitat).
- l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.
- n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:
 - Wildlife movement buffer zones
 - Corridor realignment
 - Appropriately spaced breaks in center barriers
 - Stream rerouting
 - Culverts
 - Creation of artificial movement corridors such as freeway under or overpasses
 - Other comparable measures
- p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.
- r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.
- s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:
 - Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
 - Design exterior lighting to confine illumination to the Project Site

- Provide structural and/or vegetative screening from light-sensitive uses.
 - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
 - Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:
- Install temporary noise barriers during construction.
 - Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
 - Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
 - Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
 - Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
 - Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
 - Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake

silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.

- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- u) Require large buffers between sensitive uses and freeways.
- v) Create corridor redundancy to help retain functional connectivity and resilience.

Applicability to the Project

As discussed above, consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2020–2045 RTP/SCS PEIR, the Project would comply with the Migratory Bird Treaty Act and California Fish and Game Code, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. These regulatory compliance measures are equal to or more effective than relevant measures under Mitigation Measure PMM BIO-4 from the 2020–2045 RTP/SCS PEIR. Moreover, due to the lack of habitat, habitat linkages, or wildlife corridors on or in the vicinity of the Project Site, Mitigation Measure PMM BIO-4 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
- b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.
- c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.
- d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
- e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter

of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.

- f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
- g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.
- h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources
- i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
 - Avoidance strategies
 - Contribution of in-lieu fees
 - Planting of replacement trees
 - Re-landscaping areas with native vegetation post-construction
 - Other comparable measures developed in consultation with local agency and certified arborist.

Applicability to the Project

As analyzed below, the Project would not conflict with any local policies or ordinances protecting biological resources (trees). Thus, Mitigation Measure PMM BIO-5 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.
- b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.
- c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.

Applicability to the Project

As analyzed below, the Project would not conflict with any local policies or ordinances protecting biological resources. Thus, Mitigation Measure PMM BIO-6 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM BIO-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, and species that meet the definition of “rare” as defined in CEQA Guidelines Section 15380(b)(2). Such measures may include the following or other comparable measures identified by the lead agency:

- a) Avoid occupied habitat and potentially suitable habitat for threatened, endangered, or rare species, as well as designated critical habitat in project design, wherever practicable and feasible.

Where projects are determined to contain suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, prior to construction, conduct preconstruction focused species surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. If sensitive plants or wildlife are present, identify and implement species-specific measures to avoid, minimize, and mitigate for potential impacts in consultation with USFWS or CDFW.

- b) Where avoidance is determined to be infeasible for species protected under FESA, CESA, or local/regional species habitat conservation plan, provide conservation measures to result in no net loss of sensitive habitats and open space and fulfill the requirements of the applicable authorization for incidental

take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special-status species may include:

- i. Impact minimization strategies
 - ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts
 - iii. Use of in-kind mitigation bank credits
 - iv. Funding of research and recovery efforts
 - v. Habitat restoration
 - vi. Establishment of conservation easements
 - vii. Permanent dedication of in-kind habitat.
- c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
 - d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.
 - e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
 - f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
 - g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
 - h) Appoint a qualified biologist to monitor implementation of mitigation measures.
 - i) Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
 - j) Develop an invasive species control plan associated with project construction.
 - k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.
 - l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
 - m) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings and may use alternatives

to hydrocarbon-based asphalt paving to mitigate for potential hydrocarbon and heavy metal contamination.

Applicability to the Project

As discussed below, the Project Site is fully developed and situated within an urban environment, and therefore no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the surrounding area. However, the Project would result in the removal of existing trees from the Project Site, where migratory birds and other species (e.g., bats) could potentially nest or roost. Accordingly, as discussed below, and consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2024–2050 RTP/SCS PEIR, the Project would adhere to regulatory compliance measures in accordance with the Migratory Bird Treaty Act and California Fish and Game Code, which are equal to or more effective than the relevant measures under Mitigation Measure PMM BIO-1 from the 2024–2050 RTP/SCS PEIR, and which would ensure that the Project would not have a substantial adverse effect on species covered under these regulations. In addition, the Project would incorporate relevant measures from Mitigation Measure PMM BIO-1, as detailed below, which would be applicable to protected species that are not covered under existing regulatory measures (e.g., bats). Specifically, the Project would incorporate Mitigation Measure PMM BIO-1(g) and Mitigation Measure PMM BIO-1(i) from the 2024–2050 RTP/SCS PEIR, which would address potential impacts to other species that could potentially be affected due to the removal of the existing trees, and ensure that potential impacts would be reduced to less than significant levels. The remainder of the measures included in Mitigation Measure PMM BIO-1 from the 2024–2050 RTP/SCS PEIR are not applicable to the Project due to the lack of other potential habitat on or in the vicinity of the Project Site.

PMM BIO-2: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.
- b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
- c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.
- d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.

- e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.
- g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.
- h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.
- i) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to sensitive communities.
- j) Appoint a qualified biologist to monitor implementation of mitigation measures.
- k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist or regulatory specialist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.
- m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant to an adopted regional conservation plan.
- n) Install temporary construction fencing and/or mark sensitive habitat to be avoided during construction activities.
- o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified ecologist/biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified ecologist/biologist.
- p) Revegetate with appropriate indigenous native vegetation following the completion of construction activities. as identified by the qualified ecologist/biologist.
- q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).
- r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging

growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

Applicability to the Project

As discussed below, no riparian or other sensitive natural community exists on the Project Site or in the surrounding area. Therefore, Mitigation Measure PMM BIO-2 from the 2024-2050 RTP/SCS PEIR is not applicable to the Project.

PMM BIO-3: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands. Such measures may include the following or other comparable measures identified by the lead agency.

- a) Conduct an aquatic resources delineation by a qualified biologist or regulatory specialist to identify and map the extent of state and federally protected aquatic resources. Avoid state and federally protected aquatic resources in project design, consistent with the provisions of Sections 404 and 401 of the CWA and Section 1600 of Fish and Game Code, wherever practicable and feasible.
- b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered waters of the state of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.
- c) Where avoidance of wetlands is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE or SAA by the CDFW. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with USACE's Final Compensatory Mitigation Rule or the CDFW SAA conditions. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as feasible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance, or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The rule establishes performance standards, sets timeframes for decision making, and to the maximum extent feasible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:
 - Permittee-responsible mitigation

- Contribution of in-kind in-lieu fees
- Use of in-kind mitigation bank credits
- d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
 - Avoidance
 - Impact Minimization On-site alternatives
 - On-site alternatives
 - Off-site alternatives
- e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

Applicability to the Project

As analyzed below, no water bodies or state and federally protected wetlands exist on the Project Site. Therefore, the measures included in Mitigation Measure PMM BIO-3 from the 2024–2050 RTP/SCS PEIR are not applicable to the Project.

PMM BIO-4: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
- b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.
- c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 Section 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
- d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.
- e) Prohibit construction activities within 300 feet, or modified as appropriate by a qualified biologist, of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.

- f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
- g) When feasible and practicable, minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors in project design.
- h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.
- i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.
- j) Review construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.
- k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).
- l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities.
- n) Install directional wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the temporal or permanent loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in PMM BIO-1(b), where applicable:
 - Wildlife movement buffer zones
 - Corridor realignment
 - Appropriately spaced breaks in center barriers
 - Stream rerouting
 - Culverts
 - Creation of artificial movement corridors such as freeway under- or overpasses

- Acquire contiguous adjacent land parcels to be protected in perpetuity from encroachment and development
 - Other comparable measures
- p) Where the lead agency has identified that an RTP/SCS project, or other regionally significant project, has the potential to impact open space or wildlife nursery site areas that are not designated as such by federal, state, or local jurisdictions, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- q) Incorporate applicable and appropriate guidance (e.g., FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.
- r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.
- s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as but not limited to:
- Use high-pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
 - Design exterior lighting to confine illumination to the project site.
 - Provide structural and/or vegetative screening from light-sensitive uses.
 - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
 - Direct architectural lighting onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:
- Install temporary noise barriers during construction.
 - Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
 - Provide structural and/or vegetative screening from light-sensitive uses.
 - Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
 - Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External

jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

- Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
 - Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
 - Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- u) Include large buffers between sensitive uses and freeways.
 - v) Create wildlife corridor redundancy to help retain functional connectivity and resilience.
 - w) To the extent practicable, avoid construction during dawn and dusk, when wildlife activity is highest.
 - y) If protected terrestrial wildlife enter work areas during construction, temporarily halt work to allow wildlife to move through the work area unharmed. A qualified biologist may relocate non-listed wildlife species out of the work area.

Applicability to the Project

As discussed above, consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2024–2050 RTP/SCS PEIR, the Project would comply with the Migratory Bird Treaty Act and California Fish and Game Code, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. These regulatory compliance measures are equal to or more effective than relevant measures under Mitigation Measure PMM BIO-4 from the 2024–2050 RTP/SCS PEIR. Moreover, due to the lack of habitat, habitat linkages, or wildlife corridors on or in the vicinity of the Project Site, Mitigation Measure PMM BIO-4 is not applicable to the Project.

PMM BIO-5: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
- b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to

remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.

- c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally sourced native species, as directed by a qualified biologist.
- d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas where trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to avoid resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
- e) Establish a scheme for the removal and disposal of logs, brush, earth, and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.
- f) No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees to occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. No heavy construction equipment or construction materials to be operated or stored within a distance from the base of any protected trees. Wires, ropes, or other devices not to be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
- g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.
- h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If such tree cannot be preserved in a healthy state, as determined by the certified arborist, replace any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation or as determined by the local jurisdictions, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources.
- i) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable policy or

ordinance, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:

- Avoidance strategies
- Contribution of in-lieu fees
- Planting of replacement trees
- Re-landscaping areas with native vegetation post-construction
- Other comparable measures developed in consultation with local agency and certified arborist.

Applicability to the Project

As analyzed below, the Project would not conflict with any local policies or ordinances protecting biological resources. Thus, Mitigation Measure PMM BIO-5 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

The analysis of potential impacts associated with removal of trees is based in part on the Tree Inventory and Evaluation (Tree Inventory and Evaluation Report) prepared for the Project by Arborgate Consulting, Inc. and dated November 30, 2020. This report is included as Appendix B of this SCEA.

a. Would the project 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 with Mitigation Incorporated. The Project Site is located in a highly urbanized area and is currently developed with residential and commercial uses. As described in Section 3, Project Description, of this SCEA, the Project Site is currently developed with a nineteen-story tower located at the corner of Vine Street and Sunset Boulevard with 64 live-work units and 69,468 square feet of residential floor area and 9,263 square feet of ground floor retail as well as various other one- and two-story primarily commercial buildings. The Project Site contains very limited to sparse landscaping in the form of shrubs and trees. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, along with the lack of large expanses of open space areas within and in the vicinity of the Project Site, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)³² or by the U.S. Fish and Wildlife Service (USFWS)³³ would be present on-site. Furthermore,

³² California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2022.

³³ United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed>, accessed August 8, 2024.

the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.³⁴

As provided in the Tree Inventory and Evaluation Report, included as Appendix B of this SCEA, there are four trees located within the Project Site and 10 street trees located along the sidewalks surrounding the Project Site.^{35,36} As set forth in the Tree Inventory and Evaluation Report, none of the onsite or street trees are considered protected under the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.³⁷ The Project would involve removal of at minimum the four onsite trees to allow for clearing of the Project Site and development of the Project. Additionally, the Tree Inventory and Evaluation Report recommends that, due to tree health, one street tree approximately in front of 6263 Sunset Boulevard be removed and four other street trees be replaced, while the remaining five street trees be protected in place. As such, the Project could potentially involve removal of eight to up to nine existing trees, including four onsite trees and four or potentially five street trees. The trees to be removed could potentially serve as nesting sites for migratory birds which are protected by the Migratory Bird Treaty Act.

The Migratory Bird Treaty Act prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” Consistent with Mitigation Measure PMM BIO-4(e) and (f) from SCAG’s 2020–2045 RTP/SCS PEIR, the Project would comply with the Migratory Bird Treaty Act and California Fish and Game Code, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site.

In addition to species covered under the Migratory Bird Treaty Act and the California Fish and Game Code, construction activities, including ground disturbance, vegetation removal, and increased noise and light levels, could have direct and/or indirect impacts on small terrestrial and avian species typically found in developed settings, such as bats, which sometimes use trees and man-made structures for roosting. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment. Specifically, Title 14, Section 251.1 of the California Code of Regulations, prohibits harassment (defined in that section as an intentional act that disrupts an animal’s normal behavior patterns, including breeding, feeding, or sheltering) of nongame mammals, and California Fish and Game Code Section 4150, prohibits “take” or possession of all nongame mammals or parts thereof.

³⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

³⁵ As noted in the Tree Inventory and Evaluation report, it appears that one tree located in front of 6263 Sunset may be a street tree and was categorized as such in this analysis.

³⁶ Arborgate Consulting Inc., Tree Inventory and Evaluation for SE Corner of Sunset Blvd. & N. Vine Street, November 30, 2020. See Appendix B of this SCEA.

³⁷ Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

Any activities resulting in bat mortality, such as the destruction of an occupied bat roost that results in the death of bats; or disturbance that causes the loss of a maternity colony of bats, which may also result in the death of young bats; or various modes of nonlethal pursuit or capture may be considered “take” as defined in Section 86 of the California Fish and Game Code. While none have been identified on the Project Site, it is possible that bats or bat roosts are present in on-site trees or in building cavities. Thus, construction activities could have a significant impact on bats, which are a protected species.

As discussed above, SCAG’s 2020–2045 and 2024–2050 RTP/SCS PEIR MMRP contain mitigation measures that are to be implemented, as appropriate and feasible, if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measure PMM BIO-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs, listed in detail above, which identifies measures to reduce substantial adverse effects related to threatened and endangered species and other special status species. In addition, Mitigation Measure PMM BIO-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs includes measures reflecting applicable components of the Migratory Bird Treaty Act. Adherence to all applicable regulatory compliance measures included in the Migratory Bird Treaty Act and California Fish and Wildlife Code, which are equal to or more effective than the relevant measures under Mitigation Measures PMM BIO-1 and PMM BIO-4 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs, would ensure that the Project would not have a substantial adverse effect on species covered under these regulations. However, the Project would incorporate the following mitigation measures from SCAG’s 2020–2045 and 2024–2050 RTP/SCS PEIR MMRPs to address protected species that are not covered under existing regulatory measures:

2020–2045 RTP/SCS Mitigation Measure PMM BIO-1(g): Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species’ habitat to facilitate avoidance of resources not permitted for impact.

2020–2045 RTP/SCS Mitigation Measure PMM BIO-1(i): Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

2024–2050 RTP/SCS Mitigation Measure PMM BIO-1(g): Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species’ habitat to facilitate avoidance of resources not permitted for impact.

2024–2050 RTP/SCS Mitigation Measure PMM BIO-1(i): Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

Compliance with the Migratory Bird Treaty Act and California Fish and Game Code as well as adherence to Mitigation Measures PMM BIO-1(g) and PMM BIO-1(i) from SCAG’s 2020–2045 and 2024–2050 RTP/SCS PEIR MMRP outlined above, would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Thus, impacts would be less than significant with incorporation of mitigation measures.

b. Would the project 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?

Less Than Significant Impact. As previously described above, the Project Site is located in a highly urbanized area and is currently developed with residential and commercial uses. The Project Site is surrounded by a mix of low- to high-intensity residential and commercial uses. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.^{38,39} Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.^{40,41} In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.⁴² **Therefore, the Project would not 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 and impacts would be less than significant.**

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with residential and commercial uses. No water bodies or state and federally protected wetlands exist on the Project Site.⁴³ **As such, the Project would not 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, and impacts would be less than significant.**

d. Would the project 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?

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is developed with residential and commercial uses. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space within and surrounding the Project Site that could serve as wildlife corridors or that could provide linkages to natural open space

³⁸ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://apps.wildlife.ca.gov/bios6/>, accessed August 8, 2024.

³⁹ United States Fish and Wildlife Service, National Wetlands Inventory (NWI), www.fws.gov/wetlands/data/Mapper.html, accessed August 8, 2024.

⁴⁰ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-3.

⁴¹ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

⁴² California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands, accessed August 8, 2024.

⁴³ United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed August 8, 2024.

areas. The Project Site is also not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.^{44,45}

As discussed in the Tree Inventory and Evaluation Report included in Appendix B of this SCEA, there are three trees located within the Project Site and 10 street trees located along the sidewalks surrounding the Project Site.⁴⁶ The Project would involve removal of at minimum the three onsite trees to allow for clearing of the Project Site and development of the Project. Additionally, the Tree Inventory and Evaluation Report recommends that, due to tree health, one street tree approximately in front of 6263 Sunset Boulevard be removed and four other street trees be replaced, while the remaining five street trees be protected in place. As such, the Project could potentially involve removal of eight existing trees, including three onsite trees and five street trees. These trees could potentially provide nesting sites for migratory birds which are protected by the Migratory Bird Treaty Act. The Project would be required to comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.”

As discussed above under Biological Resources, Threshold (a), consistent with Mitigation Measure PMM BIO-4(e) and (f) from SCAG’s 2020–2045 and 2024–2050 RTP/SCS PEIR, the Project would comply with the Migratory Bird Treaty Act and California Fish and Game Code, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. The Project would implement Mitigation Measure BIO-MM-1, set forth above, to ensure potential construction related impacts on nesting birds would not occur. ***Overall, with compliance with the Migratory Bird Treaty Act and California Fish and Game Code as well as implementation of Mitigation Measure BIO-MM-1 provided above, 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. Impacts would be less than significant.***

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, adopted February 4, 2021) (Protected Tree and Shrub Ordinance) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California bay trees, Mexican elderberry shrubs, and toyon shrubs, of at least 4 inches

⁴⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4.

⁴⁵ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

⁴⁶ Arborgate Consulting Inc., Tree Inventory and Evaluation for SE Corner of Sunset Blvd. & N. Vine Street, November 30, 2020. See Appendix B of this SCEA.

in diameter at 4.5 feet above the ground level at the base of the tree or shrub.⁴⁷ These tree and shrub species are defined as “protected” by the City. Trees and shrubs that have been planted as part of a tree planting program are exempt from the Protected Tree and Shrub Ordinance and are not considered protected. The Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree or shrub, including “acts which inflict damage upon root systems or other parts of the tree or shrub...” The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, as determined by the Board of Public Works, or a licensed or certified arborist.

As previously discussed, there are three trees located within the Project Site and 10 street trees located along the sidewalks surrounding the Project Site. The Project would involve removal of at minimum the three onsite trees to allow for clearing of the Project Site and development of the Project. Additionally, the Tree Inventory and Evaluation Report, included in Appendix B of this SCEA, recommends that, due to tree health, one street tree approximately in front of 6263 Sunset Boulevard be removed and four other street trees be replaced, while the remaining five street trees be protected in place.⁴⁸ As such, the Project could potentially involve removal of eight existing trees, including three onsite trees and five street trees. As determined in the Tree Inventory and Evaluation Report, none of the onsite or street trees are considered protected under the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. The Project would provide 56 new on-site trees and would replace any removed street trees in compliance with the City’s Urban Forestry Division standards and subject to approval by the Board of Public Works. ***Therefore, the Project would not have a substantial adverse effect on the Project and would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.***

f. Would the project 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 is located in an urbanized area and is currently developed with residential and commercial uses. As previously discussed, the Project Site does not support any known habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.⁴⁹ ***Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community***

⁴⁷ Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

⁴⁸ Arborgate Consulting Inc., Tree Inventory and Evaluation for SE Corner of Sunset Blvd. & N. Vine Street, November 30, 2020. See Appendix B of this SCEA.

⁴⁹ California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Cumulative impacts associated with biological resources are generally a consequence of aggregate past, present, and foreseeable impacts of the Project and other projects located in the vicinity of the Project Site. Thus, the cumulative analysis in this SCEA takes into consideration the 45 related projects identified in Table 33 on page 367 and shown in Figure 17 on page 370 of this SCEA. Neither the Project Site nor any of the related projects are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts associated with these designated areas would occur. As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of an established wildlife corridor and would not contribute related cumulative impacts. In addition, the Project and the related projects would comply with applicable regulatory requirements regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code, and the City's regulations regarding protected trees and the removal of street trees. **As such, no significant cumulative impacts regarding biological resources 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to

determine whether the project area has been previously surveyed and whether historical resources were identified.

- b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.
- c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
 - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
 - Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.
- e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.

- f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.
- g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.
- h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.
- i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.
- j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist,

the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS

- k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.
- l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

Applicability to the Project

Consistent with Mitigation Measure PMM CULT-1(a) from the 2020–2045 RTP/SCS PEIR, a record search was conducted to determine if the Project area has been previously surveyed and whether historical resources were identified. As discussed further below, a Cultural Resources Technical Report evaluating the Project’s potential impacts on historical resources was prepared by Jenna Snow, and is included as Appendix C of this SCEA. As detailed in the Cultural Resources Technical Report, the potential for direct impacts to historical resources at the Project Site is limited to potential impacts on the Morgan Camera Shop building, which appears eligible for local designation. However, the Project would rehabilitate the Morgan Camera Shop building in conformance with the Secretary of the Interior’s Standards consistent with Mitigation Measure PMM CULT-1(d) from the 2020–2045 RTP/SCS PEIR, above. As concluded in the Cultural Resources Technical Report, no significant impacts to historic resources would occur as a result of the Project.

Consistent with Mitigation Measure PMM CULT-1(f) from the 2020–2045 RTP/SCS PEIR, a CHRIS record search was conducted through the SCCIC as part of the Archaeological Resources Assessment prepared by SWCA and included in Appendix D of this SCEA. The CHRIS record search did not identify a previously discovered archaeological resource within the Project Site. Consistent with Mitigation Measure PMM CULT-1(g) from the 2020–2045 RTP/SCS PEIR, a Sacred Lands File search was also conducted as part of the Archaeological Resources Assessment prepared by SWCA. The Sacred Lands File search indicated negative results. As described in Section 3, Project Description, of this SCEA, the Project would involve excavations to a depth of approximately 28 feet below existing grades for the proposed subterranean parking levels. As such, there is potential for a previously unknown archaeological resource to be discovered during construction of the Project. As set forth in the Archaeological Resources Assessment, impacts to archaeological resources could be potentially significant. Therefore, mitigation measures were included to reduce the Project’s potential impacts to archaeological resources to less than significant. As listed below, these mitigation measures would

include retaining a qualified archaeologist and monitoring for archaeological resources. These measures would be consistent with Mitigation Measure PMM CULT-1(j) through (l) from the 2020–2045 RTP/SCS PEIR provided above.

PMM CULT-2:In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
- b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:
 - Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.
 - If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

Applicability to the Project

Mitigation Measure PMM CULT-2 from the 2020–2045 RTP/SCS PEIR involves compliance with existing regulations in the event of discovery of human remains. As discussed below and evaluated in the Archaeological Resources Assessment, with compliance with existing regulations regarding the handling of human remains, impacts to human remains would be less than significant. In addition, as set forth in the Tribal Cultural Resources Assessment, the City's standard Condition of Approval regarding the inadvertent discovery of tribal cultural resources would be implemented as part of the Project. This Condition of Approval has been determined to be equal to or more effective than the

measures included in Mitigation Measure PMM CULT-2 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM CULT-2 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM CUL-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the Plan area has been previously surveyed and whether historical resources were identified.
- b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.
- c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
 - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
 - Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent feasible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the Secretary of the Interior's PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character defining features and construction activities and be provided to the lead agency for review and approval.

- e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the Secretary of the Interior's PQS. Recordation should meet the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the lead agency.
- f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the Secretary of the Interior's PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the Plan area has been previously surveyed and whether resources were identified.
- g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.
- h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the lead agency, or the Information Center. In the event the records indicate that no previous survey has been conducted, the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the Plan area for archaeological resources.
- i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources are determined significant or unique through Phase II testing, and avoidance is not feasible, appropriate resource-specific mitigation measures should be established by the lead agency and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Archaeological materials collected from a significant resource should be curated with a recognized scientific or educational repository.
- j) If a record search or archaeological assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the lead agency in consultation with a qualified archaeologist, retain an archaeological monitor to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features

of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the Secretary of the Interior's PQS.

- k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.
- l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant. If the archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository.

Applicability to the Project

Consistent with Mitigation Measure PMM CUL-1(a) from the 2024–2050 RTP/SCS PEIR, a record search was conducted to determine if the Project area has been previously surveyed and whether historical resources were identified. As discussed further below, a Cultural Resources Technical Report evaluating the Project's potential impacts on historical resources was prepared by Jenna Snow, and is included as Appendix C of this SCEA. As detailed in the Cultural Resources Technical Report, the potential for direct impacts to historical resources at the Project Site is limited to potential impacts on the Morgan Camera Shop building, which appears eligible for local designation. However, the Project would rehabilitate the Morgan Camera Shop building in conformance with the Secretary of the Interior's Standards consistent with Mitigation Measure PMM CUL-1(d) from the 2024–2050 RTP/SCS PEIR, above. As concluded in the Cultural Resources Technical Report, no significant impacts to historic resources would occur as a result of the Project.

Consistent with Mitigation Measure PMM CUL-1(f) from the 2024–2050 RTP/SCS PEIR, a CHRIS record search was conducted through the SCCIC as part of the Archaeological Resources Assessment prepared by SWCA and included in Appendix D of this SCEA. The CHRIS record search did not identify a previously discovered archaeological resource within the Project Site. Consistent with Mitigation Measure PMM CUL-1(g) from the 2024–2050 RTP/SCS PEIR, a Sacred Lands File search was also conducted as part of the Archaeological Resources Assessment prepared by SWCA. The Sacred Lands File search indicated negative results. As described in Section 3, Project Description, of this SCEA, the Project would involve excavations to a depth of approximately 28 feet below existing grades for the proposed subterranean parking levels. As such, there is potential for a previously unknown archaeological resource to be discovered during construction of the Project. As set forth in the Archaeological Resources Assessment, impacts to archaeological resources could be potentially significant. Therefore, mitigation measures were included to reduce the Project's potential impacts to archaeological resources to less than significant. As listed below, these mitigation measures would include retaining a qualified archaeologist and monitoring for archaeological resources. These measures would be consistent with Mitigation Measure PMM CUL-1(j) through (l) from the 2024–2050 RTP/SCS PEIR provided above.

PMM CUL-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains. Such measures may include the following or other comparable measures identified by the lead agency:

a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.

b) If any discovered remains are of Native American origin:

- Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.
- If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

Applicability to the Project

Mitigation Measure PMM CUL-2 from the 2024–2050 RTP/SCS PEIR involves compliance with existing regulations in the event of discovery of human remains. As discussed below and evaluated in the Archaeological Resources Assessment, with compliance with existing regulations regarding the handling of human remains, impacts to human remains would be less than significant. In addition, as set forth in the Tribal Cultural Resources Assessment, the City’s standard Condition of Approval regarding the inadvertent discovery of tribal cultural resources would be implemented as part of the Project. This Condition of Approval has been determined to be equal to or more effective than the measures included in Mitigation Measure PMM CUL-2 from the 2024–2050 RTP/SCS PEIR. Thus, Mitigation Measure PMM CUL-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

The analysis of potential impacts to historic resources provided below is based on the Cultural Resources Technical Appendix (Cultural Resources Technical Report), prepared by Jenna Snow, included as Appendix C of this SCEA. The analysis of potential impacts to archaeological resources

and human remains is based on the Archaeological Resources Assessment prepared by SWCA and included as Appendix D of this SCEA.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, 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 a 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 on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As described in Section 3, Project Description, the Project Site is currently developed with a 19-story tower located at the corner of Vine Street and Sunset Boulevard with 64 units and 9,263 square feet of ground floor retail; two commercial buildings fronting on Sunset Boulevard occupied by restaurants; a two-story vacant commercial building (the Morgan Camera Shop building) fronting Sunset Boulevard; a one-story vacant commercial building fronting on Vine Street; a one-story vacant commercial building fronting on Leland Way; and a one-story vacant duplex building on Leland Way. As discussed in the Cultural Resources Technical Report, the Morgan Camera Shop building has been identified in previous historical resources surveys as appearing eligible for designation.

The Cultural Resources Technical Report also identified several historical resources in the vicinity of the Project Site, including the Bank of America Building located across Vine Street to the west, the Home Savings and Loan building across Sunset Boulevard to the north, the Hollywood Palladium located across Sunset Boulevard and to the east, the Earl Carroll Theater to the east of the Project Site, and the Afton Square Historic District located approximately one block away on the east end of Leland Way and along De Longpre Avenue. Provided below are summaries of the Project's potential direct and indirect impacts to historical resources located within and in the vicinity of the Project Site based on the Cultural Resources Technical Report. Refer to the Cultural Resources Technical Report included in Appendix C of this SCEA for the full, detailed analysis.

Direct Impacts

As discussed in the Cultural Resources Technical Report, the potential for direct impacts to historical resources at the Project Site is limited to potential impacts on the Morgan Camera Shop building, which appears eligible for local designation. No other buildings appear eligible for local designation or for listing in the National or California Registers. The Morgan Camera Shop building is located at

6260–6264 Sunset Boulevard and comprises a commercial building constructed in 1938. Most recently the Morgan Camera Shop building was identified in the historic resources survey prepared for the CRA/LA, a Designated Local Authority, dated January 2020 (2020 CRA Survey).

As part of the Project, the Morgan Camera Shop building is proposed to be rehabilitated in conformance with the Secretary's Standards and reused as a restaurant. Specifically, the façade of the building is proposed to be restored to its period of significance, including restoring the west storefront windows as well as an earlier configuration of the east storefronts. A one-story addition is proposed to be constructed adjacent to the south (rear) elevation. On the interior, east and west tenant spaces would be integrated. Interior alterations would include conversion of the sales floors to dining rooms with service spaces and kitchen utilizing back-of-house rooms. Extant historic cabinetry would be retained to the greatest extent possible. As discussed in the Cultural Resources Technical Report, by rehabilitating the Morgan Camera Shop building in conformance with the Secretary's Standards and restoring the façade, the Project would have a beneficial impact on this identified historical resource. All character-defining features of the building would be retained, including its mass, form, masonry walls, fenestration patterns, window sash and glazing, and especially the distinctive blade sign. The building is currently in a state of disrepair and the Project would rehabilitate and restore damaged and missing materials in conformance with the Secretary's Standards.

Overall, as determined in the Cultural Resources Technical Report, the Project would not directly affect any onsite historical resources. As such, the Project would not result in a direct substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Indirect Impacts

As discussed in the Cultural Resources Technical Report, included in Appendix C of this SCEA, in general, CEQA describes an indirect impact as one that results from the "...alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). Indirect impacts are assessed for conformance with Secretary's Standards 9 and 10, which deal specifically with new additions. As provided in the Cultural Resources Technical Report, the Project is in conformance with Standard 9. The Project would not destroy any spatial relationships that characterize adjacent and nearby historical resources. The setting of the Morgan Camera Shop building has changed since its period of significance and most recently with construction of a new, seven-story building almost immediately adjacent. The proposed new building does not compound impacts to the setting such that the Morgan Camera Shop building would no longer be eligible for designation. In addition, the Project is designed in a contemporary style and is distinct from the surrounding historic buildings. Furthermore, historic buildings in the vicinity of the Project Site are from several different time periods and there is not a consistent size, scale, proportion or massing among them. While the Project is generally larger than surrounding historical resources, it is a similar scale, massing and proportion to other, more contemporary development along Sunset Boulevard. The Project would also be in conformance with Standard 10 as the proposed building could be removed in the future without impairing the essential form and integrity of any adjacent or nearby historical resources.

With regard to surrounding historical resources, the Project does not appear to have a potential to indirectly impact the Bank of America building located across Vine Street to the west. Specifically, as there is little visibility to or from the Project Site and the Bank of America building, the Project would not

destroy the distinctive appearance of the Bank of America building. Therefore, the Project would not cause an indirect impact on the Bank of America building.

Similarly, the Project does not appear to have the potential to indirectly impact the Home Savings and Loan building located across Sunset Boulevard to the north. While its location at the corner of Sunset Boulevard and Vine Street, as well as its orientation toward the corner contribute to its visibility, its setting on Sunset Boulevard and Vine Street has changed tremendously over time and the building no longer retains integrity of setting. Additionally, while the Project would somewhat change the appearance of the Project Site from low-scale commercial buildings to an eight-story mixed-use building, the setting of the Home Savings and Loan building has already been compromised. Therefore, the Project would not result in an indirect impact to this building.

The Project also would not indirectly impact the Hollywood Palladium. Given its location across Sunset Boulevard from the Project Site and some distance to the east, the Project does not appear to have potential to impact the integrity of the Palladium and therefore would not cause an indirect impact to this historical resource.

Additionally, the Project would not indirectly impact the Earl Carroll Theater. The Earl Carroll Theater is separated from the Project Site by a large, new, seven-story development. Given the intervening building between the Project Site and the Earl Carroll Theatre, the Project does not appear to have the potential to impact its integrity and therefore would not cause an indirect impact to this historical resource.

The Afton Square Historic District is located nearly a block away from the Project Site, on the east end of Leland Way as well as south along De Longpre Avenue. There is significant intervening development between the Project Site and the historic district to the east on Leland Way, including the aforementioned 7-story development adjacent to the Project Site. To the south, the Project Site is separated from the historic district by a surface parking lot. The Afton Square Historic District is significant as a concentration of early twentieth century residential development. The buildings at the Project Site were also constructed in the early twentieth century. However, even before the historic district was listed in the California Register in the 1990s, there was already considerable intervening development for the Project Site to be considered as part of that concentration of buildings. The Project would not destroy any character-defining features of the historic district. The area surrounding the historic district has changed considerably and does not contribute to the sense of time and place within the historic district. Therefore, the Project, located nearly a block to the west and north of the historic district would not cause an indirect impact to the district as a whole.

Overall, potential indirect impacts to historic resources as a result of development of the Project would be less than significant.

Based on the above, the Project would not result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. As such, impacts would be less than significant, and no mitigation measures are required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact with Mitigation Incorporated. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. As previously noted, an Archaeological Resources Assessment was prepared by SWCA and is included as Appendix D of this SCEA. The following analysis is a summary of the detailed evaluation included in the Archaeological Resources Assessment.

As discussed in the Archaeological Resources Assessment, SWCA received the results of the CHRIS records search from the SCCIC on June 2, 2023. Results of the records search indicate that 33 cultural resources studies have been conducted within 0.5 mile of the Project Site. Of the 33 previously conducted studies, five overlap or border the Project Site. These five studies include three technical reports which were conducted for proposed Metro Subway expansions in Los Angeles (LA-7565, LA-7566, LA-8020), one addendum which provides additional information for a Draft Supplemental Impact Statement for the Metro Subway expansions (LA-7562), and one historic resources survey of the Hollywood neighborhood (LA-11797). The CHRIS records search also identified one previously documented archaeological resource within a 0.5-mile radius of the Project Site. The resource (LAN-3545H) is a historic-period archaeological site with materials dating between the 1910s and 1980s. The site was identified during construction approximately 140 feet to the northwest of the Project Site. LAN-3545H was composed of refuse materials and the remnants of various structures such as a cellar, septic tanks, and a wall segment of a former building. The archaeological components were found beneath what had been developed with paved lots or buildings. Some materials were recorded directly beneath paved surfaces and others extended to depths of approximately three to seven feet below grade. The historical materials identified appeared to have been associated with residential developments that had existed in the vicinity in the early twentieth century and were demolished in multiple phases between the 1930s and 1970s. On May 24, 2023, the NAHC submitted the results of an SLF search in response to SWCA’s request. As previously discussed, the results of the SLF were negative.

Based on the above and as discussed in the Archaeological Resources Assessment, no previously recorded archaeological resources have been identified within the Project Site. However, based on the findings of the Archaeological Resources Assessment, the Project Site has a moderate to high sensitivity for containing historic-period archaeological resources. The Project would require the excavation and removal of the underlying alluvial sediments below the current grade for construction of the subterranean parking. At a minimum, any sediments designated as fill within the Project Site have moderate sensitivity for archaeological resources that have the potential to be significant under CEQA. Specifically, there is a potential to encounter objects associated with residential land uses beginning around 1900, especially beneath the extant parking lots within the Project Site. While construction at the Project Site would adhere to applicable regulatory compliance measures intended to reduce and avoid creating significant impacts to archeological resources in the event of a discovery during grading, excavation, or other soil-disturbing activities within the Project Site, given the moderate to high potential for historical archaeological resources to be found within the Project Site, impacts to archaeological resources could be potentially significant and mitigation measures are required, as set forth below.

- CUL-MM-1: Retain a Qualified Archaeologist.** Prior to any ground-disturbing activities on the Project Site associated with the Project, the Project Applicant shall retain a Qualified Archaeologist. Ground-disturbing activities include activities such as excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, auguring, backfilling, blasting, stripping topsoil, or a similar activity at the Project Site. A Qualified Archaeologist is defined as one who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology and the Society for California Archaeology's qualifications for a principal investigator.
- CUL-MM-2: Worker Environmental Awareness Program (WEAP) Training.** Prior to the commencement of ground-disturbing activities, the Qualified Archaeologist shall provide a briefing to construction crews to provide information on archaeological monitoring procedures, regulatory requirements for the protection of archaeological resources, and procedures to follow shall unanticipated discoveries of archaeological resources be made during construction. Workers shall be provided contact information and protocols to follow in the event these discoveries are made. Additionally, workers shall be shown examples of the types of resources that would require notification. A copy of the training materials and a list of attendees shall be provided to City Planning no more than 10 days after completing the training.
- CUL-MM-3: Prepare an Archaeological Resources Management Plan (ARMP).** Before the commencement of ground-disturbing activities, an ARMP shall be prepared. The ARMP shall include, but not be limited to, monitoring protocol for ground-disturbing activities, a worker training program, and discovery and processing protocol for inadvertent discoveries of cultural resources. The ARMP shall identify areas that require full-time monitoring, including but not limited to, the fill consistent with MM-CUL-4 below, and shall detail a protocol for determining circumstances in which additional or reduced levels of monitoring (e.g., spot checking) may be appropriate, including areas assessed as having moderate and low archaeological sensitivity. Specifically, SWCA recommends that the ARMP include a framework for assessing the geoarchaeological setting to determine whether undisturbed sediments capable of preserving archaeological remains are present adjacent to or beneath those sediments disturbed by agricultural and urban development, as well as the depth at which these undisturbed sediments would no longer be capable of containing archaeological material.
- The ARMP shall summarize the requirements for tribal coordination in the event of an inadvertent discovery of Native American archaeological resources, including the applicable regulatory compliance measures, conditions of approval, or mitigation measures established for the inadvertent discovery of tribal cultural resources to be carried out in concert.
- CUL-MM-4: Monitor for Archaeological Resources.** Monitoring shall occur during ground disturbance for the Project, including excavation within fill, and shall be directed and supervised by the Qualified Archaeologist. As specified in the ARMP, the frequency of monitoring will be adjusted based upon the rate of ground-disturbing activities, expected archaeological sensitivity, and preliminary results. The monitor shall have the authority to temporarily halt or redirect construction activities in soils that are likely or observed to contain potentially significant archaeological resources, as determined by the Qualified Archaeologist. The monitor shall complete a daily log documenting construction activities and observations. In the event that potentially significant archaeological resources

are exposed during construction, work in the immediate vicinity of the find (within 8 m [25 feet]) shall stop until a Qualified Archaeologist can evaluate the significance of the find. Construction activities may continue in other areas in coordination with the Qualified Archaeologist. If the discovery is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to PRC 21083.2(g), and the treatments proposed in the ARMP are found to be infeasible or other alternatives are proposed, the Qualified Archaeologist shall coordinate with the Project proponent and City Planning to amend the ARMP with a formal treatment plan that would reduce impacts to the resource(s). The treatment plan established for the resource(s) shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment and if it is determined avoidance is not feasible, treatment may include architectural documentation and archaeological data recovery (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant.

CUL-MM-5: Report Monitoring Results. After archaeological monitoring is completed, the Qualified Archaeologist shall prepare a technical report documenting the methods and results of all work completed under the ARMP, including, if any, treatment of archaeological materials; results of artifact processing, analysis, and research; and evaluation of the resource(s) for the CRHR. If archaeological materials are identified and collected for laboratory analysis, once the analysis is complete, any recovered archaeological materials shall be curated at a public, non-profit research institution that shall ensure their long-term preservation and allow access to interested scholars. If no such institutions accept the materials, they shall be donated to an educational institution or historical society. The format and content of the report shall follow the California Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR): Recommended Contents and Format. Any archaeological resources identified shall be documented on appropriate California Department of Parks and Recreation 523-Series Forms. The report shall be prepared under the supervision of a Qualified Archaeologist and submitted to the Project Applicant. The timing and content of the final report shall consider the quantity of archaeological materials, level of analysis required, and documentation needed to establish the significance of any identified resources. The final draft of the report shall be submitted to the SCCIC.

Overall, as concluded in the Archaeological Resources Assessment, with implementation of Mitigation Measures CUL-MM-1 through CUL-MM-5, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5, and impacts would be less than significant.

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

Less Than Significant Impact. The Project Site has been subject to previous grading and development, and no known traditional burial sites have been identified on-site. In addition, as evaluated in the Archaeological Resources Assessment, no evidence was identified during preparation of the

Archaeological Resources Assessment to indicate there are human remains interred within the Project Site. However, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98. If the human remains are determined to be Native American, the coroner will notify the NAHC, who will determine and notify the Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. ***With compliance with existing regulatory requirements, potential impacts associated with the disturbance of human remains, including those interred outside of dedicated cemeteries, would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. Regarding historic resources, although impacts tend to be site-specific, cumulative impacts could occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As provided in the Cultural Resources Technical Report, the Project would not destroy any spatial relationships that characterize adjacent and nearby historical resources. As further discussed in the Cultural Resources Technical Report, historic buildings in the vicinity of the Project Site are from several different time periods and there is not a consistent size, scale, proportion or massing among them. As such, nearby related projects would similarly not be anticipated to affect the setting of historic resources in the vicinity. In addition, if any of the related projects could potentially result in a significant impact to a historical resource, mitigation measures would be included to address the potential impact. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

Regarding potential cumulative impacts related to archaeological resources and human remains, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. If archaeological resources and/or human remains are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established or the City's standard Condition of Approval regarding inadvertent discovery of archaeological resources would be applied, as necessary.

Overall, based on the above, cumulative impacts to historical resources, archaeological resources, and human remains would be less than significant and would not be cumulatively considerable.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 and 2024–2050 RTP/SCS PEIR Mitigation Measures

The 2020–2045 and 2024–2050 RTP/SCS PEIR’s MMRPs did not identify any mitigation measures specifically regarding Energy. However, Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs, outlined in Item VIII, Greenhouse Gas Emissions, below, identifies measures capable of avoiding or reducing the significant effects of increased residential energy consumption. While these mitigation measures mainly serve to reduce the Project’s GHG emissions, measures contained in Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs, such as use of energy efficient materials, lighting, and heating and cooling systems, would also serve to reduce the Project’s energy usage. As described in the impact analysis below, the Project would incorporate multiple green building and energy efficiency measures in compliance with CALGreen, the LA Green Building Code, and LEED Silver equivalency. Compliance with existing regulatory would be equal to or more effective than Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs for reducing residential energy consumption. Since the Project would comply with existing energy efficiency standards and incorporate energy reduction practices, the Project would not result in a wasteful or inefficient use of energy. Thus, relative to energy, the measures included in Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs are not incorporated into the Project.

Impact Analysis

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

Less Than Significant Impact. Regarding Energy Threshold (a), this analysis relies upon Appendix F of the CEQA Guidelines.

In accordance with Appendix F of the CEQA Guidelines, the following criteria will be considered in this evaluation:

- a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
 - b) The effects of the project on local and regional energy supplies and on requirements for additional capacity;
 - c) The effects of the project on peak and base period demands for electricity and other forms of energy;
 - d) The degree to which the project complies with existing energy standards;
 - e) The effects of the project on energy resources;
 - f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.
 - g) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.
- a. *The project's energy requirements and its energy use efficiencies by amount and fuel type for each state of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.*

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operation, and maintenance activities). For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities of the structures constructed under this Project would include demolition or abandonment of the site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of the new buildings, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As shown in Table 9 on page 142 and as discussed further below, Project construction would consume approximately a total of 104,801 gallons of gasoline, and approximately 193,337 gallons of diesel.

Table 9
Summary of Energy Use During Construction^a

Fuel Type	Quantity
Electricity	
Water Consumption (Dust Control) ^b	1,542 kWh
Construction Temporary Power (Lighting, power tools)	15,876 kWh
Electric Equipment	2,540 kWh
Total Electricity	19,958 kWh
Gasoline	
On-Road Construction Equipment	104,801 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	104,801 gallons
Diesel	
On-Road Construction Equipment	145,594 gallons
Off-Road Construction Equipment	47,743 gallons
Total Diesel	193,337 gallons
<hr/> <i>kWh = kilowatt-hour</i> <i>Note: Numbers may not add up exactly due to rounding.</i> ^a Detailed calculations are provided in Appendix E of this SCEA. ^b Energy usage associated with supply and conveyance of water from the source. Source: Eyestone Environmental, 2024.	

Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from both existing infrastructure serving the Project Site and gas- and/or diesel-powered portable generators, as required. As shown in Table 9, approximately 19,958 kilowatt-hours (kWh) of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Therefore, the use of electricity during project construction would be minimal and would not be wasteful, inefficient, or unnecessary.

Natural Gas

Construction activities, including the construction of the new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated during construction.

Transportation Energy

The petroleum-based fuel use summary provided in Table 9 on page 142 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions. As shown, on- and off-road vehicles would consume an estimated 104,801 gallons of gasoline and approximately 193,337 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.003 percent of the 2024 annual on-road gasoline-related energy consumption and 0.03 percent of the 2024 annual diesel fuel-related energy consumption in Los Angeles County.⁵⁰

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. The Project would increase electrification by installing space heating, water heating and residential appliances (cooking, clothes dryers) powered by electricity while restaurant cooking will be powered by natural gas consistent with the City's Ordinance 187,714. As shown in Table 10 on page 144, the Project's net demand for electricity would be approximately 1,562,005 kWh per year. As shown in Table 10, the Project's net reduction for natural gas would be 86,680 cf per year due to the Project's compliance with the City's All-Electric Ordinance. As shown in Table 10, the Project's net demand for gasoline and diesel would be 70,356 and 11,674 gallons per year, respectively.

Electricity

As the Project would comply with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 1,562,005 kWh per year (refer to Table 10). Based on LADWP's 2022 Resource Plan, LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (the Project's buildout year) will be 21,017 gigawatt hour (GWh) of electricity.⁵¹ As such, the Project-related net increase in annual electricity consumption would represent only approximately 0.007 percent of LADWP's projected sales in 2026-2027. In addition, LADWP is committed to ensuring the sustainability of its power supply and is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020 and at least 50 percent by 2030, which will ensure that projected supplies will be more than sufficient to meet demand.

Natural Gas

The Southern California Gas Company (SoCalGas) provides natural gas service to the Project Site vicinity. With compliance of Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is anticipated to generate a net decrease in the on-site demand for natural gas totaling approximately 86,680 cubic feet (cf) per year, or approximately 237 cf per day. Based on

⁵⁰ California Air Resources Board, EMFAC2021 Web Database, www.arb.ca.gov/emfac. Details provided in Appendix E of this SCEA.

⁵¹ LADWP, 2022 Final Power Strategic Long-Term Resource Plan.

Table 10
Summary of Total Annual Energy Use During Operation^a

Source	Project with Project Features
Electricity	
Building	1,476,588 kWh
Water	57,643 kWh
EV Chargers	27,775 kWh
Total Electricity	1,562,005 kWh
Natural Gas	-86,680 cf
Mobile (Transportation)	
Gasoline	70,356 gallons
Diesel	11,674 gallons
Total Transportation Fuel	82,030 gallons
<hr/> <i>cf = cubic feet</i> <i>kWh = Kilowatt-hour</i> <i>EV = electric vehicle</i> ^a Detailed calculations are provided in Appendix E of this SCEA. Energy usage presented is net increase or decrease (new construction minus existing uses to be removed). Source: Eyestone Environmental, 2024.	

the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2.26 billion cf per day in 2026.⁵² As the Project's natural gas consumption results in a decrease in the onsite demand for natural gas, the Project would be consistent with the forecasted 2026 consumption in SoCalGas's planning area.⁵³

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As shown in Table 10, the Project's net demand for gasoline and diesel would be approximately 70,356 and 11,674 gallons per year, respectively. The Project Site is located in a Job Center, Transit Priority Area (TPA), High Quality Transit Area (HQTa) and a Neighborhood Mobility Area (NMA), as designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective.⁵⁴

⁵² California Gas and Electric Utilities, 2024 California Gas Report.

⁵³ Consistent with Ordinance 187,714, the Project will include 1,115,177 cf/year of natural gas usage for restaurant cooking. The Project's natural gas consumption would account for approximately 0.0001 percent of the forecasted 2026 consumption in the SoCalGas planning area.

⁵⁴ According to the 2020–2045 RTP/SCS an HQTa is a corridor-focused Priority Growth Area (PGA) within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency (Footnote continued on next page)

Extensive public transit service is also provided in the vicinity of the Project Site. The existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle parking areas for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. These specific transportation demand management measures include reduced parking, pedestrian project enhancements, and bicycle parking. Furthermore, the Project would install EV-ready and EV-equipped parking spaces at the Project Site. As such, operational impacts to transportation energy would be less than significant.

b. The effects of the project on local and regional energy supplies and on requirements for additional capacity

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. The estimated construction electricity usage would represent less electricity usage than the estimated electricity usage during operation which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses that currently generate a demand for electricity. As previously discussed above, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities. Thus, there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.003 percent of gasoline usage and approximately 0.03 percent of diesel usage within Los Angeles County, respectively.⁵⁵ As energy consumption during Project construction activities would be relatively negligible, the Project would not affect regional energy consumption during construction.

Operation

Based on LADWP's 2022 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (the Project's buildout year) will be 21,017 GWh of electricity.⁵⁶

of every 15 minutes (or less) during peak commuting hours; an NMA is a PGA with a high number of intersections, low observed travel speed, high mix of uses and high accessibility to "everyday" destinations where complete streets and sustainability policies support and encourage replacing or reducing single and multi-occupant automobile use.

⁵⁵ California Air Resources Board, EMFAC2021 Web Database, www.arb.ca.gov/emfac.

⁵⁶ LADWP, 2022 Final Power Strategic Long-Term Resource Plan.

As such, the Project-related net increase in annual electricity consumption of 1,562,005 kWh per year would represent approximately 0.007 percent of LADWP's projected sales in 2026.

Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2.26 billion cf per day in 2026.⁵⁷ With implementation of the City's All-Electric Ordinance, the Project's natural gas consumption results in a decrease in the onsite demand for natural gas; as such, the Project would be consistent with the forecasted 2026 consumption in SoCal Gas's planning area.

As energy consumption during Project operation would be relatively negligible and the Project's energy requirements would be within LADWP's and SoCalGas' service provisions, Project impacts on energy usage during operation would be less than significant.

c. The effects of the project on peak and base period demands for electricity and other forms of energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project.⁵⁸ Therefore, Project electricity consumption during operation would have a negligible effect on load conditions of the power grid.

d. The degree to which the project complies with existing energy standards

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.⁵⁹ Electricity and Natural Gas usage during Project operation presented in Table 10 on page 144 would comply with Title 24 standards and applicable CALGreen requirements as well as the Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

Regarding transportation fuels, trucks and equipment used during proposed construction activities for the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site are assumed to comply with CAFE fuel economy standards, as required.

⁵⁷ California Gas and Electric Utilities, 2024 California Gas Report.

⁵⁸ LADWP, 2018 Retail Electric Sales and Demand Forecast.

⁵⁹ Energy Independence and Security Act of 2007, Public Law 110-140.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.

e. Effects of the Project on Energy Resources

LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind, and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.⁶⁰ According to the U.S. Energy Information Administration (EIA), the United States currently has over 89 years of natural gas reserves.⁶¹ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet consumption through 2050.⁶² The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 35.6 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.⁶³ This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

Regarding on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles

⁶⁰ California Gas and Electric Utilities, 2024 California Gas Report.

⁶¹ U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed May 5, 2023.

⁶² U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=38&t=6, accessed May 5, 2023.

⁶³ LADWP Annual Power Content Labels for 2022, www.ladwp.com/powercontent, accessed August 12, 2024.

basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.⁶⁴

f. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives

As discussed above, the Project would include project features to reduce VMT during operational activities. The Project's high-density design and location in proximity to transit, job centers and retail uses would allow for residents to live closer to services and shopping areas, reducing VMT. The Project design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be located in close proximity to multiple existing and future transit stops. Therefore, the Project would encourage the use of efficient transportation alternatives.

g. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The current City of LA Green Building Code requires compliance with CALGreen and California's Building Energy Efficiency Standards (Title 24). Therefore, the Project would incorporate measures that comply with current State and City energy conservation requirements. While SCAG's Mitigation Measure PMM GHG-1 provides measures to reduce project-level GHG emissions, some of the measures would also be considered energy-conservation measures (e.g., use of energy efficient materials, lighting and heating and cooling systems). Project compliance with State and City energy conservation requirements would be as effective as the energy-conservation measures included in SCAG's Mitigation Measure PMM GHG-1 and would serve to reduce the Project's energy usage.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

Conclusion

As demonstrated in the analysis above, the Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage would be consistent with electricity

⁶⁴ California Energy Commission, Systems Assessment & Facilities Siting Division Cartography Unit, California Wind Resource Potential Map,.

and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction the Project would comply with Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operation, the Project would comply with applicable energy efficiency requirements such as CALGreen. ***Thus, overall, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation, and impacts would be less than significant.***

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Regarding Energy Threshold (b), the Project was evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CALGreen, and City building codes. Also, as discussed throughout this SCEA, the Project would be consistent with SCAG's RTP/SCS, which includes goals to reduce VMT and a corresponding decrease in fuel consumption.

As discussed under Item VIII, Greenhouse Gas Emissions, the City published its LA Green Plan/ClimateLA in 2007 as well as the Green New Deal Sustainable City pLAn in 2019, which outlines goals and actions by the City to reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2022 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

Regarding transportation uses, the Project design would reduce VMT throughout the region and encourage use of alternative modes of transportation. The Project would also be consistent with regional planning strategies that address energy conservation. As discussed above and under Item XI, Land Use and Planning, SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. Most notably, the Project would be an infill mixed-use development developed within an HQT, TPA, Job Center, and NMA. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro, and LADOT. The introduction of new housing and job opportunities within an HQT, as proposed by the Project, is consistent with numerous policies in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS would result in an estimated 19 percent decrease in VMT by 2035. The State Office of Planning and Research recommended that achieving 15 percent lower per capita (residential or employee) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals (i.e., SB 375 goal).

Consistent with the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, the Project would result in an approximately 32-percent reduction in VMT from mobile sources in comparison to a Project without reduction measures (e.g., density and proximity to transit, TDM measures, and mitigation measures), and, consequently, the Project’s petroleum-based fuel usage would be reduced.⁶⁵ In addition, the Project would comply with state energy efficiency requirements, and would use electricity from LADWP, which has a current renewable energy mix of 35 percent. All these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel.

The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11). The California Energy Code provides energy conservation standards for all new and renovated commercial buildings constructed in California. The California Energy Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The California Energy Code provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls and ceilings. The California Energy Code also emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition, the California Green Building Standards Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

The City’s Sustainable City pLAn also establishes short-term and long-term energy and conservation targets geared towards advancing the City’s economy and equity. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the City’s Sustainable City 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 cut an additional 30 percent in GHG emissions above and beyond the City’s Sustainable City pLAn to ensure that the City stays within its carbon budget until 2050.⁶⁶ To summarize, the Project would be required to comply with the Title 24 standards for Energy Efficiency and Conservation that are in effect at the time of development. In addition, per compliance with the California Energy Code, the Project would allocate roof area for future solar panels. ***Based on the above, the Project would be consistent with adopted energy conservation plans. The Project would incorporate features to comply with regulatory standards which would ensure that the Project would not conflict with energy and conservation measures provided by the state or City, and as such, impacts would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impacts analysis regarding electricity is LADWP’s service area and the geographic context for the cumulative impacts analysis

⁶⁵ The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites.

⁶⁶ City of Los Angeles, L.A.’s Green New Deal Sustainable City pLAn 2019.

regarding natural gas is the SoCalGas service area. Growth within these geographic areas, inclusive of the related projects, is anticipated to increase the demand for energy, as well as the need for new and expanded energy infrastructure. As with the Project, with compliance with existing energy standards, including implementation of the City's All-Electric Ordinance, and compliance with adopted energy conservation plans, the related projects also would not result in the wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. In addition, as evaluated above, the Project would result in less than significant impacts related to energy consumption. Therefore, the Project's contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. ***As such, the Project's impacts would not be cumulatively considerable and cumulative energy 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 potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geology and soils, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
- b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.
- c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.
- d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

Applicability to the Project

Consistent with Mitigation Measure PMM GEO-1(a) from the 2020–2045 RTP/SCS PEIR, a Geotechnical Investigation was prepared for the Project, which includes site-specific measures regarding areas of potential geological risk. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would be required to provide a final design-level geotechnical report, subject to Los Angeles Department of Building and Safety (LADBS) review and approval, prior to the issuance of grading and building permits for the Project. In addition, the Project would be required to comply with existing City and state regulations regarding erosion control, drainage, and stormwater management. Compliance with existing regulatory requirements would be equal to or more effective than the measures included in Mitigation Measure PMM GEO-1 from the 2020–2045 RTP/SCS PEIR as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed Project building would be constructed in accordance with all City-required geotechnical requirements. In addition, as analyzed below, the Project would not result in potentially significant impacts regarding geology and soils issues that would require mitigation. As such, Mitigation Measure PMM GEO-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.
- b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.
- c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for

protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered..

2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.
 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
- e) Avoid routes and project designs that would permanently alter unique geological features.
 - f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.
 - g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.
 - h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

Applicability to the Project

As described in Section 3, Project Description, of this SCEA, the Project would involve excavations to a depth of approximately 28 feet below existing grades for the proposed subterranean parking levels. As such, there is potential for a previously unknown paleontological resource to be discovered during construction of the Project, and impacts to paleontological resources could be potentially significant. Therefore, mitigation measures were included to reduce the Project's potential impacts to paleontological resources to less than significant. As listed below, these mitigation measures would include retaining a qualified paleontologist and monitoring for paleontological resources, and would ensure that the Project's impacts regarding paleontological resources would be less than significant.

These measures would be equal to or more effective than Mitigation Measure PMM GEO-2 from the 2020–2045 RTP/SCS PEIR provided above.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM GEO-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to minimize the potential for adverse effects associated with surface fault rupture, seismic ground shaking, seismic-related ground failure, liquefaction, and landslides for projects located on sites with unusual geologic conditions, the following measures shall be considered:

- Use interim precautionary steps during construction to maintain ground surface and slope stability;
- Incorporate design and structural features that exceed the requirements of the applicable building code(s) as appropriate; and
- Utilize innovative design techniques for buildings and other structural elements located on sites with unique geologic conditions to ensure that projects do not exacerbate risks associated with existing conditions.

Applicability to the Project

Consistent with Mitigation Measure PMM GEO-1 from the 2024–2050 RTP/SCS PEIR, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading and building permits for the Project. Compliance with existing regulatory requirements would be equal to or more effective than the measures included in Mitigation Measure PMM GEO-1 from the 2024–2050 RTP/SCS PEIR as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed Project building would be constructed in accordance with all City-required geotechnical requirements. In addition, as analyzed below, the Project would not result in potentially significant impacts regarding geology and soils issues that would require mitigation. As such, Mitigation Measure PMM GEO-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated as part of the Project.

PMM GEO-2: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geologic hazards. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) While compliance with the various municipal regional stormwater permits (MS4) is required by law, not all areas are necessarily covered. For those areas that are not covered under a municipal stormwater permit (MS4), consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by

stormwater. Road cuts should be designed to maximize the potential for revegetation.

Applicability to the Project

The Project would be required to comply with existing City and state regulations regarding erosion control, drainage, and stormwater management. As such, Mitigation Measure PMM GEO-2 from the 2024–2050 RTP/SCS PEIR would not be incorporated into as part of the Project.

PMM GEO-3: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For sites where the presence of paleontological resources is considered possible, as appropriate obtain review by a qualified paleontologist (meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.
- b) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- c) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
 2. A qualified paleontologist prepares a paleontological resources management plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.
 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of SVP or BLM to

determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.

4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
 - d) Avoid routes and project designs that would permanently alter unique geological features.
 - e) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.
 - f) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.
 - g) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the CEQA lead agency and the repository curating the collected artifacts and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

Applicability to the Project

As discussed below, the Project would implement specific mitigation measures tailored to the Project's location and development characteristics, which would be equal to or more effective than Mitigation Measure GEO-MM-3 from the 2024–2050 RTP/SCS PEIR. Project Mitigation Measures GEO-MM-1 through GEO-MM-4 would ensure that the Project's impacts regarding paleontological resources would be less than significant. As such, Mitigation Measure GEO-3 from the 2024–2050 RTP/SCS PEIR would not be incorporated as part of the Project.

Impact Analysis

The following analysis is largely based on the Updated Planning-Level Preliminary Geotechnical Investigation (Preliminary Geotechnical Investigation) prepared for the Project by Geotechnical Professionals, Inc. (GPI), dated November 10, 2022, which is included as Appendix F of this SCEA. The analysis of potential impacts with regard to paleontological resources is based on the Paleontological Resources Technical Report prepared for the Project by SWCA, dated July 2023, and included as Appendix G of this SCEA.

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

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other**

substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures.

Based on the Preliminary Geotechnical Investigation and a review of the City's ZIMAS system, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone, and no known active faults underlie the Project Site. Therefore, ground rupture due to a nearby known fault or faults is considered unlikely at the Project Site. As discussed in the Preliminary Geotechnical Investigation, the closest active fault to the Project Site is the Hollywood Fault, which is located approximately 0.34 miles north of the Project Site. As further described in the Preliminary Geotechnical Investigation, the Project Site is located outside of and approximately 0.25 miles south of the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault. Therefore, as determined in the Preliminary Geotechnical Investigation, since there are no known faults underlying the Project Site, the risk for surface rupture at the Project Site is considered low. Furthermore, while the Project would involve excavations up to approximately 28 feet below existing grade, the Project would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Additionally, the Project would comply with existing State and local code requirements, which ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Project would comply with the City of Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. A final design-level geotechnical report, subject to LADBS review and approval, would also be prepared prior to the issuance of grading permits for the Project. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in a comprehensive design-level geotechnical investigation for the Project to be approved by LADBS. ***Therefore, through compliance with existing State and City regulatory requirements, the Project would not directly or indirectly***

cause potential substantial adverse effects, including the risk of loss, injury, or death related to rupture of a known earthquake fault. Impacts would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. As discussed above, no active faults are known to pass directly beneath the Project Site. The closest active fault to the Project Site is the Hollywood Fault, located approximately 0.34 miles north of the Project Site. As further described in the Preliminary Geotechnical Investigation, the Project Site is located outside of and approximately 0.25 miles south of the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault. Therefore, as determined in the Preliminary Geotechnical Investigation, since there are no known faults underlying the Project Site, the risk for surface rupture at the Project Site is considered low. In addition, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions such as strong seismic ground shaking.

Additionally, State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. LADBS is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by LADBS. The final approved geotechnical report would include the recommendations of the Preliminary Geotechnical Investigation included as Appendix F of this SCEA, and its final recommendations would be enforced by the LADBS for the construction of the Project. In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations, including, but not limited to, the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, and the City's General Plan Safety Element. ***Based on the above, through compliance with regulatory requirements, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. Thus, impacts related to exposure to strong seismic ground shaking would be less than significant.***

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, relatively cohesionless soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of

the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's Seismic Hazard Zone Map for the Hollywood Quadrangle, the California Earthquake Hazards Zone Application, the City's Local Hazard Mitigation Plan, and the Geotechnical Investigation, the Project Site is not located within a liquefaction hazard zone.^{67,68,69} This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. ***Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death related to seismic-related ground failure, including liquefaction, and impacts would be less than significant.***

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site and surrounding area are generally characterized by relatively level topography. Given the largely impervious (developed/paved) nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not present within the Project Site or surrounding area. In addition, the Project Site is not located in a landslide area as mapped by the State of California.⁷⁰ Furthermore, the Project Site is not mapped as a landslide area by the City of Los Angeles.^{71,72} ***As such, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides, and no impact would occur.***

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site is currently developed with residential and commercial uses. There are no extensive open spaces with exposed topsoil within the Project Site. However, development of the Project would require grading, excavation associated with the installation of building footings and subterranean parking, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. However, this potential would be reduced by the implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from the

⁶⁷ California Department of Conservation, California Geological Survey, State of California Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle, March 25, 1999.

⁶⁸ California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed August 8, 2024.

⁶⁹ City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 9-21, West Los Angeles APC Liquefaction Zones, p. 9-28.

⁷⁰ California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed August 8, 2024.

⁷¹ City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 11-12, Landslide Hazard Areas in the West Los Angeles APC, p. 11-13.

⁷² City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011.

City of Los Angeles Department of Building and Safety, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. The Project would also be required to comply with the City's LID Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed and would not include large expanses of exposed soil. ***Therefore, with compliance with applicable regulatory requirements, the Project would not result in substantial soil erosion or the loss of topsoil during construction or operation. Impacts would be less than significant.***

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project Site is not located near slopes, mountains, or other geologic features that would result in on- or off-site landslides. Therefore, no impacts related to landslides would occur.

As previously discussed, liquefaction-related effects include lateral spreading, which refers to the lateral movement of gently to steeply sloping saturated soil deposits that have rapid fluid-like flow movement caused by earthquake-induced liquefaction.⁷³ As summarized above and discussed in the Preliminary Geotechnical Investigation, the Project Site is not susceptible to liquefaction and would not potentially result in lateral spreading. Therefore, impacts related to lateral spreading would be less than significant.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the potential for subsidence is considered low, and no impacts related to subsidence would occur.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Preliminary Geotechnical Investigation, the soils underlying the Project Site generally consist of 11 feet to 15 feet of loose to medium dense silty sand and firm sandy silt, underlain predominantly by interbedded layers of very stiff to hard clays and silts. Additionally, discontinuous layers of medium dense to very dense sands and silty sands, approximately 3 feet to 15 feet in thickness, were encountered at a depth of 37 feet to 59 feet below ground surface. As previously noted, the Project would include excavations to an approximate depth of 28 feet. As such, the soils underlying the Project Site to the depth of excavation would be removed. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not located on a geologic

⁷³ Lateral spreading refers to the lateral movement of gently to steeply sloping saturated soil deposits caused by earthquake-induced liquefaction.

unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant.

Overall, based on the above, impacts associated with liquefaction, landslides, lateral spreading, subsidence, and collapsible soils would be less than significant and no mitigation would be required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. According to the Preliminary Geotechnical Investigation, the onsite geological materials that will be encountered at the lowest subterranean level are expected to have a relatively low (possibly medium) expansion potential and are not anticipated to impact the Project. Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design-level geotechnical investigation required by the City. ***Therefore, the Project would not create substantial direct or indirect risks to life or property regarding expansive soil, and impacts would be less than significant.***

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

No Impact. The Project Site is served by existing wastewater infrastructure, and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. **No impact related to the use of septic tanks or alternative wastewater disposal systems would occur.**

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact with Mitigation Incorporated.

Paleontological Resources

As previously discussed, the analysis of potential impacts with regard to paleontological resources is based on the Paleontological Resources Technical Report prepared for the Project by SWCA, dated July 2023, and included as Appendix G of this SCEA. Provided below is a summary of the detailed evaluation included in the Paleontological Resources Technical Report.

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since most species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. As provided in the Paleontological Resources Technical Report, a Project-specific paleontological records search for the Project Site was conducted by the Natural History Museum of Los Angeles County and the results of that records search was received by SWCA on May 14, 2023. As outlined therein, there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, several fossil localities have been recorded in its vicinity from the same or similar geologic units. As detailed in Table 1 of the Paleontological Resources Technical Report, several fossil localities were recovered from unnamed Pleistocene deposits that vary in depth from five feet to six feet below ground surface to at least 80 feet below ground surface. Additionally, several co-located fossil localities were recovered from the Puente Formation from depths of at least 91 feet below ground surface.

As discussed in the Paleontological Resources Technical Report, included as Appendix G of this SCEA, the Project Site is likely underlain by artificial fill from approximately 10 feet to 15 feet below ground surface. Recent artificial fill has a low paleontological sensitivity. However, below the artificial fill are geologic units with high paleontological sensitivity (such as the Fernando Formation and the Puente Formation, which have high paleontological sensitivity). Therefore, as concluded in the Paleontological Resources Technical Report, the uppermost 10 feet to 15 feet of the soils underlying the Project Site have a low paleontological sensitivity, while the sediments greater than 10 feet to 15 feet below ground surface have a high paleontological sensitivity. As the Project would include excavations up to approximately 28 feet below ground surface, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be found. Therefore, as determined in the Paleontological Resources Technical Report, any significant fossils encountered during ground disturbances greater than 10 feet below ground surface in previously undisturbed sediments of high paleontological sensitivity would be at risk for damage or destruction from construction activities, which would constitute a potentially significant impact. However, as discussed in the Paleontological Resources Technical Report, implementation of appropriate mitigation measures would ensure that paleontological resources, if encountered, are assessed for significance and, if deemed significant, are salvaged and curated with an accredited repository. As concluded in the Paleontological Resources Technical Report, these actions would reduce impacts to paleontological resources to less-than-significant levels.

As set forth in the Paleontological Resources Technical Report, the following mitigation measures would be implemented as part of the Project, which have been developed in accordance with and incorporate the performance standards of the Society of Vertebrate Paleontology (SVP), State and local regulations, and published best practices in mitigation paleontology.

GEO-MM-1: Retain a Qualified Professional Paleontologist: The project applicant should retain a qualified professional paleontologist (qualified paleontologist/project

paleontologist/principal paleontologist), who meets or exceeds the SVP definition, to carry out all regulatory compliance measures and protocols related to paleontological resources. The qualified professional paleontologist should obtain a curatorial arrangement with a qualified repository (e.g., NHMLA) before construction in the event of significant paleontological resource discoveries during construction.

GEO-MM-2: Conduct Worker Training: The qualified professional paleontologist should develop worker environmental awareness program training to educate the construction crew on the legal requirements for preserving fossil resources, as well as the procedures to follow in the event of a fossil discovery. This training program should be given to the crew before ground-disturbing work commences and should include handouts to be given to new workers as needed.

GEO-MM-3: Monitor for Paleontological Resources: Full-time paleontological monitoring should occur during ground-disturbing activities greater than or equal to 10 feet bgs that have the potential to impact previously undisturbed deposits of late Pleistocene old fan deposits, Unit 4 (Qof₄), late Pleistocene old fan deposits, Unit 2 (Qof₂), early Pleistocene to Pliocene Fernando Formation, and/or early Pliocene to late Miocene Puente Formation. Monitoring should not be required when ground-disturbing activities are less than 10 feet bgs, or when impacting only previously disturbed sediments and/or Recent artificial fill regardless of depth. Monitoring should be conducted by a qualified paleontological monitor who meets the standards of the SVP (2010) and who should be supervised by the qualified professional paleontologist. The qualified professional paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. Monitoring efforts can be increased, reduced, or ceased entirely if determined adequate by the qualified professional paleontologist. Paleontological monitoring should include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor should have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. The monitor should record pertinent geologic data and collect appropriate sediment samples from any fossil localities. Recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological repository (e.g., NHMLA).

GEO-MM-4: Prepare a Paleontological Resources Monitoring Report: Upon conclusion of ground-disturbing activities, the qualified professional paleontologist overseeing paleontological monitoring should prepare a final paleontological resource monitoring report that documents the paleontological monitoring efforts and describes any paleontological resources discoveries observed and/or recorded during earthwork activities associated with construction or implementation of the Project. If paleontological resources are curated, the final monitoring report and any associated data pertinent to the curated specimen(s) should be submitted to the designated repository. A copy of the final monitoring report should be filed with City Planning.

Overall, with implementation of Mitigation Measure GEO-MM-1 through Mitigation Measure GEO-MM-4, the Project would not directly or indirectly destroy a unique paleontological resource.

Therefore, Project impacts to paleontological resources would be less than significant with mitigation incorporated.

Geologic Features

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site. Thus, the Project would not destroy any distinct and prominent geologic or topographic features and no impacts would occur.

Cumulative Impacts

Less Than Significant Impact. Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), impacts associated with geology and soils are generally evaluated within the context of each individual project rather than on a cumulative basis. Nonetheless, cumulative growth in the surrounding area (inclusive of the Project and the related projects identified in Table 33 on page 367 further below) would expose a greater number of people to seismic hazards. However, as with the Project, related projects and other future development projects would be required to comply with existing regulatory requirements and the City’s grading permit review and approval process, as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular related project site. In addition, if paleontological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, the City’s standard Condition of Approval regarding the inadvertent discovery of paleontological resources, or site-specific mitigation. **Therefore, cumulative impacts related to geology and soils (including paleontological resources) would not be cumulatively considerable and cumulative impacts would be less than significant.**

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse

gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:
 - i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
 - ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
 - iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
 - iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment.
 - v. Use high-efficiency lighting and cooking devices.
 - vi. Incorporate passive solar design.
 - vii. Use high-reflectivity building materials and multiple glazing.
 - viii. Prohibit gas-powered landscape maintenance equipment.
 - ix. Install electric vehicle charging stations.
 - x. Reduce wood burning stoves or fireplaces.
 - xi. Provide bike lanes accessibility and parking at residential developments.
- b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- c) Include off-site measures to mitigate a project's emissions.
- d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
 - i. Use energy and fuel-efficient vehicles and equipment;
 - ii. Deployment of zero- and/or near-zero-emission technologies;
 - iii. Use lighting systems that are energy efficient, such as LED technology;
 - iv. Use the minimum feasible amount of GHG-emitting construction materials;
 - v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
 - vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
 - vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;
 - viii. Incorporate design measures to reduce water consumption;
 - ix. Use lighter-colored pavement where feasible;

- x. Recycle construction debris to maximum extent feasible;
 - xi. Plant shade trees in or near construction projects where feasible; and
 - xii. Solicit bids that include concepts listed above.
- e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
- i. Promote transit-active transportation coordinated strategies;
 - ii. Increase bicycle carrying capacity on transit and rail vehicles;
 - iii. Improve or increase access to transit;
 - iv. Increase access to common goods and services, such as groceries, schools, and day care;
 - v. Incorporate affordable housing into the project;
 - vi. Incorporate the neighborhood electric vehicle network;
 - vii. Orient the project toward transit, bicycle and pedestrian facilities;
 - viii. Improve pedestrian or bicycle networks, or transit service;
 - ix. Provide traffic calming measures;
 - x. Provide bicycle parking;
 - xi. Limit or eliminate park supply through;
 - xii. Elimination (or reduction) of minimum parking requirements
 - xiii. Creation of maximum parking requirements
 - xiv. Provision of shared parking.
 - xv. Unbundle parking costs;
 - xvi. Provide parking cash-out programs;
 - xvii. Implement or provide access to commute reduction program;
- f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;
- g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and
- h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:
- i. Provide car-sharing, bike sharing, and ride-sharing programs;
 - ii. Provide transit passes;
 - iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
 - iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;

- v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
- vi. Provide employee transportation coordinators at employment sites;
- vii. Provide a guaranteed ride home service to users of non-auto modes.
- i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- j) Land use siting and design measures that reduce GHG emissions, including:
 - i. Developing on infill and brownfields sites;
 - ii. Building compact and mixed-use developments near transit;
 - iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;
 - iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
 - v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.
- l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.
- m) Encourage telecommuting and alternative work schedules, such as:
 - i. Staggered starting times
 - ii. Flexible schedules
 - iii. Compressed work weeks
- n) Implement commute trip reduction marketing, such as:
 - i. New employee orientation of trip reduction and alternative mode options
 - ii. Event promotions
 - iii. Publications
- o) Implement preferential parking permit program
- p) Implement school pool and bus programs
- q) Price workplace parking, such as:
 - i. Explicitly charging for parking for its employees;
 - ii. Implementing above market rate pricing;

- iii. Validating parking only for invited guests;
- iv. Not providing employee parking and transportation allowances; and
- v. Educating employees about available alternatives.

Applicability to the Project

As analyzed below, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) that would be consistent with or as effective as the measures included in Mitigation Measure PMM GHG-1 from the 2020–2045 RTP/SCS PEIR, above. Specifically,

- The Project would integrate green building measures consistent with CALGreen (California Building Code Title 24) and LEED Silver equivalency. Specifically, the Project would comply with Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As discussed above in Item VI, Energy, the Project would include all electric HVAC systems; and Energy Star–labeled all electric appliances in residential areas, or equivalent rating as may be applied at the time of construction. Furthermore, all exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. The Project would also set aside a minimum area for potential installation of solar panels on residential and non-residential buildings at a later date as required by Title 24.
- The Project would comply with the City’s and CalGreen’s EV charging requirements.
- Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project’s construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.
- The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.⁷⁴ The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

Overall, the Project would adhere to existing regulatory requirements regarding GHG emissions, which are consistent with or as effective as Mitigation Measure PMM GHG-1 from the 2020–2045 RTP/SCS PEIR in reducing substantial adverse effects related to GHG emissions. As such, Mitigation Measure PMM GHG-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

⁷⁴ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM GHG-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:
 - i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
 - ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
 - iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
 - iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment.
 - v. Use high-efficiency lighting and cooking devices.
 - vi. Incorporate passive solar design.
 - vii. Use high-reflectivity building materials and multiple glazing.
 - viii. Use no gas-powered landscape maintenance equipment.
 - ix. Install alternative fuel (i.e., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations.
 - x. Reduce wood burning stoves or fireplaces.
 - xi. Provide bike lanes accessibility and parking at residential developments.
 - xii. Encourage projects to reduce natural gas infrastructure in buildings and/or reduce the use of natural gas appliances, with exceptions for limited uses
- b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- c) Include off-site measures to mitigate a project's emissions.
- d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to:
 - i. Use energy and fuel-efficient vehicles and equipment;
 - ii. Deployment of zero- and/or near zero emission technologies;
 - iii. Use lighting systems that are energy efficient, such as LED technology;
 - iv. Use the minimum feasible amount of GHG-emitting construction materials;

- v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
 - vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
 - vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;
 - viii. Incorporate design measures to reduce water consumption;
 - ix. Use lighter-colored pavement where feasible;
 - x. Recycle construction debris to maximum extent feasible;
 - xi. Plant shade trees in or near construction projects where feasible; and
 - xii. Solicit bids that include concepts listed above.
- e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
- i. Promote transit-active transportation coordinated strategies;
 - ii. Increase bicycle carrying capacity on transit and rail vehicles;
 - iii. Improve or increase access to transit;
 - iv. Increase access to common goods and services, such as groceries, schools, day care, and medical care;
 - v. Incorporate housing, including affordable housing, into the project;
 - vi. Incorporate a neighborhood electric vehicle network;
 - vii. Orient the project toward transit, bicycle, and pedestrian facilities;
 - viii. Improve pedestrian or bicycle networks, or transit service;
 - ix. Provide traffic calming measures;
 - x. Provide bicycle parking;
 - xi. Limit or eliminate park supply;
 - xii. Unbundle parking costs;
 - xiii. Provide parking cash-out programs;
 - xiv. Implement or provide access to commute reduction program;
- f) Incorporate bicycle and pedestrian facilities into project designs, maintain these facilities, and provide amenities incentivizing their use; and plan for and construct local bicycle projects that connect with the regional network;
- g) Improve transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations;
- h) Adopt employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, provide end-of-trip facilities, and telecommuting programs including but not limited to measures that:
- i. Provide car-sharing, bike sharing, and ride-sharing programs;

- ii. Provide transit passes;
- iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example by providing ridematching services;
- iv. Provide incentives or subsidies that increase use of modes other than single-occupancy vehicle;
- v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
- vi. Provide employee transportation coordinators at employment sites;
- vii. Provide a guaranteed ride home service to users of non-auto modes.
- i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- j) Land use siting and design measures that reduce GHG emissions, including:
 - i. Developing on infill and brownfields sites;
 - ii. Building compact and mixed-use developments near transit;
 - iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;
 - iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations or neighborhood alternative fuel vehicle networks, or charging for electric bicycles;
 - v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; and
 - vi. Establish methane recovery in Landfills and Wastewater Treatment Plants, where applicable.
- k) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color.
- l) Require at least five percent of all new vehicle parking spaces include alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations, or at a minimum, install the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Encourage electric vehicle capable (branch circuit and raceway) or ready (charging outlet) spaces to accommodate future growth in electric vehicles.
- m) Encourage telecommuting and alternative work schedules, such as:
 - i. Staggered starting times
 - ii. Flexible schedules
 - iii. Compressed work weeks
- n) Implement commute trip reduction marketing, such as:

- i. New employee orientation of trip reduction and alternative mode options
 - ii. Event promotions
 - iii. Publications
- o) Implement preferential parking permit program
- p) Implement school pool and bus programs
- q) Price workplace parking, such as:
 - i. Explicitly charging for parking for its employees
 - ii. Implementing above market rate pricing
 - iii. Validating parking only for invited guests
 - iv. Not providing employee parking and transportation allowances
 - v. Educating employees about available alternatives.

Applicability to the Project

As analyzed below, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) that would be consistent with or as effective as the measures included in Mitigation Measure PMM GHG-1 from the 2024–2050 RTP/SCS PEIR, above. Specifically,

- The Project would integrate green building measures consistent with CALGreen (California Building Code Title 24) and LEED Silver equivalency. Specifically, the Project would comply with Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As discussed above in Item VI, Energy, the Project would include all electric HVAC systems; and Energy Star–labeled all electric appliances in residential areas, or equivalent rating as may be applied at the time of construction. Furthermore, all exterior and interior lighting would meet high energy efficiency requirements utilizing LED or efficient fluorescent lighting technology. The Project would also set aside a minimum area for potential installation of solar panels on residential and non-residential buildings at a later date as required by Title 24.
- The Project would comply with the City’s and CalGreen’s EV charging requirements.
- Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project’s construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.
- The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that

development projects include an on-site recycling area or room of specified size.⁷⁵ The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

Overall, the Project would adhere to existing regulatory requirements regarding GHG emissions, which are consistent with or as effective as Mitigation Measure PMM GHG-1 from the 2024–2050 RTP/SCS PEIR in reducing substantial adverse effects related to GHG emissions. As such, Mitigation Measure PMM GHG-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

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

Less Than Significant Impact.⁷⁶ 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. Nor have SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emission that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the analysis focuses on the Project's consistency with statewide, regional and local plans adopted for the purpose of reducing and/or mitigating GHG emissions, as discussed under GHG Threshold (b). The evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG emissions-related impacts on the environment. Notwithstanding, for informational purposes, this analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions.⁷⁷

The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were

⁷⁵ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

⁷⁶ The Less Than Significant Impact determination is based on the analysis included under GHG Threshold (b).

⁷⁷ Pursuant to California Public Resources Code Sections 21155.2(b)(1) and 21159.28(a), any Project-specific or cumulative GHG-related impacts associated with vehicular and/or truck trips are disclosed for informational (as opposed to impact evaluation) purposes. The SCEA statute specifies that these specific impacts do not need to be discussed or referenced in the SCEA prepared for the Project.

adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix A of this SCEA).

The Project includes the construction of a new 201,134 square feet, eight-story mixed-use building consisting of 170 new residential units (inclusive of 26 Very Low-Income Households and 8 Low Income units) and 16,680 square feet of ground-floor commercial space. As presented in Table 11 on page 176, construction of the Project is estimated to generate a total of 4,262 metric tons of GHGs measured as an equivalent mass of carbon dioxide (MTCO₂e). As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix A of this SCEA.

Operation

The Project would increase on-site residential and commercial uses. This would result in direct and indirect GHG emissions generated by the increase in vehicular trips, as well as operations associated with the proposed uses, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). The Project would comply with the requirements under Title 24 and the Los Angeles Green Building Code, which would serve to reduce GHG emissions.

Operational emissions from the sources described above were estimated using CalEEMod in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the Project's daily VMT as discussed under Item XVII, Transportation, and in the Transportation Assessment included as Appendix L.1 of this SCEA. The Project's daily VMT was calculated using the LADOT VMT Calculator (Attachment A of the Transportation Assessment). As shown in Table 12 on page 177, the Project, with implementation of regulatory requirements set forth in Title 24 and Los Angeles Green Building Code, including the use of LED lighting, would result in approximately 1,159 MTCO₂e annually.

As pointed out above, there is not an adopted numerical significance threshold for assessing impacts related to GHG emissions. The following analysis, which includes an evaluation of the Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reduction GHG emissions, is, therefore, used to determine the significance of the Project's GHG emissions-related impacts on the environment.

Table 11
Construction-Related GHG Emissions
(MTCO₂e)

Year	MTCO ₂ e ^a
2024 ^b	1,596
2025	1,946
2026	720
Total	4,262
Amortized Over 30 Years^c	142
<hr/> <p><i>MTCO₂e = metric tons of an equivalent mass of carbon dioxide</i></p> <p>^a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix A of this SCEA.</p> <p>^b For purposes of conservatively analyzing construction impacts, it was assumed that the Project's construction could start in 2024 with buildout in 2026. Based on SCAQMD factors, the construction equipment and truck fleet mix will emit less pollution in future years due to more stringent emissions control regulations. As construction activities for the Project are evaluated based on an earlier start date, the emissions presented are more conservative.</p> <p>^c As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.</p> <p>Source: Eyestone Environmental, 2024.</p>	

Table 12
Operational Greenhouse Gas Emissions

Emission Source	Project With Regulatory Requirements (No Project Design Features) CO₂e (metric tons)^a	Project With Regulatory Requirements and Project Design Features CO₂e (metric tons)^a
Area ^b	5	5
Energy ^c	309	309
Mobile ^d	1,291	670
EV Charging ^e	(16)	(16)
Stationary ^f	23	23
Solid Waste ^g	11	11
Water/Wastewater ^h	15	15
Construction	142	142
Total Emissions	1,780	1,159

^a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix A of this SCEA.

^b Area source emissions are from landscaping equipment.

^c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for compliance with 2022 Title 24 Standards and Los Angeles Green Building Code, including Ordinance 187,714 which requires all new buildings to be all electric except for select uses including restaurant cooking.

^d The reduction in mobile source emissions accounts for project features such as increased density and proximity to transit as well as other VMT reduction measures (e.g., unbundled parking) that are included as part of the transportation analysis, which would reduce VMT and associated fuel usage in comparison to free-standing sites. This reduction in VMT was calculated within the LADOT VMT Calculator.

^e EV Charging GHG emission reduction accounts for compliance with City requirements.

^f Stationary source emissions are from an on-site emergency generator.

^g Solid waste emissions are calculated based on CalEEMod default solid waste generation rates and accounts for compliance with City's mandated diversion goals.

^h Water/wastewater emissions are calculated based on CalEEMod default water consumption rates and accounts for compliance with Los Angeles Green Building Code.

Source: Eyestone Environmental, 2024.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. As discussed above, in the absence of a quantifiable significant threshold for Greenhouse Gas Emissions Threshold (a), the following analysis is used to determine significance levels related to Greenhouse Gas Emissions Threshold (a) and Greenhouse Gas Emissions Threshold (b).

Consistency with Applicable Plans and Policies

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.⁷⁸

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.⁷⁹ The 2008 Scoping Plan proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”⁸⁰ The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.⁸¹

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target* (2017 Update).⁸² The 2017 Update builds upon

⁷⁸ Executive Order B-55-18 establishes a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

⁷⁹ Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

⁸⁰ Climate Change Scoping Plan, CARB, December 2008, ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2008-scoping-plan-documents, last reviewed April 3, 2013, accessed May 5, 2023.

⁸¹ CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

⁸² CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target, November 2017.

the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.⁸³

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.⁸⁴ The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future." The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.⁸⁵ The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.⁸⁶

Lead agencies must either establish significance thresholds for their respective jurisdictions or make a determination of significance on a case-by-case basis. The lead agency should use its "careful

⁸³ CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.

⁸⁴ California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

⁸⁵ CEQA Guidelines Section 15064.7(c).

⁸⁶ CEQA Guidelines Section 15130 (f).

judgment” in making a determination of significance, and should make a “good-faith” effort to “describe, calculate or estimate” the amount of GHGs that will result from a project.^{87,88} The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.⁸⁹ A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.⁹⁰

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change, no current law or regulation would regulate all aspects of the Project’s GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project’s GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) 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 greenhouse gas emissions. For this Project, this analysis considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates, SCAG’s 2020–2045 RTP/SCS, 2024–2050 RTP/SCS (RTP/SCS), and the City’s Green New Deal.

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB’s Scoping Plan and subsequent updates, SCAG’s 2020–2045 RTP/SCS, SCAG’s 2024–2050 RTP/SCS, and the City’s Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CARB’s Climate Change Scoping Plan

The Scoping Plan is a strategy the California Air Resources Board (CARB) develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State’s climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the original plan that was adopted in 2008. The initial Scoping Plan laid out a path

⁸⁷ CEQA Guidelines Section 15064.4(a).

⁸⁸ CEQA Guidelines Section 15064.4(a).

⁸⁹ CEQA Guidelines Section 15064.4(a)(1)-(2).

⁹⁰ CEQA Guidelines Section 15064.4(b).

to achieve the AB 32 2020 limit of returning to 1990 levels of GHG emissions, a reduction of approximately 15 percent below business as usual activities.⁹¹ The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update assessed progress toward achieving the 2020 limit and made the case for addressing short-lived climate pollutants (SLCPs).⁹² The second update, the 2017 Scoping Plan Update,⁹³ shifted focus to the newer Senate (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress toward achieving the AB 32 goal of returning to 1990 levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.⁹⁴ The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working land sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan. Included in Attachment X of the 2022 Scoping Plan is a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how action at the state, regional, and local levels

⁹¹ CARB. 2008. Climate Change Scoping Plan.

⁹² CARB. 2014. First Update to the Climate Change Scoping Plan.

⁹³ CARB. 2017. California's 2017 Climate Change Scoping Plan.

⁹⁴ CARB, California's 2017 Climate Change Scoping Plan, 2017.

of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the City's Green New Deal and Green Building Code.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes “recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA).” (Page 4 of Appendix D.) The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, as not all jurisdictions have sufficient resources (e.g., technical expertise, staffing, funding) to do so, jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas when developing local climate plans, measures, policies, and actions. “By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction.” (Page 9 of Appendix D.)

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing⁹⁵ while demonstrating that a Project is in alignment with the State's Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing, or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

⁹⁵ The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, 2022 Scoping Plan Update, November 2022.

To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas), which include Transportation Electrification, VMT Reduction, and Building Decarbonization.⁹⁶ A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas and how the Project would serve to support these strategies is provided below.

Transportation Electrification

Convert local government fleets to zero-emission vehicles (ZEV): The City's Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement was required to follow a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035 and 100 percent by 2050. In order to achieve this goal, the City would build 20 publicly available Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by installing EV chargers in at least 10 percent of total proposed parking spaces. Installation of additional EV chargers would encourage adoption of EVs.

Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide: The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future EVSE. However, CALGreen 2022 has been updated to require 40 percent of total residential parking spaces be constructed as EV capable.⁹⁷ The City's ordinance also requires new construction to install EVSE at 10 percent of total parking spaces, which is consistent with CALGreen 2022 requirements. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. In addition, the Project would comply with Ordinance No. 186485 by installing EV chargers in at least 10 percent of total proposed parking spaces which would meet the CALGreen 2022 requirement. In addition, 40 percent of all new residential parking spaces would be required to be EV "ready," which will be capable of supporting future EV charging equipment.

⁹⁶ Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.

⁹⁷ California Green Building Standards Code. Supplement Part 11. July 1, 2024.

VTM Reduction

Reduce or eliminate minimum parking standards in new developments and Implement parking pricing or transportation demand management pricing strategies: The City of Los Angeles Mobility Plan 2035 (Mobility Plan), which is the Transportation Element of the City's General Plan, contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, Mobility Plan Program No. PK.13 and AB 2097 would reduce parking requirements for developments near transit (within half a mile), while Program No. PK.3 would allow for individualized parking requirements where businesses can identify parking demand and can reduce on-site parking with TDM strategies. These reduction strategies would serve to reduce minimum parking standards in order to reduce vehicle trips.

The Project would provide 120 residential bicycle parking spaces (including 10 short-term and 110 long-term spaces) and 18 commercial bicycle parking spaces (including 9 short-term and 9 long-term). Therefore, the Project would be consistent with and would not conflict with this reduction strategy to reduce parking standards.

Implement Complete Streets policies and investments, consistent with general plan circulation element requirements: The Mobility Plan established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015 consistent with California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020. The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation. However, the Project would conform to all design element requirements which may affect public rights-of-way, including proper driveway alignment, adequate sidewalk widths, improved lighting elements, and landscaping design which does not hinder sight distance, mobility, or accessibility. Therefore, the Project would not conflict with implementation of Complete Streets policies.

Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.; Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking; Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood): These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and

transit, and increasing investment in transit and complete streets. The City has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking. In implementing the Mobility Plan, the City continues to build out networks for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. While Connect SoCal 2024 remains focused on its core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a sustainable communities strategy, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband and mobility hubs. The primary goals of the 2024–2050 RTP/SCS include:

- Mobility: Build and maintain an integrated multimodal transportation network;
- Communities: Develop, connect and sustain livable and thriving communities;
- Environment: Create a healthy region for the people of today and tomorrow; and
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.

While the 2024–2050 RTP/SCS has been adopted by SCAG, the 2024–2050 RTP/SCS has not yet been accepted by the California Air Resources Board. In addition, SB 375 does not provide GHG emissions reduction targets specific to the 2024–2050 RTP/SCS that are not also applicable to 2020–2045 RTP/SCS.

The Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by the Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT bus lines. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage residents and employees of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Therefore, the Project would be consistent with these reduction strategies.

California continues to experience a severe housing shortage. The State must plan for more than 2.5 million residential units over the next eight years, and no less than one million of those residential units must be affordable to lower-income households.⁹⁸ This represents more than double the housing

⁹⁸ California Department of Housing and Community Development. 2022. Statewide Housing Plan.

planned for during the last eight years.⁹⁹ The housing crisis and the climate crisis must be confronted simultaneously, and it is possible to address the housing crisis in a manner that supports the State's climate and regional air quality goals.¹⁰⁰ CAPCOA's Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA's Handbook) provides a VMT reduction measurement for incorporation of low-income housing. Measure T-4 (Integrate Affordable and Below Market Rate Housing) shows a 28.6 percent reduction in VMT for low-income units in comparison to market rate units.

The City's Housing Element of the General Plan provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The current RHNA goal for affordable housing within the City is approximately forty percent of new construction. However, the City's projections show affordable housing comprising twenty percent of new construction, which falls short of the forty percent RHNA goal. In order to address this shortfall, the Housing Element identifies measures to encourage development of affordable housing such as revising density bonuses for affordable housing; identify locations which are ideal for funding programs to meet low-income housing goals; and rezone areas to encourage low-income housing. The Housing Element estimates that implementation of these measures would increase housing production at all income ranges compared to previous cycles.

The City's 40-percent goal of low-income housing for new construction is applicable on a citywide basis and not applicable to an individual project. The Planning Department's Housing Division found, based on market studies and experiences of other agencies, that mandating 20-percent affordable housing on individual projects is likely to reduce overall housing production, including low income housing, in the City and would be contrary to City and State policies. Pushing more housing outside of the City would be contrary to the Scoping Plan, as infill housing production in the City, which is a highly urbanized city with billions in transit infrastructure, lower average VMT than the SCAG region, is called for in the 2022 Scoping Plan.

The Project will include up to 170 residential units comprised of 136 market rate units and 34 affordable units, representing 20 percent of the total proposed residential units. The Project also has a density that is supportive of transit with 98 dwelling units per acre.¹⁰¹ The Project's affordable units would serve to support the City in its goal of increasing low-income housing for new construction on a citywide basis.

Building Decarbonization

Adopt all-electric new construction reach codes for residential and commercial uses: The City has adopted an All-Electric Buildings Ordinance effective April 1, 2023 which will reduce GHG emissions related to natural gas combustion. Under this ordinance, all building permit applications for newly constructed buildings will be required to be all-electric with some exceptions such as cooking within restaurant uses. Space heating, water heating and cooking for non-restaurant uses would be required

⁹⁹ Ibid.

¹⁰⁰ Elkind, E. N., Galante, C., Decker, N., Chapple, K., Martin, A., & Hanson, M. 2017. Right Type, Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. Available at <https://turnercenter.berkeley.edu/research-and-policy/right-type-right-place/>.

¹⁰¹ The minimum density for transit-supportive development is 20 residential du per acre.

to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the All-Electric ordinance and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project would be required to comply with the City's LAMC, and would not use natural gas except for the restaurant uses, which are exempt from the All-Electric ordinance and would consist of a small portion of the total square footage. Therefore, the Project would be consistent and not conflict with the City's LAMC.

Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers): This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and Los Angeles Department of Water and Power (LADWP) has established rebate programs to promote use of energy-efficient products and home upgrades. Under LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project would involve retrofit of an existing building (the Morgan Camera Shop building) as well as new construction. Retrofitted and new buildings would be designed and constructed in accordance with the City's Municipal Code and would include, as applicable, highly efficient HVAC systems; energy-efficient wall insulation and glazing units; and Energy Star-labeled appliances. Moreover, the Project would include energy saving technologies and appliances, water-efficient plantings with drought-tolerant species, and pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking. Therefore, the Project would be consistent with and would not conflict with policies to implement energy efficiency retrofits.

City of Los Angeles Green New Deal

L.A.'s Green New Deal Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, renewable energy, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal, climate change mitigation is one of eight explicit benefits that help define its strategies and goals. L.A.'s Green New Deal's specific targets include ensuring 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035; reducing VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050; increasing the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025 and 50 percent by 2035 and has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and

28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.¹⁰²

Although L.A.'s Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, certain reductions associated with the Project would promote its goals. Such measures include increasing renewable energy usage, reduction of per capita water usage, promotion of walking and biking to work, promotion of high density housing close to major transportation stops, and various recycling and trash diversion goals. The Project would generally be consistent with these goals because it is an infill development within an existing urbanized area that would introduce employment within a High Quality Transit Area (HQTa) which is well served by public transportation. Furthermore, the Project would comply with the CALGreen Code, implement various project design features to reduce energy usage and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the targets included in L.A.'s Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas. Project design would also provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive. The Project would also use LED lighting to minimize use of electricity and would use native and drought-tolerant plant species in the landscaping to minimize water use. The Project would also provide parking spaces which are EV ready and with EV-charging stations to assist in the reduction of GHG emissions from vehicles. Installation of EV-charging stations would also be consistent with the L.A. Green New Deal goal of increasingly publicly available EV charging infrastructure. These EV charging stations would facilitate trips in zero emission vehicles, resulting in a reduction of GHG emissions.¹⁰³ Therefore, the Project would be consistent with and would not conflict with the City's Green New Deal.

SCAG 2020–2045 RTP/SCS and 2024–2050 RTP/SCS

SCAG's 2020–2045 RTP/SCS, adopted on September 3, 2020, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier thanks to an expanded regional charging network.

¹⁰² City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019 Targets, https://plan.lamayor.org/targets/targets_plan.html, accessed May 5, 2023.

¹⁰³ However, as a conservative assumption, the GHG analysis did not take credit for this reduction.

The goals and policies of SCAG's 2020–2045 RTP/SCS that focus on reducing VMT feature transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities such that there is access to high quality transit service. Priority Growth Areas, which include HQTAs, Job Centers, Transit Priority Areas (TPAs), NMAs, Livable Corridors, and Spheres of Influence (SOIs), will account for less than 4 percent of regional total land but are projected to accommodate 64 percent of future household growth and 74 percent of employment growth between 2020 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's PGAs, including HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2024–2050 RTP/SCS does not use the HQTA designation as part of its Priority Development Areas (previously referred to as Priority Growth Areas) and instead uses a new designation referred to as Livable Corridors. Livable Corridors are defined as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. SCAG also recognizes that many of these key corridors are also High Quality Transit Corridors (HQTCS). The Project would improve mobility and accessibility, encourage transit use, and reduce VMT by intensifying urban density within a Livable Corridor and HQTC in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office and retail uses; providing pedestrian and bicycle improvements; and implementing TDM strategies to reduce single-occupant travel.

The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.¹⁰⁴ Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS outline a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

Regarding individual developments, such as the Project, the strategies and policies set forth in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved

¹⁰⁴ SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 5, May 7, 2020.

energy efficiency. The Project's consistency with these general categories of strategies and policies are each discussed below.

Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.¹⁰⁵ By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. HQTAs will account for 3 percent of regional total land but are projected to accommodate 46 percent and 50 percent of future household and employment growth respectively between 2012 and 2040. The overall land use pattern in the 2020–2045 RTP/SCS reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2024–2050 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2019 and currently includes approximately 6.2 million homes and 9.0 million jobs.¹⁰⁶ By 2050, the integrated growth forecast projects that these figures will increase by 2.1 million people, with nearly 1.6 million more homes and 1.3 million more jobs. NMAs, TPAs, and Livable Corridors will account for 8.2 percent of regional total land but are projected to accommodate 66 percent and 54 percent of future household and employment growth respectively between 2019 and 2050. The overall land use pattern in the 2024–2050 RTP/SCS reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

As discussed below under Item XIV, Population and Housing, the Project would increase the residential population as well as the daytime population (employees) within the Project Site. Specifically, based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 383 residents.¹⁰⁷ The Project's 16,680 square feet of ground-floor commercial space would generate approximately 33 new employees based on employee generation rates developed by the LADOT.¹⁰⁸ This increase in population and employees would be well within the existing population and employment projections for the community and region and would be able to be accommodated by vacancies in the housing stock and new residential units currently being developed in the region, as detailed below under Item XIV, Population and Housing. Furthermore, while the Project would generate jobs associated with construction of the Project, these employment opportunities would be short-term

¹⁰⁵ 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

¹⁰⁶ 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

¹⁰⁷ City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.

¹⁰⁸ Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 2 employees per 1,000 square feet of "General Retail."

opportunities during construction and are employment positions that circulate throughout the region based on the construction site. Therefore, due to the Project's minimal increase in population and employment in the City, the Project would be consistent with the demographic projections set forth in SCAG's 2020–2045 RTP/SCS, which were also used in the 2022 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2022 AQMP.

With regard to consistency with growth projections for the 2024–2050 RTP/SCS, as discussed below in Section XIV, Population and Housing, the Project would represent approximately 1.03 percent of the projected growth in the SCAG region between 2023 and 2026 (i.e., the Project's baseline and anticipated buildout years) and approximately 0.11 percent of the projected employment growth in the SCAG Region between 2023 and 2026. Therefore, the Project's contribution to population and employment growth would be also consistent with projections contained in the 2020–2045 RTP/SCS.

Consistent with the SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide residents and employees with convenient access to public transit, which would facilitate a reduction in VMT and corresponding vehicular GHG emissions. The Project would concentrate on new development within 0.5-mile (walking distance) of bus lines serviced by Metro and LADOT. Thus, residents and employees are provided with an alternative to single-occupant vehicle travel that would facilitate a reduction in VMT and corresponding vehicular GHG emissions. As such, the Project's location provides some opportunities for the use of public transit to reduce vehicle trips. Moreover, the Project would represent a development within an existing semi-urbanized area that would include residential uses near other residential and commercial uses.

As discussed above, the Project would incorporate design features which would reduce VMT in comparison to a Project without reduction features. The Project's estimated VMT reductions would be consistent with regional strategies to reduce transportation-related GHG emissions and would be consistent with and support the goals and benefits of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. The Project represents a development within an existing urbanized area that would concentrate new residential uses within an HQT/A/HQTC, TPA, Job Center, and NMA and adjacent to a Livable Corridor. Convenient access to public transportation and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.

Consistency with VMT Reduction Strategies and Policies

As discussed under Item XI, Land Use and Planning, the Project includes GHG-reducing strategies from the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS that are applicable to the Project. Specifically, the Project includes characteristics that are consistent with strategies identified in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, and that would reduce Project trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. Such characteristics and VMT reducing measures include developing a mix of residential and commercial uses near other residential and commercial uses, because in comparison, a similar project located further away from major residential centers or mass transit would not achieve a similar reduction in VMT. In addition, the Project would include EV parking at the Project Site reducing mobile source GHG emissions.

As discussed above, the Project represents an infill development within an existing urbanized area that would concentrate new residential uses within an HQT/A/HQTC and NMA and along a Livable Corridor. The Project Site is transit accessible and is close to the many bus transit lines, rail lines, and local shuttle service. Specifically, the Project is within 0.5-mile (walking distance) of Metro Bus Lines 2, 180, 210, and 222, and LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line. Furthermore, in accordance with Ordinance No. 185,480, the Project would provide bicycle parking spaces as required by the LAMC, in addition to bicycle-serving amenities that would further encourage biking. These project features would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

The second category of strategies and policies of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, regarding individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS policy initiatives focus on accelerating the deployment of a zero-emission transportation system. As discussed above, the Project Site would set aside parking spaces with EV charging equipment and spaces that support future EVSE. Therefore, the Project would support the alternative fueled vehicle policy initiative.

Energy Efficiency Strategies and Policies

The third category of strategies and policies of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. The 2024–2050 RTP/SCS policy initiative focuses on exploring and advancing the transition toward zero-emission and clean technologies and other transformative technologies, where viable. All Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, reduction of outdoor water use; drip irrigation systems; and water-efficient landscape design, including drought tolerant plants. Restroom fixtures would also comply with the City of LA Green Building code which requires a 20-percent reduction in water usage based on the City of LA Plumbing Code. The Project would also use LID techniques to minimize the amount of stormwater that leaves the Project Site. Furthermore, the Project would be subject to the 2022 Title 24 Standards.

Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are plans adopted for the purpose of reducing GHGs. To assess the Project's potential to conflict with the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, this SCEA also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, if they are

compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project's consistency with the applicable goals and principles set forth in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are discussed under Item XI, Land Use and Planning, of this SCEA. As shown under Item XI, the Project is consistent with the goals and principles set forth in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.

In sum, the Project is a land use development that is consistent with the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.¹⁰⁹ By furthering implementation of SB 375, the Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. Overall, the Project would not conflict with the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, which are intended to reduce GHG emissions.

Conclusion

In conclusion, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CALGreen Building Code.¹¹⁰ As discussed above, the Project would generate only a relatively small number of new vehicle trips that would not result in any VMT impacts and would also not conflict with SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity, use native and drought-tolerant plant species in the landscaping to minimize water use, and include EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. Moreover, the Project would meet LEED Silver equivalency and include all electric appliances in the residential units. As such, the Project would be consistent and not conflict with the Sustainable City pLAn/L.A.'s Green New Deal.

Overall, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. In addition, in the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project would not generate GHG emissions that may have a significant impact on the environment. Thus, impacts relative to GHG Threshold (a) and GHG Threshold (b) would be less than significant.

¹⁰⁹ As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

¹¹⁰ The Project's GHG emissions inventory does not take into account future regulations and legislation to reduce GHG emissions to achieve carbon neutrality by 2045. However, for all the reasons described above, the Project would support the State's goals of Executive Order B-55-18 as well as AB 32 and SB 32 to achieve carbon neutrality by 2045.

Cumulative Impacts

Less Than Significant Impact. The analysis of a project’s GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis provided above already considers the potential for the Project to contribute to the cumulative impact of global climate change. As demonstrated in the above analysis, the Project would be consistent with CARB’s Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The Project would also be consistent with SCAG’s 2020–2045 RTP/SCS’ and 2024–2050 RTP/SCS’ regulatory requirements to reduce regional GHG emissions from the land use and transportation sectors by 2035. Furthermore, the Project would generally comply with the intent of L.A.’s Green New Deal, which includes specific targets related to housing and development, and mobility and transit. Given the Project’s consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project’s incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project’s cumulative contribution to global climate change is less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.
- b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.
- c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:
 - The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and

cleaning fluids. and ensure notification in the event the Coroner is not available.

- The location of such hazardous materials.
 - An emergency response plan including employee training information.
 - A plan that describes the way these materials are handled, transported and disposed.
- d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.
 - e) Avoid overtopping construction equipment fuel gas tanks.
 - f) Properly contain and remove grease and oils during routine maintenance of construction equipment.
 - g) Properly dispose of discarded containers of fuels and other chemicals.
 - h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.
 - i) Identify and implement more stringent tank car safety standards.
 - j) Improve rail transportation route analysis, and modification of routes based on that analysis.
 - k) Use the best available inspection equipment and protocols and implement positive train control.
 - l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.
 - m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
 - n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.
 - o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.
 - p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.
 - q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.

Applicability to the Project

As analyzed below, no significant impacts are anticipated in relation to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in connection with the Project. The Project would comply with all applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials. Existing regulations are equal to or more effective than the measures set forth in Mitigation

Measure PMM HAZ-1 from the 2020–2045 RTP/SCS PEIR. Therefore, Mitigation Measure PMM HAZ-1 from the 2020–2045 RTP/SCS PEIR is not incorporated into the Project.

PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:

- a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;
- b) More stringent tank car safety standards;
- c) Improved rail transportation route analysis, and modification of routes based on that analysis;
- d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control;
- e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;
- f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;
- g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;
- h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.

Applicability to the Project

Mitigation Measure PMM HAZ-2 from the 2020–2045 RTP/SCS PEIR includes measures regarding the transport of hazardous materials. No significant impacts are anticipated in relation to the transport of such materials as the Project would not involve the transport of such materials. In addition, the Project would comply with all applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials, which are equal to or more effective than the measures set forth in Mitigation Measure PMM HAZ-2 from the 2020–2045 RTP/SCS PEIR. As such, Mitigation Measure PMM HAZ-2 from the 2020–2045 RTP/SCS PEIR is not incorporated into the Project.

PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release

of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.
- b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

Applicability to the Project

As analyzed below, the Project would not emit or handle hazardous materials in proximity to a school. As such, Mitigation Measure PMM HAZ-3 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
- b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the Project Site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.
- c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.

- f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.
- i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.
- j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.
- k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.
- m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.
- n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence

or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.

- o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

Applicability to the Project

Consistent with Mitigation Measure PMM HAZ-4 from the 2020–2045 RTP/SCS PEIR, a Phase I ESA was prepared for the Project. The Phase I ESA obtained a database search report from Environmental Data Resources, Inc. (EDR), which is included as Appendix H of this SCEA. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. Moreover, the Project would implement all applicable hazardous materials management protocols and would comply with all applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials. Regulatory compliance and incorporation of Project-specific mitigation measures would be more effective than Mitigation Measure PMM HAZ-4 from the 2020–2045 RTP/SCS PEIR, and as such, Mitigation Measure PMM HAZ-4 from the 2020–2045 RTP/SCS PEIR would not be incorporated as part of the Project.

MM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.
- b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation

Applicability to the Project

Consistent with this measure, the Project would implement Project Design Feature TR-PDF-1, which, consistent with current and standard City policy, would require the preparation and City approval of a Construction Traffic Management Plan to ensure that adequate emergency access is maintained during construction of the Project. Project Design Feature TR-PDR-1 is equal to or more effective than the measures identified in Mitigation Measure PMM HAZ-5 from the 2020–2045 RTP/SCS PEIR. As such, Mitigation Measure PMM HAZ-5 from the 2020–2045 RTP/SCS PEIR would not be incorporated as part of the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM HAZ-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials and hazardous materials releases, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Reduce train speeds when train cars contain hazardous material to 40 miles per hour when passing through urbanized areas of any size.
- b) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
- c) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
- d) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.
- e) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.
- f) Undertake annual emergency responses scenario/field-based training including Emergency Operations Center Training activations with local emergency response agencies.

Applicability to the Project

As analyzed below, no significant impacts are anticipated in relation to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in connection with the Project. Regardless, consistent with Mitigation Measure PMM HAZ-1 from the 2024–2050 RTP/SCS PEIR, appropriate hazardous materials management protocols would be implemented at the Project Site to the extent applicable during construction and operation, and the Project would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Existing regulations are equal to or more effective than Mitigation Measure PMM HAZ-1 from the 2024–2050 RTP/SCS PEIR. Therefore, Mitigation Measure PMM HAZ-1 from the 2024–2050 RTP/SCS PEIR is not incorporated into the Project.

PMM HAZ-2: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within 0.25 miles of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:

- a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within 0.25 miles of schools, when school is in session, wherever feasible.
- b) Where it is not feasible to avoid transport of hazardous materials, within 0.25 miles of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

Applicability to the Project

The Project would not emit or handle hazardous materials within 0.25-mile of a school. As such, Mitigation Measure PMM HAZ-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM HAZ-3: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site that is included on the Cortese List of hazardous waste and substances sites, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
- b) If warranted by the Phase I report, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Professional Geologist or Professional Engineer.
- c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the USEPA to determine the extent of potential contamination beneath all underground storage tanks, elevator shafts,

clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.

- f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination (including dewatering effluent), or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- h) Cease work if soil, groundwater (including dewatering effluent), or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.
- i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state, and federal laws and policies.
- j) Groundwater (including dewatering effluent) pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.
- k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board, have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.
- m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM

in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915–25919.7; and other local regulations.

- n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, LBP, and any other building materials or stored materials classified as hazardous waste by state or federal law.
- o) Where the remediation of LBP has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's Construction Lead Standard, CCR Title 8 Section 1532.1 and Department of Health Services Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

Applicability to the Project

As described below, a Phase I ESA was prepared for the Project. The Phase I ESA for the Project Site obtained a database search report from Environmental Data Resources, Inc. (EDR), which is included as Appendix H of this SCEA. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. As discussed therein, the Project Site is not included on the Cortese List of hazardous waste and substances site. Moreover, the Project would implement all applicable hazardous materials management protocols and would comply with all applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials. Regulatory compliance and incorporation of Project-specific mitigation measures would be more effective than Mitigation Measure PMM HAZ-3 from the 2024–2050 RTP/SCS PEIR. As such, Mitigation Measure PMM HAZ-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM HAZ-4: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.
- Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;

- Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.
- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
 - Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
 - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
 - Scheduling of truck trips outside of peak morning and evening commute hours.
 - Limiting of lane closures during peak hours to the maximum extent feasible.
 - Usage of designated haul routes to minimize truck traffic on local roadways to the maximum extent feasible.
 - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
 - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
 - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
 - Storage of construction materials only in designated areas.
 - Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
 - Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
 - Enhance emergency preparedness awareness among public agencies and with the public at large.

Applicability to the Project

Consistent with this measure, the Project would implement Project Design Feature TR-PDF-1, which, consistent with current and standard City policy, would require the preparation and City approval of a Construction Traffic Management Plan to ensure that adequate emergency access is maintained during construction of the Project. Project Design Feature TR-PDR-1 is equal to or more effective than the measures identified in Mitigation Measure PMM HAZ-4 from the 2024–2050 RTP/SCS PEIR. As such, Mitigation Measure PMM HAZ-4 from the 2024–2050 RTP/SCS PEIR would not be incorporated as part of the Project.

Impact Analysis

The following analysis is based, in part, on the Environmental Site Assessment—Phase I (Phase I ESA) prepared for the Project by California Environmental Geologists and Engineers, Inc. (CE), dated April 2023, which is included as Appendix H of this SCEA.

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

Less Than Significant Impact. As evaluated below, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction or operation.

Construction

The Project would not involve the routine (long-term) transport of hazardous materials to and from the Project Site during construction. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used and stored on the Project Site. The use and storage of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. In addition, while some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. Furthermore, all potentially hazardous materials to be used during construction of the Project would be used, stored, and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. **Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.**

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently

occurring at other nearby residential and commercial developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements. Due to the type of development proposed (e.g., residential and commercial), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. ***Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with manufacturer's specifications and all applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.***

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

Less Than Significant Impact. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials within the Project Site. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the American Society for Testing Materials (ASTM) Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. Types of RECs can include Historical Recognized Environmental Conditions (HRECs), which are RECs that have been addressed to the satisfaction of the applicable regulatory authority or have met unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls; and Controlled Recognized environmental Conditions (CRECs), which are RECs that have been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

As discussed in the Phase I ESA, the onsite Sunset and Vine residential tower is listed as a hazardous waste generator with the building's previous owner, CIM Group, listed as the responsible party. Between 2008 and 2010 multiple shipments of hazardous waste were made from the Project Site for offsite disposal. Records indicate the waste consisted of unspecified aqueous solutions, detergent waste, lead, asbestos, and other organic solids, which are likely attributed to renovations that occurred during this time period and onsite laundering activities for the commercial units. The current tenant at 1460 Vine Street, Chipotle, is listed on the HAZMAT and CERS databases. Chipotle is listed as a chemical storage facility on the CERS database. The listings are likely associated with cleaning chemicals and are considered minimal risk to the Project Site. As concluded in the Phase I ESA, no evidence of recognized environmental conditions (RECs), Historical Recognized Environmental Conditions (HREC), or Controlled Recognized Environmental Conditions (CRECs) was identified in connection with the Project Site. However, due to the date of construction of the onsite buildings between 1911 and 1961, asbestos and lead may be present within certain buildings on the Project Site.

Construction

Hazardous Waste Generation, Handling, and Disposal

As discussed above, during demolition, grading/excavation, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be used on the Project Site, and therefore would require proper handling and management and, in some cases, disposal. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. In particular, if asbestos-containing materials (ACMs) are found, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable federal, state, and local regulations. Similarly, if lead-based paint (LBP) is found onsite, suspect materials would be managed in accordance with applicable procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. As such, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing underground storage tanks (USTs) was observed on the Project Site. In addition, no other records were found that indicate the presence of any USTs within the areas proposed for construction. In the unlikely event that USTs are found during construction of the Project, they would be removed in accordance with applicable federal, State, and local regulations. One diesel generator on-site includes a built-in aboveground storage tank. Based on the Phase I ESA, the generator appears to be in good condition. This diesel generator is associated with the existing Sunset Vine Tower within the Project Site and would remain as part of the Project. Thus, with compliance with applicable regulations and requirements, Project construction activities would not create hazardous conditions related to risk of upset associated with exposure to USTs or ASTs.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Thus, any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs. Based on the age of the on-site structures (i.e., constructed between 1911 and 1961), ACMs may be present on-site. Pursuant to SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), an asbestos survey would be conducted prior to demolition activities, subject to approval by the City of Los Angeles Department of Building and Safety. If ACMs are found, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable federal, state, and local regulations. Thus, with compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Based on the age of the on-site structures, LBP may be present on-site. If LBP is found onsite, suspect materials would be managed in accordance with applicable procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Examples of procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. Therefore, with compliance with relevant regulations and requirements, the Project would not expose people to a substantial risk resulting from the release of LBP into the environment.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. According to the Phase I ESA, two vaulted transformers were observed within the Project Site. These transformers, which are owned and maintained by the Los Angeles Department of Water and Power (LADWP), are sealed and not accessible. The transformers are in good condition, and no evidence of leaks and/or spills has been observed. Notwithstanding, in the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, with compliance with applicable regulations and requirements, the Project would not create reasonably foreseeable upset and accident conditions associated with PCBs.

Oil Wells and Methane

A review of the State of California Geologic Energy Management Division (CalGEM) Well Finder determined that no oil fields or oil wells are located within a 2,000-foot radius of the Project Site.¹¹¹ In addition, the Project Site is not located within a recognized Methane Hazard Zone or Methane Buffer Zone as mapped by ZIMAS.¹¹² Therefore, the Project would not create environmental hazards relative to oil wells or methane.

Operation

Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of residential and commercial uses, including cleaning products, paints, and those used for landscape maintenance. All hazardous materials present on the Project Site during operation

¹¹¹ CalGEM, Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/>, accessed August 8, 2024.

¹¹² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031.

would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant.

Underground and Aboveground Storage Tanks

The Project does not propose the installation of USTs or ASTs. As such, operation of the Project would not 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.

Asbestos-Containing Materials

Development of the Project would include the use of commercially sold construction materials that would not include asbestos or ACMs. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to friable asbestos or ACMs at the Project Site.

Lead-Based Paint

Development of the Project would include the use of commercially sold construction materials that would not include LBP. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to LBP at the Project Site.

Polychlorinated Biphenyls

In accordance with existing regulations that ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs, and operation of the Project would not expose people to any risk resulting from the release of PCBs into the environment.

Oil Wells and Methane

The Project does not include the installation of new oil wells. As such, operation of the Project would not result in a risk of upset and accident conditions associated with operation or re-abandonment of oil wells. In addition, as discussed above, the Project Site is not located within a recognized Methane Hazard Zone or Methane Buffer Zone as mapped by ZIMAS.¹¹³ Thus, operation of the Project would not exacerbate environmental hazards relative to oil wells or methane.

Based on the above, with adherence to regulatory requirements, construction and operation of the Project would not create a significant hazard to the public or the environment through

¹¹³ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031.

reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. There are no schools located within a 0.25-mile radius of the Project Site. The nearest schools to the Project Site are Selma Avenue Elementary School and Larchmont Charter School located at 6611 Selma Ave, approximately 0.7 mile northwest of the Project Site, and Citizens of the World Hollywood Charter School and Le Conte Middle School located at 1316 Bronson Ave, approximately 0.7 miles east of the Project Site.¹¹⁴ As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. ***As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.***

d. Would the project 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?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992. Information regarding the Cortese List is now compiled on the websites of multiple agencies, including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Phase I ESA included the results of consultation with local agency representatives and a review of available federal, State, and local databases including, but not limited to, EnviroStor database, GeoTracker, ZIMAS, and the Division of Oil, Gas, and Geothermal Resources. As detailed in the Phase I ESA, the onsite Sunset and Vine residential tower is listed on the RCRA-LQG, FINDS, ECHO,

¹¹⁴ City of Los Angeles, Los Angeles GeoHub, Schools (LAUSD), <https://geohub.lacity.org/datasets/lahub::schools-laUSD/explore?location=34.015464%2C-118.403498%2C11.00>, accessed August 8, 2024.

HAZNET, CIWQS, CERS, HAZMAT, and HWTS databases as a hazardous waste generator with the building's previous owner, CIM Group, listed as the responsible party. Specifically, between 2008 and 2010, multiple shipments of hazardous waste were made from the property for offsite disposal. Records indicate the waste consisted of unspecified aqueous solutions, detergent waste, lead, asbestos, and other organic solids, which are likely attributed to renovations of the structure that occurred during this time period and onsite laundering activities for the commercial units.

Additionally, the current tenant at 1460 Vine Street, Chipotle Mexican Grill, is listed on the HAZMAT and CERS databases. Chipotle is listed as a chemical storage facility on the CERS database. Based on the Phase I ESA, the listings are likely associated with cleaning chemicals and are considered minimal risk to the Project Site.

Based on the above analyses, while the Project Site is identified on standard government sources that monitor hazardous materials, conditions on the Project Site would not create a significant hazard to the public or the environment, and impacts would be less than significant.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. The closest private airstrip or airport is the Bob Hope Airport located at 2627 Hollywood Way, Burbank, California, 91505, approximately eight miles north of the Project Site.¹¹⁵ ***Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. No impact would occur.***

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the City General Plan Safety Element, California Government Code Section 65302(g)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. In response, the City includes a wide range of physical environments and dramatic differences in population density based on the time of day or day of the week. To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City EOP Evacuations Annex "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." However, in response to a more localized emergency, such as a hillside wildfire, the LAFD works in coordination with the Los Angeles Department of Transportation (LADOT) and City of Los Angeles Police Department (LAPD) to identify the most

¹¹⁵ County of Los Angeles, Los Angeles Department of Regional Planning, Airport Land Use Commission (ALUC) Viewer A-NET), <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>, accessed August 8, 2024.

appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.¹¹⁶

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with a standard construction management plan that would be implemented to ensure that adequate circulation and emergency access is maintained. **Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan during construction. Impacts would be less than significant.**

Operation of the Project would generate traffic in the vicinity of the Project Site and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access to and in the Project Site vicinity. **Therefore, operation of the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan, and impacts would be less than significant.**

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

No Impact. The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated VHFHSZ.¹¹⁷ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. **Therefore, Project construction and operation would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and no impacts would occur.**

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with the related projects listed in Table 33 on page 367 and shown in Figure 17 on page 370 of this SCEA has the potential to increase the risk of an accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas, and would be required to comply with all applicable local, state, and federal laws, rules and regulations, as discussed above for the Project. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual related project affected, in conjunction with development

¹¹⁶ Los Angeles Safety Element, November 2021, p. 23.

¹¹⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546-025-020, -029, -030, and -031. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

proposals on these properties. Therefore, with full compliance with all applicable federal, State, and local laws, rules and regulations, as well as implementation of site-specific recommendations for the related projects and the Project, significant cumulative impacts related to hazards and hazardous materials would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

- PMM HYD-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
 - b) Implement Best Management Practices to reduce the peak stormwater runoff from the Project Site to the maximum extent practicable.
 - c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.
 - d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
 - e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
 - f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:
 - g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
 - h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.
 - i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
 - j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.
 - k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
 - l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins

or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.

- m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

Applicability to the Project

Consistent with Mitigation Measure PMM HYD-1 from the 2020–2045 RTP/SCS PEIR, and as described below, the Project would comply with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) related to stormwater runoff and water quality. Conformance with applicable regulations would be ensured during the City’s building permit plan review and approval process for the Project. Compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure PMM HYD-1 from the 2020–2045 RTP/SCS PEIR, would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, Mitigation Measure PMM HYD-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated as part of the Project.

PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Avoid designs that require continual dewatering where feasible.

For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.

- a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
- b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.
- c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

Applicability to the Project

Consistent with Mitigation Measure PMM HYD-2 from the 2020–2045 RTP/SCS PEIR, although not anticipated, should the Project require temporary or permanent dewatering, it would be conducted in compliance with all applicable regulatory requirements regarding water quality. In addition, since the Project Site is currently developed and provides little groundwater recharge potential, the construction of the Project would not substantially impact the amount of groundwater recharge occurring on-site. Compliance with existing regulatory requirements would be equal to or more effective than Mitigation Measure PMM HYD-2 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM HYD-2 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM HYD-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure that all roadbeds for new highway and rail facilities be elevated at least 1 foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

Applicability to the Project

As discussed below, the Project Site is not located in a flood zone and would not impede or redirect flood flows. Therefore, Mitigation Measure HYD-3 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM HYD-1: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. While compliance with the various municipal regional stormwater permits (MS4s) is required by law, not all areas are necessarily covered under a permit. For those areas that are not covered under a municipal stormwater permit (MS4), such measures may include the following or other comparable measures identified by the lead agency:

- a) Implement best management practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
- b) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
- c) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.

- d) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
- e) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban stormwater runoff discharge permits, on new facilities.
- f) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable stormwater runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
- g) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
- h) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.
- i) Encourage low-impact development and incorporation of natural spaces that reduce, treat, infiltrate, and manage stormwater runoff flows in all new developments, where practical and feasible.

Applicability to the Project

Consistent with Mitigation Measure PMM HYD-1 from the 2024–2050 RTP/SCS PEIR, and as described below, the Project would comply with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) related to stormwater runoff and water quality. Conformance with applicable regulations would be ensured during the City's building permit plan review and approval process for the Project. Compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure PMM HYD-1 from the 2024–2050 RTP/SCS PEIR, would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, Mitigation Measure PMM HYD-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated as part of the Project.

PMM HYD-2: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may

include the following or other comparable measures identified by the Lead Agency:

- a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project. Construction designs comply with appropriate building codes and standard practices including the CBC.
- b) Maximize, where practical and feasible, permeable surface area to protect water quality and allow for groundwater recharge. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
- c) Avoid construction and siting on groundwater recharge areas, where feasible, to prevent conversion of those areas to impervious surface.

Applicability to the Project

Consistent with Mitigation Measure PMM HYD-2 from the 2024–2050 RTP/SCS PEIR, although not anticipated, should the Project require temporary or permanent dewatering, it would be conducted in compliance with all applicable regulatory requirements regarding water quality. In addition, since the Project Site is currently developed and provides little groundwater recharge potential, the construction of the Project would not substantially impact the amount of groundwater recharge occurring on-site. These regulatory compliance measures would be equal to or more effective than Mitigation Measure PMM HYD-2 from the 2024–2050 RTP/SCS PEIR. Thus, Mitigation Measure PMM HYD-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM HYD-3: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100- year base flood elevation. In areas affected by coastal flooding, new projects should be designed for resilience against 3.5 feet of sea-level rise, as per California Ocean Protection Council’s strategic guidance. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

Applicability to the Project

As discussed below, the Project Site is not located in a flood zone and would not impede or redirect flood flows. Therefore, Mitigation Measure HYD-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

The following analysis is based, in part, on the Water Resources Technical Report (Water Resources Technical Report), prepared for the Project by Fuscoe Engineering, dated June 2023 and included as Appendix I of this SCEA.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As demonstrated by the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soil 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. As Project construction would disturb more than one acre of soil, the Project would be required to retain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) with the State, which would specify BMPs and erosion control measures to be used during construction of the Project to manage runoff flows and prevent pollution. The Project would be required by the City of Los Angeles to put in place an erosion control plan for the full duration of Project construction activities. The NPDES and SWPPP measures would be designed to contain and treat, as necessary, stormwater and construction watering for dust reduction on the Project Site to prevent runoff from impacting off-site drainage facilities or receiving waters. BMPs could include, but not be limited to, sandbag barriers, inlet protection, regular street sweeping, controlled entrance/exit with rumble plates, dust control, and designated staging areas for materials and equipment. Site-specific BMPs, which will be implemented when construction commences, prior to site clearing and grubbing or demolition activities, would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Therefore, with compliance with NPDES requirements, including site-specific BMPs, 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. Thus, temporary construction-related impacts on surface water quality would be less than significant.

Operation

As discussed in the Water Resources Technical Report, stormwater runoff from the Project has the potential to discharge pollutants into the City and County storm drain systems. As listed in Table 9 of

the Water Resources Technical Report, anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, pathogens, trash/debris, oil/grease, and metals. The implementation of BMPs as required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for at least 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 and as discussed in the Water Resources Technical Report, the Project would include the installation of an infiltration system. As described in the Water Resources Technical Report, the proposed infiltration system would include two subsurface infiltration drywell systems that would be located within the Project Site. The proposed infiltration system would include preliminary treatment that would be provided through collection and separation in a deep, large-volume chamber where silt and other heavy particles would settle to the bottom. As detailed in the Water Resources Technical Report, the capacity of the proposed infiltration system would exceed the capacity required for the Project. In addition, as noted in the Water Resources Technical Report, since the existing Project Site does not have any structural or LID BMPs onsite, implementation of the LID features proposed as part of the Project would result in a significant improvement in surface water quality runoff as compared to existing conditions. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Thus, impacts to surface water quality during operation of the Project would be less than significant.

Groundwater Quality

Construction

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and containment. The presence of these potentially hazardous materials within the Project Site could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater. In addition, as there are no existing groundwater production wells or public water supply wells within and in the vicinity of the Project Site, construction activities would not be anticipated to affect existing wells.

As provided in the Water Resources Technical Report, a review of the Seismic Hazard Zone Report for the Hollywood Quadrangle and the California Division of Mines and Geology (CDMG, 1998) indicates that the historic groundwater in the area is approximately 50 feet below ground surface.¹¹⁸ While not anticipated, 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 Los Angeles Regional Water Quality Control Board

¹¹⁸ Fuscoe Engineering, Sunset and Vine 2: Water Resources Technical Report, Hollywood Area, Los Angeles, California, June 2023. See Appendix I of this SCEA.

(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.

Other potential effects to groundwater quality could result from the presence of an UST or during the removal of a UST. As discussed above, no evidence of USTs are associated with the Project Site. Therefore, USTs would not pose a significant hazard on groundwater quality.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

Operation

Operational activities that could affect groundwater quality include spills of hazardous materials. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. As discussed above, there are no records of USTs associated with the Project Site. Additionally, the Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. As described in the Water Resources Technical Report, the GeoTracker website indicates there are no significant sources of soil or groundwater pollution within the Project Site. The Project would also comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements.

As described above, the Project would include the installation of LIB BMPs to treat and dispose of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event prior to discharging the streets in the public right-of-way. The Project also does not include the installation or operation of water wells, or any extraction or recharge system. Therefore, operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality, and impacts will be less than significant.

Overall, as analyzed above, the construction and operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, impacts would be less than significant.

b. Would the project 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. As discussed in the Water Resources Technical Report, no water supply wells are located at the Project Site or within 1,000 feet of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. Development of

the Project would include excavations to an approximate depth of 28 feet below existing grade. As provided in the Water Resources Technical Report, a review of the Seismic Hazard Zone Report for the Hollywood Quadrangle and the California Division of Mines and Geology (CDMG, 1998) indicates that the historic groundwater in the area is approximately 50 feet below ground surface.¹¹⁹ Since excavations for the proposed subterranean parking would reach approximately 28 feet below grade, as concluded in the Water Resources Technical Report, dewatering activities are not anticipated as part of the Project. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Regarding groundwater recharge during operation, the Project would develop hardscape and structures that would cover the majority of the Project Site with impervious surfaces. However, as previously discussed, in accordance with the City's LID Ordinance, the Project would include the installation of LID BMPs to prevent upstream flooding during major storm events. The stormwater that bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. In addition, Project operation does not include any groundwater pumping. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Overall, construction and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin and impacts during construction and operation of the Project would be less than significant.

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

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

Less Than Significant Impact. Construction activities for the Project would involve demolition of the existing buildings, grading, and excavation activities. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soil could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above in Item X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan,

¹¹⁹ Fuscoe Engineering, Sunset and Vine 2: Water Resources Technical Report, Hollywood Area, Los Angeles, California, June 2023. See Appendix I of this SCEA.

to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site.

No streams or rivers are located on or within the immediate vicinity of the Project Site. As discussed in the Water Resources Technical Report, development of the Project would result in the addition of landscaped areas and building areas throughout the Project Site and, upon buildout of the Project, the Project Site would continue to be comprised of approximately 89 percent impervious areas. Accordingly, there would be a limited potential for erosion or siltation to occur from exposed soils. The Project would also include BMPs that would address drainage flows and would ensure that substantial soil erosion or siltation does not occur.

Based on the above, the Project would not 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 result in substantial erosion or siltation on- or off-site. Thus, impacts would be less than significant.

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

Less Than Significant Impact. As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Item X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site.

As provided in the Water Resources Technical Report, at buildout of the Project, the Project Site would be comprised of approximately 89 percent impervious areas. As the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions (from approximately 3.4 cubic feet per second to 3.1 cubic feet per second under a 10-year storm event and from approximately 4.5 cubic feet per second to 4.2 cubic feet per second under a 25-year storm event) (refer to Table 8 of the Water Resources Technical Report included in Appendix I of this SCEA). As such, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site.

Based on the above, the Project would not increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Thus, impacts would be less than significant.

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

Less Than Significant Impact. As discussed above, at buildout of the Project, the Project Site would be comprised of approximately 89 percent impervious areas. As provided in the Water Resources Technical Report, implementation of Project BMPs would control stormwater runoff and could ultimately result in a minor decrease in runoff compared to existing conditions (from approximately 3.4 cubic feet per second to 3.1 cubic feet per second under a 10-year storm event and from approximately 4.5 cubic feet per second to 4.2 cubic feet per second under a 25-year storm event). In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. ***Consequently, the Project would not 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, and impacts would be less than significant.***

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.^{120,121} ***Thus, the Project would not impede or redirect flood flows, and no impact would occur.***

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City.^{122,123} In addition, the City does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water within or near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the City's Hazards Mitigation Plan, the Project Site is not

¹²⁰ Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1760F, effective September 26, 2008.

¹²¹ City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 10-7, Mapped Flood Hazards Areas in West Los Angeles APC, p. 10-14.

¹²² Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1760F, effective September 26, 2008.

¹²³ City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 10-7, Mapped Flood Hazards Areas in West Los Angeles APC, p. 10-14.

located within a flood impact zone or located near a dam.¹²⁴ Therefore, the risk of flooding from inundation by dam failure is considered low. Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater. Therefore, in the unlikely event of inundation of the Project Site, the Project would not result in a discharge of pollutants.

Overall, the Project would not risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone, and impacts would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (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).

As provided in the Water Resources Technical Report, the Project Site lies within the Ballona Creek watershed. As summarized in Table 5 of the Water Resources Technical Report, constituents of concern listed for Ballona Creek include Copper, Trash, Zinc, Lead, Viruses, Toxicity, and Indicator Bacteria. As discussed above, during construction, the Project would be required to implement a SWPPP that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, 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, the implementation of BMPs required by the City's LID Ordinance during Project operation would target pollutants that could potentially be carried in stormwater runoff. As such, construction and operation of the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed and other urban watersheds.

Regarding potential impacts associated with groundwater management, as discussed above in Item X.a., of this SCEA, the Project would not expand any potential areas of contamination, increase the level of groundwater contamination, or cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. In addition, the Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

Based on the above, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality

¹²⁴ City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 12-2, Mapped Tsunami Inundation Area in West Los Angeles APC, p. 12-5.

control plan or a sustainable groundwater management plan. Accordingly, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The related projects comprise a variety of uses, including residential, commercial/retail, mixed-use, hotel, and institutional uses. The Project and these related projects, as well as other development projects in the area, would be required to comply with applicable regulatory requirements regarding drainage and water quality, including implementation of a SWPPP and BMPs, conformance with NPDES permit conditions, and a LID or Standard Urban Stormwater Mitigation Plan, which would ensure that the related project would not result in increases in stormwater flows such that capacity of the existing stormwater infrastructure is affected. Furthermore, the Project would not result in any water quality related impacts and would not increase peak stormwater flows from the Project Site. **Therefore, the Project would not contribute to cumulative impacts regarding hydrology and water quality.**

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

- PMM LU-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Facilitate good design for land use projects that build upon and improve existing circulation patterns
 - b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:
 - Selecting alignments within or adjacent to existing public rights of way.
 - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.

- Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
- c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
 - Alignment shifts to minimize the area affected.
 - Reduction of the proposed right-of-way take to minimize the overall area of impact.
 - Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

Applicability to the Project

As described under Land Use and Planning Threshold (a) below, the Project would not physically divide an established community. Therefore, Mitigation Measure PMM-LU-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project

PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.

Applicability to the Project

As outlined in the impact analysis under Land Use and Planning Threshold (b) below, the Project would not physically divide an established community or create a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Mitigation Measure PMM-LU-2 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM LU-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Facilitate connections in communities that have been physically divided through land use projects that build upon and improve existing circulation patterns.
- b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:
 - Selecting alignments within or adjacent to existing public rights of way.
 - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
 - Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
- c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
 - Alignment shifts to minimize the area affected.
 - Reduction of the proposed right-of-way take to minimize the overall area of impact.
 - Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

Applicability to the Project

As described under Land Use and Planning Threshold (a) below, the Project would not physically divide an established community. Therefore, Mitigation Measure PMM-LU-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM LU-2: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that are due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as applicable and feasible. When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified, measures may include the following or other comparable measures identified by the lead agency:

- a) Modify the transportation or land use project to eliminate or reduce the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation and process said amendment.

Applicability to the Project

As outlined in the impact analysis under Land Use and Planning Threshold (b) below, the Project would not create a significant environmental impact due to a conflict with an applicable land use plan, policy,

or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Mitigation Measure PMM LU-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

a. Would the project physically divide an established community?

Less Than Significant Impact. As shown in Figure 1 in Section 3, Project Description, of this SCEA, the Project Site is bounded by Sunset Boulevard to the north, Leland Way to the south, Vine Street to the west, and a multi-family residential apartment building to the east of the Project Site. The Project Site is currently developed with a nineteen-story tower located at the corner of Vine Street and Sunset Boulevard with 64 live-work units and 69,468 square feet of residential floor area and 9,263 square feet of ground floor retail and several one- and two-story primarily commercial buildings.

The Project Site is located within the Hollywood Community Plan area and has a General Plan land use designation of Regional Center Commercial. The Project Site is comprised of three zoning designations: C4-2D-SN (Commercial, Height District 2 with Development Limitation, Sign District), [Q]C4-2D-SN (Q Condition, Commercial, Height District 2 with Development Limitation, Sign District), and R4-2D (Residential and Height District 2 with Development Limitation). The C4 zone permits a wide array of land uses including commercial, office, multi-family residential, retail, and hotel uses, while the R4 zone permits high-density residential uses. The SN designation indicates that the Project Site is located within the Hollywood Signage Supplemental Use District. The [Q] conditions permit adaptive reuse of the existing nineteen-story tower into live-work units and for construction of new ground floor retail. The “D” limitation restricts the floor area ratio to 2.3 times the buildable area on the portion of the Project Site zoned [Q]C4-2D-SN and restricts the floor area ratio to 2 times the buildable area on the remaining portions of the Project Site zoned C4-2D-SN and R4-2D.

The Project Site is located within the vibrant commercial area along Sunset Boulevard in the Hollywood Community Plan area. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential and commercial uses. Specifically, land uses located adjacent to the Project Site include a Chase Bank and the 21-story Sunset Media Center office building to the north, across Sunset Boulevard; a multi-family residential apartment building directly east of the Project Site; a FedEx Office Print and Ship Center to the south, across Leland Way; and the Bank of America Financial Center and Arclight Cinemas located west of the Project, across Vine Street. Similar to the Project Site, the surrounding uses are designated as Regional Commercial and are zoned [Q]C4-2D-SN, C4-2D-SN, and R4-2D.

As discussed in Section 3, Project Description, of this SCEA, the Project proposes the development of a new 201,134-square-foot, eight-story mixed-use building consisting of 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 would be reserved for Low Income Households) and 16,680 square feet of ground-floor commercial space within the Project Site. These multi-family residential and commercial uses would be consistent with the uses already within the Project Site as well as other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project.

Therefore, the Project would not physically divide an established community and impacts would be less than significant.

b. Would the project 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. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site.

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 plan or regulation and would not preclude the attainment of its primary goals.¹²⁵ More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. Local land use regulations applicable to the Project Site that govern the development and land use planning include the City of Los Angeles General Plan (including all applicable elements), the Los Angeles Municipal Code, the Hollywood Community Plan, and SCAG’s 2020–2045 RTP/SCS. These plans, policies, and regulations are discussed in more detail below.

Southern California Association of Governments

2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Project’s general consistency with the applicable goals and strategies of the 2020–2045 RTP/SCS is outlined in Table 13 on page 232.

As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing a new mixed-use development that would include residential and commercial uses on a Project Site within a SCAG-designated HQTa and City-designated TPA that is well served by public transit. As previously discussed, a total of 120 bicycle parking spaces (110 long-term spaces and 10 short term spaces) for residents and visitors. In addition, the ground floor commercial uses and pedestrian-scale improvements proposed by the Project would promote walkability in the vicinity of the Project Site. The Project would also be designed with LEED Silver or equivalent green building standards and would provide parking spaces that are equipped with EV charging stations and additional spaces capable of

¹²⁵ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th.704, 719.

Table 13
Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS

Goal/Strategy	Would the Project Conflict?
<p>Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.</p> <p>Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.</p> <p>Goal 4: Increase person and goods movement and travel choices within the transportation system.</p>	<p>No Conflict. The Project Site is located within a SCAG-designated High Quality Transit Area (HQTA). A HQTA is generally a walkable transit village or corridor that is within 0.5 mile of a well-served transit stop or a transit corridor with 15-minutes or less service frequency during peak commute hours. Specifically, the Project Site is served by a variety of public transit options, including the Metro Bus Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL, and Metro Rail B Line. These public transit options are within 0.5 mile from the Project Site and provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute period (See Appendix L.1: Gibson, Approved Transportation Assessment, Table 1 on p. 17).</p> <p>Sunset Boulevard, located adjacent to the Project Site, also qualifies as a High Quality Transit Corridor (HQTC) with bus service frequency of at least 15 minutes during the peak hour periods. The Project Site vicinity also includes a mature network of roads and freeways that provide local and regional access. The Project is designed to promote walkability by siting all commercial uses on the ground floor fronting Sunset Boulevard and Vine Street to encourage pedestrian activity. In addition, the Project would enhance the pedestrian streetscape environment along Sunset Boulevard, Vine Street, and Leland Way by incorporating pedestrian friendly design features such as storefronts with floor-to-ceiling glazing, new trees, and landscaping around the building perimeters. The Project Site is also located adjacent to sharrowed bicycle routes provided on Vine Street. The Project would provide long-term and short-term bicycle parking spaces in accordance with LAMC requirements, which would promote bicycle use by Project residents and visitors. Additionally, the Project does not include any design features that could pose safety issues to travelers. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. Thus, the Project's proximity to a variety of public transit options, pedestrian-friendly design, and the availability of multiple modes of transportation, would allow the Project to improve mobility, accessibility, reliability, and travel safety for residents and visitors to the area. Thus, the Project would not conflict with these goals.</p>
<p>Goal 5: Reduce greenhouse gas emissions and improve air quality.</p> <p>Goal 6: Support healthy and equitable communities.</p>	<p>No Conflict. The Project would reduce greenhouse gas emissions and improve air quality by concentrating new development within a HQTA, as discussed above. The Project would provide new housing and commercial uses near transit, which would further encourage the use and productivity of the existing public transportation system. Also, the design of the Project would reduce vehicle miles</p>

Table 13 (Continued)
Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS

Goal/Strategy	Would the Project Conflict?
<p>Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p>traveled and help to improve air quality in the region. In addition, the Project Site is located in a pedestrian oriented area in the Hollywood Community Plan area along Sunset Boulevard and Vine Street with a high density of commercial, entertainment, and new housing options. The Project would improve the pedestrian streetscape by including commercial uses on the ground floor, planting new trees, and installing landscaping around the perimeter of the Project Site to promote walkability. The Project would provide long-term and short-term bicycle parking spaces in accordance with LAMC requirements, which would promote bicycle use by Project residents and visitors. In addition, the Project would enhance the pedestrian streetscape environment along Sunset Boulevard, Vine Street, and Leland Way by incorporating pedestrian friendly design features such as storefronts with floor-to-ceiling glazing, new trees, and landscaping around the building perimeters. Thus, the Project would not conflict with these goals.</p>
<p>Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel.</p>	<p>No Conflict. This policy about new technologies is directed toward SCAG and does not apply to individual development projects. The Project includes the development of 170 residential units and 16,680 square feet of commercial space. The Project is located within close proximity to regional serving transit and provides bicycle parking facilities. Concentrating density near regional serving transit and providing bicycle parking facilities would provide residents and employees of the Project alternative methods of transportation, therefore resulting in more efficient travel. Thus, the Project would not conflict with this goal.</p>
<p>Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p>No Conflict. The Project would construct 170 residential units of various sizes, and would set aside 26 units for Very Low Income households and 8 units for Low Income households. The Project is within an HQTa and is supported by multiple transportation options, as discussed above. Thus, the Project would not conflict with this goal.</p>
<p>Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.</p>	<p>No Conflict. The Project Site is located within a highly urbanized area and does not include natural and agricultural lands. This goal does not apply to the Project. Thus, the Project would not conflict with this goal.</p>
<p>Strategy 1: Focus Growth Near Destinations & Mobility Options</p> <p>Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.</p> <p>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.</p>	<p>No Conflict. The Project would develop 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 units would be reserved for Low Income Households) and 16,680 square feet of ground-floor commercial space within the Hollywood Community Plan area, a destination center. The proposed development would locate housing and create jobs near transit. The Project Site has convenient access to a variety of public transportation options provided by the Los Metro and LADOT. Specifically, the Project Site is served by Metro Bus</p>

Table 13 (Continued)
Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS

Goal/Strategy	Would the Project Conflict?
<p>Plan for growth near transit investments and support implementation of first/last mile strategies.</p> <p>Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.</p> <p>Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.</p> <p>Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).</p>	<p>Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL, and Metro Rail B Line. All these public transit options are within 0.5 mile from the Project Site and provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. (See Appendix L.1: Gibson, Approved Transportation Assessment, Table 1 on p. 17).</p> <p>The Project Site is also located adjacent to sharrowed bicycle routes provided on Vine Street. The Project would provide long-term and short-term bicycle parking spaces in accordance with LAMC requirements, which would promote bicycle use by Project residents and visitors. The Project is designed to promote walkability by siting all commercial uses on the ground floor fronting Sunset Boulevard and Vine Street to encourage pedestrian activity. In addition, the Project would enhance the pedestrian streetscape environment along Sunset Boulevard, Vine Street, and Leland Way by incorporating pedestrian friendly design features such as storefronts with floor-to-ceiling glazing, new trees, and landscaping around the building perimeters. The Project would be developed on an infill site and would include retail/restaurant amenities. Thus, the Project's proximity to a variety of public transit options, pedestrian-friendly design, and the availability of multiple modes of transportation, would allow the Project to focus growth near destinations and mobility options. Thus, the Project would not conflict with this land use strategy.</p>
<p>Strategy 2: Promote Diverse Housing Choices</p>	<p>No Conflict. The Project would construct 170 residential units of various sizes, and would set aside 26 units for Very Low Income households and 8 units for Low Income households. Thus, the Project would promote diverse housing choices and would not conflict with this land use strategy.</p>
<p>Strategy 3: Leverage Technology Innovations</p> <p>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.</p>	<p>No Conflict. This broad strategy is directed toward SCAG and does not apply to individual development projects. Thus, the Project would not conflict with this land use strategy.</p>
<p>Strategy 4: Support Implementation of Sustainability Policies</p> <p>Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.</p>	<p>No Conflict. This broad strategy is directed toward SCAG and does not apply to individual development projects. The Project Site is located in the highly active Hollywood Community Plan area in proximity to a variety of public transit options, including Metro Bus Lines 2, 180, 210, and 222, LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line (See Appendix L.1: Gibson, Approved</p>

Table 13 (Continued)
Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS

Goal/Strategy	Would the Project Conflict?
	Transportation Assessment, Table 1 on p. 17). Thus, the Project would not conflict with this land use strategy.
<p>Strategy 5: Promote a Green Region</p> <p>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.</p> <p>Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.</p> <p>Promote more resource efficient development focused on conservation, recycling and reclamation.</p>	<p>No Conflict. This broad strategy is directed toward SCAG and does not apply to individual development projects. Thus, the Project would not conflict with this land use strategy.</p>
<p>Source: Eyestone Environmental, 2024.</p>	

supporting future EVSE. As such, the Project would support the reduction in greenhouse gas emissions, encourage the use of alternative modes of transportation (i.e., walking, biking, public transit) and reduce dependency on single-occupancy vehicles. Therefore, the Project would not conflict with the applicable goals of the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

2024–2050 Regional Transportation Plan/Sustainable Communities Strategy

The Project’s general consistency with the applicable policies set forth in the 2024–2050 RTP/SCS is discussed in in Table 14 on page 236. As detailed therein, the Project would not conflict with the applicable policies set forth in the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the policies of the 2024–2050 RTP/SCS to: pursue the development of Complete Streets, first-mile connections and multi-modal connectivity; improve transportation safety and eliminating transportation-related fatalities/serious injuries; encourage residential and commercial development close to transit; encourage alternatives to single-occupancy vehicle travel (e.g., trips made by foot, bikes and transit); promote future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities; encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region; encourage housing in transit-supportive and walkable areas to create more interconnected and resilient communities; support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region; promote 15-minute communities; and promote sustainable development (including sustainable energy and water use) and reduce VMT. Therefore, the Project would not conflict with the applicable policies of the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

Table 14
Consistency with Applicable Policies of the 2024–2050 RTP/SCS

Policies ^a	Would the Project Conflict?
<p>Policy 03: Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit).</p> <p>Policy 04: Ensure the implementation of Complete Streets that are sensitive to urban, suburban, or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking).</p> <p>Policy 05: Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery.</p> <p>Policy 07: Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.</p> <p>Policy 22: Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system.</p>	<p>No Conflict. Although these policies apply at a regional level, Project development would support SCAG's and the City's goals to develop Complete Streets. The Project would be implemented within an existing urbanized area served by an established network of roads and freeways that provide local and regional access to the area, including the Project Site, and that include pedestrian amenities (sidewalks and crosswalks). The design of the Project would comply with all City access and circulation requirements which may affect public rights-of-way, including proper driveway alignment, sidewalks widths, lighting, accessibility, and placement of landscaping. While the Project is seeking a waiver of dedication and improvement on Leland Way, there is an existing one-story residential duplex on Leland Way that would make widening that street infeasible.</p> <p>Vehicular access to the Project Site would be provided via two driveways along Leland Way. The driveways would be designed in accordance with City standards and provide full access to accommodate both left- and right-turn ingress and egress maneuvers. The vehicular access and internal circulation plan for the Project would be designed to minimize vehicular conflicts. The Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping surrounding the Project Site. The Project would also include new street trees along the perimeter of the Project Site, further enhancing the pedestrian environment. The Project would also provide proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. Overall, the Project would be designed to enhance pedestrian, bicycle, transit, and vehicular circulation and safety. The Project would also be developed on an urban infill site within a SCAG-designated PDA and City designated TPA in close proximity to transit which would facilitate and encourage transit use, and would provide on-site bicycle parking in accordance with LAMC requirements, which would facilitate and encourage bicycle use. Hence, the Project would facilitate first/last mile connections.</p> <p>Sunset Boulevard and Vine Street have been designated as part of the Bicycle Lane Network (BLN)/Bicycle Enhanced Network (BEN), the Pedestrian Enhanced District (PED), and Vision Zero's High Injury Network (HIN). The Project does not propose any driveways along Sunset Boulevard or Vine Street and would not result in vehicular conflicts with pedestrians and bicyclists. Furthermore, the Project driveways would not preclude or interfere with the implementation of any other future roadway improvements benefiting pedestrians, bicycles, or transit. No unusual or</p>

Table 14 (Continued)
Consistency with Applicable Policies of the 2024–2050 RTP/SCS

Policies ^a	Would the Project Conflict?
	<p>new obstacles are presented in the design that would be considered hazardous to pedestrians or bicyclists. As such, the Project would not have the potential to interfere with Mobility Plan 2035 Complete Streets goals/objectives, reduce first/last mile connections, or increase vehicle-related hazards to pedestrians along a dangerous street.</p> <p>Based on the above, the Project would contribute to Complete Streets that provide a safe, multimodal network for people of all ages and abilities using a variety of modes. Therefore, the Project would not conflict with these policies.</p>
<p>Policy 09: Encourage residential and employment development in areas surrounding existing and planned transit/rail stations.</p>	<p>No Conflict. As indicated above, the Project would be developed on an urban infill site within a SCAG-designated PDA and City-designated TPA in close proximity to transit. Specifically, transit options in the vicinity of the Project Site include Metro Bus Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 14: Encourage the development of transportation projects that provide convenient, cost-effective and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, via transit, etc).</p> <p>Policy 15: Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers and visitors.</p>	<p>No Conflict. Regarding Policy 14, see the discussion for Policies 3, 4, 5, 7 and 9 above.</p> <p>Regarding Policy 15, the Project would include a mix of residential and commercial uses in an area well served by public transit. The Project would also promote pedestrian activity through building design and streetscape improvements that would provide better connections to transit stops. The Project would also provide bicycle parking facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. In addition, the Project would incorporate applicable TDM strategies in accordance with the City's TDM requirements. These TDM strategies, which include the provision of bicycle parking, would facilitate a reduction in the number of single occupancy vehicle trips to the Project Site. Based on the above, the Project would not conflict with these policies.</p>
<p>Policy 32: Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities.</p> <p>Policy 33: Promote the growth of origins and designations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicles (SOV) dependency and vehicle miles traveled.</p> <p>Policy 35: Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social</p>	<p>No Conflict. The Project would consist of a mixed-use development on an already developed urban infill site in a highly developed area of the City, which is already served by fully developed street and utility infrastructure systems. No new roads and no extension of existing roads would be required to serve the Project. As indicated under Item XIX, Utilities and Service Systems, the Los Angeles Department of Water and Power (LADWP) and the City Department of Public Works, Bureau of Sanitation (LASAN) would have the capacity to serve the Project with regard to water/energy infrastructure and wastewater/solid waste, respectively.</p>

Table 14 (Continued)
Consistency with Applicable Policies of the 2024–2050 RTP/SCS

Policies ^a	Would the Project Conflict?
<p>and similar) to further fair housing access and equity across the region.</p>	<p>In addition, as previously indicated, the Project would be developed in a SCAG-designated HQTAs and City-designated TPAs in close proximity to employment, destinations, and other neighborhood services. Furthermore, the Project would include pedestrian improvements and bicycle parking facilities, and as indicated under Item XVII, Transportation, the Project would result in lower household VMT per capita and work VMT per employee compared to the average for the Central Area Planning Commission (APC).</p> <p>Lastly, rather than displacing existing housing or a substantial number of existing jobs, the Project would replace existing primarily commercial uses with 170 residential units (26 of which would be reserved for Very Low Income Households and 8 reserved for Low Income units for a total of 34 affordable units) and 16,680 square feet of ground-floor commercial space, thereby furthering fair housing access and equity in the community. Therefore, the Project would not conflict with these policies.</p>
<p>Policy 36: Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities.</p>	<p>No Conflict. See the discussion for Policies 09, 14 and 15 above (i.e., the Project would include housing development in a transit-supportive area). In addition, the Project would include streetscape improvements and ground level commercial uses, which would encourage walkability and interconnectivity with adjacent land uses. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 37: Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region.</p> <p>Policy 38: Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region.</p>	<p>No Conflict. The Project Site includes a vacant one-story duplex building on Leland Way, which is proposed to be removed as part of the Project. Although the Project would demolish this existing duplex, the building is vacant and the Project would result in a net increase in units on the Project Site, including 26 Very-Low Income and 8 Low Income housing units. Thus, the Project would not displace any existing occupied housing. Overall, the Project would replace underperforming and vacant commercial uses with 170 residential units (inclusive of 26 Very Low-Income Households and 8 units for Low Income Households) and ground-floor commercial space, which would help the City achieve its fair share of SCS-identified regional housing demand (including affordable housing demand). Therefore, the Project would not conflict with these policies.</p>
<p>Policy 42: Promote 15-minute communities as places with a mix of complimentary land uses and accessible mobility options that align with and support the diversity of places or communities across the region. There are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in</p>	<p>No Conflict. As indicated previously, the Project would consist of a mixed-use development on an already developed urban infill site in a highly developed area of the City, in proximity to employment, destinations, and other neighborhood services, and transit. As further indicated previously, the Project would provide streetscape improvements (i.e., improved sidewalks, new trees, and landscaping within and around the Project Site) that would increase pedestrian and bicycle connectivity with the</p>

Table 14 (Continued)
Consistency with Applicable Policies of the 2024–2050 RTP/SCS

Policies ^a	Would the Project Conflict?
fewer and shorter trips because of the proximity of complementary land uses.	surrounding community. Lastly, as evidence that the Project would promote 15-minute communities, as indicated under Item XVII, Transportation, of this SCEA, the Project would result in lower VMT per capita and work VMT per employee compared to the average for the Central APC. Therefore, the Project would not conflict with this policy.
<p>Policy 48: Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience.</p> <p>Policy 49: Support communities across the region to advance innovative sustainable development practices.</p> <p>Policy 67: Promote sustainable water use planning, practices and storage that improves regional water security and resilience in a drier environment.</p>	<p>No Conflict. The Project would consist of a mixed-use development on an already developed urban infill site in a highly developed area of the City, in proximity to employment, destinations, and other neighborhood services, and transit. As such, the Project would promote sustainable development, best practices (i.e., smart growth), resource conservation, and resilience, and would reduce resource consumption, by conserving undeveloped land and reducing traffic, per capita VMT, air emissions, and fuel consumption, etc. The Project would also implement a series of sustainability measures that would further reduce the Project's demand for natural resources and infrastructure capacity, such as: high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star–labeled appliances; and drought tolerant planting. The Project would also incorporate various features required to meet LEED Silver or equivalent certification. The above factors are, in part, the reason that this SCEA concludes that the Project would result in less than significant impacts (either before or after mitigation) in terms of: biological resources (Item IV); energy resources (Item VI); greenhouse gas emissions (Item VIII); traffic, including VMT (Item XVIII); and water resources/supply, sewer infrastructure capacity, and energy infrastructure capacity (Item XX). Therefore, the Project would not conflict with these policies.</p>
<p>Policy 51: Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts.</p>	<p>No Conflict. As evaluated under Item III, Air Quality and Item VIII, Greenhouse Gas Emissions, the Project would result in less-than-significant impacts related to air quality and GHG emissions during construction and operation. As discussed under Item VIII, Greenhouse Gas Emissions, all Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs, which would reduce energy usage and, thereby, reduce associated GHG emissions. Additionally, the Project would also further support and promote environmental sustainability by complying with regulatory requirements and the sustainability intent of the U.S. Green Building Council's LEED Silver or equivalent green building standards. These features include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star–</p>

Table 14 (Continued)
Consistency with Applicable Policies of the 2024–2050 RTP/SCS

Policies ^a	Would the Project Conflict?
	labeled appliances; and drought tolerant planting. In addition, the Project would comply with the California Building Code Title 24 requirements. These features would reduce GHG emissions and improve air quality. Therefore, the Project would not conflict with this policy.
^a Southern California Association of Governments, 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 20204), adopted April 4, 2024. Source: Eyestone Environmental, 2024.	

City of Los Angeles General Plan

Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City’s General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. The Project’s consistency with the applicable goals, objectives and policies of the General Plan Framework Element is provided in Table 15 on page 241 and summarized below.

Land Use Chapter

The Framework Element Land Use Chapter identifies districts, centers, and mixed-use boulevards, which are described in terms of ranges of intensity/density, heights, and lists of typical uses. The Project Site is located in an area that is identified as a Regional Center in the Long Range Land Use Diagram of the City of Los Angeles General Plan Framework. As provided in the Long Range Land Use Diagram, Regional Centers are characterized as a focal point of regional commercial, identity, and activity. Regional Centers consist of a variety of land uses, including, but not limited to, corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. In addition, development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities within Regional Centers.

Regional Centers form development in: (1) areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages; (2) areas containing mid- and high-rise structures sites on large independent lots; and (3) areas containing retail commercial “malls” characterized by low- and mid-rise buildings clustered around common pedestrian areas. Regional Centers fall within an FAR of 1.5:1 to 6.0:1. Generally, the land uses will vary as commercially oriented while others will contain a mix of residential and commercial uses. However, Regional Centers are characterized by buildings six to 20 stories (or higher) and are typically near major transportation hubs. The Project would be consistent with the type of use and at the intensity envisioned for a Regional Center. As

Table 15
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
General Plan Framework Element	
Land Use Chapter	
<p>Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</p>	<p>No Conflict. While this is a Citywide goal, the Project's proposed residential and commercial uses would support the City's goal to provide a physically balanced distribution of land uses by replacing the existing mostly commercial uses on the Project Site with a mix of residential and commercial uses. Development of the Project would create new employment opportunities during construction and operation, which would support the City's long-term fiscal and economic health. The Project would be consistent with surrounding uses and would be designed to complement existing residential neighborhoods. The Project Site is located in close proximity to public transit served by Metro and LADOT, which would help reduce traffic congestion and improve air quality through a reduction in the number of vehicles traveling to the Project Site. Furthermore, as detailed under Item XV, Public Services, and under Item XIX, Utilities and Service Systems, the agencies that provide public infrastructure and services to the Project Site would have adequate infrastructure and capacity to serve the Project. In addition, the Project would include extensive open space and landscaping. Thus, the Project would contribute to the achievement of a more livable City and would not conflict with this goal.</p>
<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</p>	<p>No Conflict. The Project would replace the existing mostly commercial uses with a new mixed-used development consisting of 170 new residential units (26 of which would be reserved for Very Low-Income Households and 8 units would be reserved for Low Income Households) and ground-floor commercial space. The Project would also incorporate a variety of open space and recreational amenities throughout the Project Site to support the needs of Project residents and visitors. Thus, the Project would not conflict with this objective.</p>
<p>Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.</p>	<p>No Conflict. While this policy refers to the citywide provision of public infrastructure, as discussed under Item XV, Public Services, and Item XIX, Utilities and Service Systems, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. Thus, the Project would not conflict with this policy.</p>
<p>Policy 3.1.3: Identify areas for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.</p>	<p>No Conflict. While this policy relates to the citywide provision of open space, as described in Section 3, Project Description, of this SCEA, the Project would incorporate a variety of open space and recreational amenities throughout the Project Site that would exceed the requirements of the LAMC. In addition, landscaping would be provided on the</p>

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
	Project's ground floor, including along the sidewalk. Therefore, the Project would not conflict with this policy.
<p>Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.</p> <p>Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>No Conflict. While this is a citywide objective and policy, the Project would support the attainment of this objective and policy. Specifically, the Project Site is located within proximity to a variety of public transit options, including the Metro Bus Lines 2, 180, 210, and 222, LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line (See Appendix L.1: Gibson, Approved Transportation Assessment, Table 1 on p. 17). Furthermore, the Project would provide a total of 120 bicycle parking spaces (110 long-term spaces and 10 short term spaces) for residents and visitors. In addition, the ground floor commercial uses and pedestrian-scale improvements proposed by the Project would promote walkability in the vicinity of the Project Site. Therefore, the Project would provide the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, VMT, and air pollution. Therefore, the Project would not conflict with this objective and policy.</p>
<p>Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</p>	<p>No Conflict. As discussed under Item XIV, Population and Housing, population and employment growth associated with the Project would be well within SCAG's projections for the Los Angeles Subregion, which serves as the basis for the General Plan Framework's demographics projections and planned provisions of transportation and utility infrastructure and public services. Moreover, as discussed under Item XV, Public Services, and Item XIX, Utilities and Service Systems, the Project's impacts to public services and utilities would be less than significant. Therefore, the Project would be consistent with this objective.</p>
<p>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.</p>	<p>No Conflict. The Project would support this objective as the Project would include the development of 170 residential units (inclusive of 26 Very Low-Income units and 8 Low Income units) and 16,680 square feet of ground-floor commercial space within an area designated as a Regional Center. The Project would be compatible with the existing neighborhood context and would further support this objective as it is located in an area that is well-served by several transit lines as well as numerous employment and entertainment options. Therefore, the Project would not conflict with this objective.</p>
<p>Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents quality of life can be maintained or improved.</p>	<p>No Conflict. The Project would provide for the stability and enhancement of the neighborhood by providing 170 new multi-family units (with 26 units reserved for Very Low-Income households and 8 units reserved for Low Income households) and 16,680 square feet of commercial uses to serve Project residents and residents in the surrounding area. As discussed for Policy 3.1.2 and Objective 3.2 above, the Project is located within an area with sufficient public</p>

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
	infrastructure and services and that is well-served by public transit. Therefore, the Project would not conflict with this objective.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	No Conflict. The Project is an infill development that would replace existing mostly commercial uses within the Project Site area proposed for development with new multi-family residential and commercial uses. The Project would enhance the streetscape surrounding the Project Site by providing ground floor commercial spaces along with landscaping and new trees. As such, the Project would not conflict with this objective.
Housing Chapter	
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.	No Conflict. The Project would construct 170 residential units of various sizes and would also set aside 26 units for Very Low-Income households and 8 units for Low Income households. Therefore, the Project would not conflict with this objective.
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.	No Conflict. While this is a citywide objective, the Project would support its implementation. Specifically, as discussed above, the Project Site is located in the highly active Hollywood Community Plan area in proximity to a variety of public transit options, including the Metro Bus Lines 2, 180, 210, and 222, LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line (See Appendix L.1: Gibson, Approved Transportation Assessment, Table 1 on p. 17). Therefore, the Project would not conflict with this objective.
Urban Form and Neighborhood Design Chapter	
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	No Conflict. The Project would upgrade the quality of development within the Project Site and surrounding area by replacing the existing primarily commercial uses with a new mixed-use development comprised of 170 residential units (inclusive of 26 Very Low-Income Households and 8 units for Low Income Households) and 16,680 square feet of ground-floor commercial space. The Project would also improve the quality of the public realm by providing street frontages that would be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor, thereby creating a pedestrian-friendly environment. In addition, the Project would provide new landscaping at the Project's ground floor, including along the sidewalk and in the required front yards. Overall, the Project would be designed to complement and enhance the surrounding area. Thus, the Project would not conflict with this objective.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	No Conflict. Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and wayfinding pedestrian signage that would comply with LAMC regulations. No new billboards or other off-site advertising are proposed as part of the Project.

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
	<p>The Project would also not include signage with flashing or mechanical properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. Thus, the Project would not conflict with this policy.</p>
<p>Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.</p>	<p>No Conflict. The Project would include project design features, as outlined under Item XV.b., Public Services, of this SCEA, that would increase personal safety at all times of the day. These project design features include the use of security fencing, lighting, and locked entry during construction; the use of a closed-circuit camera system and keycard for entry into residential spaces and residential parking; the provision of proper lighting of the buildings, walkways, and subterranean parking areas; and entrances, exits, and open space areas that are designed to be open and in view of surrounding areas. During operation, the Project would provide proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. Thus, the Project would not conflict with this objective.</p>
<p>Open Space and Conservation Chapter</p>	
<p>Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.</p>	<p>No Conflict. As described in Section 3, Project Description, of this SCEA, the Project would provide approximately 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck, and 4,538 square feet of interior tenant resident common areas, which includes a clubroom, a clubhouse, and a fitness center. In addition, extensive landscaping would be provided at the Project's ground floor, including along the sidewalk and in the required front yards. Overall, the Project's proposed open space would exceed the requirements of the LAMC to provide 18,150 square feet of open space. Furthermore, the Project would not conflict with or encroach upon the public and private open space system. The Project would also comply with the City's requirements in LAMC Section 12.33 through the payment of park fees. Thus, the Project would not conflict with this goal.</p>
<p>Policy 6.4.7: Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of</p>	<p>No Conflict. While this is a citywide policy, the Project would provide open space in excess for LAMC requirements. This on-site open space would serve to reduce the demand for parks and recreational facilities in the vicinity of the Project Site. In addition, extensive landscaping would be provided at the Project's ground floor, including along the sidewalk and in the required front yards. Thus, the Project would not conflict with this policy.</p>

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
communities that are currently deficient in these resources.	
<p>Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.</p> <p>b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of “unbuildable” areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.</p>	<p>No Conflict. Refer to discussion for Goal 6A and Policy 6.4.7 above.</p>
Economic Development Chapter	
<p>Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of residents, sustains economic growth, and assures maximum feasible environmental quality.</p>	<p>No Conflict. The Project would support this objective by providing 16,680 square feet of ground-floor commercial space to complement the employment base of the area, help meet needs of residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Thus, the Project would not conflict with this objective.</p>
<p>Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.</p>	<p>No Conflict. The Project would include 16,680 square feet of ground-floor commercial space in an area well served by public transit. Specifically, the Project Site is served by a variety of public transit options, including the Metro Bus Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line (See Appendix L.1: Gibson, Approved Transportation Assessment, Table 1 on p. 17). All these public transit options are within 0.5 mile from the Project Site and provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Thus, the Project would not conflict with this policy.</p>
<p>Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.</p>	<p>No Conflict. As discussed under Objective 7.2 and Policy 7.2.3 above, the Project would include approximately 16,680 square feet of ground-floor commercial space that would serve employees, visitors, and the local neighborhood, and result in a reduction in VMT. Thus, the Project would not conflict with this policy.</p>
Infrastructure and Public Services Chapter	
<p>Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.</p>	<p>No Conflict. As discussed under Item X, Hydrology and Water Quality, in accordance with the requirements of the NPDES Construction General Permit, the Project would implement a SWPPP adhering to the California Stormwater</p>

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
	<p>Quality Association BMP Handbook. The Project would implement BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include the installation of pre-treatment system and infiltration BMPs to collect and store the first flush of stormwater runoff to satisfy LID Manual requirements, which would then be discharged to an approved discharge point in the public right-of-way. The Project does not include uses that handle or generate hazardous substances. Thus, with the implementation of the BMPs, the Project would reduce the number of hazardous substances and the total amount of flow entering the wastewater system over existing conditions and the Project would not conflict with this policy.</p>
<p>Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.</p> <p>Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>	<p>No Conflict. While this is a citywide goal, the Project would not interfere with its implementation as detailed in Policy 9.3.1 above. Thus, the Project would not conflict with this goal and objective.</p>
<p>Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.</p>	<p>No Conflict. As evaluated under Item XIX, Utilities and Service Systems, based on Los Angeles Department of Water and Power's (LADWP's) water demand projections through 2045 provided in its 2020 Urban Water Management Plan (UWMP), LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project would not conflict with this objective.</p>
<p>Goal 9D: An integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal.</p>	<p>No Conflict. While this is a citywide goal, the Project would support its implementation by promoting sustainable development, including the provision of recycling facilities and other waste reduction features. Therefore, the Project would not conflict with this goal.</p>
Housing Element	
<p>Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.</p>	<p>No Conflict. While this is a citywide goal, the Project would support its implementation. Specifically, the Project includes the development of 170 new residential units of various sizes (including 26 units for Very Low-Income households and 8 units for Low Income households). Thus, the Project would not conflict with goal.</p>
<p>Policy 1.1.4: Plan for and provide sufficient services and amenities to support the existing and planned population.</p>	<p>No Conflict. While this is a citywide policy, regarding utilities and service systems, as discussed under Item XIX, Utilities and Service Systems, below, the existing infrastructure would have sufficient capacity to accommodate the Project. In addition, the Project would provide a variety of open space and recreational amenities to enhance the open space</p>

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
	resources in the neighborhood. Therefore, the Project would not conflict with this policy.
<p>Policy 1.2.1: Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs.</p> <p>Policy 1.2.2: Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.</p>	No Conflict. Refer to the discussion for Goal 1 above.
<p>Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for household of all income levels.</p>	No Conflict. Refer to the discussion for Goal 1 above.
<p>Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.</p>	<p>No Conflict. The Project would provide for the development of 170 new residential units (inclusive of 26 Very Low-Income households and 8 units for Low Income households) as well as 16,680 square feet of ground floor commercial space within a site that is well-served by public transit. The Project would also include open space and amenities for the residents that would contribute to a healthy and livable community, including 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck, and 4,538 square feet of interior tenant resident common areas, which includes a clubroom, a clubhouse, and a fitness center. In addition, extensive landscaping would be provided at the Project's ground floor, including along the sidewalk and in the required front yards. In addition, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen. These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. Therefore, the Project would not conflict with this goal.</p>
<p>Policy 3.1.5: Develop and implement environmentally sustainable urban design standards and pedestrian-centered improvements in development of a project within the public and private realm such as shade trees, parkways, and comfortable sidewalks.</p> <p>Policy 3.1.7: Promote complete neighborhoods by planning for housing that includes open space, and other amenities.</p>	<p>No Conflict. The Project would support these policies by implementing sustainability measures consistent with the Los Angeles Green Building Code and CALGreen that would reduce energy and water usage and waste, thereby reducing associated GHG emissions and minimizing the Project's impact on natural resources and infrastructure. These measures would include, but not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems, Energy Star-labeled appliances, and a water-efficient landscape design. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable. The Project would also incorporate a variety of open space and recreational amenities throughout the</p>

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
	Project Site that would exceed the requirements of the LAMC. Therefore, the Project would not conflict with this policy.
<p>Objective 3.2: Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.</p> <p>Policy 3.2.1: Promote the integration of housing with other compatible land uses at both the building and neighborhood level.</p> <p>Policy 3.2.5: Promote and facilitate the reduction of water, energy, carbon and waste consumption in new and existing housing.</p>	<p>No Conflict. The Project would incorporate environmentally sustainable design features and open space areas and amenities as described above in the discussion for Policy 3.1.5 and Policy 3.1.7. The Project would create an integrated mixed-use development consisting of residential and commercial uses which would be compatible with existing uses to remain onsite as well as other residential and commercial uses surrounding the Project Site. Therefore, the Project would not conflict with this objective and policy.</p>
Mobility Plan 2035	
<p>Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.</p>	<p>No Conflict. During construction of the Project, most construction activities would be confined on-site. However, limited construction activities may be needed on adjacent rights-of-way for installation of necessary utility connections. Project would include the preparation and implementation of a Construction Traffic Management Plan to minimize potential construction impacts to the surrounding area related to construction trucks, worker trips, and any possible sidewalk and lane closures and ensure safe passage for all modes of travel during Project construction. Thus, the Project would not conflict with this policy.</p>
<p>Policy 2.3: Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p>No Conflict. The Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping surrounding the Project Site. The Project would also include new street trees along the perimeter of the Project Site, further enhancing the pedestrian environment. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.</p>	<p>No Conflict. Passenger loading areas would be accommodated within and adjacent to the Project Site in accordance with City requirements.</p>
<p>Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.</p>	<p>No Conflict. While this is a citywide policy, the Project would support this policy by providing adequate vehicular and pedestrian access and providing bicycle parking, as previously discussed. In addition, the Project would be located in an area well served by public transit. Thus, the Project would not conflict with this policy.</p>
<p>Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>No Conflict. The Project would support this policy by locating new development consisting of residential and commercial uses in proximity to employment, destinations, and other neighborhood services in a transit-rich area. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.</p>	<p>No Conflict. The Project would support the implementation of this citywide policy by locating a new mixed-use development in an area well served by public transit. Residents, employees, and visitors to the Project Site would</p>

Table 15 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Would the Project Conflict?
	be well-served by local and regional transit options, which would reduce the number of vehicle miles traveled. Thus, the Project would not conflict with this policy.
Policy 3.8: Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.	No Conflict. The Project would provide a total of 120 residential bicycle parking spaces (including 110 long-term spaces and 10 short-term spaces) and 18 commercial bicycle parking spaces (including 9 long-term spaces and 9 short-term spaces). The Project would also provide a closed-circuit security camera system to ensure that the bicycle parking and storage areas are secured and well-maintained. Thus, the Project would not conflict with this policy.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	No Conflict. The Project supports implementation of this policy by locating a mix of residential and commercial uses in an area well served by public transit. The Project would also provide bicycle parking facilities and would enhance the streetscape to encourage bicycling and walking for residents, employees, and visitors to the Project Site. Therefore, the Project would not conflict with this policy.
<hr/> Source: Eyestone Environmental, 2024.	

described in Section 3, Project Description, of this SCEA, the Project includes the development of a new 201,134-square-foot, eight-story mixed-use building consisting of 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 units reserved for Low Income Households) and 16,680 square feet of ground-floor commercial space. Upon completion of the Project, total Project Site development, including existing uses to remain, would be 282,560 square feet of floor area with a site-wide FAR of 3.72:1.

Land Use Chapter

The Framework Element Land Use Chapter identifies districts, centers, and mixed-use boulevards, which are described in terms of ranges of intensity/density, heights, and lists of typical uses. The Project Site is located in an area that is identified as a Regional Center in the Long Range Land Use Diagram of the City of Los Angeles General Plan Framework. As provided in the Long Range Land Use Diagram, Regional Centers are characterized as a focal point of regional commercial, identity, and activity. Regional Centers consist of a variety of land uses, including, but not limited to, corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. In addition, development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities within Regional Centers. Regional Centers form development in (1) areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages, (2) areas containing mid- and high-rise structures sites on large independent lots, and (3) areas containing retail commercial “malls” characterized by low- and mid-rise buildings clustered around common pedestrian areas. Regional Centers fall within an FAR of 1.5:1 to 6.0:1. Generally, the land uses will vary as commercially oriented while others will contain a mix of

residential and commercial uses. However, Regional Centers are characterized by 6- to 20-stories (or higher) and are typically near major transportation hubs. The Project would be consistent with the type of use and at the intensity envisioned for a Regional Center. As described in Section 3, Project Description, of this SCEA, the Project includes the development of a new 201,134-square-foot, eight-story mixed-use building consisting of 170 new residential units (26 of which would be reserved for Very Low Income Households and 8 units reserved for Low Income Households) and 16,680 square feet of ground-floor commercial space. Upon completion of the Project, total Project Site development, including existing uses to remain, would be 282,560 square feet of floor area with a site-wide FAR of 3.72:1.

As detailed in Table 15 on page 241, the Project would support and would be consistent with the Land Use Chapter as it would contribute to the City's goal of providing mixed-use centers that provide jobs, entertainment, culture, and serve the region. In particular, the Project would promote a more balanced distribution of land uses with the replacement of the existing primarily commercial buildings with a new mixed-use development that would include residential uses and ground-floor commercial space that could be filled by a variety of tenants. These proposed uses would be developed in an area well-served by public transit provided by Metro and LADOT. Specifically, the Project Site is served by a variety of public transit options, including the Metro Bus Lines 2, 180, 210, and 222. Additional transit options include LADOT DASH Bus service lines BC, HW, HWL and Metro Rail B Line. All these public transit options are within 0.5 mile from the Project Site and provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.¹²⁶ Furthermore, the Project would provide secure bicycle parking and EV charging infrastructure on-site. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution, while supporting the City's objective to encourage multi-family residential, retail, restaurant, and office uses along primary transit corridors/boulevards and in designated Regional Centers. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City for existing and future residents. This chapter defines "urban form" as the City's general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. "Neighborhood design" is defined as the physical character of neighborhoods and communities. The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the community plans. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. Based on the discussion provided above in Table 15, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

¹²⁶ Gibson Transportation Consultants, Inc., Supplemental Transportation Assessment for the Refined Sunset Vine 2 Project, Hollywood, California, March 16, 2023. See Appendix L.1 of this SCEA.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources, address the outdoor recreational needs of the City's residents, and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to resolve the City's open space issues. This chapter specifically contains open spaces goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

The Project's consistency with this Framework Element chapter is provided in Table 15 on page 241. As described therein, the Project would be consistent with the relevant objectives and policies that support the goals of the Open Space and Conservation Chapter of the Framework Element. The Project would incorporate a variety of open space and recreational amenities throughout the Project Site in excess of LAMC requirements. Specifically, the Project would provide approximately 24,997 square feet of open space comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck, and 4,538 square feet of interior tenant resident common areas, which includes a clubroom, a clubhouse, and a fitness center. In addition, extensive landscaping would be provided at the Project's ground floor, including along the sidewalk and in the required front yards. Furthermore, the Project would not conflict with or encroach upon the public and private open space system. Therefore, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Open Space and Conservation Chapter that seek to avoid or mitigate an environmental effect.

Infrastructure and Public Service Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of services after emergencies, including earthquakes.

The Project's consistency with the Framework Element's Infrastructure and Public Services Chapter is discussed in Table 15. As described therein, the public services and utilities serving the Project Site would have sufficient capacity to accommodate the Project. The Project would also comply with the City's LID Ordinance, which would require the implementation of BMPs to collect, detain, and treat runoff on-site. Thus, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter that seek to avoid or mitigate an environmental effect.

Conservation Element

The Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources, including agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resources. The Conservation Element also recognizes the City's responsibility for identifying and protecting its cultural and historical heritage.

As previously described, the Project Site is currently developed with residential and commercial uses. As discussed throughout this SCEA, the Project would have no significant impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed under Item IV, Biological Resources, above, the trees and landscaping within the Project Site are not subject to the City's Protected Tree and Shrub Ordinance. With respect to historic resources, as discussed under Item V, Cultural Resources, of this SCEA, impacts to historic resources would be less than significant. The Project would also implement mitigation measures and the City's standard conditions of approval to ensure that potential impacts to archaeological, paleontological, and tribal cultural resources would be less than significant. Furthermore, as analyzed under Item I, Aesthetics, of this SCEA, the Project would not obstruct or remove access to natural and scenic vistas. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. Overall, as outlined above, the Project would not conflict with the Conservation Element.

Housing Element

The 2021–2029 Housing Element (Housing Element), which was adopted on November 24, 2021, and subsequently amended by the City Council on June 14, 2022, identifies the City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City.

The Project's consistency with the applicable goals, policies, and objectives set forth in the Housing Element is analyzed in Table 15 on page 241. As described therein, the Project would support the City's housing goals through the development of 170 new dwelling units of various sizes (including 26 units that would be set aside for Very Low-Income Households and 8 would be reserved for Low Income Households). The Project would provide these new housing opportunities for residents in a diverse residential and commercial environment, while also enabling residents to utilize existing public transit infrastructure provided by Metro and LADOT. Overall, as detailed in Table 15, the Project would be consistent with the applicable objectives and policies set forth in the Housing Element.

Transportation Element/Mobility Plan 2035

The Mobility Plan, adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. The overarching goal of the Mobility Plan is to achieve a transportation system that balances the needs of all road users. The Mobility Plan incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to "plan

for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context.” The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan, as detailed in Table 15 on page 241. Specifically, the Project would support the Mobility Plan policy to provide for safe passage of all modes of travel during construction by implementing a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1, which would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets. Each driveway proposed as part of the Project would also be designed to provide safe access for pedestrians. Also, the Project’s proximity to a variety of public transit options would provide residents, workers, and visitors convenient access to transit services. While the Project is seeking a waiver of dedication and improvement on Leland Way, there is an existing one-story residential duplex on Leland Way that would make widening that street infeasible. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan.

Hollywood Community Plan

The Hollywood Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. Adopted on December 13, 1988, and readopted on April 2, 2014, the Community Plan is currently in the process of an update.¹²⁷

As detailed in Table 16 on page 254, the Project would preserve and enhance the positive characteristics of existing residential neighborhoods within the Hollywood Community Plan area while providing a variety of compatible new housing opportunities and improve the function, design, and economic vitality of the commercial corridors. The Project would also advance several other objectives, goals and policies of the Community Plan, as evidenced by the consistency analysis in Table 16. As set forth therein, the Project would be consistent with the applicable objectives and policies set forth in the Community Plan.

Los Angeles Municipal Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The LAMC establishes objective zoning and development standards but was not adopted to avoid or mitigate environmental impacts. Therefore, no consistency analysis is required for purposes of determining potential impacts under this threshold. However, a

¹²⁷ On May 3, 2023, the Los Angeles City Council adopted the Hollywood Community Plan Update. Following adoption of the updated Hollywood Community Plan, the implementing ordinances will be reviewed and finalized by the City Attorney, to ensure clarity of regulations and consistency with state law, which can take approximately six months to a year. After this process is complete, the updated Hollywood Community Plan will be brought into effect by the City Council. However, as the Project is vested under SB 330, the current Hollywood Community Plan will continue to apply to the Project.

Table 16
Applicable Objectives and Policies of the Hollywood Community Plan

Objective/Policy	Would the Project Conflict?
<p>Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.</p>	<p>No Conflict. As discussed, the Project would not require the construction of public service facilities as impacts on public services would be less than significant. In addition, utilities to the Project Site would have capacity to serve the Project. Further, the Project would provide on-site open space and recreational amenities to serve the recreational needs of Project visitors and employees, and would also comply with the City's requirements in LAMC Section 12.33 through the payment of park fees, which would reduce the potential for additional demand to be placed on public parks and open space areas. Thus, the Project would not conflict with this objective.</p>
<p>Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.</p>	<p>No Conflict. While this is a citywide objective, the Project would support its implementation. Specifically, the Project Site is located in a highly urbanized area well-served by public transit provided by Metro and LADOT. The Project would include various streetscape improvements, such as new trees and landscaping, to encourage walkability. Furthermore, the Project would provide bicycle parking spaces for the residential and commercial uses in accordance with LAMC requirements. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling and would not conflict with this objective.</p>
<p>Objective 7: To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.</p>	<p>No Conflict. There is currently no open space on the Project Site. In addition, as discussed above, the Project would not obstruct existing views of the Hollywood Hills to the north. As such, the Project would not conflict with this objective.</p>
<p>Housing</p>	
<p>The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon, shall be limited in accordance with the following criteria:</p> <ol style="list-style-type: none"> 1. The adequacy of the existing and assured circulation and public transportation systems within the area; 2. The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities; 3. The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development. 	<p>No Conflict. The Project consists of a new mixed-use development consisting of 170 dwelling units. As previously discussed, the Project Site is located within a TPA and a SCAG HQT, and is served by various public transportation options including Metro Bus Lines and LADOT DASH. As previously discussed, the Project Site would not result in significant impacts to public services and utilities. In addition, compliance with regulatory measures and implementation of project design features would ensure that public services and utilities would have adequate capacity to service the Project. According to the Geotechnical Investigation included in Appendix F of this SCEA, the geology of the area is suitable for the proposed mixed-use development.</p>

Table 16 (Continued)
Applicable Objectives and Policies of the Hollywood Community Plan

Objective/Policy	Would the Project Conflict?
Circulation	
No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated.	No Conflict. As provided in Section 3, Project Description, of this SCEA, the Project would not include a zone change.
Service Systems	
No increase in density shall be affected by zone change or subdivision unless it is determined that such facilities are adequate to serve the proposed development.	No Conflict. Refer to discussion above. The Project does not include a zone change.
<hr/> <i>Source: Eyestone Environmental, 2024.</i>	

brief discussion of the Project's consistency with the LAMC requirements for the Project Site is provided below for informational purposes.

As discussed in Section 3, Project Description, of this SCEA, the Project Site is comprised of three zoning designations: C4-2D-SN, [Q]C4-2D-SN, and R4-2D. The C4 zone permits a wide array of land uses including commercial, office, multi-family residential, retail, and hotel uses, while the R4 zone permits high-density residential uses. The SN designation indicates that the Project Site is located within the Hollywood Signage Supplemental Use District. The [Q] conditions permit adaptive reuse of the existing nineteen-story tower into live-work units and for construction of new ground floor retail. The "D" limitation imposed restricts the floor area ratio to 2.3 times the buildable area on the portion of the Project Site zoned [Q]C4-2D-SN and restricts the floor area ratio to 2 times the buildable area on the remaining portions of the Project Site zoned C4-2D-SN and R4-2D. The permitted density for a mixed-use project for the Project Site is one unit per 200 square feet of lot area, pursuant to LAMC Section 12.22.A.18 and State Density Bonus law,. Accordingly, 347 dwelling units are permitted on the Project Site. The Project's density of 234 units (170 new units plus the 64 units to remain) would be below the permitted base density for the Project Site.

With regard to FAR, the Project would use an off menu density bonus incentive to permit a floor area increase to 282,560 square feet of floor area (3.72 FAR) in lieu of 161,664 square feet of floor area (blended 2.13 FAR). Notwithstanding, the proposed residential and commercial uses would be consistent with the types of uses permitted by the current zoning and with the types of uses surrounding the Project Site. With the approval of the above requests, the Project would not conflict with the LAMC.

Cumulative Impacts

Less Than Significant Impact. As listed below in Item XXI, Mandatory Findings of Significance, the related projects primarily consist of other infill residential, commercial/retail, mixed-use, hotel, and institutional uses, which would reflect existing uses already found in the vicinity of the Project Site and

within the Hollywood Community Plan area. As such, given the mostly developed area, the related projects would similarly not be anticipated to physically divide a community either through the introduction of a non-compatible use or the closure of existing roads. The uses proposed by the related projects would also be compatible with the various uses throughout the Project Site. In addition, as with the Project, the related Projects would be required to comply with relevant land use plans, policies, and regulations. Because the approval of the Project would not result in land use and planning impacts, the Project's potential impacts would not be cumulatively considerable. Furthermore, the related projects would be reviewed by the City prior to construction to ensure that they do not conflict with applicable land use plans. ***As such, based on the above, cumulative impacts related to the physical division of an established community and cumulative impacts related to conflicts with land use plans, policies, or regulations 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

- PMM MIN-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
 - b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:
 - 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.

- 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the Project Site.
- 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.
- 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of Project Sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

Applicability to the Project

As evaluated below, the Project would not result in the loss of availability of a regionally valuable mineral resource. Therefore, Mitigation Measure PMM MIN-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM MIN-1: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
- b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:
 - 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
 - 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
 - 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.
 - 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of

project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

Applicability to the Project

The Project would not result in the loss of availability of a regionally valuable mineral resource. Therefore, Mitigation Measure PMM MIN-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site, and none are proposed by the Project. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.^{128,129,130} The Project Site is also not located within a City-designated oil field or oil drilling area.¹³¹ ***Therefore, the Project would not result in the loss of availability of a known mineral resource, and no impact would occur.***

b. Would the project 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. 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 Geological Survey. The Project Site is also not located within a City designated oil field or oil drilling area. ***Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and no impact would occur.***

Cumulative Impacts

Less Than Significant Impact. The related projects are located within a developed, urbanized area of the City and, as with the Project Site, do not support existing or future mineral extraction. It is unknown whether any of the related project sites contain mineral resources of local or regional importance. Regardless, since the Project would have no impact on the availability of known mineral

¹²⁸ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

¹²⁹ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

¹³⁰ City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

¹³¹ City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

resources, it would not contribute to a potential cumulative impact. ***As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and there would be no cumulative impact.***

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

- PMM NOI-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Install temporary noise barriers during construction.
 - b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
 - c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance.
 - d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
 - e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are

expected to exceed limits established in the noise element of the general plan or noise ordinance.

- f) Designate an on-site construction complaint and enforcement manager for the project.
- g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where repavement is planned.
- l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.
- m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses.
- n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.
- o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed

within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

- q) Use of portable barriers in the vicinity of sensitive receptors during construction.
- r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.
- s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.
- t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.
- u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.
- v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.
- y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

Applicability to the Project

As described below, with compliance with the City's Noise regulations, the Project would not result in significant noise impacts during construction or Project operation. However, portions of Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR, including measure (a), which calls for the installation of temporary noise barriers during construction, would be applicable to the Project. Specifically, as specified by LAMC Section 112.05, Project construction activities would involve the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques, as technically feasible. In particular, prior to the start of construction, temporary and impermeable sound barriers would be installed, as detailed below. The installation of sound barriers would be based on the specific Project-related construction activities and Project Site conditions. Accordingly, compliance with the City's existing noise regulations would be consistent with but more effective than Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR. In addition, while other measures included in Mitigation Measure PMM-NOI-1 from the 2020–2045 RTP/SCS PEIR would generally be applicable to the Project, the Project would adhere to all relevant regulatory compliance measures regarding noise, including those outlined in the LAMC and the Noise Element of the City of Los Angeles General Plan,

which would be equal to or more effective than the measures outlined in Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

PMM NOI-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
- b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
- c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.
- d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.
- e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps).
- f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

Applicability to the Project

As analyzed below, through compliance with Mitigation Measure NOI-MM-1 from the 2020–2045 RTP/SCS PEIR, the Project would not result in significant impacts related to vibration. In addition, the Project would not require pile driving. Thus, while some of the measures outlined in Mitigation Measure PMM NOI-2 from the 2020–2045 RTP/SCS PEIR would generally apply to the Project, including the restriction of construction hours and the maintenance of construction equipment, existing regulatory requirements would be equal to or more effective than the measures outlined in Mitigation Measure PMM NOI-2 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM NOI-2 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM NOI-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider

mitigation measures to reduce ambient noise levels in the vicinity of the project, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Install temporary noise barriers during construction between noise sources and noise-sensitive land uses and species.
- b) Include permanent noise barriers and sound-attenuating features as part of the project design between noise sources and noise-sensitive land uses and species. Barriers could be in the form of outdoor barriers, sound walls, buildings, landscaped berms, dense planting, or earth berms to attenuate noise at adjacent sensitive uses. Sound-attenuating features could be in the form of grade separation, buffer zones, reduced-noise paving materials, and traffic calming measures.
- c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance.
- d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- f) Designate an on-site construction complaint and enforcement manager for the project.
- g) Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.

- k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
- l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.
- m) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.
- n) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- o) Stationary noise sources can and should be located as far from adjacent sensitive receptors and species to the maximum extent feasible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- p) Use of portable barriers in the vicinity of sensitive receptors during construction.
- q) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.
- r) Monitor the effectiveness of noise attenuation measures by taking noise measurements.
- s) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.

Applicability to the Project

As described below, with compliance with the City’s Noise regulations, the Project would not result in significant noise impacts during construction or Project operation. However, portions of Mitigation Measure PMM NOI-1 from the 2024–2050 RTP/SCS PEIR, including measure (a), which calls for the installation of temporary noise barriers during construction, would be applicable to the Project. Specifically, as specified by LAMC Section 112.05, Project construction activities would involve the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques, as technically feasible. In particular, prior to the start of construction, temporary and impermeable sound barriers would be installed, as detailed below. The installation of sound barriers would be based on the specific Project-related construction activities and Project Site conditions. Accordingly, compliance with the City’s existing noise regulations would be consistent with but more effective than Mitigation Measure

PMM NOI-1 from the 2024–2050 RTP/SCS PEIR. In addition, while other measures included in Mitigation Measure PMM-NOI-1 would generally be applicable to the Project, the Project would adhere to all relevant regulatory compliance measures regarding noise, including those outlined in the LAMC and the Noise Element of the City of Los Angeles General Plan, which would be equal to or more effective than the measures outlined in Mitigation Measure PMM NOI-1 from the 2024–2050 RTP/SCS PEIR. Thus, Mitigation Measure PMM NOI-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

PMM NOI-2: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to groundborne vibration. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
- b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
- c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain and reduce the vibration occurrences and magnitude.
- d) Perform construction activities within permitted hours in accordance with local jurisdiction regulation.
- e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).

Applicability to the Project

As analyzed below, through compliance with Mitigation Measure NOI-MM-1, the Project would not result in significant impacts related to vibration. In addition, the Project would not require pile driving. Thus, while some of the measures outlined in Mitigation Measure PMM NOI-2 from the 2024–2050 RTP/SCS PEIR would generally apply to the Project, including the restriction of construction hours and the maintenance of construction equipment, existing regulatory requirements would be equal to or more effective than the measures outlined in Mitigation Measure PMM NOI-2 from the 2024–2050 RTP/SCS

PEIR. Thus, Mitigation Measure PMM NOI-2 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

Impact Analysis

a. Would the project result in 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.

Existing Noise Environment

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. The City's Noise Element defines noise-sensitive land uses as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks. Based on a review of the land uses surrounding the Project Site, seven off-site noise receptor locations (receptor locations R1 through R7) were selected to represent the nearest noise sensitive uses surrounding the Project Site (within 500 feet of the property line of the Project Site). The descriptions of the seven off-site noise receptor locations are provided in Table 17 on page 267.

Existing ambient noise levels were monitored at the seven off-site receptor locations on April 20, 2023. The baseline noise monitoring was conducted using a Larson-Davis Model 870 and a Quest Technologies Model 2900 Integrated/Logging Sound Level Meters.¹³² A 24-hour ambient noise measurement was conducted at receptor location R1. Two 15-minute measurements were conducted at each of the off-site receptor locations R2 through R7 during the daytime hours (between 10:00 A.M. and 1:00 P.M.) and nighttime hours (between 10:00 P.M. and 1:00 A.M.). The ambient noise measurements were recorded in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.

The results of the ambient sound measurement data are summarized in Table 17. As indicated in Table 17, the existing daytime ambient noise levels at the off-site noise receptor locations surrounding the Project Site ranged from 54.4 dBA (L_{eq}) at receptor R4 to 72.3 dBA (L_{eq}) at receptor location R6. The measured nighttime ambient noise levels ranged from 53.6 dBA (L_{eq}) at receptor location R4 to 67.6 dBA (L_{eq}) at receptor location R6. Thus, the existing ambient noise levels at all off-site locations are above the City's presumed daytime and nighttime ambient noise levels of 50 dBA (L_{eq}) and 40 dBA (L_{eq}), respectively, for residential uses. Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on

¹³² The Larson-Davis Model 870 and Quest Model 2900 sound meter meets and exceeds the minimum industry standard performance requirements for "Type 1" and "Type 2" standard instruments, respectively, as defined in the American National Standard Institute (ANSI) S1.4. It also meets the requirement specified in Section 111.01(I) of the LAMC that instruments be "Type S2A" standard instruments or better. The sound meter was calibrated and operated according to the manufacturer's written specifications.

Table 17
Existing Ambient Noise Levels

Receptor Location	Approximate Distance to Project Site ^a (feet)	Measured Noise Levels, dBA L_{eq}		CNEL (dBA)
		Daytime Hours ^b (7:00 A.M.– 10:00 P.M.)	Nighttime Hours ^b (10:00 P.M.– 7:00 A.M.)	
R1—Multi-family residential uses adjacent to the Project Site to the east	Adjacent to the Project Site	58.3 ^c	56.2 ^c	63.4
R2—Multi-family residential uses on the south side of Leland Way, southeast of the Project Site	50	56.2	55.8	60.6 ^d
R3—Southern California Hospital on the north side of De Longpre Avenue, southwest of the Project Site	210	60.6	60.7	65.4 ^d
R4—Single-family residential on the south side of De Longpre Avenue, south of the Project Site	385	54.4	53.6	58.4 ^d
R5—The Los Angeles Film School at the northeast corner of Sunset Boulevard and Ivar Avenue, northwest of the Project Site	410	69.8	65.2	71.2 ^d
R6—Multi-family residential uses at the northwest corner of Sunset Boulevard and Vine Street, northwest of the Project Site	140	72.3	67.6	73.7 ^d
R7—Multi-family residential uses at the southeast corner of Vine Street and Selma Avenue, north of the Project Site	430	67.5	62.4	68.6 ^d

CNEL = Community Noise Equivalent Level

dBA = A-weighted sound pressure level in decibel

L_{eq} = equivalent sound level

^a Distances shown are estimated using Google Earth and are referenced to the nearest boundary of the Project Site.

^b The range of hours for the daytime and nighttime periods shown herein are defined by the LAMC. For receptor locations R2 through R7, daytime ambient noise levels were measured between 10:00 A.M. and 1:00 P.M., and the nighttime ambient noise levels were measured between 10:00 P.M. and 1:00 A.M.

^c Levels shown for R1 represent the average for the entire daytime and nighttime periods.

^d Estimated based on short-term (15-minute) noise measurements per FTA procedures.

Source: AES, 2023.

local roadways (i.e., Vine Street and Sunset Boulevard). Consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the nearest off-site sensitive receptor locations and comparing these estimated construction-related noise levels to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Project construction activities would comply with LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction activities on Sunday or a national holiday.

On-Site Construction

Typical construction equipment would produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, based on the data provided in the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (RCNM, 2006).¹³³ These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on a typical construction site often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.¹³⁴ These noise levels are typically associated with multiple pieces of equipment operating simultaneously. The on-site construction-related noise levels were calculated by distributing all construction equipment over the entire construction site. Additional noise attenuation was assigned as the line-of-sight to the Project Site would be interrupted by the presence of existing intervening structures.¹³⁵

Table 18 on page 269 provides the estimated on-site construction noise levels at the off-site noise sensitive receptor locations. The on-site construction noise levels are mainly due to the large construction equipment (e.g., excavator, grader, drill rig) operating at the ground level. Construction activities at the upper levels of the Project buildings would involve smaller construction equipment (i.e., hand tools), which would generate lower noise levels than the large construction equipment at the ground level. Furthermore, Project construction at the upper floors, such as fit-out constructions, normally occur when the building exterior walls are in-place, which would minimize transmission of construction noise to the exterior. As indicated in Table 18, the estimated construction noise levels would exceed the significance criteria at off-site receptor locations R1 and R2 by 4.2 dBA and 2.4 dBA, respectively. However, the Project would comply with the City's 75 dBA noise limit, as specified by LAMC Section 112.05, with the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques, as technically feasible.

¹³³ Federal Highway Administration, FHWA Roadway Construction Noise Model User's Guide, January 2006.

¹³⁴ Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, page 7, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

¹³⁵ Caltrans, Technical Noise Supplement (TeNS), September 2013, Figure 2-15f.

**Table 18
Construction Noise Levels**

Receptor Location	Calculated Construction Noise Levels by Month, ^a CNEL (dBA)					Significance Criteria (L _{eq} (dBA)) ^a	Maximum Noise Exceedance Above the Criteria (L _{eq} (dBA))
	Demolition	Grading/ Excavation	Parking Structure	Building Construction	Landscape		
R1	78.4	76.9	79.2	76.6	76.6	75	4.2
R2	76.6	75.2	77.4	74.8	74.8	75	2.4
R3	51.1	49.7	51.8	49.2	49.3	75	0.0
R4	65.0	63.6	65.7	63.1	63.1	75	0.0
R5	51.3	50.0	52.0	49.4	49.4	75	0.0
R6	65.8	64.5	66.5	63.9	63.9	75	0.0
R7	60.4	59.1	61.1	58.6	58.6	75	0.0
<p>Detail calculation worksheets are included in Appendix J of this SCEA. Source: AES, 2023.</p>							

Specifically, in accordance with LAMC Section 112.05, prior to commencement of construction, temporary and impermeable sound barriers would be installed along the eastern property line between the construction area and residential uses to the east (receptor location R1) and along the southern property line between the construction area and the residential uses on the on the south side of Leland Way (receptor location R2). The temporary sound barriers would be designed to provide a minimum 5-dBA and 3-dBA noise reduction at the outdoor deck of receptor location R1 and at the ground and upper levels of the residential uses at receptor location R2, respectively. The temporary sound barriers would be designed to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor locations R1 and R2.

Table 19 on page 270 shows the estimated on-site construction noise levels at the off-site sensitive receptor locations with installation of the proposed sound barriers. As indicated therein, with installation of temporary sound barriers, the Project's construction-related noise levels at the off-site sensitive uses would be reduced to below the 75-dBA significance threshold. ***As such, the Project would not result in generation of a substantial temporary 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. Therefore, the Project's potential noise impacts due to on-site construction would be less than significant, and no mitigation is required.***

Off-Site Construction Traffic

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. Construction delivery/haul trucks would travel on approved truck routes between the Project Site and the Hollywood Freeway (US-101), via Vine Street, Sunset Boulevard, Hollywood Boulevard, or Santa Monica Boulevard.

Table 19
Construction Noise Levels with Sound Barriers

Receptor Location	Calculated Construction Noise Levels by Month, ^a CNEL (dBA)					Significance Criteria (L _{eq} (dBA)) ^a	Maximum Noise Exceedance Above the Criteria (L _{eq} (dBA))
	Demolition	Grading/ Excavation	Parking Structure	Building Construction	Landscape		
R1	73.4	71.9	74.2	71.6	71.6	75	0.0
R2	73.6	72.2	74.4	71.8	71.8	75	0.0
R3	51.1	49.7	51.8	49.2	49.3	75	0.0
R4	65.0	63.6	65.7	63.1	63.1	75	0.0
R5	51.3	50.0	52.0	49.4	49.4	75	0.0
R6	65.8	64.5	66.5	63.9	63.9	75	0.0
R7	60.4	59.1	61.1	58.6	58.6	75	0.0
<p>Detail calculation worksheets are included in Appendix J of this SCEA.</p> <p>Source: AES, 2023.</p>							

In addition to the construction trucks, construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, which would not overlap with the Project construction equipment or trucks. Noise levels from construction trucks would be higher than those of construction workers vehicles. Therefore, the noise impacts due to off-site construction sources are based on construction trucks. Table 20 on page 271 provides the estimated number of construction-related truck trips and the estimated noise levels along the anticipated truck route. As indicated in Table 20, the estimated off-site construction noise levels would be below the significance criteria along the anticipated haul routes. **Therefore, the Project's potential off-site construction traffic noise impacts would be less than significant, and no mitigation is required.**

Operational Noise

Noise associated with Project operation would include: (a) on site stationary source noise, including outdoor mechanical equipment (e.g., HVAC equipment), parking facilities, and activities within the proposed outdoor spaces; and (b) off-site mobile source (roadway traffic) noise.

On-Site Operational Noise

Mechanical Equipment

The Project would include new air conditioning mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level of the new building. Project-related outdoor mechanical equipment would be designed to comply with the City's Noise Regulations (Section 112.02 of the LAMC) to ensure that it would not increase the existing ambient noise levels by 5 dBA. Table 21 on page 272 presents the estimated on-site mechanical equipment noise levels associated with this equipment at the off-site receptor locations. As shown in Table 21, the estimated noise levels from the mechanical equipment would range from 29.0 dBA (L_{eq}) at receptor location R3 to 55.2 dBA (L_{eq}) at receptor location

Table 20
Off-Site Construction Truck Noise Levels

Construction Phase	Estimated Number of Construction Truck Trips per Day	Estimated Number of Construction Truck Trips per Hour ^a	Estimated Truck Noise Levels Plus Ambient Along the Project Truck Route, ^b (Leq (dBA)) (Project/Project + Ambient)			
			Vine St.	Sunset Blvd.	Hollywood Blvd.	Santa Monica Blvd.
Demolition	100	17	61.7 / 68.5	61.7 / 70.4	61.7 / 68.5	62.4 / 70.5
Grading/Excavation	160	27	63.7 / 69.0	63.7 / 70.8	63.7 / 69.0	64.4 / 70.9
Parking Structure	180	23	63.0 / 68.8	63.0 / 70.6	63.0 / 68.8	63.7 / 70.8
Building Construction	140	18	62.0 / 68.6	62.0 / 70.5	62.0 / 68.6	62.7 / 70.6
Landscape	14	2	52.4 / 67.6	52.4 / 69.9	52.4 / 67.6	53.1 / 69.9
Existing Daytime Ambient Noise Levels along the Project Haul Routes, ^c Leq (dBA)			67.5	69.8	67.5	69.8
Significance Criteria, ^d Leq (dBA)			72.5	74.8	74.8	74.8
Maximum Noise Exceedance Above the Criteria, Leq (dBA)			0.0	0.0	0.0	0.0
Significance Impact?			No	No	No	No
^a Haul truck hourly trips are based on 6-hour per day. Other delivery trucks are based on 8-hour per day. ^b Noise levels include Project-related truck trips plus ambient. ^c Ambient noise levels along Sunset Boulevard and Vine Street are based on measured noise level at receptor locations R6 and R7, respectively. Ambient noise levels along Hollywood Boulevard and Santa Monica Boulevard are estimated based on measured noise levels at receptor locations R6 and R7, respectively. ^d Significance criteria are equivalent to the measured ambient noise levels plus 5 dBA. Detail calculation worksheets are included in Appendix J of this document. Source: AES, 2023.						

R1, which would be below the existing ambient noise levels. As such, the Project's noise levels due to the mechanical equipment at the off-site receptor locations would be below the significance threshold of 5 dBA (Leq) above existing ambient noise levels. **Therefore, noise impacts from the Project's mechanical equipment would be less than significant, and no mitigation is required.**

Outdoor Spaces

As described in Section 3, Project Description, of this SCEA, the Project would provide a variety of outdoor common spaces, including courtyards and pool deck on Level 3 and Level 5. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a normal voice were used for analyzing potential noise impacts from people gathering at the outdoor spaces. This noise analysis conservatively assumed up to 635 people and 211 people at

Table 21
Mechanical Equipment Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L _{eq})	Estimated Noise from Project Mechanical Equipment, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})	Significance Threshold, ^a dBA (L _{eq})	Exceedance over Significance Criteria	Sig. Impact?
R1	56.2	55.2	58.7	61.2	0.0	No
R2	55.8	39.6	55.9	60.8	0.0	No
R3	60.6	29.0	60.6	65.6	0.0	No
R4	53.6	38.5	53.7	58.6	0.0	No
R5	65.2	35.5	65.2	70.2	0.0	No
R6	67.6	39.0	67.6	72.6	0.0	No
R7	62.4	38.3	62.4	67.4	0.0	No
^a Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower, plus 5 dBA. Detail calculation worksheets are included in Appendix J of this document. Source: AES, 2023.						

the west and east courtyards on Level 3, respectively.¹³⁶ To analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time.

An additional potential noise source associated with outdoor spaces would be the use of an outdoor sound system (e.g., music or other sounds broadcast through an outdoor mounted speaker system) at the outdoor spaces. The amplified sound system for use in outdoor areas would be designed so as not to exceed the maximum noise level of 75 dBA L_{eq} at a distance of 15 feet from the face of the respective loudspeakers, thereby ensuring that the amplified sound system would not exceed the significance criteria (i.e., an increase of 5 dBA L_{eq}) at any off-site noise sensitive receptor location. Table 22 on page 273 presents the estimated noise levels from the Project's outdoor areas at the off-site sensitive receptor locations.

As presented in Table 22, the estimated noise levels from the outdoor spaces would range from 32.0 dBA (L_{eq}) at off-site receptor location R3 to 59.3 dBA (L_{eq}) at receptor location R1, which would not result in an exceedance of the significance threshold of 5 dBA over the ambient noise levels.

¹³⁶ Based on maximum occupancy rate of 15 square feet per person per the City Fire Code, Section 1004, Table 1004.5 Maximum Floor Area Allowances per Occupant.

Table 22
Estimated Noise Levels from Outdoor Spaces

Receptor Location	Existing Ambient Noise Levels, dBA (L _{eq})	Estimated Noise from Outdoor Spaces, ^a dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})	Significance Threshold, ^b dBA (L _{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	56.2	59.3	61.0	61.2	0.0	No
R2	56.2	44.3	56.5	61.2	0.0	No
R3	60.6	32.0	60.6	65.6	0.0	No
R4	53.6	32.2	53.6	58.6	0.0	No
R5	65.2	37.8	65.2	70.2	0.0	No
R6	67.6	48.9	67.7	72.6	0.0	No
R7	62.4	45.1	62.5	67.4	0.0	No
<p>^a Noise analysis assumed up to 635 and 211 people at the west and east courtyards on Level 3, respectively.</p> <p>^b Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower, plus 5 dBA.</p> <p>Detail calculation worksheets are included in Appendix J of this document.</p> <p>Source: AES, 2023.</p>						

Therefore, the Project's potential noise impacts from the outdoor uses would be less than significant, and no mitigation is required.¹³⁷

Parking

The Project includes 284 vehicular parking spaces within two above-grade parking levels and within two subterranean levels. Sources of noise within the parking garage would primarily include vehicular movements and engine noise, doors opening and closing, and intermittent car alarms. Noise levels within the parking garage would fluctuate with the amount of automobile and human activity. Since the parking garage would be fully enclosed on all sides, with the exception of the entrance/exit at the south side of the Project Site, noise generated within the enclosed parking garage would be effectively shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. **Therefore, noise impacts from the parking garage would be less than significant.**

Off-Site Operational (Traffic) Noise

Off-site roadway noise was analyzed using the FHWA TNM model and traffic data from the Project's Transportation Assessment, which is included as Appendix L.1 of this SCEA.¹³⁸ The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor. Roadway noise conditions without the Project

¹³⁷ Furthermore, Public Resources Code Section 21085 provides that for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment. *Make UC a Good Neighbor v. Regents of University of California* (2024) 16 Cal.5th 43.

¹³⁸ Federal Highway Administration, Traffic Noise Model (TNM) Version 2.5,

(“Future without Project”) were calculated and compared to noise levels that would occur with implementation of the Project (“Future Plus Project”) to determine Project-related noise impacts for operational off-site roadway noise. Table 23 on page 275 presents the off-site traffic noise impacts for the Future plus Project condition. As indicated in Table 23, the estimated increase in traffic-related noise levels along the analyzed roadway segments would be well below the 3-dBA and 5-dBA CNEL significance criteria.

In addition, traffic noise impacts were also analyzed to determine the potential noise impacts based on the increase in noise levels due to the Project (“Existing Plus Project”) compared with the existing without Project conditions (“Existing Without Project”). Table 24 on page 276 presents the off-site traffic noise impacts when compared with the existing conditions. As indicated in Table 24, the estimated increase in traffic-related noise levels along the analyzed roadway segments would be well below the 3-dBA and 5-dBA CNEL significance criteria. Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

Composite Noise Levels

An evaluation of the Project’s composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the off-site noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-site and off-site noise source associated with the operation of the Project. On-site noise sources associated with the Project would include the use of mechanical equipment and outdoor uses. Table 25 on page 277 presents the estimated composite noise from Project-related noise sources in terms of CNEL at the off-site noise sensitive receptors. As reported in Table 25, the composite noise levels from Project operation at the off-site receptor locations would be below the 3-dBA significance criterion (applicable to receptor locations R5 and R6) as the composite (Project plus Ambient) noise level falls within the normally unacceptable (70 to 75 CNEL) land use category as well as the 5 dBA significance criterion (applicable to receptor locations R1, R2, R3, R4, and R7) as the composite noise levels fall within the conditionally acceptable (60 to 70 CNEL) land use category. Therefore, the composite noise level impacts due to Project operation would be less than significant.

Conclusion

Based on the above, the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project Site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and noise impacts associated with Project construction and operation would be less than significant.

Table 23
Off-Site Roadway Traffic Noise Impacts—Future Plus Project

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels, ^a CNEL (dBA)		Increase in Noise Levels due to Project, dBA (CNEL)	Significant Impact?
		Future Without Project	Future Plus Project		
Vine Street					
Between Hollywood Blvd. and Sunset Blvd.	Residential	69.7	69.7	0.0	No
Between Sunset Blvd. and Leland Way	Residential	69.9	69.9	0.0	No
Between Leland Way and De Longpre Ave.	Commercial	69.7	69.7	0.0	No
Between De Longpre Ave. and Fountain Ave.	Residential	69.5	69.5	0.0	No
El Centro Avenue					
Between Sunset Blvd. and Leland Way	Residential	61.9	62.0	0.1	No
Between Leland Way and De Longpre Ave.	Residential	61.7	61.8	0.1	No
Sunset Boulevard					
Between Cahuenga Blvd. and Vine St.	Residential, School	69.7	69.7	0.0	No
Between Vine St. and El Centro Ave.	Residential	70.1	70.1	0.0	No
Leland Way					
Between Vine St. and El Centro Ave.	Residential	59.9	60.3	0.4	No
De Longpre Avenue					
Between Cahuenga Blvd. and Vine St.	Residential	62.4	62.6	0.2	No
Between Vine St. and El Centro	Residential, Hospital	60.3	60.3	0.0	No
^a Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix J of this SCEA. Source: AES, 2023.					

Table 24
Off-Site Roadway Traffic Noise Impacts—Existing Plus Project

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels, ^a CNEL (dBA)		Increase in Noise Levels due to Project, dBA (CNEL)	Significant Impact?
		Existing Conditions	Existing Plus Project		
Vine Street					
Between Hollywood Blvd. and Sunset Blvd.	Residential	68.7	68.7	0.0	No
Between Sunset Blvd. and Leland Way	Residential	68.8	68.8	0.0	No
Between Leland Way and De Longpre Ave.	Commercial	68.5	68.5	0.0	No
Between De Longpre Ave. and Fountain Ave.	Residential	68.4	68.5	0.1	No
El Centro Avenue					
Between Sunset Blvd. and Leland Way	Residential	61.1	61.2	0.1	No
Between Leland Way and De Longpre Ave.	Residential	60.9	61.1	0.2	No
Sunset Boulevard					
Between Cahuenga Blvd. and Vine St.	Residential, School	69.2	69.2	0.0	No
Between Vine St. and El Centro Ave.	Residential	69.6	69.6	0.0	No
Leland Way					
Between Vine St. and El Centro Ave.	Residential	58.7	59.2	0.5	No
De Longpre Avenue					
Between Cahuenga Blvd. and Vine St.	Residential	60.6	60.8	0.2	No
Between Vine St. and El Centro	Residential, Hospital	58.5	58.5	0.0	No
^a Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix J of this SCEA. Source: AES, 2023.					

**Table 25
Composite Noise Levels**

Receptor Location	Existing Ambient Noise Levels (CNEL (dBA))	Calculated Project-Related Noise Levels, ^a CNEL (dBA)			Project Composite Noise Levels (CNEL (dBA))	Ambient Plus Project Composite Noise Levels (CNEL (dBA))	Increase in Noise Levels due to Project (CNEL (dBA))	Significance Criteria ^b (CNEL (dBA))	Significant Impact?
		Traffic	Mechanical	Outdoor Spaces					
R1	63.4	45.4	61.9	63.4	65.7	67.7	4.1	68.4	No
R2	60.6	48.1	46.3	48.4	52.5	61.2	0.6	65.6	No
R3	65.4	41.0	35.7	36.1	43.1	65.4	0.0	70.4	No
R4	58.4	47.3	45.2	36.3	49.6	58.9	0.5	63.4	No
R5	71.2	40.4	42.8	48.9	50.3	73.7	2.5	74.2	No
R6	73.7	44.3	45.7	53.0	54.2	73.7	0.0	76.7	No
R7	68.6	45.0	42.3	36.0	47.2	68.6	0.0	73.6	No

^a Detail calculation worksheets are included in Appendix J of this SCEA.

^b Significance criteria are equivalent to the existing ambient plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the “normally unacceptable” or “clearly unacceptable” land use categories or ambient plus 5 dBA if the estimated noise levels fall within the “normally acceptable” or “conditionally acceptable” land use categories, per the City of Los Angeles Noise Element. If the estimated noise levels exceed those significance criteria, a noise impact is identified.

Source: AES, 2023.

b. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?

Less Than Significant with Mitigation Incorporated.

On-Site Construction Vibration Impacts

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction activities. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site (i.e., within 20 feet related to building damage).¹³⁹ Heavy construction equipment (e.g., a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. Specifically, heavy construction equipment such as a large bulldozer would generate a vibration level of up to 0.210 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.¹⁴⁰ With respect to potential building damage, FTA provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration (such as historic structures) to 0.50 PPV (inch/second) for reinforced-concrete, steel or timber buildings.¹⁴¹

As discussed in the Project's Historic Resources Technical Report, there are five historical resources within and in the vicinity of the Project Site, including the Bank of America building (located at 6300 Sunset Boulevard), the Home Savings and Loan building (located at 1500 Vine Street), the Hollywood Palladium (located at 6215 Sunset Boulevard), the Earl Carroll Theater (located at 6230 Sunset Boulevard), and the onsite Morgan Camera building.¹⁴²

Table 26 on page 279 provides the estimated vibration levels at the nearest off-site buildings and the onsite Morgan Camera Building. As indicated in Table 26, the estimated vibration velocity levels from construction equipment would be below the significance criteria of 0.12 PPV for the off-site historic buildings and the 0.3 PPV (inch/second) applicable to the residential and commercial buildings to the south. However, the estimated groundborne vibration velocity levels from construction equipment would exceed the significance criteria of 0.12 PPV for the onsite Morgan Camera Building and the 0.5 PPV (inch/second) applicable to the newly constructed residential building to the east of the Project Site. As such, mitigation is required, as set forth below.

¹³⁹ Distances calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage.

¹⁴⁰ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4.

¹⁴¹ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-5.

¹⁴² Cultural Resources Technical Appendix, June 2023. See Appendix C of this SCEA. It is noted that the Afton Square Historic District is also identified in the Cultural Resources report; however, the impact analysis related to vibration considers potential damage to buildings.

Table 26
Construction Vibration Impacts—Building Damage

Off-Site Building Structure ^a	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment, ^b (inch/second (PVV))					Significance Threshold, PPV	Exceed Criteria?
	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.210	0.089	0.089	0.076	0.003	—	—
Home Saving and Loan Building to the North (historic)	0.019	0.008	0.008	0.007	0.000	0.12 ^b	No
Single-story Commercial and 3-story Residential Buildings to the South	0.074	0.032	0.032	0.027	0.001	0.3 ^c	No
6-story Residential Building to the East	0.575	0.244	0.244	0.208	0.008	0.5 ^d	Yes
Bank of America to the West (historic)	0.026	0.011	0.011	0.010	0.000	0.12 ^d	No
Single-family residential building within the Afton Square Historic District to the South (historic)	0.011	0.005	0.005	0.004	0.000	0.12 ^b	No
Hollywood Palladium to the northeast (historic)	0.008	0.004	0.004	0.003	0.000	0.12 ^b	No
Earl Carroll Theater to the east (historic)	0.006	0.002	0.002	0.002	0.000	0.12 ^b	No
Morgan Camera Building ^e (on-site historic)	0.575	0.244	0.244	0.208	0.008	0.12 ^b	Yes
<p>^a Vibration level calculated based on FTA reference vibration level at 25-foot distance.</p> <p>^b FTA criteria for buildings extremely susceptible to vibration damage.</p> <p>^c FTA criteria for engineered concrete and masonry buildings.</p> <p>^d FTA criteria for reinforced-concrete, steel or timber buildings.</p> <p>^e The Morgan Camera Building is located within the Project Site and is provided for informational purposes.</p> <p>Source: FTA, 2018; AES, 2023. See Appendix J of this SCEA.</p>							

Mitigation Measure NOI-MM-1: Prior to start of construction, the Applicant shall retain the services of a qualified structural engineer to visit the Morgan Camera Building (historic structure) located on site and the 6-story apartment building adjacent to the Project Site to the east, to inspect and document (video and/or photographic) the apparent physical condition of the buildings' readily-visible features (i.e., any cracks at the exterior of the noted buildings). In addition, the structural engineer shall survey the existing foundations and other structural aspects of the Morgan Camera Building and provide a shoring design to protect the building from potential damage.

Prior to construction, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of recording and documenting the construction-related ground vibration levels at the Morgan Camera Building

and at the 6-story apartment building to the east during the demolition, shoring, and excavation phases, as described below. In the event that consent is not provided from the R1 property owners, the vibration monitoring shall be made at the Project Site's property line. The vibration monitoring at the Project Site's property line would provide a more conservative reading, because the monitoring equipment would be closer to the construction equipment.

- (a) The vibration monitoring system shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 inch/second (PPV) for the Morgan Camera Building and 0.45 inch/second (PPV) for the 6-story apartment building, and a regulatory level of 0.12 inch/second (PPV) for the Morgan Camera Building and 0.5 inch/second (PPV) for the 6-story apartment building. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.
- (b) The vibration monitoring program shall be submitted to the Department of Building and Safety, prior to initiating any construction activities.
- (c) In the event the warning level (i.e., 0.10 and 0.45 inch/second [PPV]) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to staggering concurrent activities (if doing so would not pose a safety risk to personnel or damage risk to buildings) and utilizing lower vibratory techniques.
- (d) In the event the regulatory level (i.e., 0.12 and 0.5 inch/second [PPV]) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is re-measured and below the warning level.
- (e) At the conclusion of vibration-causing construction, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to the Morgan Camera Building or the 6-story apartment building and recommendations for repair, as may be necessary. Repairs to the Morgan Camera Building shall be undertaken and completed in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and all applicable codes including the California Historical Building Code (Part 8 of Title 24).

With implementation of Mitigation Measure NOI-MM-1, potential building damage impacts to the onsite Morgan Camera Building and the 6-story apartment building adjacent to the east of the Project Site would be reduced to a less-than-significant level.

Off-Site Construction Vibration Impacts

Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route. Based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at 50 feet from the truck. There are existing buildings along the Project's anticipated haul routes, including Vine Street, Sunset Boulevard, Hollywood Boulevard, and

Santa Monica Boulevard, that are situated approximately 20 feet from the truck travel lane and would be exposed to ground-borne vibration levels of approximately 0.022 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. ***Therefore, vibration impacts pursuant to the thresholds of significance for building damage from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant, and no mitigation is required.***

Operational Groundborne Vibration

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking garage. Due to the rapid attenuation characteristics of groundborne vibration, vibration due to Project operation at the off-site sensitive receptors would be well below the perceptible level. Therefore, the Project would not result in the generation of excessive groundborne vibration levels at sensitive receptors in the vicinity of the Project Site. ***As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.***

Conclusion

Based on the above, groundborne vibration impacts associated with the Project would be less than significant with mitigation incorporated.

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

No Impact. The Project Site is not located in the vicinity of a private airstrip or an airport land use plan or within two miles of an airport. The nearest airport is the Hollywood Burbank Airport located at 2627 N. Hollywood Way, Burbank, approximately 6.8 miles northwest of the Project Site. In addition, the Project Site is not within an airport overlay zone.¹⁴³ Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. ***Therefore, impacts with respect to Threshold (c) would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. The Project, together with the related projects and future growth, could contribute to cumulative noise and vibration impacts. The potential for cumulative noise and vibration impacts to occur is specific to the distance between each related project and their stationary noise

¹⁴³ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031, <http://zimas.lacity.org/>, accessed May 5, 2023.

sources, as well as the cumulative traffic that these projects would add to the surrounding roadway network.

Construction Noise

Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on the City's L.A. CEQA Thresholds Guide screening criteria. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. Of the 45 related projects located in the vicinity of the Project Site, 34 related projects are located more than 1,000 feet from the Project Site and with intervening building structures, which would not contribute to the cumulative on-site construction noise impacts. The following 11 related projects are located within 1,000 feet of the Project Site, which could contribute to the cumulative construction noise impacts.

- Related Project No. 1 (mixed use development at 6250 Sunset Boulevard), Related Project No. 4 (mixed use development at 6200 Sunset Boulevard), Related Project No. 6 (Academy Square Project at 1341 Vine Street), Related Project No. 9 (Modera Argyle Project at 1546 Argyle Avenue), and Related Project No. 10 (Godfrey Hotel Project at 1400 Cahuenga Boulevard) have been completed or substantially completed. Therefore, these related projects would not contribute to cumulative construction-related noise impacts as the primary construction phases have already been completed.
- Related Project No. 2 (a mixed-use development) is located at 1400 Vine Street, approximately 40 feet south of the Project Site. There are residential uses located along the south side of Leland Way (receptor location R2), with direct line-of-sight to both the Project and Related Project No. 2. As analyzed above, noise impacts associated with Project construction would be less than significant with compliance with the City's noise limits. Construction noise impacts associated with Related Project No. 2 would also be less than significant with implementation of project-specific noise mitigation measures.¹⁴⁴ Therefore, construction noise levels from the Project and Related Project No. 2 would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with the Project.
- Related Project No. 3 (mixed-use development) is located at 1360 Vine Street, approximately 350 feet south of the Project Site. There are noise sensitive uses located between the Project Site and Related Project No. 3, including receptor locations R2, R3 and R4. It should be noted that receptor location R4 is currently vacant and will be relocated onsite as part of Related Project No. 3; as such, receptor location R4 would not be impacted cumulatively. As analyzed above, noise impacts associated with Project construction would be less than significant at receptor locations R2 and R3. In addition, construction noise levels associated with Related Project No. 3 at receptor location R3 would be reduced to approximately 68 dBA with implementation of the project-specific noise mitigation measures.¹⁴⁵ Therefore, the cumulative construction noise at receptor location R3 due to the Project (51.8 dBA) and the Related Project No. 3 (68.0 dBA) would be approximately

¹⁴⁴ City of Los Angeles, 1400 Vine Project Sustainable Communities Project CEQA Exemption, Chapter 4.13 Noise, April 2021.

¹⁴⁵ City of Los Angeles, 1360 N. Vine Project Draft EIR, Chapter IV.H Noise, June 2022.

68.1 dBA. Construction noise from Related Project No. 3 at receptor location R2 would be further reduced due to additional distance attenuation, which would be approximately 54.2 dBA.¹⁴⁶ The cumulative construction noise at receptor location R2 due to the Project (74.4 dBA) and the Related Project No. 3 (54.2 dBA) would be approximately 74.4 dBA. Therefore, the cumulative construction noise levels at receptor locations R2 and R3 would be below the 75-dBA significance threshold. As such, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 3.

- Related Project No. 5 (Palladium Residences Project) is located at 6201 Sunset Boulevard, approximately 180 feet northwest of the Project Site. The nearest noise sensitive receptor between the Project Site and Related Project No. 5 is receptor location R1. As analyzed above, noise impacts associated with Project construction would be less than significant at receptor location R1. In addition, construction noise levels associated with Related Project No. 5 at receptor location R1 would be reduced to a less than significant level with implementation of the project-specific noise mitigation measures, approximately 73 dBA (i.e., 78 dBA minus 5 dBA).¹⁴⁷ In addition, construction noise from Related Project No. 5 would be further reduced at receptor location R1 due to additional distance loss (approximately 6 dBA) and the intervening 6-story apartment building (approximately 20 dBA), to approximately 47 dBA. Therefore, the cumulative construction noise level at receptor location R1 due to the Project and the Related Project No. 5 would be below the 75-dBA significance threshold. Therefore, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 5.
- Related Project No. 7 (Mixed-Use Development Project) is located at 6400 Sunset Boulevard, approximately 720 feet west of the Project Site. There are sensitive receptors located along Sunset Boulevard (represented by receptor locations R5 and R6), which are located between both the Project Site and Related Project No. 7. As analyzed above, the Project-related construction noise levels at receptor locations R5 (52.0 dBA) and R6 (66.5 dBA) would be well below the 75-dBA significance threshold. In addition, Related Project No. 7 would also be required to implement mitigation measures, as required to reduce the construction noise impacts to less than significant impacts.¹⁴⁸ Construction noise levels from the Related Project No. 7 at the receptor locations R5 and R6 are estimated to be approximately 69.3 dBA and 64.1 dBA, based on the reference construction noise level of 86 dBA at 50 feet, respectively. The cumulative construction noise levels at receptor locations R5 and R6 would be approximately 69.4 dBA (52.0 plus 69.3) and 68.5 dBA (66.5 plus 64.1), respectively. Therefore, construction-related noise from Related Project No. 7 would be well below the 75-dBA significance threshold, and would not contribute to cumulative construction-related noise impacts.
- Related Project No. 8 (Ivar Gardens Hotel Project) is located at 6409 Sunset Boulevard, approximately 720 feet northwest of the Project Site. There are sensitive receptors located along Sunset Boulevard (represented by receptor locations R5 and R6), which are located between both the Project Site and Related Project No. 8. As analyzed above, the Project-

¹⁴⁶ Estimated noise at receptor location R2 due to the Related Project No. 3 is equal to 83 dBA minus $20 \cdot \log(320/65)$ distance loss and minus 15 dBA (noise barrier) = 54.2 dBA.

¹⁴⁷ City of Los Angeles, Palladium Residences Draft EIR, Chapter 4.I Noise, October 2014.

¹⁴⁸ City of Los Angeles, 6400 Sunset Boulevard Project Sustainable Communities Project CEQA Exemption, p. 15, September 2018.

related construction noise levels at receptor locations R5 (52.0 dBA) and R6 (66.5 dBA) would be well below the 75-dBA significance threshold. In addition, Related Project No. 8 would be required to implement mitigation measures to reduce the construction noise impacts to less than significant impacts.¹⁴⁹ Furthermore, there are existing buildings along Sunset Boulevard, which would shield the construction noise between the Project and Related Project No. 8. Construction noise levels from Related Project No. 8 at the receptor locations R5 and R6 are estimated to be approximately 60.2 dBA and 54.3 dBA, based on the reference construction noise level of 86 dBA at 50 feet, respectively. Therefore, cumulative construction noise levels at receptor locations R5 and R6 would be approximately 60.8 dBA (52.0 plus 60.2) and 66.8 dBA (66.5 plus 54.3), respectively. As such, construction-related noise from Related Project No. 8 would not contribute to cumulative construction-related noise impacts.

- Related Project No. 11 (Artisan Hollywood Project) is located at 1520 Cahuenga Boulevard, approximately 780 feet northwest of the Project Site. There are sensitive receptors located along Sunset Boulevard (represented by receptor locations R5 and R6), which are located between both the Project Site and Related Project No. 11. As analyzed above, the Project-related construction noise levels at receptor locations R5 (52.0 dBA) and R6 (66.5 dBA) would be well below the 75-dBA significance threshold. In addition, Related Project No. 11 would also be required to implement mitigation measures to reduce the construction noise impacts at nearby noise sensitive receptors.¹⁵⁰ Furthermore, there are existing buildings along Sunset Boulevard, which would shield the construction noise between the Project Site and Related Project No. 11. Construction noise levels from Related Project No. 11 at the receptor locations R5 and R6 are estimated to be approximately 53.6 dBA and 48.7 dBA, based on the reference construction noise level of 86 dBA at 50 feet, respectively. The cumulative construction noise levels at receptor locations R5 and R6 would be approximately 55.9 dBA (52.0 plus 53.6) and 66.6 dBA (66.5 plus 48.7), respectively. Therefore, construction-related noise from Related Project No. 11 would not contribute to cumulative construction-related noise impacts.

Based on the above, cumulative noise impacts associated with on-site construction would be less than significant.

In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would have the potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. Based on the existing daytime ambient noise level of 67.5 dBA (L_{eq}) along Vine Street, 69.8 dBA (L_{eq}) along Sunset Boulevard, 67.5 dBA (L_{eq}) along Hollywood Boulevard, and 69.8 dBA (L_{eq}) along Santa Monica Boulevard, it is estimated that if the cumulative truck trips would add up to 136, 231, 136, and 197 haul truck trips per hour along Vine Street, Sunset Boulevard, Hollywood Boulevard, and Santa Monica Boulevard, respectively, the ambient noise levels would increase by 5 dBA and would exceed the significance criteria. As indicated above, the Project would generate up to 27 haul truck trips per hour in connection with its proposed excavation phase. There are three related projects in the vicinity of the Project Site, which could utilize the same truck routes, including Related Project No. 2, Related Project No. 3, and Related Project No. 5. Related Project No. 3 would generate 35 truck trips per hour along Vine Street and Sunset Boulevard and

¹⁴⁹ City of Los Angeles, Hollywood Ivar Gardens Project Initial Study/Mitigated Negative Declaration, Chapter XII Noise, June 2016.

¹⁵⁰ City of Los Angeles, Artisan Hollywood Project Draft EIR, Chapter IV.G Noise, September 2022.

Related Project No. 5 would generate 30 truck trips per hour along Sunset Boulevard.^{151, 152} There is no available information regarding construction truck trips for Related Project No. 2. However, the construction truck trips for Related Project No. 2 would likely be less than Related Project Nos. 3 and 5, as it is a smaller development. Therefore, the potential cumulative increase in total truck trips is not anticipated to reach 136 truck trips per hour along Vine Street or Hollywood Boulevard, 231 truck trips along Sunset Boulevard, and 197 truck trips along Santa Monica Boulevard. As such, cumulative off-site construction noise impacts would be less than significant.

Operational Noise

The Project Site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. Similar to the Project, each of the related projects that have been identified in the vicinity of the Project Site would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. All related projects include residential, retail, or commercial uses, and these uses are not typically associated with excessive exterior noise levels. However, each related project would produce traffic volumes that are capable of generating roadway noise impacts. The potential cumulative noise impacts associated with on-site and off-site noise sources are addressed below.

Due to provisions set forth in the LAMC that limit stationary source noise from items such as rooftop mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, as discussed above, noise impacts associated with operations within the Project Site would be less than significant. Therefore, based on the distance of the related projects from the Project Site and the operational noise levels associated with the Project, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

The Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from “Existing” conditions to “Future Plus Project” conditions to the applicable significance criteria. Table 27 on page 286 presents the cumulative off-site traffic noise impacts. As indicated in Table 27, the estimated increase in traffic-related noise levels due to cumulative traffic volumes would result in a maximum noise increase of 2.0 dBA along the roadway segment of De Longpre Avenue (between Cahuenga Boulevard and Vine Street), which would be well below the 5-dBA CNEL significance criteria. The cumulative traffic noise increase at other analyzed roadway segments would be 1.8 dBA or lower and below the applicable significance threshold. Therefore, off-site traffic noise impacts associated with the cumulative traffic would be less than significant.

¹⁵¹ City of Los Angeles, 1360 N. Vine Project Draft EIR, Chapter IV.H Noise, Table IV.H-12, June 2022.

¹⁵² City of Los Angeles, Palladium Residences Draft EIR, Chapter 4.I Noise, Page 4.I-27, October 2014. Hourly truck trips equal to 180 haul truck trips per day divided by 6 hours hauling.

Table 27
Cumulative Off-Site Roadway Traffic Noise Impacts

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels, ^a CNEL (dBA)		Increase in Noise Levels due to Cumulative Traffic, dBA (CNEL)	Significant Impact?
		Existing Conditions	Future Cumulative Plus Project		
Vine Street					
Between Hollywood Blvd. and Sunset Blvd.	Residential	68.7	69.7	1.0	No
Between Sunset Blvd. and Leland Way	Residential	68.8	69.9	1.1	No
Between Leland Way and De Longpre Ave.	Commercial	68.5	69.7	1.2	No
Between De Longpre Ave. and Fountain Ave.	Residential	68.4	69.5	1.1	No
El Centro Avenue					
Between Sunset Blvd. and Leland Way	Residential	61.1	62.0	0.9	No
Between Leland Way and De Longpre Ave.	Residential	60.9	61.8	0.9	No
Sunset Boulevard					
Between Cahuenga Blvd. and Vine St.	Residential, School	69.2	69.7	0.5	No
Between Vine St. and El Centro Ave.	Residential	69.6	70.1	0.5	No
Leland Way					
Between Vine St. and El Centro Ave.	Residential	58.7	60.3	1.6	No
De Longpre Avenue					
Between Cahuenga Blvd. and Vine St.	Residential	60.6	62.6	2.0	No
Between Vine St. and El Centro	Residential, Hospital	58.5	60.3	1.8	No

^a Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix J of this SCEA.
Source: AES, 2023.

Construction Vibration

Groundborne vibration decreases rapidly with distance. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site (i.e., within 20 feet as related to building damage).¹⁵³ The nearest related project is Related Project No. 2, which is located approximately 40 feet from the Project Site and 170 feet from the historic Bank of America building to the west (nearest historic structure). Due to the rapid attenuation characteristics of groundborne vibration, Related Project No. 2 would not contribute to the cumulative construction vibration impacts. Therefore, the cumulative construction vibration impact with respect to building damage associated with on-site construction would be less than significant.

Trucks from the related projects are expected to generate similar groundborne vibration levels as the Project along the anticipated haul route, i.e., Vine Street, Sunset Boulevard, Hollywood Boulevard, and Santa Monica Boulevard. As analyzed above, vibration levels generated by the Project’s haul trucks along the haul route would be below the significance criteria for building damage. The vibration level generated by the related project’s haul trucks would be expected to be the same as those of the Project. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul routes would be below the building damage significance criteria of 0.12 PPV (for buildings extremely susceptible to vibration). Therefore, the cumulative vibration impact from off-site construction would be less than significant.

Conclusion

Based on the above, cumulative noise impacts associated with on-site and off-site construction noise, on-site and off-site operation noise, and on-site and off-site vibration would be less than significant.

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹⁵³ Distances calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage (i.e., historic structures).

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

- PMM POP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
 - b) Prioritize the use existing ROWs, wherever feasible.
 - c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.
 - d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).
 - e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.

Applicability to the Project

As discussed below, the Project would demolish the existing duplex located at 6253–6255 Leland Way, which is vacant. Therefore, the Project would not displace people. In addition, the Project would replace the existing commercial uses and duplex with 170 new dwelling units (inclusive of 26 Very Low-Income Households and 8 Low Income Households), resulting in a net increase of residential units compared to existing conditions. Therefore, the Project would not displace persons and Mitigation Measure PMM POP-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

- PMM POP-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
 - b) Prioritize the use of existing ROWs, wherever feasible.
 - c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between ROW acquisition and construction.

- d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead agency and encouraged by the SCS (primarily TPAs, where applicable).
- e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.

Applicability to the Project

As discussed below, the Project would demolish the existing duplex located at 6253–6255 Leland Way, which is vacant. Therefore, the Project would not displace people. In addition, the Project would replace the existing commercial uses and duplex with 170 new dwelling units (inclusive of 26 Very Low-Income Households and 8 Low Income Households), resulting in a net increase of residential units compared to existing conditions. Therefore, Mitigation Measure PMM POP-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

a. Would the project 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. The Project would include the development of a new 201,134-square-foot mixed-use building comprised of 170 residential units (inclusive of 26 Very Low-Income Households and 8 Low Income Households) and 16,680 square feet of ground-floor commercial space. The construction of new residential units would increase the residential population within the Project Site and vicinity.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. Regarding future growth, SCAG's 2020–2045 RTP/SCS provides population, housing, and employment projections for cities under its jurisdiction through 2045. The growth projections in the 2020–2045 RTP/SCS reflects the 2017 American Community Survey, employment data from the California Employment Development Department, population, and household data from the California Department of Finance, and extensive input from local jurisdictions in SCAG's planning area. On April 4, 2024, SCAG's Regional Council adopted the 2024-2050 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2050. The growth projections in the 2024–2050 RTP/SCS reflects the 2020 Census, employment data from the California Employment Development Department, population, and household data from the California Department of Finance, American Community Survey, and extensive input from local jurisdictions in SCAG's planning area.¹⁵⁴ The Project Site is located in SCAG's City of Los Angeles Subregion.

¹⁵⁴ SCAG formally adopted the 2024-2050 RTP/SCS April 2024. The 2024-2050 RTP/SCS has yet to be adopted by CARB. As such, both SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS are considered in this discussion.

Population

According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2023 is approximately 4,135,955 persons.¹⁵⁵ In 2026, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,222,593.¹⁵⁶ Therefore, the projected population growth between 2023 and 2026 is approximately 86,638 persons.¹⁵⁷ Based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 383 residents.¹⁵⁸ The estimated 383 new residents generated by the Project would represent approximately 0.44 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2023 and 2026.¹⁵⁹ The Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's 2020–2045 population projection for the City of Los Angeles Subregion.

According to SCAG's 2024–2050 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2023 is approximately 3,957,000 persons.¹⁶⁰ As projected by the 2024–2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 3,994,350 persons in 2026, the projected occupancy year of the Project.¹⁶¹ Therefore, the projected population growth between 2023 and 2026 is approximately 37,350 persons.¹⁶² Based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 383 residents.¹⁶³ The estimated 383 new residents generated by the Project would represent approximately 1.03 percent of the population growth forecasted by SCAG's 2024–2050 RTP/SCS in the City of Los Angeles Subregion between 2023 and 2026. As discussed above, the Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's 2024–2050 population projection for the City of Los Angeles Subregion.

¹⁵⁵ SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's 2016–2045 population data for 2016 (3,933,800) and 2045 (4,771,300), the 2023 value for population is extrapolated from 2016 and 2045 values: $[(4,771,300 - 3,933,800) \div 29] * 7 + 3,933,800 = \sim 4,135,955$.

¹⁵⁶ SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's population data for 2016 (3,933,800) and 2045 (4,771,300). The 2026 value is extrapolated from 2016 and 2045 values: $[(4,771,300 - 3,933,800) \div 29] * 10 + 3,933,800 = \sim 4,222,593$.

¹⁵⁷ The projected population growth between 2023 and 2026 is approximately 86,638 ($4,222,593 - 4,135,955 = 86,638$).

¹⁵⁸ City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.

¹⁵⁹ $413 \div 86,638 \times 100\% = 0.48\%$

¹⁶⁰ SCAG. 2024-2050 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 39. Based on a linear interpolation of SCAG's 2019–2035 population data for 2019 (3,907,200) and 2035 (4,106,400), the 2023 value for population is extrapolated from 2019 and 2035 values: $[(4,106,400 - 3,907,200) \div 16] * 4 + 3,907,200 = \sim 3,957,000$.

¹⁶¹ SCAG. 2024-2050 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 39. Based on a linear interpolation of SCAG's 2019–2035 population data for 2019 (3,907,200) and 2035 (4,106,400), the 2026 value for population is extrapolated from 2019 and 2035 values: $[(4,106,400 - 3,907,200) \div 16] * 7 + 3,907,200 = \sim 3,994,350$.

¹⁶² The projected population growth between 2023 and 2026 is approximately 37,350 ($3,994,350 - 3,957,000 = 37,350$).

¹⁶³ City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.

Housing

According to the 2020–2045 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2023 is approximately 1,469,828 households.^{164,165} In 2026, the projected buildout of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,513,897 households.¹⁶⁶ Therefore, the projected household growth in the City between 2023 and 2026 is approximately 44,069 households. The Project’s 170 residential households added by the Project would constitute approximately 0.39 percent of the housing growth forecasted between 2023 and 2026 by SCAG’s 2020–2045 RTP/SCS. The Project would also assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area well-served by transit. Therefore, the Project’s households would be well within SCAG’s 2020–2045 household projection for the City of Los Angeles Subregion.

According to the 2024–2050 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2023 is approximately 1,473,800 households.^{167,168} As projected by the 2024–2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 1,530,200 households in 2026, the projected occupancy year of the Project.¹⁶⁹ Therefore, the projected household growth in the City between 2023 and 2026 is approximately 56,400 households. The Project’s 170 residential households added by the Project would constitute approximately 0.30 percent of the housing growth forecasted between 2023 and 2026 by SCAG’s 2024–2050 RTP/SCS. The Project would also assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area well-served by transit. Therefore, the Project’s households would be well within SCAG’s 2024–2050 household projection for the City of Los Angeles Subregion.

Employment

In addition to the residential population, operation of the Project would generate new employment positions, which could result in increased population growth in the area. Based on employee generation factors from the City of Los Angeles Department of Transportation Vehicle Miles Traveled Calculator,

¹⁶⁴ SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG’s 2016–2045 household data for 2016 (1,367,000) and 2045 (1,793,000), the 2023 value for housing is extrapolated from 2016 and 2045 values: $[(1,793,000 - 1,367,000) \div 29] * 7 + 1,367,000 = \sim 1,469,828$.

¹⁶⁵ SCAG forecasts “households,” not housing units. As defined by the U.S. Census Bureau, “households” are equivalent to occupied housing units.

¹⁶⁶ SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG’s household data for 2016 (1,367,000) and 2045 (1,793,000). The 2026 value is extrapolated from 2016 and 2045 values: $[(1,793,000 - 1,367,000) \div 29] * 10 + 1,367,000 = \sim 1,513,897$.

¹⁶⁷ SCAG. 2024-2050 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 39. Based on a linear interpolation of SCAG’s 2019–2050 household data for 2019 (1,398,600) and 2035 (1,699,400), the 2023 value for housing is extrapolated from 2019 and 2035 values: $[(1,699,400 - 1,398,600) \div 16] * 4 + 1,398,600 = \sim 1,473,800$.

¹⁶⁸ SCAG forecasts “households,” not housing units. As defined by the U.S. Census Bureau, “households” are equivalent to occupied housing units.

¹⁶⁹ SCAG. 2024-2050 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 39. Based on a linear interpolation of SCAG’s 2019–2035 household data for 2019 (1,398,600) and 2050 (1,699,400), the 2026 value for housing is extrapolated from 2019 and 2050 values: $[(1,699,400 - 1,398,600) \div 16] * 7 + 1,398,600 = \sim 1,530,200$.

the Project's 16,680 square feet of ground-floor commercial space would generate approximately 33 new employees.¹⁷⁰ According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 is approximately 1,917,721 employees.¹⁷¹ In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,472 employees.¹⁷² Therefore, the projected employment growth in the City between 2023 and 2026 based on SCAG's 2020–2045 RTP/SCS is approximately 29,751 employees. Thus, the Project's estimated 33 new employees would constitute approximately 0.11 percent of the employment growth forecasted between 2023 and 2026.

According to the 2024–2050 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 is approximately 1,995,450 employees.¹⁷³ In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 2,026,538 employees in 2026, the projected occupancy year of the Project.¹⁷⁴ Therefore, the projected employment growth in the City between 2023 and 2026 based on SCAG's 2024–2050 RTP/SCS is approximately 31,088 employees. Thus, the Project's estimated 33 new employees would constitute approximately 0.11 percent of the employment growth forecasted between 2023 and 2026.

The provision of new jobs would constitute a small percentage of employment growth. It would not be considered “unplanned growth” and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. ***As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial unplanned population or housing growth, and impacts would be less than significant.***

¹⁷⁰ Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 2 employees per 1,000 square feet of “General Retail.” It is noted that existing uses within the Project Site include commercial retail and restaurant uses, which would be removed as part of the Project; however, for conservative purposes, this analysis does not account for the commercial uses to be removed.

¹⁷¹ SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's 2016–2045 employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2023 value is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 7 + 1,848,300 = \sim 1,917,721$.

¹⁷² SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's 2016–2045 employment data for 2016 (1,367,000) and 2045 (1,793,000). The 2026 value for employment is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 10 + 1,848,300 = \sim 1,947,472$.

¹⁷³ SCAG. 2024-2050 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 39. Based on a linear interpolation of SCAG's 2019–2035 employment data for 2019 (1,954,000) and 2035 (2,119,800). The 2023 value is extrapolated from 2019 and 2035 values: $[(2,119,800 - 1,954,000) \div 16] * 4 + 1,954,000 = \sim 1,995,450$.

¹⁷⁴ SCAG. 2024-2050 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 39. Based on a linear interpolation of SCAG's 2019–2050 employment data for 2019 (1,954,000) and 2035 (2,119,800). The 2026 value is extrapolated from 2019 and 2035 values: $[(2,119,800 - 1,954,000) \div 16] * 7 + 1,954,000 = \sim 2,026,538$.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with residential and commercial uses. The Project Site includes a vacant duplex that will be demolished as part of the Project. As this residential use is vacant, the Project would not displace any existing people. The Project would construct 170 new residential units (inclusive of 26 Very Low-Income Households and 8 Low Income Households), and would result in a net increase of residential units compared to existing conditions. **Therefore, no impacts related to displacement of people would occur.**

Cumulative Impacts

Less Than Significant Impact. The cumulative analysis takes into consideration the 45 related projects listed in Table 33 on page 367 and shown in Figure 17 on page 370 of this SCEA. The related projects consist of residential, commercial/retail, mixed-use, hotel, and institutional uses. However, these related projects are not of a scale that would result in an exceedance of SCAG’s projection populations, as they would include a relatively small number of housing units. Furthermore, as discussed above, the Project would not induce population growth beyond that included in SCAG’s population projections contained in the 2020–2045 and 2024–2050 RTP/SCS. **As such, the Project would not directly or indirectly contribute to significant cumulative impacts associated with population and housing, and cumulative impacts 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, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider

mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.
- b) Where current levels of services at the Project Site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.
- c) Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.

Applicability to the Project

As analyzed below, existing facilities can provide acceptable fire and emergency response services for the Project. Furthermore, the Project would be subject to existing regulations included in the City's Fire Code and LAMC related to emergency access. In addition, the Project would include the preparation and implementation of a Construction Traffic Management Plan, which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Adherence to applicable regulatory requirements would be equal to or more effective than the measures outlined above in Mitigation Measure PMM PSP-1 from the 2020–2045 RTP/SCS PEIR, and thus, it would not be applicable to the Project.

PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.

Applicability to the Project

Consistent with Mitigation Measure PMM PSS-1 from the 2020–2045 RTP/SCS PEIR and as discussed below, the Project Applicant shall pay required school fees to the Los Angeles Unified School District pursuant to SB 50. As the existing regulatory requirement regarding the payment of school fees would

be equal to or more effective than Mitigation Measure PMM PSS-1 from the 2020–2045 RTP/SCS PEIR, this measure is not applicable to the Project.

PMM REC-1: In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
- b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
 - i. Increasing the accessibility to natural areas for outdoor recreation
 - ii. Utilizing “green” development techniques
 - iii. Promoting water-efficient land use and development
 - iv. Encouraging multiple uses, such as the joint use of schools
 - v. Including trail systems and trail segments in General Plan recreation standards.

Applicability to the Project

Consistent with Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR, the Project would comply with all regulatory compliance measures (dedication of parkland or payment of in-lieu fees) to offset the Project’s demand on parks and recreational facilities. In addition, the Project would provide open space areas as part of the Project that could be used for outdoor recreation. The Project would also utilize sustainable development techniques and promote water efficiency. Thus, while the Project would be consistent with the relevant measures of Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR, compliance with existing regulatory requirements, which already require the Project to incorporate features outlined in this mitigation measure would be equal to more effective than incorporation of Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.

Applicability to the Project

As evaluated below, the Project would not result in significant impacts to library services. As such, mitigation is not required, and this mitigation measure is not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM PSP-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered fire and police facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Coordinate with fire and police protection services agencies to ensure that there are adequate facilities to maintain acceptable service ratios, response times or other performance objectives for fire and police protection services and that any required additional construction of buildings is incorporated into the project description.
- b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements for fire and police protection services facilities, as appropriate and applicable, to mitigate identified CEQA impacts.

Applicability to the Project

As analyzed below, existing facilities can provide acceptable fire and police protection services for the Project. Furthermore, the Project would be subject to existing regulations included in the City's Fire Code and LAMC related to emergency access. In addition, the Project would include the preparation and implementation of a Construction Traffic Management Plan, which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Adherence to applicable regulatory measures would be equal to or more effective than Mitigation Measure PMM PSP-1 from the 2024–2050 RTP/SCS PEIR, and thus, it would not be applicable to the Project.

PMM PS-2: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Where construction or expansion of school facilities is required to meet public school service ratios, support expansion of such facilities, for example by ensuring safe routes to schools.

Applicability to the Project

Consistent with Mitigation Measure PMM PS-2 from the 2024–2050 RTP/SCS PEIR and as discussed below, the Project Applicant shall pay required school fees to the Los Angeles Unified School District pursuant to SB 50. As the existing regulatory requirement regarding the payment of school fees would be equal to or more effective than Mitigation Measure PMM PS-2 from the 2024–2050 RTP/SCS PEIR, this measure is not applicable to the Project.

Impact Analysis

a. Fire Protection?

Less Than Significant Impact. The analysis below relies on the following metrics from the LAFD to assess potential demands on fire protection and emergency medical services: the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels; emergency access; and fire flow requirements. The analysis is based, in part on information available on the LAFD website; information obtained through consultation with the Los Angeles Fire Department (LAFD) in written correspondence dated September 20, 2023 (included as Appendix K.1 of this SCEA), and the Water and Sewer Infrastructure Assessment Report (Utility Report), dated December 2022 (included as Appendix N of this SCEA).¹⁷⁵

LAFD provides fire protection and emergency medical services for the Project Site. Based on LAFD's website, the designated "first-in" station for the Project Site is Fire Station No. 27, located at 1327 North Cole Avenue, approximately 0.6 mile southwest of the Project Site. In addition, Fire Station No. 82 is located approximately 0.8 mile northeast of the Project Site at 5789 Hollywood Boulevard.¹⁷⁶ Secondary fire stations that could serve the Project Site include Fire Station No. 41, located at 1439 North Gardner Street approximately 1.6 miles west of the Project Site and Fire Station No. 52, located at 4957 Melrose Avenue approximately 2 miles southeast of the Project Site.¹⁷⁷ According to the LAFD, based on response distance from existing fire stations, fire protection for the Project Site would be considered adequate.¹⁷⁸

Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during

¹⁷⁵ Fuscoe Engineering, Water and Wastewater Infrastructure Assessment Report, Sunset and Vine 2, 6262 W. Sunset Boulevard, City of Los Angeles, California, December 2022. See Appendix N of this SCEA.

¹⁷⁶ Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 20, 2023. See Appendix K.1 of this SCEA.

¹⁷⁷ Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 20, 2023. See Appendix K.1 of this SCEA.

¹⁷⁸ Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 20, 2023. See Appendix K.1 of this SCEA.

construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.¹⁷⁹ Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.¹⁸⁰ Project construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage and management of potentially flammable or explosive hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, construction could require temporary lane and/or sidewalk closures adjacent to the Project Site. A Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Traffic Management Plan would be prepared by the Applicant for approval by LADOT prior to the issuance of any construction permits. In addition, the Construction Traffic Management Plan would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Applicant would coordinate plan details with emergency services and affected transit providers to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Thus, based on the above, Project construction would not affect fire protection services to the extent that new or physically altered fire facilities would be needed to maintain acceptable service ratios, response distances, or other performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.

Operation

Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 27, the “first-in” station for the Project Site, located approximately 0.6 mile southwest of the Project Site. Fire Station No. 27 is currently equipped with a Task Force, Paramedic Rescue Ambulance, BLS Rescue Ambulance, and Urban Search and Rescue. As described below, Fire Station No. 27 falls within the required 1.0-mile engine

¹⁷⁹ United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.150, accessed August 8, 2024.

¹⁸⁰ United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.150, accessed August 8, 2024.

company and 1.5-mile truck company response distances from the Project Site and would be available to serve the Project in the event of an emergency. As described in Section 3, Project Description, of this SCEA, the Project involves the development of 170 residential and live-work units (inclusive of 26 Very Low-Income Households and 8 Low Income Households) and 16,680 square feet of ground-floor commercial space. As such, the Project would result in an increase in the on-site service population within the service area of Fire Station No. 27.

While the Project's residential and employee population would increase the demand for LAFD fire protection and emergency medical services, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communication systems etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118 and which are required prior to the issuance of a building permit. The Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways. Compliance with applicable regulatory requirements, including LAFD's fire/life safety inspection for the Project would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new facilities. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In addition, as confirmed in the written correspondence from the LAFD, the City and LAFD would continue to monitor the demand for existing and projected fire facilities and coordinate the development of new fire facilities to be phased with growth. As such, Project impacts regarding LAFD facilities and equipment would be less than significant.

Emergency Access

As described in Section 3, Project Description, of this SCEA, vehicular access to the Project Site, including emergency vehicle access, would be provided from two driveways on Leland Way located to the south of the Project Site, where one parking entry would be designated for residential uses and the other parking entry would be designated for commercial uses. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Compliance with such requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118, prior to the issuance of any building permit. Additionally, operation of the Project would not include the installation of any barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operations. Additionally, while the Project would create additional trips to and from the Project Site in the surrounding street system, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature.

Therefore, the street system surrounding the Project Site is not considered substandard and would allow drivers of emergency vehicles various paths for circulating around traffic. In particular, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, emergency access to the Project Site and surrounding area would be maintained, and Project impacts with regard to emergency access would be less than significant.

Fire Flow

Domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. Fire water flow requirements vary from 2,000 gallons per minute for low density residential developments to 12,000 gallons per minute for high density industrial and commercial (principal business districts or centers) developments. Specifically, Low Density Residential developments have a required fire flow of 2,000 gallons per minutes from three adjacent fire hydrants flowing simultaneously; High Density Residential and Neighborhood Commercial developments have a required fire flow of 4,000 gallons per minute from four adjacent fire hydrants flowing simultaneously; Industrial and Commercial developments have a required fire flow of 6,000 gallons per minute to 9,000 gallons per minute from four to six fire hydrants flowing simultaneously; and High Density Industrial and Commercial (Principal Business Districts or Centers) developments have a required fire flow of 12,000 gallons per minute available to any block.

As discussed in the Utility Report, based on the fire flow standards set forth by LAMC Section 57.507.3 and the proposed development of a residential mixed-use development, the Project would fall under the High Density Residential and Neighborhood Commercial development category, which requires a fire flow of 4,000 gallons per minute from four adjacent fire hydrants flowing simultaneously. However, as indicated by the LAFD in their written correspondence provided in Appendix K.1 of this SCEA, the LAFD has identified a fire flow for the Project Site of 12,000 gallons per minute (gpm), which corresponds to High Density Industrial and Commercial (Principal Business Districts or Centers) developments, and is not consistent with the type of development proposed as part of the Project.

As discussed in the Utility Report included as Appendix N of this SCEA, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated needs. Based on the completed IFFAR (included as Exhibit B of Appendix N of this SCEA), the four existing fire hydrants near the Project Site can provide a combined 6,000 gpm with the four fire hydrants flowing simultaneously. Therefore, based on the IFFAR, there is adequate fire flow and pressure available for the Project to comply with the fire flow requirements pursuant to LAMC Section 57.507.3. Furthermore, the Project would incorporate a fire sprinkler suppression system in the proposed buildings, which would be subject to LAFD review and approval during the design and permitting of the Project, and which would serve to reduce the Project's public hydrant demand.

Based on the analysis above, Project construction and operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service and would not inhibit emergency response. Therefore, construction and operation of the Project would not result in substantial adverse impacts associated with the provision of a new physically altered governmental facility, the construction of which would

cause significant environmental impacts, to maintain acceptable fire protection services, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impact analysis for fire protection is the service area of Fire Station No. 27, which is the designated “first-in” station for the Project Site based on distance from the Project Site. As noted above, other fire stations in the vicinity of the Project Site include Fire Station No. 82, located approximately 0.8 mile northeast of the Project Site at 5789 Hollywood Boulevard; Fire Station No. 41, located approximately 1.6 miles west of the Project Site at 1439 North Gardner Street; and Fire Station No. 52, located approximately 2 miles southeast of the Project Site at 4957 Melrose Avenue. Given the location of the related projects, not all related projects would be located in proximity to Fire Station No. 27; some of the related projects would be located closer to other fire stations in the vicinity of the Project Site. As such, Fire Station No. 27 would not be the “first-in” station for all related projects. Notwithstanding, the increase in development and residential service populations from the Project, related projects, and other future development in the service areas of the above-mentioned fire station would result in a cumulative increase in the demand for overall LAFD services. However, similar to the Project, related projects, and other future development projects would be subject to the City’s standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

As with the Project, the related projects and other future development projects in the vicinity would also generate revenues to the City’s General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.¹⁸¹ Cumulative increases in demand for fire protection services due to related projects and other future development projects would be identified and addressed through the City’s annual programming and budgeting processes. LAFD resource needs would be identified, and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. ***Thus, compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and the Project’s contribution to cumulative impacts would not be cumulatively considerable.***

b. Police Protection?

Less Than Significant Impact. The LAPD service area covers approximately 468 square miles and is divided into four geographic bureaus: the Central Bureau, the West Bureau, the South Bureau, and

¹⁸¹ City of Los Angeles, Proposed Budget for the Fiscal Year 2024-2025.

the Valley Bureau.¹⁸² The Project Site is located within the West Bureau of the LAPD, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents.¹⁸³ The West Bureau oversees operations in Hollywood, Wilshire, Pacific and West Los Angeles service areas as well as the West Traffic Division. The Project Site is located within the Hollywood Area of the West Bureau and is served by the Hollywood Community Police Station. The Hollywood Community Police Station is located at 1358 N. Wilcox Avenue, approximately 0.4 mile west of the Project Site. The Hollywood Area includes a service population of approximately 300,000 persons and is staffed by approximately 302 sworn officers and 15 civilian support staff.¹⁸⁴ As such, the officer-to-resident ratio in the Hollywood Area is 1 officer per every 993 residents.

Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Area as construction workers move from job site to job site and would not relocate their place of residence as a result of working on the Project. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of this security measure, potential impacts associated with theft and vandalism during construction activities would be reduced.

Also, as previously discussed above under the Project's potential construction-related impacts to fire protection, construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, construction could require temporary lane and/or sidewalk closures adjacent to the Project Site. A Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 included below in Item XVII, Transportation, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Traffic Management Plan would be prepared by the Applicant for approval by LADOT prior to the issuance of any construction permits. In addition, the Construction Traffic Management Plan would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Applicant would coordinate plan details with emergency services and affected transit providers to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Based on the above, Project construction would not affect police protection services to the extent that new or physically altered fire facilities would be needed to maintain acceptable

¹⁸² LAPD, LAPD Organization Chart, www.lapdonline.org/lapd-organization-chart/, accessed August 8, 2024.

¹⁸³ LAPD, About West Bureau, www.lapdonline.org/lapd-contact/west-bureau/, accessed August 8, 2024.

¹⁸⁴ Written Correspondence from Billy B. Brockway, Office of Operations, Los Angeles Police Department, October 5, 2023. See Appendix K.2 of this SCEA.

service ratios, response distances, or other performance objectives for fire protection services. Therefore, construction-related impacts on police protection would be less than significant.

Operation

As discussed in Section 3, Project Description, of this SCEA, the Project involves the development of a new 201,134-square-foot mixed-use building comprised of 170 residential and live-work units (inclusive of 26 Very Low-Income Households and 8 Low Income Households) and 16,680 square feet of ground-floor commercial space. Thus, the Project would introduce a new residential population to the Hollywood Area of LAPD's West Bureau.¹⁸⁵ The Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities.

As previously discussed, the Project Site is under the jurisdiction of the LAPD's Hollywood Community Police Station, which is staffed by approximately 302 sworn officers and 15 civilian support staff. The Hollywood Community Police Station has a service population of approximately 300,000 residents. As such, the officer-to-resident ratio in the Hollywood Area is 1 officer per every 993 residents. As discussed above under Item XIV, Population and Housing, implementation of the Project would result in 413 new residents. This would increase the existing LAPD service population in the Hollywood Area from approximately 300,000 persons to approximately 300,413 persons. With the increase in the police service population, the officer-to-resident ratio for the Hollywood Area would be reduced from approximately one officer for every 993 residents¹⁸⁶ to approximately one officer for every 995 residents.¹⁸⁷

As outlined below, Project Design Features POL-PDF-2 through POL-PDF-6 would be implemented as part of the Project and would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of the buildings and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the buildings. The Project would also design entrances to, and exits from, the buildings and open spaces areas, to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Feature POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. The Project's design features would help offset the Project-related increase in demand for police services. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features as well as the Project's

¹⁸⁵ The LAPD considers the residential population within their service area to evaluate service capacity. However, in addition to the Project's residential population, this analysis also considers the Project's daytime employee population to provide a conservative analysis of Project-level impacts.

¹⁸⁶ $300,000 \text{ residents} \div 302 \text{ officers} = 993 \text{ officers per resident} = 1 \text{ officer for every } 993 \text{ residents.}$

¹⁸⁷ $300,413 \text{ with Project residents} \div 302 \text{ officers} = 995 \text{ officers per resident} = 1 \text{ officer for every } 995 \text{ residents.}$

contribution to the General Fund would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant.

As described in Section 3, Project Description, of this SCEA, vehicular access to the Project Site, including emergency vehicle access, would be provided from two driveways on Leland Way located to the south of the Project Site, where one parking entry would be designated for residential uses and the other parking entry would be designated for commercial uses. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Additionally, operation of the Project would not include the installation of any barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operations. Additionally, while the Project would create additional trips to and from the Project Site in the surrounding street system, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard and would allow drivers of emergency vehicles various paths for circulating around traffic. In particular, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, emergency access to the Project Site and surrounding area would be maintained, and Project impacts with regard to emergency access would be less than significant.

Project Design Features

- POL-PDF-1:** During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.
- POL-PDF-2:** The Project will include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas.
- POL-PDF-3:** The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between subterranean parking areas and points of entry into the building.
- POL-PDF-4:** The Project will provide sufficient lighting of the subterranean parking areas to maximize visibility and reduce areas of concealment.
- POL-PDF-5:** The Project will design entrances to, and exits from, the building and open space areas to be open and in view of surrounding areas.
- POL-PDF-6:** Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

Overall, based on the above, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in

substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Thus, impacts regarding police protection services and facilities would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The related projects listed in Table 33 on page 367 and shown in Figure 17 on page 370 of this SCEA fall within the boundaries of the Hollywood Area. It is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Like the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations that would help offset the increase in demand for police services. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified, and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. ***Therefore, the cumulative impact on police protection services would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

c. Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD) and would be served by Hollywood Elementary, located at 1115 Tamarind Avenue approximately 0.8 southeast of the Project Site; Grant Elementary School, located at 1530 North Wilton Place approximately 0.8 mile east of the Project Site; Joseph Le Conte Middle School, located at 1316 North Bronson Avenue approximately 0.7 mile southeast of the Project Site; and Hollywood Senior High, located at 1521 North Highland Avenue approximately 0.9 mile west of the Project Site.¹⁸⁸

As previously discussed, the Project would construct a new 201,134-square-foot mixed-use building comprised of 170 residential units (inclusive of 26 Very Low-Income Households and 8 Low Income Households) and 16,680 square feet of ground-floor commercial space. As such, the Project would directly generate students through the construction of 170 residential units. Based on LAUSD Student Generation rates, the Project would result in approximately 76 net elementary students, 42 net middle school students, and 11 net high school students, for a total of approximately 23 net students.¹⁸⁹ As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project

¹⁸⁸ LAUSD Unified, "Residential School Identifier," <https://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed August 9, 2024.

¹⁸⁹ Los Angeles Unified School District, 2024 School Impact Fee Justification Study, February 2024, Table 3 and Table 14.

residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options that are not accounted for that may be available to Project-generated students include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and centers, which are open to qualified students in the LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known childcare.

Additionally, pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. ***Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives for schools. Project-related impacts to schools would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. The related projects are located within the boundaries of LAUSD, and 21 of the 45 related projects would include a residential component. As discussed above, in accordance with SB 50, payment of developer impact fees would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the related projects would be required to pay school fees, which would fully mitigate any potential impacts to school facilities. ***Therefore, cumulative impacts associated with schools would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

d. Parks?

Less Than Significant Impact. The Project's potential impacts to parks during construction and operation of the Project are discussed below.

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Additionally, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population in the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts on parks during Project construction would be less than significant.

Operation

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the City of Los Angeles Department of Recreation and Parks (RAP). Nearby parks and recreational facilities within an approximately 2-mile radius of the Project Site include: Selma Park (located 0.40 mile); Carlton Way Park (located 0.48 mile); De Longpre Park (located 0.52 mile); Yucca Park (located 0.66 mile); Seily Rodriguez Park (located 0.78 mile); Dorothy & Benjamin Smith Park (located 1.01 miles); La Mirada Park (located 1.14 miles); Runyon Canyon Park (located 1.41 miles); Burns (Robert L.) Park (located 1.63 miles); Wattles Garden Park (located 1.71 miles); and Barnsdall Art Park (located 1.86 miles).¹⁹⁰

An increase in the use of existing parks and recreational facilities is directly associated with an increase in population. As discussed in Section 3, Project Description, of this SCEA, the Project would include the development of 170 residential units (inclusive of 26 Very Low-Income Households and 8 Low Income Households) and 16,680 square feet of ground-floor commercial space. As outlined above under Item XIV, Population and Housing, development of the proposed 170 residential units would result in approximately 413 residents.

As described in Section 3, Project Description, of this SCEA, the Project would provide 24,997 square feet of open space within the Project Site comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck on Level 3, and 4,538 square feet of interior tenant resident common areas on Levels 3 and 5, which would include a clubroom, clubhouse, and fitness

¹⁹⁰ City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator?cat_id=45&geo%5Bradius%5D=2&geo%5Blatitude%5D=34.0976033&geo%5Blongitude%5D=-118.3264572&address=1480%20Vine%20St%2C%20Los%20Angeles%2C%20CA%2090028%2C%20US, accessed February 21, 2023.

center. Per LAMC requirements, the Project is required to provide a minimum of 18,150 square feet of open space. As such, the Project would exceed the minimum open space requirements of the LAMC.

Due to the amount, variety, and availability of the proposed open space and recreational amenities to be provided within the Project Site, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's residents would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, while the Project's commercial component could result in a demand for parks and recreational facilities, the Project also includes publicly accessible open space, which would be available for use by other users of the Project Site. Furthermore, it is expected that employees of the commercial uses would prefer to use parks and recreational facilities near their place of residence when not at the Project Site. Additionally, the Project would comply with the City's Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505) for the provision of open space and to dedicate land and/or pay in-lieu fees for parks and recreational facilities.

Based on the above, through compliance with the City's requirements, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts. As such, the Project's potential impacts on parks would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As previously discussed, only 21 of the 45 related projects include a residential component, which would generate a direct demand for parks and recreational facilities. These related projects with residential components would be required by the LAMC to provide onsite residential open space and dedicated land for parks or pay park in-lieu fees, which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for parks as a result of the Project and related projects. ***Therefore, overall, the cumulative impact associated with parks would be less than significant, and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

e. Other Public Facilities?

Less Than Significant Impact. Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library and regional and neighborhood branch libraries, as well as through web-based resources. The Project area is served by existing LAPL facilities within the Hollywood Community Plan Area, including the Frances Howard Goldwyn–Hollywood Regional Library (located approximately

0.3 mile north of the Project Site), the Will & Ariel Durant Branch Library (located approximately 1.2 miles east of the Project Site), and the John C. Fremont Branch Library (located approximately 1.4 miles south of the Project Site).¹⁹¹

The new residential population generated by the Project could result in additional demand for library services provided by the LAPL. However, while the new residents generated by the Project would be anticipated to visit the library facilities serving the Project Site, not all residents would use the library or travel to the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.^{192,193} The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Also, while the Project's commercial component could result in a demand for library services, it is expected that employees of the commercial uses would prefer to use library facilities near their place of residence when not at the Project Site. Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. ***Therefore, with the installation of internet service capabilities throughout the Project Site and the generation of revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, the impact on library facilities during the operation of the Project would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. The residential population of a library's service area is the primary metric used by LAPL for assessing the adequacy of library services and planning for future growth (i.e., citing of new facilities). As previously discussed, only 21 of the 45 related projects include a residential component, which would generate a direct demand for library facilities. As with the Project, it is anticipated that the related projects with residential components would similarly be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library location. Employees generated by the non-residential related projects would be more likely to use libraries near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing library facilities in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for libraries as a result of the Project and related projects. **Therefore,**

¹⁹¹ Los Angeles Public Library, Find a Library, www.lapl.org/branches?distance%5Bpostal_code%5D=90028&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All, accessed August 9, 2024.

¹⁹² Denise A. Troll, How and Why Libraries are Changing: What We Know and What We Need to Know, Carnegie Mellon University, 2002.

¹⁹³ Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

the cumulative impact associated with libraries would be less than significant and the Project’s contribution to cumulative impacts would not be cumulatively considerable.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

- PMM REC-1:** In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
 - b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
 - i. Increasing the accessibility to natural areas for outdoor recreation
 - ii. Utilizing “green” development techniques
 - iii. Promoting water-efficient land use and development
 - iv. Encouraging multiple uses, such as the joint use of schools
 - v. Including trail systems and trail segments in General Plan recreation standards.

Applicability to the Project

Consistent with Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR, the Project would comply with all regulatory compliance measures (dedication of land for parks or payment of in-lieu fees) to offset the Project's demand on parks and recreational facilities. In addition, the Project would provide open space areas as part of the Project that would could be used for outdoor recreation. The Project would also utilize sustainable development techniques and promote water efficiency. Thus, while the Project would be consistent with the relevant measures of Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR, adherence to existing regulatory requirements, which already require the Project to incorporate features outlined in this mitigation measure would be equal to more effective than incorporation of Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM REC-1: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
- b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
 - i. Increasing the accessibility to natural areas for outdoor recreation
 - ii. Utilizing “green” development techniques
 - iii. Promoting water-efficient land use and development
 - iv. Encouraging multiple uses, such as the joint use of schools
 - v. Including trail systems and trail segments in General Plan recreation standards.

Applicability to the Project

Consistent with the measures outlined in Mitigation Measure PMM REC-1 from the 2024–2050 RTP/SCS PEIR, the Project would comply with all regulatory compliance measures associated with maintaining parks and recreational facilities. The Project would also utilize sustainable development techniques and promote water efficiency, and promote infill development. Thus, while the Project would be consistent with the relevant measures of Mitigation Measure PMM REC-1 from the 2024–2050

RTP/SCS PEIR, adherence to regulatory requirements (including the payment of park fees pursuant to LAMC Section 12.33) and implementation of elements of the Project would be equal to more effective than these measures, and no Project-specific impacts would occur. Thus, Mitigation Measure PMM REC-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

Impact Analysis

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?

Less Than Significant Impact. As previously discussed above under Item XV, Public Services, Parks, the Project would provide 24,997 square feet of open space within the Project Site comprised of 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck on Level 3, and 4,538 square feet of interior tenant resident common areas on Levels 3 and 5, which would include a clubroom, clubhouse, and fitness center. Per LAMC requirements, the Project is required to provide a minimum of 18,150 square feet of open space. As such, the Project would exceed the minimum open space requirements of the LAMC.

Due to the amount, variety, and availability of the proposed open space and recreational amenities to be provided within the Project Site, it is anticipated that Project residents and employees would generally utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to create a substantial increase in the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, the Project would be required to comply with the City's applicable park fee requirements regarding the provision of open space and to dedicate land and/or pay in-lieu fees for parks and recreational facilities, which would be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project resident's use of existing parks and recreational facilities and/or address any deterioration of those facilities. ***Thus, based on the above, the Project would not 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, and impacts would be less than significant.***

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. The Project would not require the construction or expansion of recreational facilities. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities and existing parks in the vicinity of the Project Site, as discussed above. The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect on the environment, as discussed throughout this SCEA. ***Therefore, the Project would not include recreational facilities or require the construction or expansion of***

recreational facilities which might have an adverse physical effect on the environment and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As previously discussed, the related projects with residential components would be required by the LAMC to provide residential open space and dedicate land for parks or pay park in-lieu fees, which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks and recreational facilities. Employees generated by the non-residential related projects would be more likely to use parks and recreational facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for parks as a result of the Project and related projects. ***Therefore, the Project's contribution to cumulative impacts associated with recreation would not be cumulatively considerable, and 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:
 - include TDM mitigation requirements for new developments;
 - incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;
 - provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
 - implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
 - develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
 - incorporate TDM performance measures in the decision-making process for identifying transportation investments;
 - implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
 - set aside funding for TDM initiatives.
 - The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.

Applicability to the Project

Consistent with Mitigation Measure PMM TRA-1 from the 2020–2045 RTP/SCS PEIR, and as provided in the Transportation Assessment prepared for the Project, included in Appendix L.1 of this SCEA, the applicable TDM strategy for the Project includes the provision of bicycle parking, which is required by the LAMC and would facilitate a reduction in the Project's VMT. Thus, compliance with existing applicable regulations (the City's Municipal Code) would be equal to or more effective than Mitigation Measure PMM TRA-1 from the 2020–2045 RTP/SCS PEIR, and therefore Mitigation Measure PMM TRA-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may

include the following or other comparable measures identified by the Lead Agency:

- a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
 - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
 - Scheduling of truck trips outside of peak morning and evening commute hours.
 - Limiting of lane closures during peak hours to the extent possible.
 - Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
 - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
 - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
 - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
 - Storage of construction materials only in designated areas.
 - Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
 - Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
 - Enhance emergency preparedness awareness among public agencies and with the public at large.

Applicability to the Project

The Project would be subject to the City's existing regulations that require the Project to comply with applicable requirements of the Fire Code, including providing adequate emergency access. In addition, as provided in the Transportation Assessment included in Appendix L.1 of this SCEA, the Project would include the preparation and implementation of a Construction Traffic Management Plan, as outlined in Project Design Feature TR-PDF-1, which would be reviewed and approved by LADOT and which would ensure that adequate emergency access exists during construction. As such, Mitigation Measure PMM TRA-2 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:

For future land use development projects, lead agencies to encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services in project designs, as well as encourage developers to provide information regarding the availability of these facilities and services to residents, tenants, and owners in order to facilitate increased access to and utilization of transit and active transportation services and facilities.

Applicability to the Project

As discussed below, the Project's potential impacts related to transportation would be less than significant. As such, Mitigation Measure PMM TRA-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:

- Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local jurisdictions should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:
 - Include TDM mitigation requirements for new developments;
 - Incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;

- Provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
- Implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
- Develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
- Incorporate TDM performance measures in the decision-making process for identifying transportation investments;
- Implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
- Set aside funding for TDM initiatives.

Applicability to the Project

Consistent with Mitigation Measure PMM TRA-2 from the 2024–2050 RTP/SCS PEIR, the Project would incorporate applicable TDM strategies in accordance with the City’s TDM Ordinance. This includes the provision of bicycle parking, which would facilitate reductions in the Project’s VMT, resulting in a less than significant impact. Thus, compliance with existing applicable regulations (the City’s Municipal Code) would be equal to or more effective than Mitigation Measure PMM TRA-2 from the 2024–2050 RTP/SCS PEIR, and Mitigation Measure PMM TRA-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

PMM TRA-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:

Prepare a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction’s applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).

Applicability to the Project

As discussed below, the Project’s potential impacts related to transportation would be less than significant. As such, Mitigation Measure PMM TRA-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

The following analysis is primarily based on the Supplemental Transportation Assessment (Transportation Assessment) prepared for the Project by Gibson Transportation Consulting, Inc., (Gibson), dated April 10, 2023, which is included as Appendix L.1 of this SCEA. LADOT reviewed and

concurred with the analysis of the Transportation Assessment. LADOT's letter regarding the Transportation Assessment is included in Appendix L.2 of this SCEA.

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. Pursuant to LADOT's 2022 Transportation Assessment Guidelines (TAG), in general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT.¹⁹⁴ Based on the TAG, a project would not be shown to result in an impact merely based on whether a project would not implement a particular program, plan, policy, or ordinance. As further set forth in the TAG, many of the programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans, and policies. Each of the documents listed in the TAG (Table 2.1-1) was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project's conformance with each.

Mobility Plan 2035

The Mobility Plan combines "complete street" principles with the following five goals that define the City's mobility priorities:

1. **Safety First:** Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
2. **World Class Infrastructure:** A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. **Access for All Angelenos:** A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. **Collaboration, Communication, and Informed Choices:** The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. **Clean Environments and Healthy Communities:** Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan identifies key corridors within the Project's transportation study area as components of various "mobility-enhanced networks." Though no new specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would be designed consistent with the mobility-enhanced

¹⁹⁴ Los Angeles Department of Transportation, Transportation Assessment Guidelines, August 2022, p. 2-2.

networks and would not impede the City's ability to implement improvements along the streets surrounding the Project Site.

The Mobility Plan also designates street and sidewalk width standards based on the functional classification. LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right of way standards consistent with the Mobility Plan. Adjacent to the Project Site, Sunset Boulevard is designated as an Avenue I, requiring a 100-foot right-of-way width and a 15-foot sidewalk width, and Vine Street is designated as an Avenue II, requiring a 86 foot right-of-way width and a 15-foot sidewalk width.¹⁹⁵ As discussed in Section 3, Project Description, of this SCEA, the Project is requesting an off-menu incentive to permit a 0-foot front yard in lieu of the 15 feet otherwise required in the R4 zone along Leland Way and a 0-foot side yard in lieu of the 11 feet otherwise required along the easterly property line. With approval of the requested entitlement, the Project will provide a 15-foot sidewalk along Sunset Boulevard, a 6-foot sidewalk along Vine Street, and between a 10-foot to 16-foot sidewalk along Leland Way. It is noted that while the Project is seeking a waiver of dedication and improvement on Leland Way, there is an existing one-story residential duplex on Leland Way that would make widening that street infeasible to accommodate the standards set forth in the Mobility Plan.

Regarding access, vehicular access to the Project's parking would be provided off two driveways on Leland Way located to the south of the Project Site, with one driveway designated for residential uses and the other for the retail uses. The proposed driveways would be designed in accordance with the regulatory standards and subject to the approval of LADOT and the Bureau of Engineering.

The Project also supports initiatives of the Mobility Plan to create transit-oriented developments as the Project includes the development of a new mixed-use residential and commercial project on an infill site along a primary corridor that is well-served by public transit, supporting Metro ridership goals and enhancing transportation mobility. The Project could also serve to promote walkability through the implementation of pedestrian enhancements surrounding the Project Site, such as ground floor commercial uses that are highly visible and attractive to pedestrians as well as providing landscaping along the sidewalks and front yards.

Additionally, the Project would provide secured bicycle parking facilities. In accordance with the requirements of the LAMC, 120 residential bicycle parking spaces (including 10 short-term and 110 long-term spaces) and 18 commercial bicycle parking spaces (including 9 short-term and 9 long-term) would be provided. These measures would promote active transportation modes such as biking and walking. Furthermore, the Project's design features would further reduce vehicle trips and would result in lower VMT per capita and lower work VMT per employee compared to the average for the area.

Overall, the Project would be consistent with the applicable policies of the Mobility Plan and the Project would not interfere with the implementation of the City's goals identified in the Mobility Plan. Therefore, the Project would not conflict with the Mobility Plan.

¹⁹⁵ City of Los Angeles, Complete Streets Design Guide, Street Classifications, page 20.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The components of the Plan for a Healthy Los Angeles focus on health and wellness through increased quality of life, economic development, equity and environmental justice, housing and community stability, mobility, and open space.

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table 28 on page 321 of this SCEA. In summary, the Project would promote healthy living where active travel modes are encouraged. The Project would support multi-modal mobility options to improve the convenience of making trips without the use of a personal automobile. The Project includes pedestrian enhancements surrounding the Project Site that would provide better connections to transit stops. The Project would also provide bicycle parking facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. The Project would expand residential and employment opportunities in proximity to residential and commercial areas, destinations, and other neighborhood services in a diverse urban area. Finally, the Project is estimated to generate less VMT per capita than the average for the area. VMT directly contributes to GHG emissions; as such, a reduced VMT per capita also reduces GHG per capita. The Project prioritizes safety and access for all individuals utilizing the Project Site and does not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Thus, the Project would not conflict with the applicable policies included in the Plan for a Healthy Los Angeles.

Hollywood Community Plan

The Community Plan identifies circulations objectives that directly reflect the Mobility Plan 2035 for transportation improvement, traffic flow management, demand management programs, street widening, public transit, and private transit. As previously discussed, the Project incorporates pedestrian and bicycle enhancements that would improve mobility for pedestrians and promote the use of alternative transportation modes. Thus, based on the above, the Project would not conflict with applicable policies of the Community Plan addressing the circulation system.

LAMC

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. As discussed in Section 3, Project Description, of this SCEA, consistent with the requirements set forth in the LAMC, the Project would provide 120 residential bicycle parking spaces (including 110 long-term spaces and 10 short-term spaces) and 18 bicycle parking spaces for the commercial uses (including 9 long-term spaces and 9 short-term spaces); therefore, the Project would be consistent with LAMC Section 12.21.A.16.

Vision Zero Action Plan/Vision Zero Corridor Plan

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025 through a few strategies, including modifying the design of streets to increase safety. Vision Zero implements projects that are designed to increase safety for the most vulnerable road users. The City has identified

Table 28
Consistency with Applicable Goals, Objectives, and Policies of the Plan for a Healthy Los Angeles

Policies ^a	Would the Project Conflict?
Chapter 1: Los Angeles, a Leader in Health and Equity	
Policy 1.5 Plan for Health Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	No Conflict. As previously described, the Project Site is located along a primary transportation corridor with various modes of transportation, including public transit and bicycling. Accordingly, the Project Site is located within a TPA and a HQTa. The Project would provide new multi-family residential uses and supporting ground floor commercial uses near transit and would include bicycle parking, and extensive landscaping at the Project's ground floor, including along the sidewalk and in the required front yards, which would encourage walking and bicycling over motor vehicle use. As such, the Project would encourage the use of active travel modes and thereby promote healthy living. Therefore, the Project would not conflict with this policy.
Policy 1.6 Poverty and Health Reduce the debilitating impact that poverty has on individual, familial, and community health and well-being by: promoting cross-cutting efforts and partnerships to increase access to income; safe, healthy, and stable affordable housing options; and attainable opportunities for social mobility.	No Conflict. The Project would include 170 new multi-family residential units of various unit types and sizes, including 26 units for Very Low Income Households and 8 units for Low Income Households, and ground floor commercial space. This would provide housing and employment opportunities, and help reduce the debilitating impact that poverty has on individual, familial, and community health and well-being. Therefore, the Project would not conflict with this policy.
Policy 1.7 Displacement and Health Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.	No Conflict. As discussed above, the Project would provide housing and employment opportunities through the development of new multi-family dwelling units, including 26 units for Very Low Income Households and 8 units for Low Income Households, and commercial space. While the Project would remove a vacant residential duplex on Leland Way, the Project would replace this housing with 170 new multi-family dwelling units, increasing the amount of housing on the Project Site compared to existing conditions. Therefore, the Project would not conflict with this policy.
Chapter 2: A City Built for Health	
Policy 2.2 Healthy building design and construction Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.	No Conflict. The Project Site is architecturally designed as an extension of the Sunset and Vine tower located at the northwest portion of the Project Site. As discussed in Section 3, Project Description, of this SCEA, the Project would feature various openings throughout the building in the form of amenity terraces and balconies to create a cascading edge like the retail and residential uses in the vicinity of the Project Site. Open-air common spaces with landscaped and programmed elements would be scattered throughout the building. Additionally, the

Table 28 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the Plan for a Healthy Los Angeles

Policies ^a	Would the Project Conflict?
	Project would provide residential and commercial uses near public transportation, which promotes healthy living by reducing single use vehicle trips and a walkable community. The Project would also provide healthy design features including bicycle parking spaces, open space and landscaping, security features, lighting features, EV charging parking spaces, and sustainability measures to promote a healthy building and construction. Therefore, the Project would not conflict with this policy.
Chapter 3: Bountiful Parks and Open Spaces	
Policy 3.8 Active space Support public, private, and nonprofit partners in the ongoing development of new and innovative active spaces and strategies to increase the number of Angelenos who engage in physical activity across and level of abilities.	No Conflict. The Project would provide approximately 24,997 square feet of open space, which would exceed the LAMC open space requirement of 18,150 square feet. The proposed onsite open space would include 7,944 square feet of private balcony space, 12,515 square feet of courtyards and pool deck, and 4,538 square feet of interior tenant resident common areas, which includes a clubroom, clubhouse, and fitness center. An external bridge would connect the existing Sunset and Vine tower mezzanine level to the mixed-use building's courtyard on Level 3 to allow residents of the existing tower to use the new amenities. As such, the Project would encourage residents, visitors, and employees to enjoy the open space amenities onsite and the parks nearby. Therefore, the Project would not conflict with this policy.
Chapter 5: An Environment Where Life Thrives	
Policy 5.1 Air pollution and respiratory health Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.	No Conflict. As previously mentioned, the Project Site is located in a TPA and within a HQTa. The Project Site is easily accessible by alternative modes of transportation, including bus lines served by LADOT and DASH and bicycle facilities. The Project would also provide bicycle parking and facilities for residents and employees. EV charging stations within the parking levels would promote cleaner transportation options within the Project Site and throughout the Hollywood Community Plan area. Pedestrian amenities and a sustainable building design would also promote the reduction of air pollution within the City by employees, residents, and visitors to opt-out of single use vehicle trips. Therefore, the Project would not conflict with this policy.
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	No Conflict. The Project would generate lower VMT per capita for residents and employees as the Project would be located within a TPA and a HQTa. Further, the Project's VMT would be less than the VMT for the area. VMT directly contributes to GHG emissions. As such, a reduced VMT per capita also reduces GHG per capita. Therefore, the Project would not conflict with this policy.

Table 28 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the Plan for a Healthy Los Angeles

Policies ^a	Would the Project Conflict?
^a Policies from the Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Los Angeles Department of City Planning, March 2015). Source: Eyestone Environmental, 2024.	

numerous streets as part of the High Injury Network (HIN), which is a network of streets where strategic investments will have the biggest impact on reducing death and severe injury. The City has also created an Action Plan identifying the types of improvements that will be implemented.

The Project Site is adjacent to Sunset Boulevard and Vine Street, streets that have been identified as part of the HIN. However, no active Vision Zero Safety Improvements projects are planned adjacent to or within the Project Site vicinity. The Project improvements to the pedestrian environment would not preclude future Vision Zero Safety Improvements by the City. Thus, the Project would not conflict with Vision Zero.

Citywide Design Guidelines

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City’s functional, aesthetic, and policy objectives and help foster a sense of community. As previously discussed, the Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Per the TAG, the Pedestrian-First Design policies are applicable to this analysis. The Pedestrian-First Design approach focuses on design strategies that “create human scale spaces in response to how people engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety by putting eyes and feet on the street.” The Pedestrian-First Design guidelines are as follows:

- **Guideline 1:** Promote a safe, comfortable, and accessible pedestrian experience for all.
- **Guideline 2:** Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- **Guideline 3:** Design projects to actively engage with streets and public space and maintain human scale.

The Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities and would include accessible sidewalks and walkways that provide pedestrian access throughout the Project Site. Specifically, on the ground level, the Project would provide approximately 16,680 square feet of commercial space as well as amenities serving the residential uses, including a

lobby and mail room. Also, at ground level would be a bike room and parking area to serve the retail uses. The Project would also provide new on-site trees to provide adequate shade and a more comfortable environment for pedestrians. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Thus, based on the above, the Project is consistent with the applicable policies of the Citywide Design Guidelines.

2020–2045 RTP/SCS

Objective 6 of the 2020–2045 RTP/SCS calls for a circulation system that is coordinated with land uses and densities and adequate to accommodate traffic, and for the expansion and improvement of public transportation service. The Project Site is located in an urbanized area and SCAG-designated HQT, that is well served by public transit. The Project would include various streetscape improvements and ground level commercial uses that would activate the surrounding pedestrian environment and enhance walkability. Furthermore, the Project would provide bicycle parking per LAMC requirements. Thus, the Project would coordinate land use and circulation by promoting opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.

2024–2050 RTP/SCS

The goals of the 2024–2050 RTP/SCS fall into four core categories: mobility, communities, environment, and economy. Specific to the core category of mobility, the 2024–2050 RTP/SCS includes the following categories of mobility policies and strategies: System Preservation and Resilience, Complete Streets, Transit and Multimodal Integration, Transportation System Management, Transportation Demand Management, Technology Integration, Safety, and Funding the System/User Fees. As previously discussed, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions by intensifying urban density within a HQT in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office, retail, restaurant, and hotel uses; providing pedestrian and bicycle improvements; and implementing TDM strategies to reduce single-occupant travel. The Project would also support healthy and equitable communities by encouraging walking and bicycling, providing EV charging stations, facilitating a reduction of VMT and air pollution, and providing public realm improvements (i.e., improved sidewalks, new street trees, and landscaping).

Furthermore, because the Project would be located within a SCAG-designated HQT and in an area well-served by Metro rail and various local bus lines, the Project would contribute to the productivity and use of the regional transportation system. The Project would provide housing, employment, and local-serving uses near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with the 2024–2050 RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with the 2024–2050 RTP/SCS goal of maximizing mobility and accessibility in the region while at the same time reducing VMT and GHG emissions.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (July 2019, updated August 2022), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The TAG identifies distinct thresholds regarding significant VMT impacts for the seven Area Planning Commission (APC) areas in Los Angeles. The Project Site is located within the Central APC, for which the following thresholds have been established:

- Household VMT per Capita: 6.0
- Work VMT per Employee: 7.6

Per the VMT Calculator User Guide (May 2020), work VMT per employee is not reported for projects with local-serving commercial uses (i.e., commercial uses less than 50,000 square feet), and is thus, considered to be less than significant. As such, the Project's proposed 16,680 square feet of ground-floor commercial space would not result in a significant work VMT impact.

As provided in the Transportation Assessment included in Appendix L.1 of this SCEA, based on the Project's land uses and location, the Project is estimated to generate 1,570 daily household VMT, resulting in a daily household VMT per capita of 4.1. The average household VMT per capita would not exceed the Central APC significance household VMT per capita impact threshold of 6.0. Therefore, the Project would not result in a significant VMT impact. ***Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and VMT impacts would be less than significant.***

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

Less Than Significant Impact. Pursuant to the TAG (Threshold T-3) the determination of significance regarding hazards due to a geometric design feature or incompatible uses should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions such as curves or grade

changes, and a project's proximity to streets identified in the High Injury Network or the Safe Routes to School program.

Vehicular access to the Project Site would be provided off two driveways on Leland Way located to the south of the Project Site, where one parking entry would be designated for residential uses and the other parking entry would be designated for the commercial uses. The final design of the access points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and a safe pedestrian and vehicular design. The Leland Way driveways would accommodate ingress and egress maneuvers and would not cross any existing or planned bicycle facilities. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway. In addition, no unusual or new obstacles are presented in the Project design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians. The removal of the two existing loading spaces along Sunset Boulevard would further improve vehicular, bicycle, and pedestrian safety to and from the Project Site by reducing the potential for vehicle and pedestrian/bicycle conflicts.

Sunset Boulevard and Vine Street are considered Bicycle Enhanced Networks (BENs).¹⁹⁶ None of the Project access points would cross any existing bicycle facilities. Additionally, adjacent to the Project Site, Sunset Boulevard and Vine Street are identified as part of the Pedestrian Enhanced District (PED).¹⁹⁷ The Project includes pedestrian enhancements surrounding the Project Site, such as landscaping at the Project's ground floor, including along the sidewalk and in the required front yards. Further, pedestrian and bicycle access to the Project Site would be separated from vehicular traffic. The Project improvements would not preclude or interfere with the implementation of any other future roadway improvements benefiting pedestrians or bicycles. The Project driveways would be designed and placed to provide adequate sight distance and pedestrian refuge areas to limit potential vehicular-bicycle or vehicular-pedestrian conflicts. Based on the above, the Project does not present geometric design hazards related to mobility or pedestrian accessibility. Additionally, the proposed residential and commercial uses would be consistent with other residential and commercial uses surrounding the Project Site.

Freeway Safety

In May 2020, LADOT issued the City Freeway Guidance for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

The City Freeway Guidance requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential

¹⁹⁶ City of Los Angeles Hub, Mobility Plan 2035 Bicycle Networks, https://geohub.lacity.org/datasets/65341a49167f401e88d3d41c7d7a7795_7/explore?location=34.097242%2C-118.320653%2C16.56, accessed August 9, 2024.

¹⁹⁷ City of Los Angeles Hub, Mobility Plan 2035 Pedestrian Enhanced District (PED) Analysis Area, https://geohub.lacity.org/datasets/3d19b9ccf7b94a4bbc5ad74e355c4595_3/explore?location=34.097096%2C-118.319990%2C16.59, accessed August 9, 2024.

queueing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As identified in the Transportation Assessment, included in Appendix L.1 of this SCEA, based on the Project's trip generation estimates and trip assignments, the Project would not add 25 or more peak hour trips to any freeway off-ramp.¹⁹⁸ Therefore, no further freeway queueing analysis is required, and the Project would not result in a significant freeway safety impact.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. While it is expected that most construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur during installation of utility connections to main lines located in the surrounding streets adjacent to the Project Site. However, if temporary lane closures are necessary, one travel lane in each direction would be maintained. In addition, as provided in the Transportation Assessment included in Appendix L.1 of this SCEA, the Project would include the preparation and implementation of a Construction Traffic Management Plan, as outlined in Project Design Feature TR-PDF-1 below, which would be reviewed and approved by LADOT and which would ensure that adequate emergency access is available during construction.

Regarding operation, as described in Section 3, Project Description, of this SCEA, vehicular access to the Project Site, including emergency vehicle access, would be provided from two driveways on Leland Way located to the south of the Project Site, where one parking entry would be designated for residential uses and the other parking entry would be designated for commercial uses. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Compliance with such requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118, prior to the issuance of any building permit. Additionally, operation of the Project would not include the installation of any barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operation. Additionally, while the Project would create additional trips to and from the Project Site in the surrounding street system, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard and would allow drivers of emergency vehicles various paths for circulating around traffic. In particular, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, emergency access to the Project Site and surrounding area would be maintained.

¹⁹⁸ Gibson Transportation Consultants, Inc., Supplemental Transportation Assessment for the Refined Sunset Vine 2 Project, Hollywood, California, March 16, 2023. See Appendix L.1 of this SCEA.

Based on the above, the Project would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts would be less than significant.

Project Design Features

The Project would implement the following project design feature:

- TR-PDF-1:** Prior to the start of construction, a Construction Traffic Management Plan would be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will include, but not be limited to, the following measures, as appropriate:
- Advance notification to adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
 - Prohibition of construction worker or equipment parking on adjacent streets;
 - Prohibition of haul truck staging on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route;
 - Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
 - Containment of construction activity within the Project Site boundaries, as feasible;
 - Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
 - Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible;
 - Spacing of trucks so as to discourage a convoy effect;
 - Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
 - Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

Cumulative Impacts

Less Than Significant Impact. With regard to conflicts with a program, plan, ordinance, or policy addressing the circulation system, similar to the Project, the related projects would be individually responsible for complying with relevant plans, programs, ordinances, and policies addressing the circulation system. Thus, overall, implementation of the Project, together with the related projects, would not create inconsistencies with the Mobility Plan 2035, Plan for a Healthy Los Angeles, Hollywood Community Plan, LAMC, Vision Zero, and the Citywide Design Guidelines. Thus, the Project and the related projects would not result in a cumulative impact that would preclude the City from serving the transportation needs as defined in its adopted programs, plans, ordinances, or policies. Each of the related projects would be separately reviewed and approved by the City, including verification regarding

their consistency with applicable policies. **Therefore, the Project, together with the related projects would not create conflicts with respect to the identified programs, plans, policies, and ordinances addressing the circulation system and cumulative impacts would be less than significant.**

As detailed in LADOT's TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS. As discussed above, the Project would not result in a significant VMT impact. Therefore, the Project is not anticipated to result in a cumulative VMT impact. Furthermore, the Project would also contribute to the productivity and use of the regional transportation system by providing employment and housing near transit and encouraging active transportation by providing new bicycle parking facilities within the Project Site and active street frontages. **As such, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts associated with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.**

With regard to safety hazards, according to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts. Of the related projects, two related projects (Related Project No. 1 and Related Project No. 4) are located within the same block as the Project Site to the east. However, as discussed above, the Project would not result in a significant impact associated with hazardous geometric design features. In addition, as with the Project, the design of access points for each related project would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and a safe pedestrian and vehicular design. Regarding freeway safety, per LADOT's Interim Guidance for Freeway Safety Analysis, a project would not have the potential to result in significant freeway safety unless it adds 25 or more trips to any off ramp in either the morning or afternoon peak hour. The Project would not exceed this screening threshold. Project-level impacts to freeway safety would be less than significant, and therefore, the Project would not make a considerable contribution to cumulative freeway safety impacts. **Therefore, Project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.**

With regard to emergency access, as analyzed above, the Project would not result in inadequate emergency access. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, for each related project would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the study area and would not be concentrated to a specific location. Also, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of

opposing traffic. Furthermore, since modifications to access and circulation plans are largely confined to a specific project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.**

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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

- PMM TCR-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
 - b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;

- c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.

Applicability to the Project

As discussed below, the Project would comply with the City's standard Condition of Approval regarding the inadvertent discovery of tribal cultural resources, and which has been determined to be equal or more effective than Mitigation Measure PMM TCR-1 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM TCR-1 from the 2020–2045 RTP/SCS PEIR is not incorporated into the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM TCR-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Avoid and/or preserve the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
- b) Treat the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;
- c) Provide permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.
- d) If tribal cultural resources are found, then the lead agency should consider tribal construction monitoring.

Applicability to the Project

As discussed below, to avoid potential impacts due to the inadvertent discovery of tribal cultural resources during the Project's grading and excavation period, the Project would implement the City's standard Condition of Approval, which is equal to or more effective than the relevant measures included in Mitigation Measure PMM TCR-1 from the 2024–2050 RTP/SCS PEIR. Thus, Mitigation Measure PMM TCR-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

Impact Analysis

The following analysis is primarily based on the Tribal Cultural Resources Assessment that was prepared for the Project by SWCA, dated July 12, 2023, which is included as Appendix M of this SCEA.

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)?

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. As described in the Tribal Cultural Resources Assessment, the assessment of the Project's potential impacts to tribal cultural resources was based on the results of a confidential record search of the California Historical Resources Information System (CHRIS), a Sacred Land File (SLF) search, and archival research and review of ethnographic literature.

As discussed in the Tribal Cultural Resources Assessment, the results of the CHRIS records search was received from the SCCIC on June 2, 2023. Results of the records search indicate that 33 cultural resources studies have been conducted within 0.5-mile of the Project Site (refer to Table 1 of the Tribal Cultural Resources Assessment for a detailed listing of the 33 cultural resources studies). Of the 33 previously conducted studies, five overlap or border the Project Site. These five studies include three technical reports which were conducted for proposed Metro Subway expansions in Los Angeles (LA-7565, LA-7566, LA-8020), one addendum which provides additional information for a Draft Supplemental Impact Statement for the Metro Subway expansions (LA-7562), and one historic resources survey of the Hollywood neighborhood (LA-11797). As detailed in the Tribal Cultural Resources Assessment, no resources were identified near or within the Project Site as part of monitoring conducted for one of the studies; two of the other five studies concluded a low potential to yield significant archaeological information; another study did not include any conclusions or recommendations for further archaeological work; and the final study addressed historic resources and not archaeological resources. Overall, based on the CHRIS records search, there are no Native American archaeological resources within the Project Site or within 0.5-mile of the Project Site. The nearest Native American archaeological site is LAN-196 (Fern Dell). The Fern Dell recreation area consists of a narrow trail situated at the south end of Griffith Park, at the base of the Santa Monica Mountains, approximately 1.39 miles northeast of the Project Site. The next closest site with Native American archaeological components is the La Brea Tar Pits (LAN-159/H), which is approximately 2.92 miles southwest of the Project Site. As described in the Tribal Cultural Resources Assessment, aside from these two sites, there are no other Native American archaeological sites recorded in the Hollywood area or adjacent neighborhoods.

As indicated in the Tribal Cultural Resources Assessment, the results of the SLF search were received on May 24, 2023. The results of the SLF search were negative.

Archival research and a review of ethnographic literature was also conducted to assess the likelihood for any potentially buried tribal cultural resources to be preserved on the Project Site. According to this research, as summarized in the Tribal Cultural Resources Assessment, historical maps and ecological reconstructions indicate that natural resources important to Native American communities were once located in the general vicinity of the Project Site, but the Project Site is not close enough to these resources to result in an increased sensitivity for a tribal cultural resource that is archaeological in nature. No evidence was identified to suggest the Project Site once contained a specific natural resource or had a topographic position that would have focused Native American activities and increased the likelihood of material remains from those activities being deposited. Naturally deposited alluvial sediments that are Holocene in age have the best potential to contain a buried tribal cultural resource, whereas the older Pleistocene sediments mapped in this part of the Los Angeles Basin are likely too old to contain Native American objects or sites. Land development within the Project Site during the early to mid-twentieth century has altered the physical setting and likely destroyed or displaced any tribal cultural resource that may have once been present on the surface or been shallowly buried. Where buildings exist, the sediments with the best potential to contain a tribal cultural resource would have been excavated and the tribal cultural resource sensitivity is clearly low or absent altogether. As determined in the Tribal Cultural Resources Assessment, while the potential for a tribal cultural resource cannot be completely ruled out, the lack of substantial evidence suggesting the Project Site was intensively used by Native Americans, coupled with the known poor preservation conditions caused by the historical development of the Project Site throughout the twentieth century, indicates that the overall sensitivity for tribal cultural resources within the Project Site is low.

While no tribal cultural resources are anticipated to be affected by the Project, the City has established a standard Condition of Approval to address inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this Condition of Approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the City. If the City determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Project Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resources monitoring plan. Once the plan is approved by the City, ground disturbance activities could resume. In accordance with the Condition of Approval, all activities would be conducted in accordance with regulatory requirements.

In summary, with compliance with the City's standard condition of approval regarding the inadvertent discovery of tribal cultural resources, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code section 21074, and potential impacts to tribal cultural resources would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As shown in Figure 17 on page 370 of this SCEA, two related projects (Related Project No. 1 and Related Project No. 4) are located within the same block as the Project Site

to the east. The Project and the related projects are located within an urbanized area that has been disturbed and developed over time. Although impacts to tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected the same tribal cultural resources and communities. As discussed above, no tribal cultural resources have been identified on the Project Site. However, if tribal cultural resources are uncovered, the Project and each related project would be required to comply with applicable regulatory requirements, incorporate the City's standard Condition of Approval regarding inadvertent discovery of tribal cultural resources, or incorporate mitigation, as applicable. **Therefore, cumulative impacts related to tribal cultural resources would be less than significant and would not be cumulatively considerable.**

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider

mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:

- a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
- b) Inclusion of a waste management plan that promotes maximum C&D diversion.
- c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- d) Reuse of existing structure and shell in renovation projects.
- e) Development of indoor recycling program and space.
- f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.
- h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.
- i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.
- j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- m) Provide education and publicity about reducing waste and available recycling services.

- n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

Applicability to the Project

Consistent with Mitigation Measure PMM USSW-2 from the 2020–2045 RTP/SCS PEIR, the Project would comply with existing regulatory requirements that are already incorporated as part of the development of the Project, including adherence to the applicable regulations of Title 24 of the California Building Code, including re-using and minimizing construction and demolition debris, diversion from local landfills, and utilizing on-site recycling. Additionally, as evaluated below, there is adequate landfill capacity in the region to accommodate Project-generated waste, and no Project-specific landfill improvements are required as part of the Project. Since the Project would comply with applicable local and State requirements regarding solid waste, which would be equal to or more effective than that set forth in Mitigation Measure PMM USSW-2 from the 2020–2045 RTP/SCS PEIR, this measure would not be incorporated into the Project.

PMM USWW-1: In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.

Applicability to the Project

Consistent with the above measure, and as discussed in the impact analysis below, sufficient wastewater infrastructure capacity would be available to serve the Project. As no Project-specific impact to the existing wastewater infrastructure would occur, Mitigation Measure PMM-USWW-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.
- b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
- d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

Applicability to the Project

As described in the impact analysis below, the City's anticipated water supplies would be available to serve the Project. Furthermore, the Project would be required to comply with current water conservation measures required by Title 24 and the City's Green Building Code. As the applicable regulatory requirements are equal to or more effective than Mitigation Measure PMM USWS-1 from the 2020–2045 RTP/SCS PEIR, this mitigation measure is not incorporated into the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM UTIL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. The proposed development can and should be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project level review as necessary to provide CEQA clearance for new facilities.

Applicability to the Project

Consistent with the above measure, and as discussed in the impact analysis below, the Project would ensure that there is sufficient wastewater infrastructure capacity to serve the Project. As no Project-specific impact would occur, Mitigation Measure PMM-UTIL-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

PMM UTIL-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

- a) Reduce exterior consumptive uses of water in public areas, and promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.
- b) Promote the availability of drought-resistant landscaping options and provide information on how these can be obtained. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
- d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

Applicability to the Project

As described in the impact analysis below, available water resources are available to serve the Project, and no impacts regarding water supply are anticipated to occur. Furthermore, the Project would be required to comply with current water conservation measures required by Title 24 and the City's Green Building Code and would also implement Project Design Feature WAT-PDF-1, which includes measures that are consistent with Mitigation Measure PMM UTIL-2 from the 2024–2050 RTP/SCS PEIR. As the applicable regulatory requirements and Project Design Features are equal to or more effective than Mitigation Measure PMM UTIL-2 from the 2024–2050 RTP/SCS PEIR, it is not incorporated into the Project.

PMM UTIL-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:

- a) Reuse and minimize construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
- b) Include a waste management plan that promotes maximum C&D diversion.
- c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- d) Reuse existing structure and shell in renovation projects.
- e) Develop indoor recycling program and space.
- f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and where appropriate and feasible.
- h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent state waste diversion target.
- i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction, and recycling practices.
- j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing additional opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- l) Integrate reuse and recycling into residential industrial, institutional, and commercial projects.
- m) Provide education and publicity about reducing waste and available recycling services.
- n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

Applicability to the Project

Consistent with Mitigation Measure PMM UTIL-3 from the 2024–2050 RTP/SCS PEIR, the Project would comply with existing regulatory requirements that are already incorporated in the Project, including adherence to applicable regulations of Title 24 of the California Building Code including re-using and minimizing construction and demolition debris, diversion from local landfills, and utilizing on-site recycling. Additionally, there is adequate landfill capacity in the region to accommodate Project-generated waste, and no Project-specific impacts related to solid waste would occur. Since the Project would not have the potential to generate solid waste in excess of State or local standards and incorporates regulatory compliance measures that are consistent with applicable solid waste reduction measures under Mitigation Measure PMM UTIL-3 from the 2024–2050 RTP/SCS PEIR, this measure would not be incorporated into the Project.

Impact Analysis

The following analysis is primarily based on the Water and Sewer Infrastructure Assessment Report (Utility Report), prepared for the Project by Fuscoe Engineering, Inc., dated December 2022, and included as Appendix N of this SCEA.

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

Less Than Significant Impact. As analyzed below, the Project would not 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.

Water

Construction

As discussed in the Utility Report included as Appendix N of this SCEA, Project construction activities would require water for a variety of activities, including but not limited to dust control, cleaning of equipment, soil grading, soil excavation/export, and soil re-compaction. Water for these activities would be required during the initial stages of construction while the Project Site is prepared for development. The latter stages of construction normally require less water usage. In addition, the Project would include the removal of the existing on-site uses, which would either partially or wholly offset the limited water demand that may be required during construction of the Project. Accordingly, Project construction-related water demand would be anticipated to be less than the Project operational water demand. As discussed further below, the existing water infrastructure would be adequate to meet the Project's operational water demand. Therefore, the existing water infrastructure would have adequate capacity to meet Project construction-related water demand, and new water mains or upgrades to the existing water mains would not be required.

The Project would require the installation of new, on-site water distribution lines to connect the Project to the water main lines in the streets surrounding the Project Site. These construction activities would

primarily involve trenching within the Project Site and potentially along limited portions of adjacent streets where the water mains are located in order to place the water distribution lines below ground surface. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s). While trenching and installation of water line connections activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, as provided above in Item XVII, Transportation, of this SCEA, a Construction Traffic Management Plan would be implemented pursuant to Project Design Feature TR-PDF-1. The Construction Traffic Management Plan, which would be reviewed and approved by LADOT, would ensure that adequate and safe vehicular and pedestrian access is maintained within and adjacent to the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure that emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way during the construction period.

Overall, Project construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project construction-related water infrastructure impacts would be less than significant.

Operation

LADWP maintains water infrastructure in the Project Site vicinity and provides domestic water service to the Project Site. As described in the Utility Report, included as Appendix N of this SCEA, the Project Site is currently served by public 8-inch water mains located in Sunset Boulevard and Leland Way. There is also a 16-inch water main that runs along Sunset Boulevard; however, no existing connections exist from the Project Site. In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Utility Report, there are five existing fire hydrants surrounding the Project Site; three hydrants are located along Sunset Boulevard and two hydrants are located along Leland Way.

As discussed in the Utility Report, when analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of a project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, fire flow demands would have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project (refer to Attachment A for the results of the SAR and Attachment B for the IFFAR results).

LAMC Section 57.507.3.1 establishes fire flow requirements based on type of land development. Fire water flow requirements vary from 2,000 gallons per minute for low density residential developments to 12,000 gallons per minute for high density industrial and commercial (principal business districts or centers) developments. Specifically, Low Density Residential developments have a required fire flow of 2,000 gallons per minutes from three adjacent fire hydrants flowing simultaneously; High Density Residential and Neighborhood Commercial developments have a required fire flow of 4,000 gallons per

minute from four adjacent fire hydrants flowing simultaneously; Industrial and Commercial developments have a required fire flow of 6,000 gallons per minute to 9,000 gallons per minute from four to six fire hydrants flowing simultaneously; and High Density Industrial and Commercial (Principal Business Districts or Centers) developments have a required fire flow of 12,000 gallons per minute available to any block.

As discussed in the Utility Report, based on the fire flow standards set forth by LAMC Section 57.507.3 and the proposed development of residential and commercial uses, the Project would fall under the High Density Residential and Neighborhood Commercial development type requiring a fire flow of 4,000 gallons per minute from four adjacent hydrants flowing simultaneously.

As discussed in the Utility Report, an Information of Fire Flow Availability (IFFAR) was submitted to LADWP to determine the ability of the existing infrastructure to serve the Project. Based on the results of the IFFAR (refer to Appendix B of the Utility Report), the fire flow available from four existing fire hydrants would total 6,000 gallons per minute (each at 1,500 gallons per minute). Therefore, there is adequate fire flow capacity available to serve the Project.

The Project would incorporate a fire sprinkler suppression system to reduce the public hydrant demands, which would be subject to LAFD review and approval during design and permitting of the Project. As set forth by LAMC Section 94.2020.0, which adopts by reference NFPA 14-2019, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gallons per minute. As previously noted, LADWP performed a hydraulic analysis to determine if adequate water service exists for future development of the Project as part of the Service Advisory Request (SAR). Based on the results of the SAR, water service availability for the 8-inch water mains in Sunset Boulevard and Leland Way each have adequate flow and pressure to support the Project. Accordingly, as concluded in the Utility Report, based on the results of the SAR, the existing water infrastructure would be able to provide the necessary flow and pressure to serve the Project's domestic water demands.

Based on the above, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project's operational impacts would be less than significant.

Wastewater

Construction

As described in Section 3, Project Description, of this SCEA, the Project would involve removal of all existing uses within the portion of the Project Site to be developed.¹⁹⁹ As such, any existing wastewater

¹⁹⁹ For purposes of the environmental impact analyses included herein, when accounting for the existing uses to be removed, only the buildings that are currently occupied or that were occupied within the last year are considered and "credit" is taken for their removal. This includes the two commercial buildings fronting Sunset Boulevard that are currently occupied by restaurants and that together comprise approximately 6,202 square feet; a one-story vacant commercial building fronting Vine Street that comprises approximately 3,234 square feet; and a one-story vacant commercial building fronting Leland Way that comprises approximately 1,652 square feet (vacant since May 2023).

generation associated with the existing uses would cease during construction of the Project. As applicable, existing sewer laterals would also be capped during construction, and no sewage would enter the public sewer system from the area of the Project Site to be developed. Temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled off-site and would not be discharged directly into the public sewer system. As such, Project construction would not contribute directly to the wastewater system that serves the Project Site. In addition, any sewage generated during construction would be offset by the removal of the existing uses. Therefore, while the sewage hauled off-site would eventually be deposited at the Hyperion Water Reclamation Plant, the amount generated would likely be reduced compared to what is currently generated by the existing uses to be removed, and, as demonstrated below, the Hyperion Water Reclamation Plant has sufficient capacity to treat the sewer generation flows anticipated to be generated from the Project Site during construction. Thus, wastewater generation from Project construction is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

The Project would require the installation of new on-site sewer line connections to connect the Project to the off-site public sewer mains in the streets surrounding the Project Site. The new sewer connections would collect wastewater from the Project Site and convey the wastewater to the existing public sewer main lines. Construction impacts associated with the installation of new sewer line connections would primarily be confined to trenching in order to place the sewer line connections below ground surface for connections to the existing off-site public infrastructure. Any off-site work that may affect services from the existing sewer lines in the vicinity of the Project Site would be coordinated with the City Bureau of Engineering to identify the locations and depth of all lines prior to ground disturbance to avoid disruption of service. In addition, as set forth in Project Design Feature TR-PDF-1 included above under Item XVII, Transportation, of this SCEA, a Construction Traffic Management Plan would be implemented during Project construction to ensure that adequate and safe pedestrian and vehicle access remains available within and near the Project Site during construction. The Construction Traffic Management Plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Overall, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts to the wastewater conveyance or treatment system associated with construction of the Project would be less than significant.

Operation

LASAN operates and maintains the wastewater treatment, reclamation, and collection facilities serving most of the City of Los Angeles incorporated areas, including the Project Site, as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance system for treatment at the Hyperion Water Reclamation Plant (HWRP).

The HWRP has a capacity of 450 million gallons per day, and current average wastewater flows are at approximately 275 million gallons per day.²⁰⁰ As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 million gallons per day. Therefore, the current flows to HWRP are well below its design capacity of approximately 450 million gallons per day. As shown in Table 30 on page 351, the Project could generate a net increase of approximately 32,642 gallons per day of wastewater over existing conditions, or approximately 0.03 million gallons per day. The Project's increase in average daily wastewater flow of approximately 0.03 million gallons per day would represent approximately 0.02 percent of the current estimated 175 million gallons per day of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

As discussed in the Utility Report, a Sewer Capacity Availability Request (SCAR) report (see Attachment C of the Utility Report included as Appendix N of this Draft EIR) was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. In preparing the SCAR report, LASAN analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth and provided the current sewer gauging information for the relevant sewer lines downstream of the Project Site. As demonstrated in the SCAR report, based on LASAN's data, the existing public infrastructure can accommodate the Project via the existing 8-inch sewer mains in Sunset Boulevard and Leland Way, which would each capture 50 percent of the Project flows. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and a connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. **Based on the above, operation of the Project would not require or result in the relocation or construction of new or expanded wastewater conveyance or treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts to the wastewater conveyance or treatment system associated with operation of the Project would be less than significant.**

Stormwater

With regard to storm water drainage, as discussed above in Item X, Hydrology and Water Quality, a comparison of the pre- and post-Project peak flow rates indicates a minor decrease in stormwater runoff from the Project Site with the implementation of the Project. In addition, the BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. **Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. As such, the Project would not require or result in the relocation or construction of new or expanded storm water drainage.**

²⁰⁰ LASAN, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=b37ciyq7m_5&_adf.ctrl=&_afLoop=40056722672037049#!, accessed August 9, 2024.

Electrical Power

Construction

The existing power service in the vicinity of the Project Site is supplied by LADWP. Construction activities at the Project Site would require minor quantities of electrical power for lighting, power tools, and other support equipment. In addition, the limited amount of electricity that could be required during construction of the Project would be partially or wholly offset by the removal of the existing uses. As such, the electricity usage during construction would be less than the current electricity usage on the Project Site. As described below, LADWP's existing electrical infrastructure currently has enough capacity to serve the Project Site. Since the demand for electricity during construction would be less than what is currently generated, there would also be sufficient capacity to provide service for construction activities. The demand would be supplied from existing electrical services within the Project Site or from temporary power poles that may be installed to provide electricity during Project construction and would not affect other services. Thus, existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction.

With regard to existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. Project contractors would notify and coordinate with LADWP to identify the locations and depth of power lines and avoid disruption of electric service to other properties. Furthermore, construction impacts associated with the installation of these new lines, connections, and upgrades would not result in impacts as they are expected to be conducted consistent with the Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-1 requiring minimal construction work and confined to trenching in order to place the lines below surface. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Operation

Operation of the Project would require electricity for the proposed residential and commercial uses. As shown in Table 10 on page 144, the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 1,562,005 KWh per year. Based on LADWP's 2022 Resource Plan, LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (the Project's buildout year) will be 21,017 gigawatt hour (GWh) of electricity.²⁰¹ As such, the Project-related net increase in annual electricity consumption would represent only approximately 0.007 percent of LADWP's projected sales in 2026-2027.²⁰² In addition, LADWP is committed to ensuring the sustainability of its power supply and is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020 and at least 50 percent by 2030, which will ensure that projected supplies will be more than sufficient to meet demand.

²⁰¹ LADWP, 2022 Final Power Strategic Long-Term Resource Plan.

²⁰² The percentage is derived by taking the electricity usage during Project operations (1.562005 GWh) and dividing that number by the LADWP demand of 21,017 GWh to arrive at 0.007 percent.

Based on the above, construction and operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities and would not result in the construction of new electricity facilities or the relocation or expansion of existing facilities, the construction, relocation, or expansion of which could cause significant environmental effects. Thus, impacts would be less than significant.

Natural Gas

Construction

Construction activities, including the construction of the new buildings and associated facilities, typically do not involve the consumption of natural gas. Accordingly, no demand for natural gas would be generated by construction. In addition, since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Any needed infrastructure improvements would be limited to the installation of new natural gas line connections onsite to serve the Project and connect to the off-site public infrastructure. Such activities would primarily be confined to trenching onsite and minor off-site work associated with connection to the public infrastructure. As previously discussed, as part of the Project, a Construction Traffic Management Plan would be implemented to ensure safe and adequate pedestrian and vehicle access is maintained (see Project Design Feature TR-PDF-1 under Item XVII, Transportation). In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. **Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and the Project's impact would therefore be less than significant.**

Operation

The Southern California Gas Company (SoCalGas) provides natural gas service to the Project Site vicinity. With compliance of Title 24 standards and applicable requirements of the City's Green Building Code and the City's All-Electric Ordinance, buildout of the Project is anticipated to generate a net decrease in the on-site demand for natural gas totaling approximately 86,680 cubic feet per year, or approximately 237 cubic feet per day, as shown in Table 10 on page 144. Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2.26 billion cubic feet per day in 2026.²⁰³ As the Project's natural gas consumption results in a decrease in the onsite demand for natural gas, the Project would be within the forecasted 2026 consumption in SoCalGas's planning area.²⁰⁴ **Therefore, operation of the Project would not result in an increase in demand for natural gas that would exceed available supply or distribution infrastructure capabilities and would not result in the construction of new natural gas facilities or the relocation or expansion of existing facilities, the**

²⁰³ California Gas and Electric Utilities, 2024 California Gas Report.

²⁰⁴ Consistent with Ordinance 187,714, the Project use will include 1,115,177 cf/year of natural gas for restaurant cooking. The Project's natural gas consumption would account for approximately 0.0001 percent of the forecasted 2026 consumption in the SoCalGas planning area.

construction, relocation, or expansion of which could cause significant environmental effects. Impacts would be less than significant.

Telecommunications

Less Than Significant Impact. Regarding telecommunication facilities, the Project would require construction of new or extension of existing on-site telecommunications infrastructure to serve the proposed residential and commercial uses. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. **Thus, impacts related to telecommunication facilities would be less than significant.**

b. Would the project 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 analyzed below, the Project would have sufficient water supplies available to serve the Project.

Construction

As discussed in the Utility Report included as Appendix N of this SCEA, Project construction activities would require water for a variety of activities, including but not limited to dust control, cleaning of equipment, soil grading, soil excavation/export, and soil re-compaction. Water for these activities would be required during the initial stages of construction while the Project Site is prepared for development. The latter stages of construction normally require less water usage. In addition, the Project would include the removal of the existing on-site uses, which would either partially or wholly offset the limited water demand that may be required during construction of the Project. Accordingly, Project construction-related water demand would be anticipated to be less than the Project operational water demand. As discussed further below, the City's water supplies would be adequate to meet the Project's operational water demand during normal, single-dry, and multiple-dry years. **Therefore, LADWP water supplies would be adequate to meet Project construction-related water demand during normal, single-dry, and multiple dry years, and Project construction-related water supply impacts would be less than significant.**

Operation

Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on estimates of the Project's operational water demand as compared to LADWP's existing and forecasted future water supplies and demand over the next 20-year period during normal, single-dry, and multiple dry years as

set forth in LADWP's 2020 UWMP. In addition, consistent with LADWP's methodology, the estimates of Project operational water demand are based on 100 percent of LASAN sewage generation rates.

As shown in Table 29 on page 349, based on LASAN sewage generation factors, the Project would generate a net increase in water demand of 33.069 gallons per day. This is a conservative calculation as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code. LADWP's 2020 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2045, based on the demographic growth projections in SCAG's 2020–2045 RTP/SCS. The 2020 Urban Water Management Plan considers the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2020 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2045, as well as the intervening years (i.e., the Project buildout year of 2026).²⁰⁵ ***Therefore, based on LADWP's 2020 Urban Water Management Plan, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project's operation-related water supply impacts would be less than significant.***

²⁰⁵ Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021.

Table 29
Estimated Project Water Demand

	No. of Units/Floor Area	Water Use Factor (gpd/unit) ^a	Water Consumption (GPD)
Existing to Be Removed^b			
Commercial (Restaurant: Take Out)	11,088 sf	0.3	3,326
Existing to be Removed Subtotal			3,326
Proposed			
Residential			
Studio Apartment	28 du	75	2,100
One-Bedroom Apartment	96 du	110	10,560
Two-Bedroom Apartment	46 du	150	6,900
Residential Subtotal			19,560
Commercial and Residential Amenities			
Restaurant (Take Out)	16,680 sf	0.3 ^b	5,004
Fitness	3,803 sf	0.2	761
Club Room (lounge)	3,102 sf	0.05	155
Swimming Pool (Commercial with backwash filter)	10,488 sf	1	10,488
Landscaping	4,322 sf		427 ^c
Commercial Subtotal			16,835
Total Proposed Water Demand			36,395
Total Existing Water Demand to be Removed			3,326
Net Water Consumption (Proposed – Existing to be Removed)			33,069
<p><i>sf = square feet</i> <i>du = dwelling unit</i> <i>gpd = gallons per day</i></p> <p>^a Based on sewage generation rates provided by LASAN Sewer Generation Rates Table (2012).</p> <p>^b For purposes of the environmental impact analyses included herein, when accounting for the existing uses to be removed, only the buildings that are currently occupied or that were occupied within the last year are considered and “credit” is taken for their removal. This includes the two commercial buildings fronting Sunset Boulevard that are currently occupied by restaurants and that together comprise approximately 6,202 square feet; a one-story vacant commercial building fronting Vine Street that comprises approximately 3,234 square feet (vacant 2022); and a one-story vacant commercial building fronting Leland Way that comprises approximately 1,652 square feet (vacant since May 2023).</p> <p>^c ETWU methodology from Sunset & Vine Water Consumption Analysis. VCA, February 12, 2021.</p> <p>Source: Fuscoe Engineering, Water and Wastewater Infrastructure Assessment Report, December 2022; Eyestone Environmental, 2024.</p>			

c. Would the project 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 evaluated below, the Project would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the Project's projected wastewater demand.

Construction

As described in Section 3, Project Description, of this SCEA, the Project would involve removal of all existing uses within the portion of the Project Site to be developed. As such, any existing wastewater generation associated with the existing uses to be removed would cease during construction of the Project. As applicable, existing sewer laterals would also be capped during construction, and no sewage would enter the public sewer system from the area of the Project Site to be developed. Temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled off-site and would not be discharged directly into the public sewer system. As such, Project construction would not contribute directly to the wastewater system that serves the Project Site. In addition, any sewage generated during construction would be offset by the removal of the existing uses. Therefore, while the sewage hauled off-site would eventually be deposited at the Hyperion Water Reclamation Plant, the amount generated would likely be reduced compared to what is currently generated by the existing uses to be removed, and, as demonstrated below, the Hyperion Water Reclamation Plant has sufficient capacity to treat the sewer generation flows anticipated to be generated from the Project Site during operation. Accordingly, the wastewater generated construction would similarly be accommodated by the existing available capacity of the Hyperion Water Reclamation Plant.

Operation

As described above, wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of approximately 450 million gallons per day.²⁰⁶ As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 million gallons per day. Therefore, the current flows to HWRP are well below its design capacity of approximately 450 million gallons per day.

As analyzed in the Utility Report and summarized in Table 30 on page 351, the Project's estimated wastewater generation is approximately 35,968 gallons per day, or 0.04 million gallons per day. When accounting for existing uses to be removed, the net increase in wastewater generation for the Project would be 32,642 gallons per day (0.03 million gallons per day). The Project's increase in average daily wastewater flow of approximately 0.03 million gallons per day would represent approximately 0.02 percent of the current estimated 175 million gallons per day of remaining available capacity

²⁰⁶ LASAN, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=b37ciyq7m_5&_adf.ctrl=&_afrLoop=40056722672037049#!, accessed August 9, 2024.

Table 30
Estimated Project Wastewater Generation

	No. of Units/Floor Area	Sewage Generation Factor (gpd/unit) ^a	Water Consumption (GPD)
Existing to Be Removed^b			
Commercial (Restaurant: Take Out)	11,088 sf	0.3	3,326
Existing to be Removed Subtotal			3,326
Proposed			
Residential			
Studio Apartment	28 du	75	2,100
One-Bedroom Apartment	96 du	110	10,560
Two-Bedroom Apartment	46 du	150	6,900
Residential Subtotal			19,560
Commercial and Residential Amenities			
Restaurant (Take Out)	16,680 sf	0.3	5,004
Fitness	3,803 sf	0.2	761
Club Room (lounge)	3,102 sf	0.05	155
Swimming Pool (Commercial with backwash filter)	10,488 sf	1	10,488
Commercial Subtotal			16,408
Total Proposed Wastewater Demand			35,968
Total Existing Wastewater Demand to be Removed			3,326
Net Wastewater Flow (Proposed – Existing – Existing to be Removed)			32,642
<p><i>sf = square feet</i> <i>du = dwelling unit</i> <i>gpd = gallons per day</i></p> <p>^a Based on sewage generation rates provided by LASAN Sewer Generation Rates Table (2012).</p> <p>^b For purposes of the environmental impact analyses included herein, when accounting for the existing uses to be removed, only the buildings that are currently occupied or that were occupied within the last year are considered and “credit” is taken for their removal. This includes the two commercial buildings fronting Sunset Boulevard that are currently occupied by restaurants and that together comprise approximately 6,202 square feet; a one-story vacant commercial building fronting Vine Street that comprises approximately 3,234 square feet (vacant 2022); and a one-story vacant commercial building fronting Leland Way that comprises approximately 1,652 square feet (vacant since May 2023).</p> <p>Source: Fuscoe Engineering, Water and Wastewater Infrastructure Assessment Report, December 2022; Eyestone Environmental, 2024.</p>			

at the HWRP. As such, the HWRP would have sufficient capacity to treat the additional wastewater flows generated by the Project.

Based on the above, the Project would not result in a determination by the wastewater treatment provider that serves the Project Site that it does not have adequate capacity to serve the Project, and impacts would be less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial, and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.²⁰⁷ Ten Class III landfills and one inert landfill are currently operating within the County.²⁰⁸ In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.²⁰⁹

Based on the 2021 Countywide Integrated Waste Management Plan (CIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill disposal capacity for the City is estimated to be 137.09 million tons, with a total estimated daily disposal rate of 36,971 tons per day, and the remaining lifespan of each landfill ranges from 7 to 34 years.²¹⁰ The estimated remaining capacity for the County's Class III landfills available for City use is approximately 127.44 million tons.²¹¹ The estimated remaining capacity for the County's Class III open to the Project Site is approximately 122.93 million tons as of December 31, 2021.²¹² In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation.²¹³ This facility has 50.77 million tons of remaining capacity and

²⁰⁷ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

²⁰⁸ County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

²⁰⁹ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022.

²¹⁰ County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.

²¹¹ Total excludes Class III landfills not available for use by the City of Los Angeles for disposal (i.e., Burbank, Pebbly Beach, San Clemente, School Canyon, and Whittier) according to the 2021 Annual Report.

²¹² The Class III landfills open to the Project Site are those open to the City, not including the Calabasas landfill as this landfill is limited to the Calabasas Wasteshed, use as defined by Los Angeles County Ordinance No. 91-0003, which is composed of the incorporated cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks; that portion of the City of Los Angeles bordered by the northerly line of Township 2 North on the north, Interstate Highway 405 on the east, Sunset Boulevard and the Pacific Ocean on the south, and the City boundary on the west; and certain unincorporated areas in the Counties of Los Angeles and Ventura.

²¹³ As of 2021, according to the Los Angeles County Integrated Waste Management Plan 2021 Annual Report, the Azusa Land Reclamation facility is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

an average daily in-County disposal rate of 1,292 tons per day.²¹⁴ Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the ColWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.²¹⁵

The following analysis quantifies the Project's construction and operation solid waste generation.

Construction

The Project Site is currently developed with residential and commercial uses. The Project includes the development of a new 201,134-square-foot mixed-use building consisting of 170 new residential units comprising approximately 184,454 square feet and approximately 16,680 square feet of ground-floor commercial space. To provide for the proposed improvements, the Project would remove 11,088 square feet of commercial uses and a 2,174-square-foot vacant duplex. As shown in Table 31 on page 354, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project would generate approximately 1,027 tons of demolition waste associated with the removal of existing uses and 436 tons of construction waste, resulting in a total of 1,463 tons of waste prior to recycling.

Pursuant to the requirements of SB 1374,²¹⁶ the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

As shown in Table 31, after accounting for mandatory recycling, the Project would generate approximately 355 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.0007 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 50.77 million tons.²¹⁷ It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the

²¹⁴ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022.

²¹⁵ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022.

²¹⁶ Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

²¹⁷ $(355 \text{ tons} \div 50.77 \text{ million tons}) * 100 = 0.0007 \text{ percent.}$

Table 31
Estimated Construction and Demolition Waste Generation

Land Use	Quantity (unit)	Generation Factor (lbs/unit)^a	Total (tons)^b
Demolition Waste (to be removed)			
Commercial	11,088 sf	155	859
Residential (vacant duplex)	2,174 sf	115	125
<i>Total Construction Debris</i>			984
Construction Waste			
Residential (170 du)	184,454 sf	4.38	404
General Retail	16,680 sf	3.89	32
Total Construction Waste			436
Total Demolition and Construction Waste (prior to diversion)			1,421
Total Disposal (After 75% Diversion)			355
<p><i>sf = square feet</i> <i>lbs = pound</i> ^a U.S. Environmental Protection Agency, <i>Estimating 2003 Building-Related Construction and Demolition Materials Amounts</i>, Report No. EPA530-R-09-002, March 2009, Tables 3 and 4. ^b Numbers may not add up exactly due to rounding. Source: Eyestone Environmental, 2024.</p>			

Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, Project construction would not 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 and strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

Operation

As shown in Table 32 on page 355, based on solid waste generation factors from LASAN, the Project would generate approximately 508 tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. When accounting for a diversion rate consistent with the Citywide diversion rate of 76.4, as shown in Table 32, the Project would result in a net increase in solid waste generation of 109 tons/year. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the

Table 32
Estimated Operational Solid Waste Generation

Land Use	Size	Employee Generation Rates ^a	Estimates No. of Employees	Solid Waste Generation Factor ^b	Total Waste Generation (tons/year)
Existing to Be Removed					
Commercial	11,088 sf	0.002	23	1.92 tn/emp/yr	44
Total to be Removed					44
Proposed Use					
Residential	170 du	N/A	N/A	2.23 tn/du/yr	379
Commercial	16,680 sf	0.004	67	1.92 tn/emp/yr	129
Total Proposed Development					508
Total Net Disposal (prior to diversion)					464
Total Net Disposal (after 76.4% diversion)^c					109
<p><i>emp = employees</i> <i>tn = tons</i> <i>yr = year</i> <i>du = dwelling units</i></p> <p>^a Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.</p> <p>^b Employee yearly solid waste generation factors for business group from CalRecycle's 2014 Waste Characterization Study, www2.calrecycle.ca.gov/wastecharacterization/businessgroup/rates, accessed August 9, 2024. Based on the waste generation rate of 1.92 ton per employee per year (Restaurants). Solid waste generation rate for residential use is from L.A. CEQA Thresholds Guide, p. M.3-2.</p> <p>^c Consistent with the current Citywide diversion rate of 76.4 percent.</p> <p>Source: Eyestone Environmental, 2024.</p>					

City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the Year 2025.²¹⁸

The estimated annual net increase in solid waste that would be generated by the Project (prior to recycling/diversion) of 464 tons represents approximately 0.0004 percent of the remaining capacity (122.93 million tons) for the County's Class III landfills open to the City of Los Angeles.²¹⁹ The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not generate solid waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project's potential operational impacts to solid waste facilities would be less than significant.

²¹⁸ City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=3uminpbl7_1&_afLoop=152547096744414&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D152547096744414%26_afWindowMode%3D0%26_afCtrl-state%3D3uminpbl7_5, accessed May 5, 2023.

²¹⁹ 464 tons per year/122.93 million tons x 100 = 0.0004 percent.

Furthermore, as described in the 2021 Annual Report, the County will continue to address landfill capacity through the preparation of ColWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2021 Annual Report.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by construction and operation of the Project. Thus, the Project's potential impacts related to solid waste generation would be less than significant.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste²²⁰ on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development

²²⁰ Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

projects include an on-site recycling area or room of specified size.²²¹ The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Additionally, the Project's construction contractor would deliver all construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills, thus exceeding state requirements. As such, the Project would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAN/L.A.'s Green New Deal.

Overall, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Thus, impacts would be less than significant.

Cumulative Impacts

Water

Less Than Significant Impact. The geographic context for the cumulative impact analysis on infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the related projects would cumulatively increase demands on the existing infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of an IFFAR and SAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire demands. In addition, prior to ground disturbance, the related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects. Additionally, as with the Project, the related projects would be required to implement a construction traffic management plan to ensure that adequate and safe access remains available within and near the related Project Sites during construction activities.

With regard to water supply, LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide water supplies to serve existing and projected demands. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Implementation of the Project in combination with the related projects listed in Table 33 on page 367, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been considered in LADWP's 2020 UWMP. The 2020 UWMP anticipates that the future water supplies would be sufficient to meet existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. It is unknown whether the related projects or other developments in the LADWP service area have been considered in the 2020 UWMP.

²²¹ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

Nonetheless, it can be assumed that any development projects that are not included in the 2020 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects with over 500 residential units would have to prepare a water supply assessment pursuant to Senate Bill 610 to be reviewed and certified by LADWP to demonstrate adequate water supply.

Based on the above, cumulative impacts on water supply and infrastructure would be less than significant.

Wastewater

Less Than Significant Impact. As with the Project, new development projects in the vicinity of the Project Site would be required to submit a Sewer Capacity Availability Request (SCAR) to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines to determine if there is adequate sewer capacity. In addition, new development projects would be subject to LAMC Section 64.11 and Section 64.12, which require approval of a sewer permit prior to connection to the sewer system. To connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with LASAN and comply with all applicable City and State water conservation programs and sewer allocation ordinances. With regard to wastewater treatment facilities as stated in the One Water LA 2040 Plan, the HWRP has sufficient capacity to manage wastewater flows through the year 2040.²²²

Based on the above, cumulative impacts on wastewater infrastructure would be less than significant.

Stormwater

Less Than Significant Impact. Stormwater from each of the related projects and other nearby development projects would be collected on each of the respective sites, retained and treated in compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first 0.75 inch of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. ***Therefore, the cumulative impact related to the construction or expansion of stormwater infrastructure would be less than significant and the Project's contribution to cumulative stormwater impacts would not be cumulatively considerable.***

²²² Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 1, page ES-20.

Electricity

Less Than Significant Impact. Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2022 Power Strategic Long-Term Resources Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The Power Strategic Long-Term Resources Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Like the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24. In addition, development projects within the LADWP service area would be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. ***Overall, cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.***

Natural Gas

Less Than Significant Impact. As discussed above, the Project would result in a decrease in the onsite demand for natural gas. Given the City's adoption of an all-electric ordinance, it is anticipated that related projects would similarly result in an overall reduction in natural gas. Furthermore, like the Project, during construction and operation other future development projects would be expected to incorporate energy conservation measures and comply with applicable regulations including CALGreen and State energy standards under Title 24. Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. It is expected that SoCalGas will continue to expand its delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. ***As such, cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, cumulative impacts would be less than significant.***

Telecommunication Facilities

Less Than Significant Impact. Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. ***Thus, the Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.***

Solid Waste

Less Than Significant Impact. Given the level of urbanization present throughout the vicinity of the Project Site, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. The demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual

ColWMP report assesses future landfill disposal needs over a 15-year planning horizon. Based on the 2021 ColWMP, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2036) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual ColWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. As such, the Project’s contribution would not be cumulatively considerable, and cumulative impacts regarding solid waste disposal capacity would be less than significant.

Additionally, like the Project, the related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City’s Green Building Code, as applicable. **Therefore, construction and operation of the Project and the related projects would comply with applicable state or City solid waste regulations and would not result in significant cumulative impacts. As such, the Project’s contribution during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.**

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.
- b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
- c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.
- d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.
- e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
- f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place
- g) Include external sprinklers with an independent water source to reduce flammability of structures.
- h) Include local solar power paired with batteries to reduce power flow in electricity lines.
- i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.
- j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.
- k) Developments in fire-prone areas should have fire-resistant feature, such as:
 - Ember-resistant vents
 - Fire-resistant roofs
 - Surrounding defensible space
 - Proper maintenance and upkeep of structures and surrounding area

Applicability to the Project

As described in the impact analysis below, the Project Site is not located in an area classified as a VHFHSZ. As such, the Project would not result in potential impacts pertaining to wildfire hazards, and the measure included in Mitigation Measure PMM-WF-1 from the 2020–2045 RTP/SCS PEIR are not applicable to the Project.

PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:
 - Submit a fire protection plan including the designation of fire watch staff;
 - Maintain water and other fire suppression equipment designated solely for firefighting on-site for any construction and maintenance activities;
 - Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and
 - Designate trained fire watch staff during project construction to reduce risk of fire hazards.

Applicability to the Project

As previously discussed, the Project Site is not located in an area classified as a VHFHSZ. Thus, Mitigation Measure PMM WF-2 from the 2020–2045 RTP/SCS PEIR are not applicable to the Project.

SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures

PMM WF-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.
- b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
- c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.
- d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.
- e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
- f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.

- g) Include external sprinklers with an independent water source to reduce flammability of structures.
- h) Include local solar power paired with batteries to reduce power flow in electricity lines.
- i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.
- j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.
- k) Developments in fire-prone areas should have fire-resistant features, such as:
 - 1) Ember-resistant vents
 - 2) Fire-resistant roofs
 - 3) Surrounding defensible space
 - 4) Proper maintenance and upkeep of structures and surrounding area
- l) Explore and implement new strategies and better roadway easement management to minimize fire ignitions along roadways.
- m) Coordinate with CAL FIRE, local Fire Safe Councils, and homeowners' associations to implement FireWise Communities, implement restoration projects that remove highly flammable non-native grasses, and improve habitat via restoration projects at the Wildland Urban Interface.

Applicability to the Project

As described in the impact analysis below, the Project Site is not located in an area classified as a VHFHSZ. As such, the Project would not result in potential impacts pertaining to wildfire hazards, and the measures included in Mitigation Measure PMM-WF-1 from the 2024–2050 RTP/SCS PEIR are not applicable to the Project.

PMM WF-2: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) New development or infrastructure activity within very high hazard severity zones or SRAs to:
 - 1) Submit a fire protection plan including the designation of fire watch staff;
 - 2) Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;
 - 3) Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and
 - 4) Designate trained fire watch staff during project construction to reduce risk of fire hazards.

Applicability to the Project

As previously discussed, the Project Site is not located in an area classified as a VHFHSZ. Thus, Mitigation Measure PMM WF-2 from the 2024–2050 RTP/SCS PEIR are not applicable to the Project.

Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As discussed above, Project Site is located in an urbanized area, and is developed with relatively level topography. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.^{223,224} Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an adopted emergency response plan or emergency evaluation plan within a wildfire area. ***No impacts regarding wildfire risks or related post-fire conditions would occur and impacts would be less than significant.***

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

No Impact. As discussed above, the Project Site's topography is relatively leveled and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.²²⁵ In addition, there is no accumulation of dry vegetation within the Project Site to fuel wildfires, or wildlands or steep slopes located in the vicinity of the Project Site or frequent strong wind events to exacerbate wildfires. Therefore, as the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and due to the flat topography of the Project Site and surrounding area, the Project would not result in impacts related to exacerbating wildfire risks. ***No impacts regarding wildfire risks or related post-fire conditions would occur, and impacts would be less than significant.***

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

No Impact. As discussed above, the Project Site is located in an urbanized area, and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.^{226,227}

²²³ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031.

²²⁴ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit A, p. 47.

²²⁵ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031.

²²⁶ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN's 5546-025-020, -029, -030, and -031.

²²⁷ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit A, p. 47.

As the Project Site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones, the Project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, or emergency water sources to assist with fire suppression in a wildfire area. Therefore, while the Project could require utility improvements to connect the new buildings to the main infrastructure, such improvements would not be located within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not be considered wildfire area associated infrastructure. **No impacts regarding wildfire risks or related post-fire conditions would occur, and impacts would be less than significant.**

d. Would the project 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. As previously discussed, the Project Site is in an urbanized, generally leveled area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. As discussed, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. **No impacts regarding wildfire risks or related post-fire conditions would occur, and impacts would be less than significant.**

Cumulative Impacts

No Impact. Like the Project, the related projects are in highly urbanized areas and would not contain wildland features or be located adjacent to any wildland areas. As with the Project, any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to wildfire hazards. The Project and all related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. As such, the Project’s contribution to cumulative impacts would not be cumulatively considerable and impacts would be less than significant.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant with Mitigation Incorporated. Based on the analyses contained under Items I through XX above, with adherence to regulatory compliance measures and implementation of project design features and mitigation measures, the Project would not have the potential to degrade the quality of the environment and would not result in any significant unavoidable impacts to the environment. The Project Site is currently developed with residential and commercial uses. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan that applies to the Project Site. In addition, adherence to the Migratory Bird Treaty Act and the California Fish and Game Code and incorporation of Mitigation Measure BIO-MM-1 would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Implementation of Project Mitigation Measure BIO-MM-1 would ensure that the Project would not conflict with any local policies or ordinances protecting biological resources (e.g., protected trees). Thus, the Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. In addition, with incorporation of mitigation, as set forth above, the Project would not eliminate important examples of the major periods of California history or prehistory.

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

Less Than Significant Impact. The cumulative analysis in this SCEA takes into consideration the 45 related projects listed in Table 33 on page 367 and shown in Figure 17 on page 370. The list of related projects is based on information provided by LADOT, and includes developments within a

**Table 33
Related Projects**

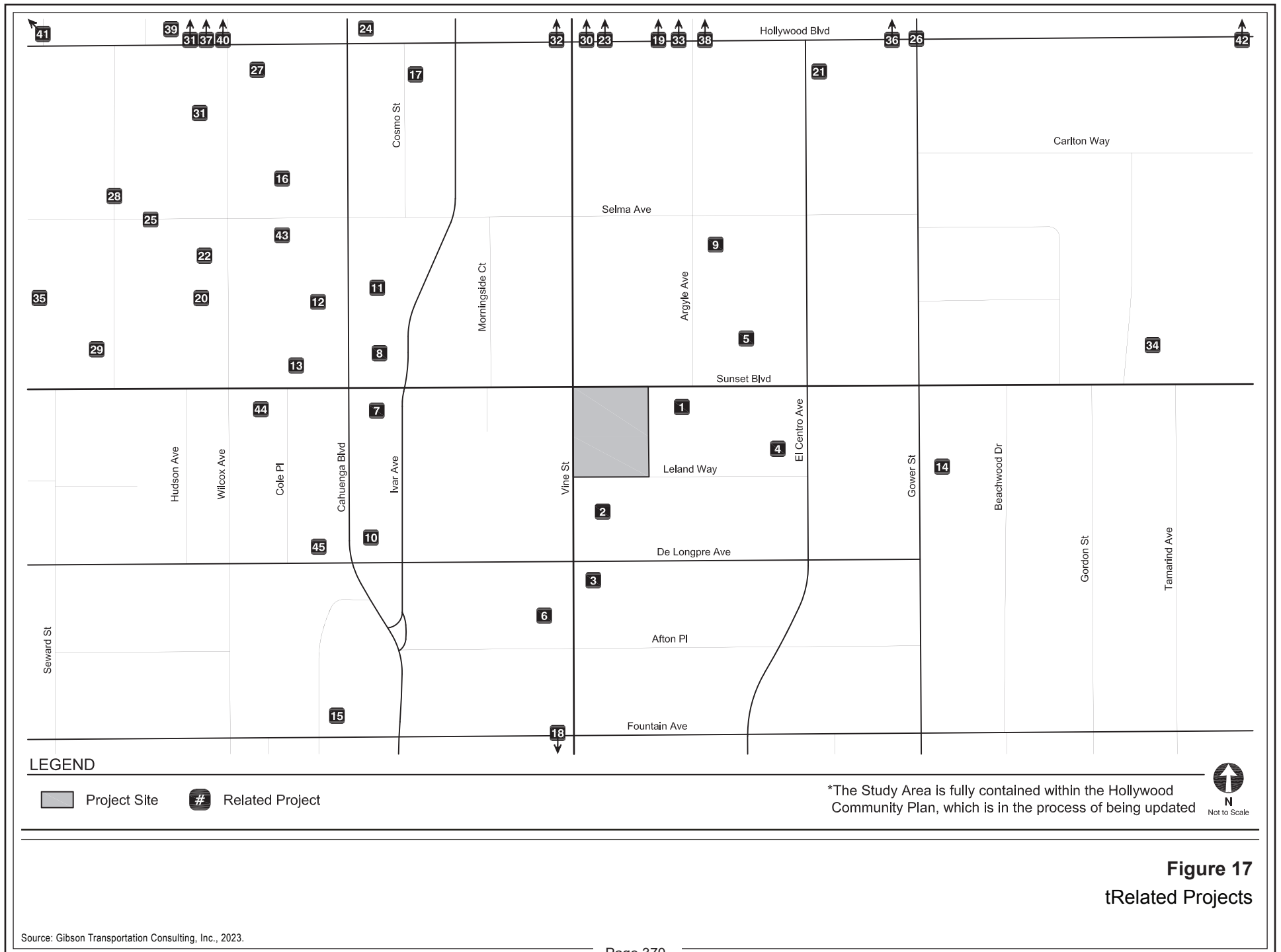
No.	Project Name/Address	Description	Unit/Area
1	Nickelodeon 6250 W. Sunset Blvd.	Apartments	200 du
		Retail	4,700 sf
2	1400 N. Vine Street	Apartments	177 du (21 affordable)
		Retail	16,000 sf
3	Onni Group Mixed-Use Development 1360 N. Vine St.	Office	463,521 sf
		Restaurant	11,914 sf
		Rehabilitated Uses (residential, restaurant, or office)	8,988 sf
4	6200 W. Sunset Blvd.	Apartments	270 du
		Quality Restaurant	1,750 sf
		Pharmacy	2,300 sf
		Retail	8,070 sf
5	Palladium Residences 6201 W. Sunset Blvd.	Apartments	200 du
		Restaurant	7,000 sf
6	Academy Square 1341 Vine St.	Office	285,719 sf
		Apartments	200 du
		Restaurant	16,135 sf
7	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartments	200 du
		Retail	7,000 sf
8	Ivar Gardens Hotel 6409 W. Sunset Blvd.	Hotel	275 rooms
		Retail	1,900 sf
9	Modera Argyle 1546 N. Argyle Ave.	Apartments	276 du
		Retail	9,000 sf
		Restaurant	15,000 sf
10	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	220 rooms
		Restaurant	2,723 sf
		Bar	1,440 sf
11	Artisan Hollywood 1520 N. Cahuenga Blvd.	Apartments	243 du (27 affordable)
		Restaurant	6,805 sf
12	Cahuenga Boulevard Hotel 1525 N. Cahuenga Blvd.	Hotel	64 rooms
		Rooftop Restaurant/Lounge	700 sf
		Restaurant	3,300 sf
13	6445 Sunset Hotel 6445 Sunset Blvd.	Hotel	175 room
		Restaurant	12,500 sf
14	Sunset Gower Studios 1438 N. Gower St.	Sound Stage	169,400 sf
		Production Support	52,800 sf
		Office	852,830 sf
		Restaurant	6,516 sf
15	1310 N. Cole Ave.	Apartments	369 du
		Office	2,570 sf

Table 33 (Continued)
Related Projects

No.	Project Name/Address	Description	Unit/Area
16	Selma–Wilcox Hotel 6421 W. Selma Ave	Hotel	114 rooms
		Restaurant	1,993 sf
17	6360 Hollywood 6360 Hollywood Blvd.	Hotel	90 rooms
		Restaurant	11,000 sf
18	1235 Vine St Project 1235 Vine St.	Office	109,190 sf
		Restaurant	7,960 sf
19	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf
20	Thompson Hotel 1541 N. Wilcox Ave.	Hotel	190 rooms
		Restaurant	4,463 sf
		Meeting Room	1,382 sf
21	6140 Hollywood 6140 Hollywood Blvd.	Hotel	102 rooms
		Condominium	27 du
		Restaurant	11,460 sf
22	Citizen News 1545 N. Wilcox Ave.	Flexible Event Space	16,100 sf
		Restaurant	14,800 sf
23	citizenM Hotel 1718 Vine St.	Hotel	240 rooms
		Restaurant	5,373 sf
24	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rooms
		Restaurant	15,290 sf
25	Tommie Hotel 6516 W. Selma Ave.	Hotel	212 rooms
		Bar/Lounge	3,855 sf
		Rooftop Bar/Event Space	8,500 sf
26	Hollywood Gower Mixed-Use 6100 W. Hollywood Blvd.	Apartments	220 du
		Restaurant	3,270 sf
27	Hollywood & Wilcox 6430–6440 W. Hollywood Blvd.	Apartments	260 du
		Office	3,580 sf
		Retail	11,020 sf
		Restaurant	3,200 sf
28	1600 Schrader 1600 Schrader Blvd.	Hotel	168 rooms
		Restaurant	5,979 sf
29	CD 13 Schrader Temp Bridge Housing Shelter 1533 Schrader Blvd.	Housing Shelter	70 beds
30	Hollywood Center Mixed-Use (Formerly Millennium) 1720 N. Vine St.	Apartments	872 du
		Affordable Senior Apartments	133 du
		Retail	30,176 sf
31	1637 N. Wilcox Mixed-Use 1637 N. Wilcox Ave.	Apartments	93 du (61 affordable)
		Commercial	6,586 sf
32	1133 N. Vine St	Hotel	112 rooms
		Café	661 sf

Table 33 (Continued)
Related Projects

No.	Project Name/Address	Description	Unit/Area
33	Yucca Street Condos 6230 W. Yucca St.	Apartments	114 du
		Commercial	2,697 sf
34	5939 W. Sunset Blvd.	Apartments	299 du
		Commercial	38,440 sf
		Restaurant	5,064 sf
		Retail	3,739 sf
35	1524–1538 N. Cassil Pl.	Apartments	138 du
		Hotel	60 rooms
		Restaurant	1,400 sf
36	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du
37	Wilcox Hotel 1717 N. Wilcox Ave.	Hotel	133 rooms
		Retail	3,580 sf
38	6220 West Yucca Street	Hotel	210 rooms
		Apartments	136 du
		Retail	3,450 sf
		Restaurant	9,120 sf
39	Hudson Building 6523 W. Hollywood Blvd.	Office	4,074 sf
		Storage	890 sf
		Restaurant	10,402 sf
40	1723 N. Wilcox 1723 N. Wilcox Ave.	Hotel	81 rooms
		Restaurant	2,236 sf
41	6630 W. Sunset Boulevard	Apartments	40 du
42	5901 Sunset Blvd.	Office	274,000 sf
		Supermarket	26,000 sf
43	Wilcox & Selma Residential Project 6422 W. Selma Ave.	Apartments	45 du
44	Sunset + Wilcox Mixed-Use 6450 W. Sunset Blvd.	Commercial	431,032 sf
		Restaurant	12,386 sf
45	Cahuenga Housing 1415 N. Cahuenga Blvd.	Apartments	82 du
<p><i>sf = square feet</i> <i>du = dwelling units</i> <i>Source: Gibson Transportation Consultants, Inc., 2023; Eyestone Environmental, 2024.</i></p>			



0.5-mile radius of the furthest outlying intersection. While these related projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. A significant impact may occur if the Project, in conjunction with the 45 related projects, would result in impacts that would be significant when viewed together, even if impacts would otherwise not be considered significant when projects are analyzed on an individual basis.

The cumulative analyses for each environmental issue area are contained under Items I through XX, above, following the assessments of Project impacts. Based on these analyses, cumulative impacts related to all of the above environmental factors would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.