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CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(PRC Section 21152; CEQA Guidelines Section 15062)

Pursuant to Public Resources Code § 21152(b) and CEQA Guidelines § 15062, the notice should be posted with the County Clerk by mailing the form and posting fee payment to the following address: Los Angeles County Clerk/Recorder, Environmental Notices, P.O. Box 1208, Norwalk, CA 90650. Pursuant to Public Resources Code § 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS

CPC-2024-480-DB-SPR-VHCA-1A / Density Bonus, Site Plan Review

LEAD CITY AGENCY

City of Los Angeles (Department of City Planning)

CASE NUMBER

ENV-2024-481-CE

PROJECT TITLE

7022 West Sunset Boulevard Mixed-Use Project

COUNCIL DISTRICT

13 – Soto-Martinez

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map)

☐ Map attached.

7014-7022 West Sunset Boulevard / 1438-1446 North Sycamore Avenue

PROJECT DESCRIPTION:

☒ Additional page(s) attached.

The project proposes the demolition of an existing 6,690-square-foot commercial building, an existing 6,633-square-foot institutional building, and an associated surface parking lot, and the construction of a new seven-story mixed-use residential and commercial building consisting of 112 dwelling units and 2,875 square-feet of commercial retail uses; resulting in a total floor area of 91,665 square-feet. The project will have a height of 86 feet, 6 inches. The project proposes 60 automobile parking spaces on-site at ground level and within one (1) subterranean level; and 93 bicycle parking spaces (83 long-term and 10 short-term) on-site at ground level. There are two (2) existing Street Trees in the public right-of-way adjacent to the project site. The project will retain both existing Street Trees and plant an additional 29 trees on-site. There are four (4) non-protected trees on-site proposed for removal and no existing Protected Trees on-site. Development of the Project would require the cut and export of approximately 11,000 cubic yards (cy) of soil. No import or fill is proposed. The project is required to provide 11,425 square-feet of open space and is voluntarily providing a total of 15,064 square feet of open space. The project assumes a worst-case scenario of removing all street trees, in the event of changes to the right-of-way improvement plans after approval of the environmental clearance. However, this environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and 62.170 and their applicable findings.

NAME OF APPLICANT / OWNER:

Sycamore Corner LLP (Owner)

CONTACT PERSON (If different from Applicant/Owner above)

Kyndra Casper (Representative)

(AREA CODE) TELEPHONE NUMBER

(213) 694-3141

EXT.

EXEMPT STATUS: (Check all boxes, and include all exemptions, that apply and provide relevant citations.)

STATE CEQA STATUTE & GUIDELINES

☐ STATUTORY EXEMPTION(S)

Public Resources Code Section(s) _____

☒ CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)CEQA Guideline Section(s) / Class(es) Section 15332 / Class 32☐ OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b))

JUSTIFICATION FOR PROJECT EXEMPTION:

☒ Additional page(s) attached

In-fill development meeting the conditions described in CEQA Guidelines 15332: (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered, rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services

☒ None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project.☐ The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.

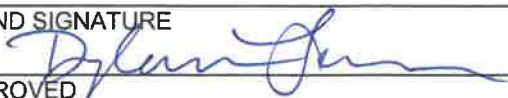
IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.

If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE

Dylan Lawrence



STAFF TITLE

City Planning Associate

ENTITLEMENTS APPROVED

See Case No. CPC-2024-480-DB-SPR-VHCA-1A

DISTRIBUTION: County Clerk, Agency Record

Rev. 6-22-2021



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

Categorical Exemption

7022 Sunset Project

Case Number: ENV-2024-481-CE

Project Location: 7014-7022 West Sunset Boulevard and 1438-1446 North Sycamore Avenue

Community Plan Area: Hollywood

Council District: 13

Project Description: The 7022 Sunset Boulevard Project (the Project) is located at 7014-7022 West Sunset Boulevard and 1438-1446 North Sycamore Avenue (Project Site) in the Hollywood community of the City of Los Angeles (City). The Project Site is 28,919 square feet (sf). The Project Site is currently developed with a 6,690- sf adult day care facility built in 1963 (7014 Sunset Boulevard), a 6,633-sf, one-story vacant commercial building built in 1932 (7022 Sunset Boulevard), and a surface parking lot (1444 North Sycamore Avenue).

The Project would demolish the existing on-site structures to construct a seven-story building with 112 residential dwelling units (42 studios, 61 one-bedrooms, and 9 two-bedrooms) and 2,875 sf of retail space on the ground floor over one level of partially underground parking and one level of ground level parking. The Project would have a total floor area of approximately 91,665 sf. The Project would include 12 very low-income units, 99 market rate units and one manager's unit (112 units total). The Project would provide 60 automobile parking spaces (47 residential automobile parking spaces and 13 commercial automobile parking spaces) and 93 bicycle parking spaces (83 long term bicycle stalls plus 10 short term spaces).

Currently, there are four trees on the Project Site including a Mulberry tree (*Morus spp*), Italian alder (*Alnus cordata*), Chinese Elm (*Ulmus parvifolia*), and Ficus (*Ficus elastica*).¹ There are two street trees; the one on Sycamore Avenue is a Camphor tree (*Cinnamomum camphora*), and the one on Sunset Boulevard is a Mexican fan palm (*Washingtonia robusta*). None of these six trees is a native tree that is protected by the LAMC Protected Tree Ordinance No. 177404. The Project would retain the two existing street trees and would remove the four existing on-site trees. The Project assumes a worst-case scenario of removing all street trees, in the event of changes to the right-of-way improvement plans after approval of the environmental clearance. However, this environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and

¹ Tree Report: 7022 Sunset Blvd. Los Angeles, CA 90028, Paul Lewis Landscape Architect, November 20, 2023

62.170 and their applicable findings. The Project proposes to plant 29 trees of varying species within and around the exterior of the Project Site and along North Sycamore Avenue.

The Project would provide 15,064 sf of open space, including 1,650 sf of open space in the form of balconies attached to the residential uses and 13,414 sf of common open space for the residents. The Project proposes 91,665 sf of floor area over 24,726 sf of combined buildable area, which constitutes an average FAR of 3.71:1. Project construction would occur over approximately 20 months, with construction beginning in the first quarter of 2025 and ending in the fourth quarter of 2026. The Project is anticipated to be operational in 2027. The Project will include 11,000 cubic yards (cy) of cut, with no fill and will include 11,000 cy of export.

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

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February 2025

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Section 1 Project Description

1.1 Project Summary

The 7022 Sunset Boulevard Project (the Project) is located at 7014-7022 West Sunset Boulevard and 1438-1446 North Sycamore Avenue (Project Site) in the Hollywood community of the City of Los Angeles (City).

The Project would demolish the existing on-site structures to construct a seven-story building with 112 residential dwelling units (42 studios, 61 one-bedrooms, and 9 two-bedrooms) and 2,865 square feet (sf) of retail space on the ground floor over one level of partially underground parking and one level of ground level parking. The Project would have a total floor area² of approximately 91,665 sf and a gross building area of approximately 120,005 sf.

The Project would include 12 very low-income units, 99 market-rate units and one manager's unit. The Project would provide 60 automobile parking spaces (47 residential automobile parking spaces and 13 commercial automobile parking spaces) and 93 bicycle parking spaces (83 long term bicycle stalls plus 10 short term spaces). The Project proposes 91,665 sf of floor area over 24,726 sf of combined buildable area, which constitutes an average FAR of 3.71:1.

1.2 Environmental Setting

Project Location

The Project Site is comprised of four parcels with the following Assessor Parcel Numbers (APN): 5548-016-001, -002, -003, and -004. The Project Site is approximately 0.66 acres (28,919 square feet). The Project Site has a combined lot area of 28,919 sf. The Project Site is located at 7014-7022 Sunset Boulevard within the Hollywood community. The Project Site is bordered by North Sycamore Avenue to the west, Sunset Boulevard to the north, the Sunset Montessori Pre-School and residential uses to the south, and commercial uses, parking and residential uses, and North Orange Drive to the east. Please refer to **Figure 1, Regional and Vicinity Map** and **Figure 2, Aerial of Project Site**.

Regional vehicle access to the Project Site is provided by the 101 Freeway, located approximately 1.4 miles east of the Project Site. Local vehicle access to the Project Site is provided via Sunset Boulevard, North Sycamore Avenue, North Orange Drive and De Longpre Avenue. The Project Site is located proximate to several transit options. It is approximately 0.4 miles northeast from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System. Numerous bus lines also serve the Project Site, including Metro bus lines 2, 212, 224, and the DASH Hollywood line.

² Floor Area: LAMC Section 12.03 Definitions. The 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 dedicated to bicycle parking, space for the landing and storage of helicopters, Outdoor Dining Areas, and Basement storage areas. Buildings on properties zoned RA, RE, RS, and R1, except properties in the Coastal Zone which are not designated as Hillside Area, are subject to the definition of Residential Floor Area.

Existing Conditions

The Project Site is currently developed with a 6,690-sf adult day care facility built in 1963 (7014 Sunset Boulevard), a 6,633 sf, one-story vacant commercial building built in 1932 (7022 Sunset Boulevard), and a surface parking lot (1444 North Sycamore Avenue).

Currently, there are four trees on the Project Site and two street trees off-site: one on Sycamore Avenue, which is a Camphor tree (*Cinnamomum camphora*), and one on Sunset Boulevard, which is a Mexican fan palm (*Washingtonia robusta*). The four trees on the Project Site include a Mulberry tree (*Morus spp*), Italian alder (*Alnus cordata*), Chinese Elm (*Ulmus parvifolia*), and Ficus (*Ficus elastica*).³ None of the trees located on the Project Site or street trees is a protected tree as defined by the Los Angeles Municipal Code (LAMC) Protected Tree Ordinance No. 177404.

The surrounding zoning and land uses are as listed below.

- **North:** Land uses to the north of the Project Site (across Sunset Boulevard) include various commercial uses including a hotel, offices, and restaurants. Hollywood High School is located to the northeast. Land uses directly to the north are zoned C4-2D-SN, with Hollywood High School zoned PF-1XL.
- **East:** Land uses directly to the east of the Project Site are zoned C4-2D-SN and RD1.5-1XL and include commercial (IHOP restaurant), parking and residential uses.
- **South:** Land uses directly to the south of the Project Site are zoned RD1.5-1XL and include the Sunset Montessori Pre-School and residential uses.
- **West:** Land uses to the west of the Project Site (across North Sycamore Avenue) are zoned C4-2D-SN and P-2D and include restaurants and commercial uses. Also located to the west is the Henson Recording Studios.⁴

1.3 Description of the Project

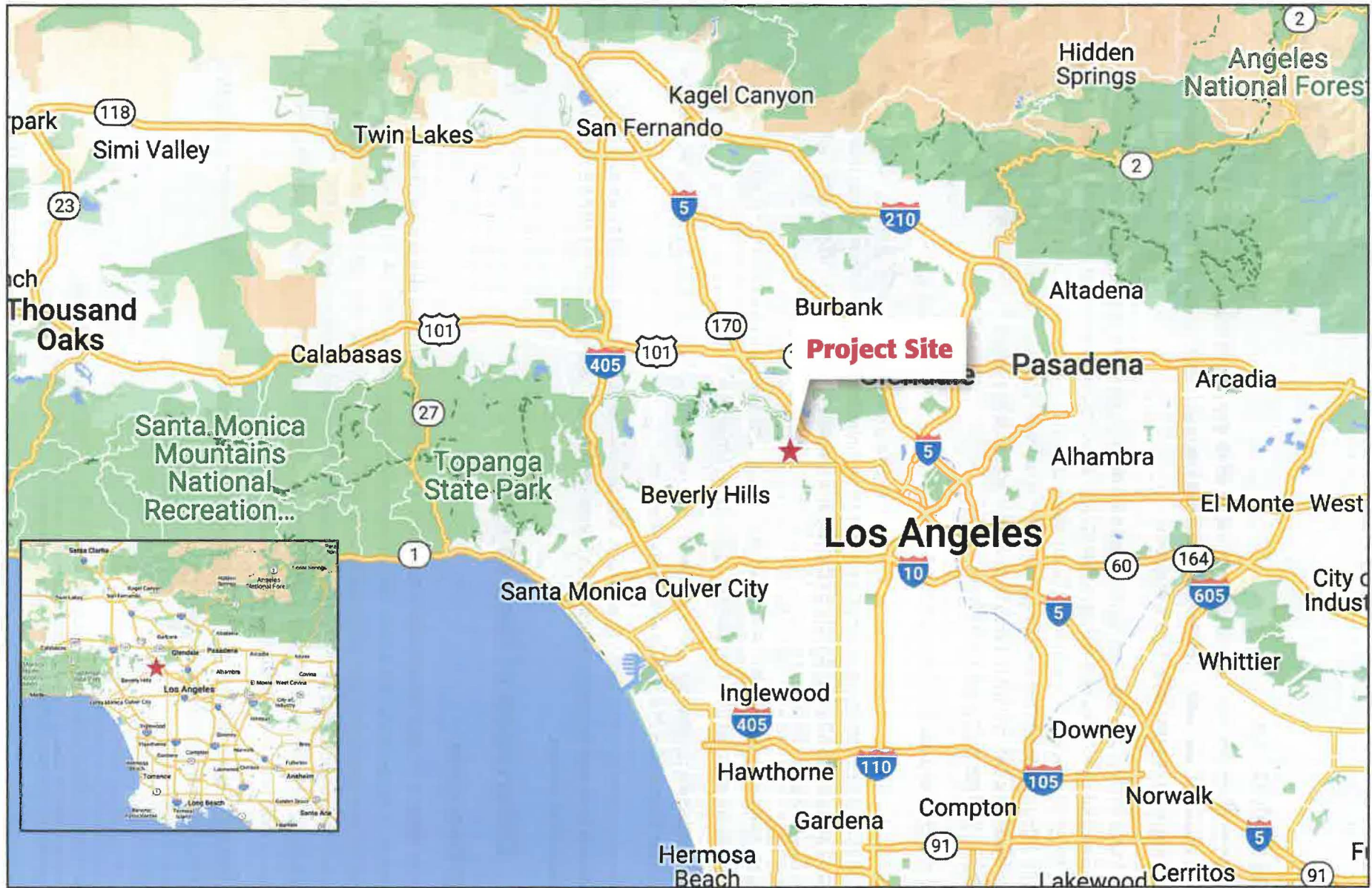
Project Overview

As shown in **Table 1, *Project Development Summary***, the Project would demolish the existing land uses and construct a seven-story (86.6-foot tall) mixed-use building comprised of 112 residential units (42 studios, 61 one-bedrooms, and 9 two-bedrooms) with 2,875 sf of retail space on the ground floor. The Project would include one level of underground parking and one level of ground level parking. The Project would include 12 very low-income units and 99 market-rate units and one manager's unit. The Project would have a total floor area of approximately 91,665 sf.

Figure 3, *Site Plan*, **Figure 4, *North and South Elevation***, and **Figure 5, *East and West Elevation***, depict the proposed floor plan and proposed elevations.

³ Tree Report: 7022 Sunset Blvd. Los Angeles, CA 90028, Paul Lewis Landscape Architect, November 20, 2023

⁴ Formally the Charlie Chaplin studios, Occupied by the Jim Recording Hensen Studios since 2000.
Source: <https://hensonrecording.com/history.html> Accessed May 8, 2024.



SOURCE: Google Maps, 2023



FIGURE 1: Regional and Vicinity Map

7022 SUNSET BOULEVARD

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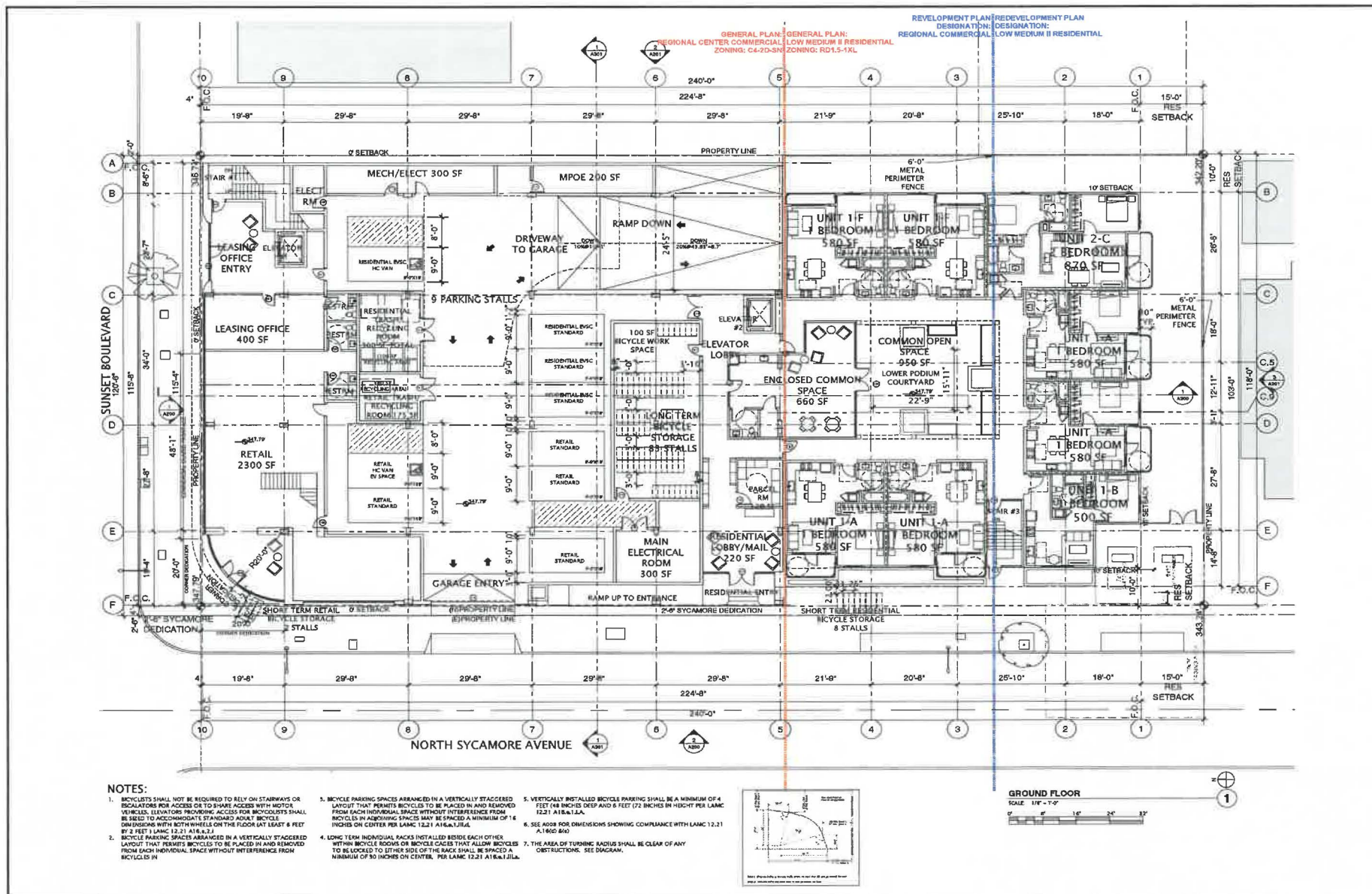


SOURCE: Nearmap, 2023



FIGURE 2: Aerial of the Project Site and Surrounding Uses

7022 SUNSET BOULEVARD



SOURCE: Newman Architecture, 2024



FIGURE 3: Site Plan

7022 SUNSET BOULEVARD



SOURCE: Newman Architecture, 2024

FIGURE 4: North and South Elevations

7022 SUNSET BOULEVARD

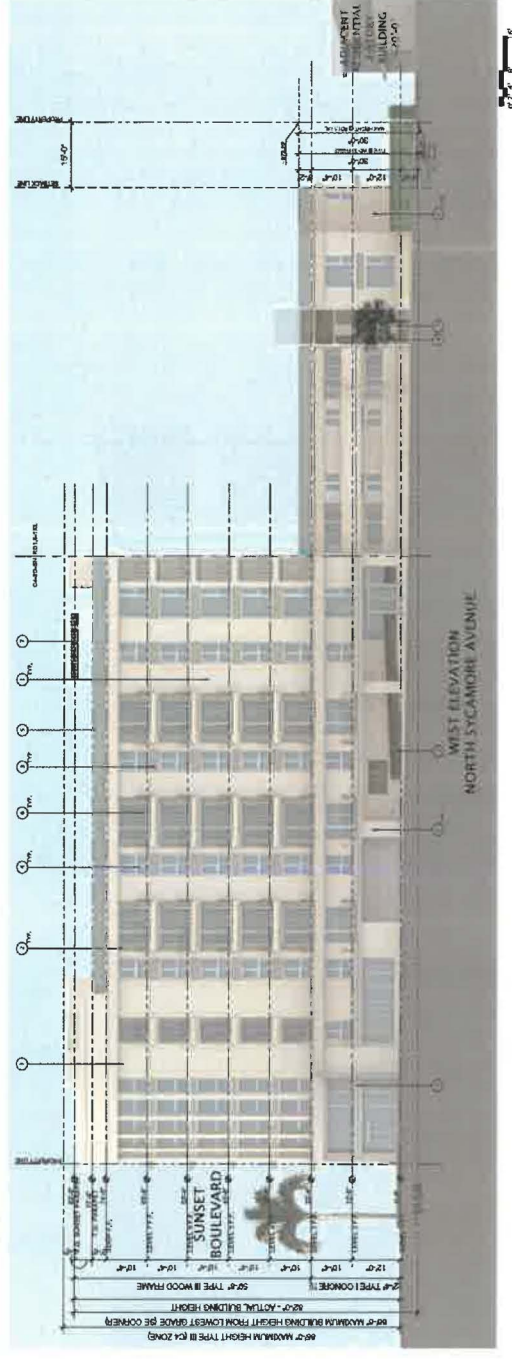


FIGURE 5: East and West Elevations

Kimley»Horn

Table 1: Project Development Summary

Project Component	Proposed Development
Floor Area	91,665 sf
Height	7 stories/86 feet 6 inches
Residential	
Total Dwelling units	112 units
Studio units	42 units
One-bedroom units	61 units
Two-bedroom units	9 units
LAMC 12.22 A.25(d) Affordable units	12 units
Commercial	2,875 sf
Parking Spaces	
Automobile parking spaces	60 spaces
Bicycle parking stalls	93 stalls (83 long term bicycle/ 10 short term)
Open Space	
Common Open Space for Residents	13,414 sf
Private Open Space (balconies)	1,650 sf
Total Open Space	15,064 sf
Source: Newmark Architecture, June, 2024.	

General Plan and Zoning

The Project Site is located within the existing 1988 Hollywood Community Plan Area within the City and is split zoned. The northern portion of the Project Site has a General Plan Land Use designation of Regional Center Commercial and is zoned C4-2D-SN. The southern portion of the Project Site has a General Plan land use designation of Low Medium II Residential and is zoned RD1.5-1XL. The C4 zone permits commercial uses, including office, retail and restaurant uses. The RD1.5-1XL zone restricts uses to one-family dwellings, two-family dwellings, apartment houses, and multiple dwellings. The SN designation indicates that the Project Site is in the Hollywood Signage Supplemental Use District.

On March 18, 2021, the Los Angeles City Planning Commission voted 5-3 to approve and recommend the Hollywood Community Plan Update to the City Council. Updates were subsequently made and released as a draft in August 2021. On May 3, 2023, the Los Angeles City Council adopted the Hollywood Community Plan Update, but it is not yet in effect. The implementing ordinances are currently being reviewed and finalized by the City Attorney, to ensure clarity of regulations and consistency with state law. After this process is complete, the Hollywood Community Plan Update will be brought into effect by the City Council.

Hollywood Redevelopment Plan

The Project Site is located within the Hollywood Redevelopment Plan (Redevelopment Plan) area. The Redevelopment Plan designates the Project Site for different land uses than the General Plan and Zoning.

Per the Redevelopment Plan, the northern three parcels have a land use designation of Regional Commercial, and the southern parcel has a land use designation of Low Medium 2 Residential.

Per the Ordinance No. 188,088, certain Redevelopment Plan requirements supersede the requirements of the General Plan and the LAMC. However, if a requirement is not specifically listed in the Redevelopment Plan, then the LAMC regulates the Project Site.

Pursuant to Redevelopment Plan Section 506.2.3, the parcels designated Regional Commercial by the Redevelopment Plan have an allowable FAR of 4.5:1, which allows 95,850 sf of floor area to be constructed on the first three parcels with a buildable area of 21,300 sf. The remaining parcel, designated Low Medium 2 Residential, allows an FAR of 3:1, which permits 10,278 sf to be constructed on the parcel with a 3,426-sf buildable area. Altogether, the Site is permitted to construct up to 106,128 sf of floor area

The Project proposes 91,665 sf of floor area over 24,726 sf of combined buildable area, which constitutes an average FAR of 3.71:1.1.

Design and Architecture

The architectural concept of the Project is inspired by Art Deco and Old Hollywood courtyard buildings. The exterior stucco design is linear, with a prominent curved corner presence and color accents. The split-level design nods to the differentiated cityscape that resides to the north and south of the Project. The exterior facade of the Project would feature a curved roof to increase the availability of natural light within the building. The Project would feature dual courtyards and roof deck seating areas. Glass panels, simulated wood, metal railings at balconies, glass guardrail at roof decks and exterior cement plaster would be used as building materials. A neutral color palette would be incorporated into the Project design. The retail area, residential office and plaza areas on Sunset Boulevard would feature large expansive, floor to ceiling windows that would provide visual transparency into the Project. Parking for the Project would be enclosed, and parking areas and vehicles would not be visible from surrounding streets. The consolidation of the parking entry and exit along North Sycamore Avenue would enhance pedestrian walkability and safety along Sunset Boulevard.

The Project's design, massing, and height are designed to be compatible with the neighboring commercial and residential uses. The massing of the seven-story building would be along Sunset Boulevard, a high activity commercial area with taller and more intensive land uses. Transitioning to the southern portion of the Project Site, the proposed building would step down to only two stories and 30 feet in height, so that the Project's massing would be in harmony with the lower scale residential uses to the south. **Figure 6: Rendering Southeast from Sunset Boulevard**, **Figure 7: Rendering Sycamore Avenue Looking Northeast**, and **Figure 8: Rendering Aerial View of Sunset Boulevard Looking South**, provide renderings of the Project from different vantage points that depict the differences in the Project's height and massing at Sunset Boulevard as compared to the Project Site's southern boundary.

Open Space and Landscaping

The Project would provide 15,064 sf of open space for residents, including 1,650 sf of private open space in the form of balconies attached to the residential uses and 13,414 sf of common open space for the residents. On the ground floor, the open space and amenities would include a residential lobby, a mail room, an office, an enclosed indoor common area and a lower courtyard. The second floor would feature a recreation room, and a courtyard podium deck. The third floor would feature a lower roof deck with a

seating area, outdoor kitchen and enclosed dog run. In addition, the seventh-floor roof would feature two deck seating areas and a pool. **Figure 9, Landscape Plan 1st Level, Figure 10, Landscape Plan 2nd Level, Figure 11, Landscape Plan 3rd Level, and Figure 12, Landscape Plan Roof** display the landscaping components for the Project. **Table 2: Summary of Required and Proposed Open Space** provides a summary of the open space requirements for the Project and a summary of the open space proposed by the Project. As shown, the Project would exceed the 11,425 sf of open space required by the LAMC.

Table 2: Summary of Required and Proposed Open Space

Open Space Summary			
Required Open Space*			
Unit Type	Number	Required sf/Unit	Sf Required
Studio	42	100 sf	4,200 sf
1 Bedroom	61	100 sf	6,100 sf
2 Bedroom	9	125 sf	1,125 sf
Total Open Space SF Required			11,425 sf
Open Space Proposed:			
Private Open Space Proposed:			1,650 sf
Common Open Space Proposed			
Outdoor Common Open Space			
Ground Floor:			2,254 sf
Second Floor:			1,300 sf
Third Floor:			3,500 sf
Roof Deck			4,460 sf
Total Outdoor Common Space			11,514 sf
Enclosed Common Open Space:			
Ground Floor:			660 sf
Second Floor:			1,240 sf
Total Enclosed Common Open Space			1,900 sf
Total Common Open Space Proposed			13,414 sf
Total Open Space Proposed		15,064 sf	
Source: newmark architecture, December 2024.			
* LAMC Section 12.21.G			

Currently, there are four trees on the Project Site including a Mulberry tree (*Morus* spp), Italian alder (*Alnus cordata*), Chinese Elm (*Ulmus parvifolia*), and Ficus (*Ficus elastica*).⁵ There are two street trees; the one on Sycamore Avenue is a Camphor tree (*Cinnamomum camphora*), and the one on Sunset Boulevard is a Mexican fan palm (*Washingtonia robusta*). None of these six trees is a native tree that is protected by the LAMC Protected Tree Ordinance No. 177404.

The Project would retain the two existing street trees and would remove the four existing on-site trees. The Project proposes to plant 29 trees of varying species within and around the exterior of the Project Site and along North Sycamore Avenue. These trees would include Japanese Maple, Maidenhair Tree, and Purple-Leaf Plum. In addition to the proposed trees, the Project would plant a variety of shrubs and perennials in the common open space areas and the frontage along North Sycamore Street. The proposed

⁵ Tree Report: 7022 Sunset Blvd. Los Angeles, CA 90028, Paul Lewis Landscape Architect, November 20, 2023

trees and other landscaping along the exterior and within the interior of the Project Site would help to create a visually attractive development and would enhance the pedestrian environment.

Access, Circulation, and Parking

The Project proposes one driveway along the eastern side of North Sycamore Avenue that would provide a two-way ingress/egress to both the at-grade parking and the one subterranean parking level beneath the Project building. Parking for the retail uses would be on the ground floor, where five (5) retail spaces would be provided. Also located on the ground floor, would be four (4) residential spaces, enclosed long-term bicycle stalls and separate residential and retail trash and recycling rooms. From the ground floor parking area, automobiles would be able to access the underground parking level via a two-way ramp.

The subterranean parking level would include 41 standard and two (2) Americans with Disabilities Act (ADA) compliant residential automobile spaces. The subterranean parking level would also include eight (8) retail spaces (60 spaces total in both the subterranean and ground floor). The subterranean parking level would also include the mechanical/electrical rooms for the Project. The Project will also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area. Per Los Angeles Ordinance 186582, 30 percent of the total number of parking spaces provided would be designated electric vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 20 percent of the spaces would be equipped with EV charging stations.

Pedestrian access to the Project Site would be separated from the automobile driveways. Pedestrians would be able to access the Project Site directly from the sidewalk. A prominent entry plaza located at the northwestern corner of Sunset Boulevard and North Sycamore Avenue would lead into the retail areas that would front Sunset Boulevard. A second entry from Sunset Boulevard would provide access into the residential leasing office located east of the retail area. An additional pedestrian entrance into the residential lobby would be located on North Sycamore Avenue. Pedestrians exiting their automobiles would be able to access the Project Site directly from the ground floor and via stairs and elevators from the subterranean parking level.

The Project Site is located within one-half mile of a Major Transit Stop (Hollywood and Highland Metro Station) and as such, per AB2097, there is no minimum parking requirement. Nevertheless, as discussed above, the Project would provide 47 residential automobile parking spaces and 13 retail automobile parking spaces. The Project would also provide code-required bicycle parking spaces. Short-term bicycle parking would be located along North Sycamore Avenue, with long term bicycle parking provided at the ground floor parking level within the Project. **Table 3, Summary of Required and Proposed Automobile and Bicycle Parking** provides a summary of the required and proposed automobile and bicycle parking spaces.



SOURCE: Newman Architecture , 2024

FIGURE 6: Rendering Southeast from Sunset Boulevard

7022 SUNSET BOULEVARD



SOURCE: Newman Architecture , 2024

FIGURE 7: Rendering Northeast Looking on Sunset Boulevard

7022 SUNSET BOULEVARD

Kimley»Horn



SOURCE: Newman Architecture , 2024

FIGURE 8: Rendering Aerial View of Sunset Boulevard Looking South

7022 SUNSET BOULEVARD

INTERIOR COURTYARD



Acer palmatum 'Japanese maple'



Heuchera 'Lime Curls' / Lime green Coral bells



Nandina 'Ouf Stream' / Heavenly bamboo



Phormium tenax 'Jubilee' / New Zealand flax

SIDEYARDS



Ginkgo biloba / Maidenhair tree



Olea europaea 'Montza' / Little Olive



Strelitzia reginae / Bird of paradise

FRONTAGE



Prunus cerasifera / Purple leaf plum



Asparagus densiflorus 'Meyer' / Fox tail asparagus



Lavandula stoechas 'Otto Quast' / Otto Quast Spanish Lavender



Strelitzia reginae / Bird of paradise



Dialotis 'Rivers' / Royal Trumpet Vine



Trachelospermum jasminoides / Star Jasmine



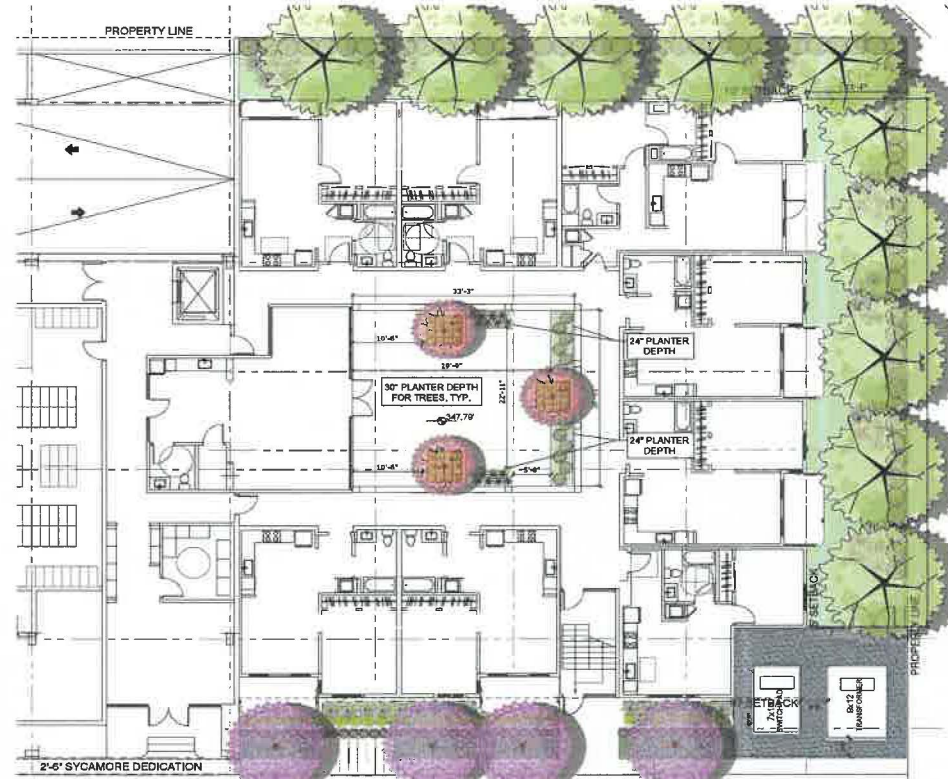
Pots at entry



Echeveria 'Ruffles' / Ruffles Echeveria



Lauandendron 'Jester' / Jester cone bush



PLANT SCHEDULE

SY-BLK	CODE	BOTANICAL / COMMON NAME	SIZE	CONTAINER	WUCOLS	CA NATIVE	QTY
TREES							
ACE BLO		<i>Acer palmatum</i> 'Bloodgood' / Bloodgood Japanese Maple	24"	Box	MED	No	5
GIN BL		<i>Ginkgo biloba</i> / Maidenhair Tree	24"	Box	MED	No	10
PRU ATR		<i>Prunus cerasifera</i> 'Nanouquand' / Purple-leaf Plum	24"	Box	MED	No	4
SHRUBS							
ASP DEN		<i>Asparagus densiflorus</i> 'Meyer' / Meyer Asparagus Fern	1 gal.		MED	No	32
DIS 11B		<i>Delosia 'Whore'</i> / Royal Trumpet Vine	15 gal.		MED	No	1
HEU L28		<i>Heuchera</i> 'Lime Curls' / Lime Curls Coral Bells	1 gal.		MED	No	48
LAV OTT		<i>Lavandula stoechas</i> 'Otto Quast' / Otto Quast Spanish Lavender	5 gal.		LOW	No	64
NAN GUL		<i>Nandina domestica</i> 'Ouf Stream' / Ouf Stream Heavenly Bamboo	5 gal.		MED	No	12
OLE UT		<i>Olea europaea</i> 'Montza' / Little Olive Olive	5 gal.		LOW	No	28
PHO J-2		<i>Phormium tenax</i> 'Jubilee' / New Zealand Flax	5 gal.		MED	No	10
STR REG		<i>Strelitzia reginae</i> / Bird of Paradise	5 gal.		MED	No	20
GROUND COVERS							
TRA JAS		<i>Trachelospermum jasminoides</i> / Chinese Star Jasmine	6qt		MED	No	12' dia. 5 Beds

1 1st LEVEL—Enlargement
1/8" = 1'-0"

SCALE: 1/8" = 1'-0"
WHEN PRINTED ON 24" X 36" PAPER

SOURCE: Courtland Studio Architecture, 2024



FIGURE 9: Landscape Plan 1st Level

7022 SUNSET BOULEVARD

Kimley»Horn

INTERIOR COURTYARD NORTH



Acer palmatum Japanese maple



Acer palmatum Japanese maple



Abutilon x hybridum hybrid abutilons



Dichondra argentea Silver Falls dichondra



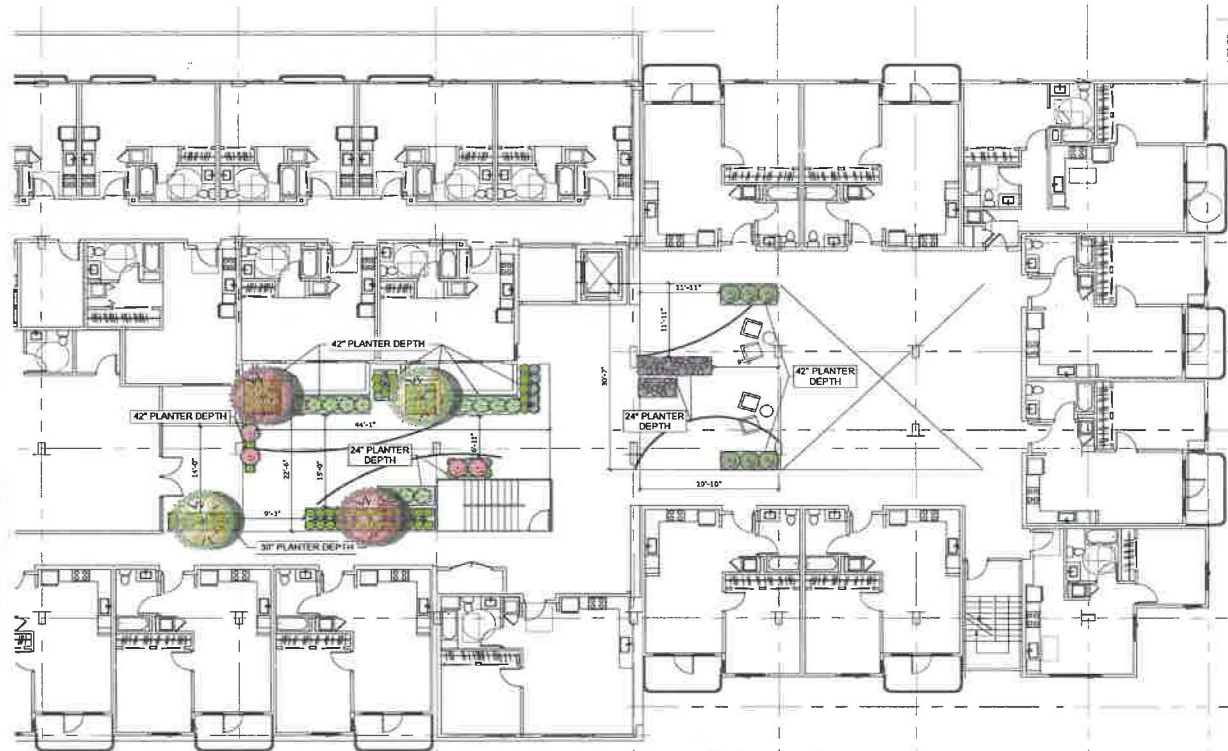
Heuchera 'Lime Glaze' Lime green Coral bells



Loropetalum 'Razzleberry' Razzle berry Fringe flower



Phormium tenax 'Jubilee' New Zealand flax



SCALE 1/8" = 1'-0"
WHEN PRINTED ON 24" X 36" PAPER.

1 2nd LEVEL-Enlargement
1/8" = 1'-0"

INTERIOR COURTYARD SOUTH



Aeonium x purpureum Purple aeonium



Echeveria x hybrids Mixed Echeveria hybrids



Tradescantia pallida Purple spiderwort



Westringia frutescens Coast rosemary

PLANT SCHEDULE

SYMBOL	CODE	BOTANICAL / COMMON NAME	SIZE	CONTAINER	WUCOLS	C/NATIVE	QTY
Tree							
	ACE BLO	Acer palmatum 'Bloodgood' / Bloodgood Japanese Maple	34"	Box	MED	NA	2
	ACE BAN	Acer palmatum 'Sango-kakki' / Coral Bark Japanese Maple	34"	Box	MED	No	2
Shrub							
	ABU HY2	Abutilon x hybridum / Flowering Maple	5 gal.		MED	No	15
	AEO ATR	Aeonium arborescens 'Mancupureum' / Purple Tree Aeonium	1 gal.		LOW	No	28
	DIC BK	Dichondra argentea 'Silver Falls' / Silver Falls Dichondra	1 gal.		MED	No	10
	ECH MT	Echeveria x 'Mingdon' / Mingdon Echeveria	4"	Plug	LOW	No	21
	HEU L28	Heuchera x 'Lime Glaze' / Lime Glaze Coral Bells	1 gal.		MED	NA	42
	LOR MON	Loropetalum chinensis 'Marmalade' / Razzleberry Fringe Flower	5 gal.		MED	No	4
	PHO J12	Phormium tenax 'Jubilee' / New Zealand Flax	5 gal.		MED	No	18
	TRA PUR	Tradescantia pallida / Purple Spiderwort	1 gal.		LOW	No	9
	WEST FRU	Westringia frutescens / Coast Rosemary	5 gal.		LOW	NA	9

SOURCE: Courtland Studio Architecture, 2024



FIGURE 10: Landscape Plan 2nd Level

7022 SUNSET BOULEVARD

Kimley»Horn



Hakia drupacea / Sweet hakea



Aeonium atropurpureum / Purple aeonium



Echeveria spp. / Echeveria



Euphorbia tirucalli / Firestick



Graptopetalum paraguayense / Ghost succulent



Kalanchoe thyrsiflora / Paddle plant



Lantana x New Gold / Yellow lantana



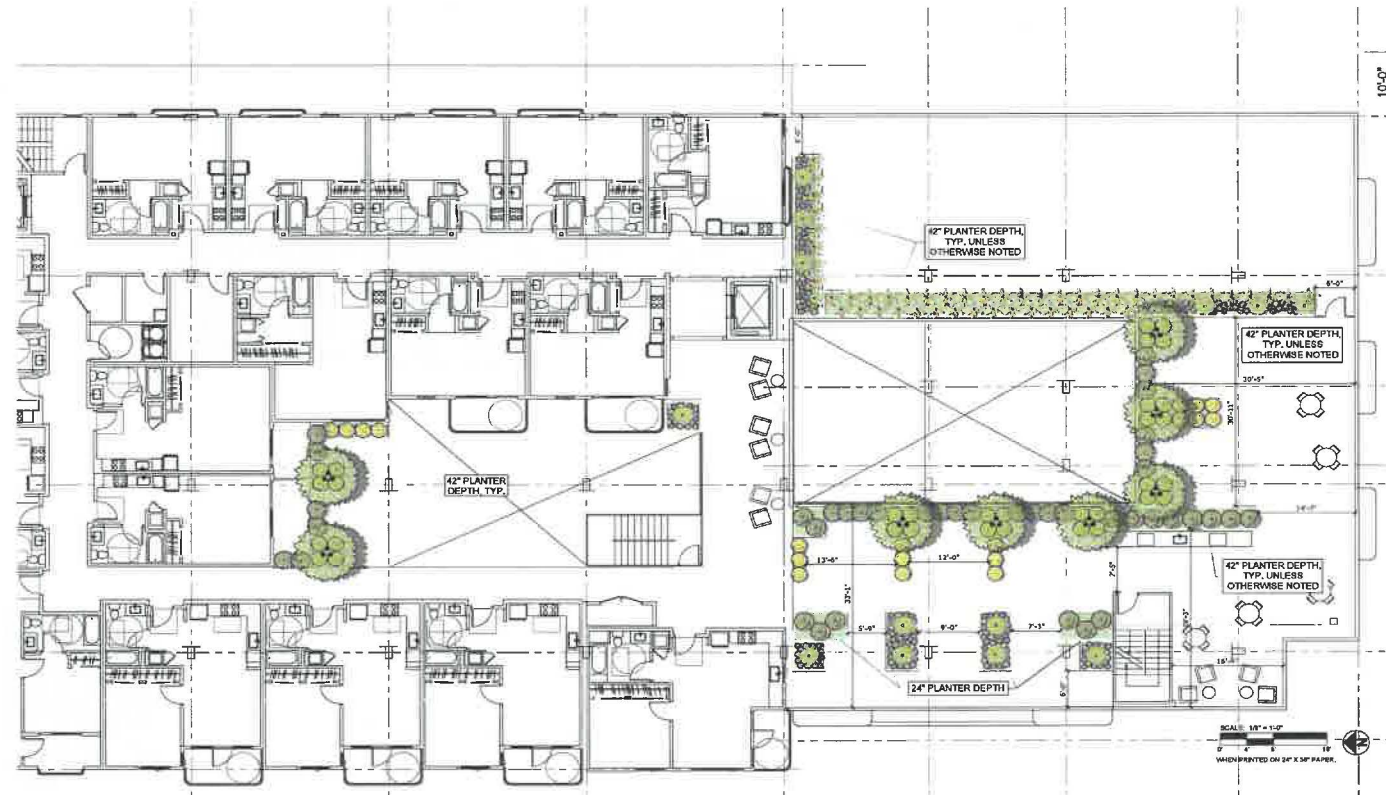
Leucandendron 'Jester' / Jester cone bush



Olea europaea 'Montro' / Little olive



Westringia fruticosa / Coast rosemary



1 3rd LEVEL—Enlargement
1/8" = 1'-0"

PLANT SCHEDULE

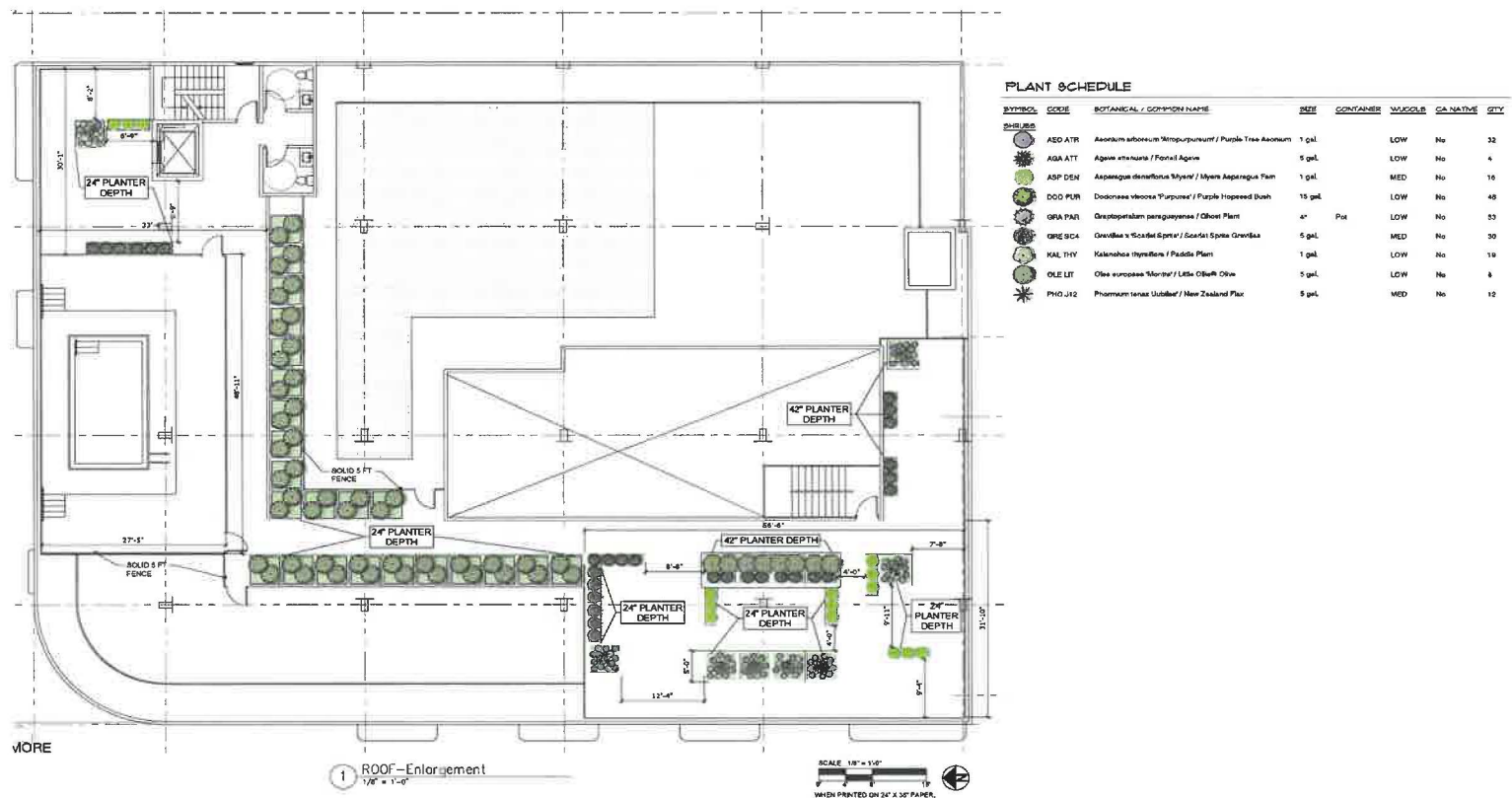
SYMBOL	CODE	BOTANICAL / COMMON NAME	SIZE	CONTAINER	WUCOLS	SA NATIVE	QTY
TREES							
	HAK DRU	Hakia drupacea / Sweet hakea	24"	Box	LOW	No	8
SUBSTRALS							
	ABO ATR	Aeonium atropurpureum / Purple Tree Aeonium	1 gal.		LOW	No	47
	EDH APT	Echeveria x 'Mangoes' / Afterglow Echeveria	4"	Pkg	LOW	No	47
	EUP BT	Euphorbia tirucalli 'Sticks on Fire' / Sticks on Fire Pencil Tree	5 gal.		VERY LOW	No	51
	GRA PAR	Graptopetalum paraguayense / Ghost Plant	4"	Pot	LOW	No	48
	KAL THY	Kalanchoe thyrsiflora / Paddle Plant	1 gal.		LOW	No	46
	LAN NYB	Lantana x 'New Gold' / New Gold Lantana	5 gal.		VERY LOW	No	51
	LEU HYB	Leucandendron x 'Jester' / Jester Conebush	5 gal.		LOW	No	13
	OLE LIT	Olea europaea 'Montro' / Little Olive	5 gal.		LOW	No	24
	WES FRU	Westringia fruticosa / Coast Rosemary	5 gal.		LOW	No	14

SOURCE: Courtland Studio Architecture, 2024



FIGURE 11: Landscape Plan 3rd Level

7022 SUNSET BOULEVARD



Aeonium atropurpureum / Purple aeonium



Agave attenuata / Foxtail agave



Asparagus densiflorus 'Meyers' / Foxtail asparagus



Dodonea viscosa 'Purpurea' / Purple hopseed



Graptopetalum paraguayense / Ghost succulent



Grevillea 'Scarlet sprite' / Compact red grevillea



Kalanchoe thyrsiflora / Paddle plant



Olea europaea 'Monte' / Little Ollie



Phormium tenax 'Jubilee' / New Zealand flax

SOURCE: Courtland Studio Architecture, 2024



FIGURE 12: Landscape Plan Roof

7022 SUNSET BOULEVARD

Table 3: Summary of Required and Proposed Automobile and Bicycle Parking

Automobile Parking	
Residential Automobile Parking	
Required Stalls Per Dwelling Unit	Stalls
Required Residential Automobile Parking:	
*Per AB2097, because the Project is within 0.5 miles of the Hollywood/Highland Metro B line subway station, a major transit stop, the Project may provide fewer parking spaces than required.	
Residential Automobile Parking Proposed	47
Commercial Automobile Parking	
Commercial Parking Required: 1 stall/ 500 sf	5
Commercial Parking Proposed	13
Total Parking Proposed	60
Bicycle Stalls¹	
Residential Proposed	
Short Term	8
Long Term	81
Total Residential Proposed	89
Commercial Proposed	
Short Term	2
Long Term	2
Total Commercial Proposed	4
Total Parking Proposed	93
Source: newmark architecture, December 2024.	
¹ Meets LAMC Section 12.21.A16 and LAMC Section 12.03 bicycle parking requirements	

Lighting and Signage

The Project would install various exterior lights around the building including interior and exterior lighting for security, entrances, signage, wayfinding, architectural highlighting, and landscape/security lowlighting. Outdoor lighting would be designed and installed with shielding to ensure that the lighting would be focused on the Project Site and deflected away from adjacent residential properties, in accordance with LAMC lighting regulations. In addition, the proposed signage and outdoor lighting would comply with applicable regulations contained within the LAMC that limit lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units.

Signage would include identification and entryway signage for the residential and commercial components of the Project. The Project includes an identification sign facing Sunset Boulevard. The Project Site is located within the boundaries of the Hollywood Signage Supplemental Use District (Hollywood Sign District) and all signage at the Project Site would be subject to its regulations, standards, and prohibitions.

Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, other than the commercial component of the Project, the Project would not be open to the public. Access to the residential parking areas controlled through gated, timed entries. Commercial and residential

entries, lobbies, and walkways would be differentiated for security, and illuminated for safety. Residential areas would be controlled with residential keycard access. Security lighting would be installed throughout the Project's common areas.

The plans for the Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, locating building entrances in high-foot traffic areas, the use of security cameras, access control to the building, and well-illuminated public and semi-public spaces designed with a minimum of dead space to eliminate areas of concealment.

Sustainability Features

The Project would pursue Leadership in Energy and Environmental Design (LEED) Silver Certification and would comply with the City's Green Building Code. LEED Silver Certification and the Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The Project would include water conservation features including native and drought tolerant landscaping, water conservation faucets and plumbing fixtures, and Energy Star electrical appliances.

The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area. Per Los Angeles Ordinance 186582, 30 percent of the total number of parking spaces provided would be designated as EV spaces capable of supporting future EVSE and 20 percent of the spaces would be equipped with EV Charging stations.

Additionally, the Project would include 15 percent of the solar-ready area on the roof for future installation of solar power.

Anticipated Construction Schedule

For purposes of this analysis, the Project's construction schedule is assumed to be approximately 20 months, with construction beginning in the first quarter of 2025 and ending in the fourth quarter of 2026. The Project is anticipated to be operational in 2027.

Construction activities would be undertaken in six main steps: (1) demolition; (2) site preparation; (3) grading, excavation, foundations; (4) building construction; (5) paving; and (6) finishing and architectural coatings. Construction activities would be performed in compliance with all applicable laws, ordinances, and regulations. As provided in Section 41.40 of the LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. No nighttime construction activities are anticipated.

The Project will include 11,000 cubic yards (cy) of cut, with no fill and will include 11,000 cy of export.

1.4 Requested Permits and Approvals

The anticipated discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, those listed below. This analysis will be sufficient to

demonstrate that the Project is categorically exempt from the California Environmental Quality Act (CEQA) under Section 15332 of the CEQA Guidelines⁶ as an “urban infill” project and that none of the applicable exceptions set forth in Section 15300.2 applies to defeat the exemption, and further to support approval of all of the entitlements and public agency actions needed for the Project, including those listed below.

1. **Density Bonus** pursuant to Los Angeles Municipal Code (“LAMC”) Section 12.22-A.25 to construct 112 dwelling units (no density bonus and inclusive of 1 manager’s unit), and provide 10% Very Low Income restricted affordable units (12 units). In exchange, the project requests two incentives:
 - a) On-menu incentive to allow the averaging of floor area ratio, density, parking, open space, and permitted vehicle access to allow the site to be developed as a unified project.
 - b) Off-menu incentive to reduce RD1.5 zone front yard along Sycamore Street per LAMC Section 12.21-C.1(e) from 15 feet to 10 feet (a 34% reduction)
2. **Site Plan Review** pursuant to LAMC Section 16.05 to permit the development of over 50 market rate dwelling units at the Project Site.
3. **Housing Crisis Act** pursuant to Senate Bill 8 to permit a Housing Development Project.

For the reasons discussed in detail later in this document, the Project is categorically exempt from CEQA under the Class 32 exemption.

Section 2 Analysis

2.1 Regulatory Framework

Title 14 of the California Code of Regulations, Chapter 3 (Guidelines for Implementation of the California Environmental Quality Act (CEQA), Article 19 (Categorical Exemptions), Section 15300 (Categorical Exemptions) includes a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA.

For the reasons discussed in detail later in this document, the Project is categorically exempt from CEQA under the Class 32 exemption, as set forth in Section 15332, Article 19, Chapter 3, Title 14 of the California Code of Regulations (CCR). The Class 32 exemption promotes infill development within urbanized areas by exempting environmentally benign urban in-fill projects that are consistent with the local general plan and zoning requirements and can be served with existing utilities and public services. The Class 32 exemption does not apply to projects that would result in significant traffic, noise, air quality, or water quality impacts. Application of this exemption, as with all categorical exemptions, is limited by the regulatory exceptions identified in Section 15300.2, listed below.

Section 15332. In-Fill Development Projects.

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*
- (c) The project site has no value as habitat for endangered, rare or threatened species.*
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*
- (e) The site can be adequately served by all required utilities and public services.*

Section 15300.2. Exceptions

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply [to] all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*
- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*
- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The Project is categorically exempt from CEQA under the Class 32 exemption. The Project is properly characterized as infill development, as it would redevelop the already developed Project Site, which is located in Hollywood, which is a heavily urbanized area of the City. Further, the Project meets all of the conditions set forth in CCR Section 15332, for the reasons described below.

2.2 Discussion of CCR Section 15332(a): General Plan Consistency

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

As discussed below, the Project would be substantially consistent with, and therefore not conflict with, all applicable plans, policies and regulations associated with development of the Project Site. These include the Southern California Association of Governments (SCAG) 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City of Los Angeles General Plan Framework Element (Framework Element) which includes the Health and Wellness Element (Plan for a Healthy Los Angeles), Hollywood Community Plan, Redevelopment Plan, and City of Los Angeles Municipal Code (Chapter 1—Planning and Zoning).

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and, under state law, as a Regional Transportation Planning Agency and a Council of Governments. SCAG is the MPO for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the federally designated MPO, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality.

SCAG 2024-2050 RTP/SCS

On September 30, 2008, SB 375 was passed⁷ to help achieve AB 32 goals related to the reduction of greenhouse gases (GHGs) through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments, (2) regional allocation of the obligation for cities and counties to zone for housing, and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region.

Every four years, the Southern California Association of Governments (SCAG) updates Connect SoCal, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The most recent RTP/SCS named the Connect SoCal 2024, outlines a vision for a more resilient and equitable future and contains investment, policies and strategies for achieving the region's shared goals through 2050. Connect SoCal 2024 includes elements that are organized within the pillars of Mobility, Communities, Environment and Economy. These goals are not mutually exclusive, they are mutually reinforcing. For example, the decisions and actions taken to achieve mobility goals can also help to achieve and support environmental goals. Connect SoCal 2024 was approved by SCAG's Regional Council in April 2024.⁸

As detailed in **Table 4, Applicable Goals of SCAG 2024–2050 RTP/SCS** the Project would be consistent with the applicable goals set forth in the 2024–2050 RTP/SCS. Specifically, the Project would support the goals of the 2024–2050 RTP/SCS to maximize the productivity of the region's transportation system, support new housing growth as well as protect the environment and health of the region's residents through its location on an urban infill site in close proximity to mass transit options, thereby minimizing vehicle miles traveled and reducing air pollution. In addition, the Project would provide bicycle parking spaces that would promote walking as well as the use of bicycles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation.

Table 4: Applicable Goals of SCAG 2024–2050 RTP/SCS

2024–2050 RTP/SCS Goals	Would the Project Be Consistent?
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions	Consistent. Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would support improved air quality and would minimize greenhouse gas emissions. The Project would pursue LEED Silver Certification and would utilize energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the Los Angeles Fire Department (LAFD), and the LAMC.

⁷ https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=2007200805B375

⁸ <https://scag.ca.gov/connect-socal>

2024–2050 RTP/SCS Goals	Would the Project Be Consistent?
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities	Consistent. Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would be developed on a currently developed Project Site located in an existing urbanized area with an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site is within close proximity to several transit options, would include bicycle parking, and is in walkable distance to jobs and services.
Support planning for people of all ages, abilities, and backgrounds	Consistent. Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would include new housing for in a variety of sizes and income levels. The Project would include 12 very low-income units in addition the market-rate units.
Communities: Develop, connect, and sustain communities that are livable and thriving	
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances	Consistent. The Project would be located a mixed-use development in an infill setting, close to transit and in walking distance, to jobs, schools, residences and commercial areas. In addition, the Project would provide 93 bicycle parking spaces, and would encourage pedestrian circulation at the street level through new landscaping and trees, separate pedestrian and vehicle entrances into the Project building and the creation of ground floor commercial uses. The Project Site is within close proximity to several transit options. It is approximately 0.4 miles northeast of the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System. Numerous bus lines also serve the Project Site, including Metro bus lines 2, 212, 224, and the DASH Hollywood line.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households	Consistent. The Project would provide a mix of both new market rate and new affordable housing in a variety of sizes for different household types in Hollywood on an infill site in an urbanized area well-served by transit.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.	Consistent. The Project would promote non-auto travel and reduce single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking, and improving the pedestrian environment. The Project would pursue LEED Silver Certification and would utilize energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide 93 bicycle parking spaces, and would encourage pedestrian circulation at the street level through new landscaping and trees, separate pedestrian and vehicle entrances into the Project building and the creation of ground floor commercial uses.
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	
Conserve the region's resources	Consistent. The Project is an infill development, surrounded by urban land uses. It is not located on land designated for agricultural uses, natural resources, or conservation.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.	

2024–2050 RTP/SCS Goals	Would the Project Be Consistent?
Improve access to jobs and educational resources.	Consistent. The Project Site located in an existing urbanized area with an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site is also within close proximity to several transit options that would provide visitors and residents easy access to jobs and educational institutions. In addition, the Project Site is located within walking distance of Hollywood High School located to the north and numerous offices, hotels, restaurants and studio uses that would provide future employment opportunities.
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	Consistent. Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed above, the Project would promote clean air and non-auto travel by being located in a transit-rich area, providing bicycle parking, and improving the pedestrian environment. The Project will contribute toward and facilitate the City's long-term housing needs and economic viability by providing a mixed-use Project that would include market rate and affordable housing units and ground floor commercial uses.
Source: Kimley-Horn, 2024. SCAG 2024–2050 RTP/SCS	

City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the seven state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element and includes an Air Quality Element and Health and Wellness Element (Plan for a Healthy Los Angeles). The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level. The Project Site is located in the Hollywood Community Plan Area, which is one of the 35 community plans of the Land Use Element. The following discusses the General Plan Framework Element and the Community Plan, which address land uses.

General Plan Framework Element

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table 5: Applicable Goals of the Framework Element**. As shown, the Project would be consistent with the applicable objectives and policies.

Table 5: Applicable Goals of the Framework Element

Objective/Policy	Would the Project Be Consistent?
<i>Distribution of Land Uses</i>	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors	Consistent. The Project will contribute toward and facilitate the City's long-term housing needs and economic viability by providing a mixed-use Project that would include market rate and affordable housing units and ground floor commercial uses.
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.	Consistent. The Project would construct a mixed-use development on an urban infill site near public transit options and a variety of land uses, which would reduce vehicle trips, vehicle miles traveled, and air pollution. In addition, the Project would encourage alternative modes of transportation as the Project would provide a total of 10 short-term and 83 long-term bicycle parking stalls, and would encourage pedestrian circulation at the street level through new landscaping and trees, separate pedestrian and vehicle entrances into the Project building and the creation of ground floor commercial uses, thereby encouraging alternative modes of transportation and fewer vehicle trips. The bicycle parking would comply with all requirements of the LAMC. The Project is located in a transit-rich area with numerous Metro transit and LADOT transit bus lines that run and stop in the greater vicinity of the Project.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations.	Consistent. The Project would promote and provide access for all modes of travel, including pedestrians and cyclists. The Project would provide secure on-site bicycle parking to promote bicycling. The installation of new trees, landscaping and enhanced pavement at pedestrian entrances, and walkways would promote the walkability of the adjacent streets and the Project Site. These improvements would emphasize pedestrian/ bicycle access and use.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	Consistent. The Project would provide new market rate and affordable housing and commercial uses on an infill site in an urbanized area well-served by transit, and within walking distance of commercial, studio and residential uses. The Project would thus support the needs of the community and adjacent studio uses.
Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.	Consistent. The Project's proposed landscaping would promote walkability along adjacent streets and would enhance the built environment.
<i>Urban Form and Neighborhood Design Chapter</i>	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	Consistent. The Project would develop new mixed-use residential and commercial uses within an urban infill site well-served by transit options.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	Consistent. The Project would construct a new building that is inspired by Art Deco and Old Hollywood courtyard buildings. The Project would feature dual courtyards and roof deck seating areas. The retail area, residential office and plaza areas on Sunset Boulevard would feature large expansive, floor to ceiling windows providing visual transparency into the Project. Parking for the Project would be enclosed, and parking areas and vehicles would not be visible from surrounding streets. The consolidation of the

Objective/Policy	Would the Project Be Consistent?
	<p>parking entry and exit along North Sycamore Avenue would enhance pedestrian walkability and safety along Sunset Boulevard.</p> <p>The Project's design, massing, and height are designed to be compatible with the neighboring commercial and residential uses. In addition to the proposed trees, the Project would plant a variety of shrubs and perennials in the common open space areas and the frontage along North Sycamore Street. The proposed trees and other landscaping along the exterior and within the interior of the Project Site would help to create a visually attractive development and would enhance the pedestrian environment.</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>Consistent. The plans for the Project would incorporate features as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, locating building entrances in high-foot traffic areas, the use of security cameras, access control to the building, and well-illuminated public and semi-public spaces designed with a minimum of dead space to eliminate areas of concealment.</p>
Infrastructure and Public Services Chapter	
<p>Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>	<p>Consistent. During construction, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit and would implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMP) and erosion control measures to be used during construction to manage runoff flows and prevent pollution.</p>
<p>Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.</p>	<p>Consistent. The Project would be within the Los Angeles Department of Water and Power (LADWP)'s current and projected available water supplies for normal, single-dry, and multiple-dry years per the 2020 Urban Water Management Plan (UWMP). As such, the 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. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the water supply, storage, and delivery systems would be adequate to support the Project's development.</p>
<p>Source: Kimley-Horn, 2024. City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001.</p>	

Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. The Plan includes the following seven goals: (1) Los Angeles, A Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods. As such, the provisions of this plan element address a number of policies not directly tied to the physical environment. However, included within this General Plan element are policies pertaining to the arrangement of land uses within the City and building design procedures.

As shown in **Table 6: Comparison of Project Characteristics to Applicable Policies of the Health and Wellness Element**, the Project would be consistent with the Plan for a Healthy Los Angeles policies.

Table 6: Comparison of Project Characteristics to Applicable Policies of the Health and Wellness Element

Objective/Policy	Would the Project Be Consistent?
Policy 2.2 Healthy Building Design and Construction. Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for health living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universally accessibility using existing tools, practices, and programs.	Consistent. The Project would develop a mixed residential/retail development on an urban infill site located near public multiple transportation options, near jobs, and would provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. Furthermore, the Project would include pedestrian-friendly landscaping and design, new perimeter streetscape improvements, that would enliven the pedestrian experience. The Project would pursue LEED Silver Certification and would incorporate energy saving and sustainable design would be incorporated throughout the Project.
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	Consistent. The Project would include characteristics and design features that support reductions in air emissions and encourage alternative modes of transportation. The Project Site is surrounded by supportive residential, studio, and commercial uses and is located near transit, reducing reliance on automobiles and VMT and minimizing associated air pollutant emissions. The Project would pursue LEED Silver Certification. Energy saving and sustainable design would be incorporated throughout the Project. In addition, the Project would install electric vehicle supply equipment in four parking spaces, consistent with the City's Green Building Code requirements.
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.	Consistent. The proposed Project is consistent with the City's Land Use Plans (in particular the General Plan Framework and the Community Plan), which support a land use distribution pattern that increases employment and housing opportunities near transit center and services, thus supporting the use of alternative transportation that could help reduce GHG emissions from private automobile travel.
Source: Kimley-Horn, 2024 City of Los Angeles Department of City Planning, Health and Wellness Element, adopted 2015, amended 2021.	

Hollywood Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The existing Hollywood Community Plan was adopted by the City in 1988. The Hollywood Community Plan Update (HCPU) is currently in process, but, as stated above, is not yet in force.

Table 7: Project Consistency with the Hollywood Community Plan, sets forth the 1988 Hollywood Community Plan's goals and policies applicable to the Project and discusses the Project's consistency with each of them. As shown, the Project would be consistent with the applicable objectives and policies of the Hollywood Community Plan.

Table 7: Project Consistency with the Hollywood Community Plan

Objective/Policy	Would the Project Be Consistent?
<p>Objective 3: To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.</p> <p>To encourage the preservation and enhancement of the varied and distinctive residential character of the Community, and to protect lower density housing from the scattered intrusion of apartments. In hillside residential areas to:</p> <ul style="list-style-type: none"> a. Minimize grading so as to retain the natural terrain and ecological balance. b. Provide a standard of land use intensity and population density which will be compatible with street capacity, public service facilities and utilities, and topography and in coordination with development in the remainder of the City 	<p>Consistent. The Project would provide a mix of both new market rate and new affordable housing in a variety of sizes for different household types in Hollywood on an infill site in an urbanized area well-served by transit. The Project is located in a relatively flat urban area, along a main corridor and would is not located in a hillside residential area.</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>Consistent While this is a citywide objective, the Project would support its implementation. Specifically, the Project would redevelop the Project Site, which is an infill site located in a highly urbanized area that is well-served by public transit. The Project would include various streetscape improvements such as additional on-site and street trees and landscaping to encourage walkability. Furthermore, the Project would provide approximately 93 short- and long-term bicycle parking spaces, per LAMC requirements. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.</p>
<p>Source: Kimley-Horn, 2024 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988.</p>	

Housing Element

The Housing Element of the General Plan is prepared and updated pursuant to state law and provides planning guidance in meeting the housing needs identified in SCAG’s Regional Housing Needs Assessment (RHNA). The Housing Element 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.

The 2021-2029 Housing Element was adopted by the City Council on November 24, 2021.⁹ The City’s 2021-2029 Housing Element must accommodate a 6th cycle RHNA allocation of 456,643 new housing units of which 184,721 units (40 percent) are designated for very low and low-income households, 75,091 units are designated for moderate income households (17 percent), and 196,831 units (43 percent) are designated for above moderate-income households. These figures are more than five times higher than the prior 5th RHNA cycle allocation. This significant increase is primarily the result of changes in state law that included new markers of existing housing needs such as overcrowding and cost burden in the RHNA.¹⁰ The City’s approach to meeting the City’s housing needs is to facilitate the development of sustainable

⁹ City of Los Angeles. *General Plan Housing Element*. Available <https://planning.lacity.org/plans-policies/housing-element>. Accessed: May 5, 2024.

¹⁰ 2021-2029 Housing Element City of Los Angeles. Executive Summary, page 19 *General Plan Housing Element*. Available <https://planning.lacity.org/plans-policies/housing-element>, Accessed May 5, 2024.

mixed-use, mixed-income neighborhoods across the City and to provide for housing, jobs, transit and basic amenities for all segments of the population.

The Housing Element goals related to the Project include:¹¹

- **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.
- **Goal 2:** A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.
- **Goal 3:** A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

The Project would redevelop the Project Site with a mixed-use development that would increase the housing stock in Hollywood by offering up to 112 new residential units in a mix of studio, one-bedroom, and two-bedroom units. The Project would include 12 very low-income units and 99 market-rate units plus a manager's unit. The mixture of different unit types at varied affordability levels would provide variety for different income levels and household sizes and contribute to the range of housing choices in the City.

Thus, the Project would support the above Los Angeles General Plan Housing Element goals and would assist the City in meeting its RHNA allocations by contributing to the overall supply of housing without removing any existing housing to do so. Furthermore, the Project would provide these new units by redeveloping an urban infill site that is close to multiple transit options that serve the greater Los Angeles region. Therefore, the Project would be substantially consistent with the Los Angeles General Plan Housing Element.

Redevelopment Plan

The Project Site is located within the Hollywood Redevelopment Plan area (Amended May 2003, expiration date May 2028). The Redevelopment Plan was managed by the Community Redevelopment Agency of the City (CRA/LA). In 2012, with the passage of ABx1-26 by the California Legislature, the CRA/LA was abolished but the City's redevelopment plan project areas and their associated plans continue to exist until the original expiration dates.

The following goals related to housing and land development within the Redevelopment Plan are as follows:

Goal 3: Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.

Goal 9: Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide home ownership opportunities and other housing choices which meet the needs of the resident population.

¹¹ Other Housing Element Goals (Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present and Goal 5: A City that is committed to preventing and ending homelessness) are under the City's purview and not related to the Project.

Goal 10: Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood.

The Project would be consistent with the above goals as it would provide new housing and ground floor commercial uses. This mix of land uses would support the housing and economic development with Hollywood. The Project would include both market rate and affordable housing units in a variety of sizes and price ranges, supporting a range of housing choices in the City for various household types and income levels. The Project's design, massing, and height are designed to be compatible with the neighboring commercial and residential uses. The massing of the seven-story building would be along Sunset Boulevard, a high activity commercial area with taller and more intensive land uses. Transitioning to the southern portion of the Project Site, the proposed building would step down to only two stories and 30 feet in height, so that the Project's massing would be in harmony with the lower scale residential uses to the south. Furthermore, the Project would include pedestrian-friendly landscaping and design and new perimeter streetscape improvements, that would enliven the pedestrian experience.

The Redevelopment Plan designates the Project Site for different land uses than the General Plan and Zoning. Per the Redevelopment Plan, the northern three parcels have a land use designation of Regional Commercial, and the southern parcel has a land use designation of Low Medium 2 Residential. The Project is consistent with the land use designations in the Redevelopment Plan.

Zoning Information

Zoning Code

The Project Site is located within the existing 1988 Hollywood Community Plan Area within the City and is split zoned. As discussed above, the northern portion of the Project Site has a General Plan Land Use designation of Regional Center Commercial and is zoned C4-2D-SN. The southern portion of the Project Site has a General Plan land use designation of Low Medium II Residential and is zoned RD1.5-1XL. The C4 zone permits commercial uses, including office, retail and restaurant uses. The RD1.5-1XL zone restricts uses to one-family dwellings, two-family dwellings, apartment houses, and multiple dwellings. The SN designation indicates that the Project Site is in the Hollywood Signage Supplemental Use District.

The Project proposes only residential uses within the RD1.5-zoned portion of the Project Site and proposes commercial space and additional residential uses within the C4-2D-SN-zoned portion of the Project Site.

The Project is being proposed as a unified project. However, because the Project Site is split zoned, and pursuant to LAMC Section 12.21-C.1(e), the RD1.5-1XL zone requires that Sycamore Street remains the "front yard" of the RD1.5 zoned parcels, the parcels cannot be effectively combined and utilized without development incentives. Therefore, while the Project is not seeking any density increases, the Project is providing 10 percent of the 112 proposed units as Very Low-Income restricted affordable units. In exchange, the Project requests an on-menu incentive pursuant to LAMC Section 12.22-A.25(f)(8) to allow the averaging of floor area ratio, density, parking, open space, and permitted vehicle access. Further, the Project also requests an off-menu incentive to reduce RD1.5 zone front yard along Sycamore Street per LAMC Section 12.21-C.1(e) from 15 feet to 10 feet.

These would allow the Project Site to be redeveloped with a viable, and desirable use consistent with surrounding land uses. Therefore, upon approval of the on and off on-menu incentives, the Project would be consistent with the applicable zoning regulations.

For all the foregoing reasons, the Project would be consistent with the applicable goals and policies of the City's land use plans and zoning for the Project Site.

The Project would meet the conditions described in CCR Section 15332(a).

2.3 Discussion of CCR Section 15332(b): Within City Limits, Site no more than 5 acres

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

As defined by CEQA Section 21071:

“Urbanized area” means either of the following: (a) An incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons. (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

The Project Site is located in an urbanized area of the City. The Project Site is surrounded by a variety of urban uses including a hotel, schools, offices, residences, a studio, and retail and restaurants. The Project Site measures 0.66 acres, which is less than five acres. The Project Site is located within a City with a population well over 100,000 persons.

Therefore, the development occurs within the City limits, on a site of no more than five acres, and is substantially surrounded by urban uses.

As such, the Project would meet the conditions described in CCR Section 15332(b).

2.4 Discussion of CCR Section 15332(c): No Value as Habitat for Endangered, Rare or Threatened Species

The Project Site has no value as habitat for endangered, rare or threatened species. The analysis provided below is supported, in part, by the *Tree Report: 7022 Sunset Blvd, Los Angeles, CA 90028* prepared by Paul Lewis Landscape Architect, November 20, 2023 (**Appendix A**).

Habitat Area and Wetlands

The Project Site is completely surrounded by urban uses. The Project Site is currently developed with two buildings and a surface parking lot. The Project Site was subjected to substantial disturbance associated first with the original construction of the existing buildings and later with ongoing regular maintenance of the landscaping. Further, nearby surrounding areas are entirely developed.

The Project Site does not contain any habitat capable of sustaining 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS).^{12, 13, 14}

Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state or federally listed species.¹⁵ Species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings.

No wetlands exist or are mapped on or near the Project Site.¹⁶ In addition, the Project does not propose any filling or grading of any ravines or other hydrologically low-lying areas that may contain intermittent waterbodies.

Migratory Birds

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The City's Bureau of Street Services, Urban Forestry Division complies with the MBTA for tree pruning and tree removal. The Project would be required to comply with all applicable laws and regulations regarding nesting birds in connection with the Project's removal of the existing on-site trees.

Trees

The City's Preservation of Protected Trees Ordinance No. 186873 (Protected Tree Ordinance) and the LAMC §§46.00-46.06 define protected trees as any of the following southern California native tree species measuring 4 inches or more in cumulative diameter at 4.5 feet above the ground level at the base of the tree: Oak trees including valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), or any of tree of the oak genus indigenous to California but excluding scrub oak (*Quercus berberidifolia*); southern California black walnut (*Juglans californica*); western sycamore (*Platanus racemosa*); and California bay (*Umbellularia californica*), and protected shrubs, including Mexican elderberry (*Sambucus Mexicana*) and toyon (*Heteromeles arbutifolia*). In accordance with the Protected Tree Ordinance, no person shall relocate or remove any protected tree without obtaining a permit from the City.

Currently, there are four trees on the Project Site including a Mulberry tree (*Morus spp*), Italian alder (*Alnus cordata*), Chinese Elm (*Ulmus parvifolia*), and Ficus (*Ficus elastica*).¹⁷ There are two street trees; the one on Sycamore Avenue is a Camphor tree (*Cinnamomum camphora*), and the one on Sunset Boulevard is a Mexican fan palm (*Washingtonia robusta*). None of these six trees is a native tree that is

¹² Los Angeles County Department of Regional Planning, Planning & Zoning Information https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed: February 17, 2024.

¹³ California Department of Fish and Wildlife, Natural Community Conservation Plans/Habitat Conservation Plans. Available online <https://wildlife.ca.gov/conservation/planning/nccp/plans>, accessed: October 17, 2023.

¹⁴ U.S. Fish and Wildlife Service, National Wetlands Inventory. www.fws.gov/wetlands/Data/Mapper.html, accessed: February 17, 2024.

¹⁵ Los Angeles County. General Plan, Figure 9.3. Significant Ecological Areas and Coastal Resource Areas Policy Map, 2015. Accessed: May 6, 2023

¹⁶ U.S. Fish and Wildlife Service, National Wetlands Inventory. www.fws.gov/wetlands/Data/Mapper.html, accessed: February 17, 2024.

¹⁷ Tree Report: 7022 Sunset Blvd. Los Angeles, CA 90028, Paul Lewis Landscape Architect, November 20, 2023

protected by the LAMC Protected Tree Ordinance. Prior to any work on the adjacent public right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. As there currently is no approved right-of-way improvement plan and for purposes of conservative analysis under CEQA, the Project has analyzed the worst-case potential for removal of all street trees. Note that street trees and protected trees shall not be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this environmental document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. The City has required a Tree Report to identify all protected trees/shrubs on the project site and all street trees in the adjacent public right-of-way. The Project proposes to remove no protected trees, no protected shrubs, and up to a total of two (2) street trees.

The Project would retain the two existing street trees and would remove the four existing on-site trees. The Project proposes to plant 29 trees of varying species within and around the exterior of the Project Site and along North Sycamore Avenue.

Therefore, the Project would meet the conditions described in CCR Section 15332(c).

2.5 Discussion of CCR Section 15332(d): Traffic

Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.¹⁸ The following analysis is largely based on the *7022 Sunset Street Project Transportation Assessment*, prepared by Kimley-Horn, July 2024 (**Appendix B**). The VMT Assessment for the Project was approved by LADOT on May 2, 2024 and the approval letter is contained in Appendix B.

Construction

The construction of the Project would begin with the demolition of the existing adult day care, commercial buildings, and surface parking lot on the Project Site, followed by site preparation, grading, building construction, paving/concrete installation, and finishing and architectural coatings. The construction of the Project is expected to be completed by the beginning of 2027.

Temporary closure of on-street parking along Sunset Boulevard adjacent to the property frontage would be requested to allow for ongoing construction access and vehicle staging, as well as loading and unloading.

Temporary Traffic Constraints

During construction, traffic on North Sycamore Avenue and Sunset Boulevard could be intermittently disrupted due to vehicle loading and unloading. Such intermittent travel lane closures may disrupt local traffic. However, a Construction Management Plan (**PDF TRAF-1**), which would include a worksite traffic control plan, would be prepared, in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks, and these plans would provide for the safe and efficient movement for vehicular, bicycle, and pedestrian traffic. As part of PDF TRAF-1, the crosswalk at the North Sycamore Avenue and Sunset Boulevard intersection identified in the Hollywood High School Safe Routes to School (SRTS) plan would be maintained during construction or an alternative pedestrian access route would be provided per the standards of the SRTS.¹⁹ During construction, the Project Site would be secured with

¹⁸ Each of these topic areas (traffic, noise, air quality, and water quality) is discussed in its own section below.

¹⁹ LADOT Livable Streets, "LADOT Livable Streets," n.d. <https://ladotlivablestreets.org/projects/Hollywood-SRTS-Plan>.

perimeter fencing. In addition, PDF TRAF-1 would require coordination with Hollywood High School administrators to identify measures to be implemented to avoid disruption of school activities.

Temporary Loss of Access

During construction, the Project Site would be secured with perimeter fencing. The existing land uses in the proximity of the Project Site would remain open throughout the construction period. Pedestrian and vehicular access to properties near the Project Site would also remain open for the duration of construction. During construction, the sidewalks along North Sycamore Avenue and Sunset Boulevard may be temporarily disrupted. A pedestrian walkway or pedestrian rerouting would be provided as an alternative for pedestrians during construction and would also be addressed in the worksite traffic control plans.

Appropriate signage would be implemented to direct pedestrians to accessible routes during this time.

Temporary Loss of Bus Stops or Rerouting of Bus Lines

The construction of the Project would not result in any temporary loss of bus stops or rerouting of bus lines.

Haul Route and Truck Analysis

The proposed haul route for the Project would require trucks to access the Project Site from the nearby US-101 using Sunset Boulevard. As part of the Project, a detailed Construction Management Plan (PDF TRAF-1), would be implemented to minimize the effect of Project construction on vehicles, bicyclists, and pedestrians, which is discussed in the following section. As noted in PDF TRAF-1, haul route scheduling would be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the Hollywood High School. Any hauling activities would not be routed past Hollywood High School during periods when the school is in session, especially when students are arriving or departing from campus.

PDF TRAF-1: Construction Management Plan

The contractor would develop a Construction Management Plan as a mandatory part of the Project and submit it to the City of Los Angeles for approval to reduce the effects of Project construction. The Construction Management Plan would include the following:

- Coordinate with the City to ensure adequate access to the Project Site and land uses in proximity of the Project Site is maintained.
- Pick-ups, deliveries, and exports of construction materials should be scheduled during off-peak hours to the extent possible.
- Reduce the potential of trucks waiting for extended periods to load or unload.
- Determine the number and location of flag personnel required during traffic rerouting and deliveries.
- Contractor to post construction notices/hotlines at several locations on the Project Site.
- Establish requirements for storage of materials and loading/unloading on the Project Site.

- Worksite traffic control plans approved by the City of Los Angeles should be implemented to route vehicles, bicyclist and pedestrians around the area during any parking, travel lane or sidewalk closures.
- Coordination with Hollywood High School administrators regarding the Project's construction schedule, points of contact, and identification of measures to avoid disruption of school activities. These activities include but not limited to, pick-up/drop-off by vehicles and foot, use of the school parking lot, outdoor breaks and recreation, noise beyond codified limits (though none is being proposed), and any construction activities that have potential to create airborne particulates from grading.
- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the Hollywood High School. Haul route trucks shall not be routed past Hollywood High School during periods when school is in session especially when students are arriving or departing from the campus.
- The crosswalk at the North Sycamore Avenue and Sunset Boulevard intersection identified in the Hollywood High School Safe Routes to School (SRTS) plan would be maintained during construction or an alternative pedestrian access route would be provided per the standards of the SRTS.²⁰

With incorporation of **PDF TRAF-1, Construction Management Plan**, approval of the Project would not result in any significant effects relating to construction traffic.

Operation

Plans, Programs, and Policy Review (Threshold T-1)

Per the LADOT Transportation Assessment guidelines, the City aims to achieve an accessible and sustainable transportation system that meets the needs of all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, and movers of commercial goods. Proposed development projects shall be analyzed to identify potential conflicts with adopted City plans and policies if the proposed project does not meet the screening criteria.

Screening Criteria

If the project requires a discretionary action, and the answer is “yes” to any of the following questions, further analysis will be required to assess whether the proposed project would conflict with plans, programs, ordinances, or policies:

- Does the project require a discretionary action that requires the decision maker to find that the decision substantially conforms to the purpose, intent and provisions of the General Plan?
- Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

²⁰ LADOT Livable Streets. “LADOT Livable Streets,” n.d. <https://ladotlivablestreets.org/projects/Hollywood-SRTS-Plan>.

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

Impact Criteria

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

Analysis

An analysis is required because the Project requires a discretionary action, and the Project is required to make modifications to the public right-of-way (dedication) along North Sycamore Avenue. The study area for the traffic analysis, was defined as including streets that front or are near the Project Site and include Sunset Boulevard, North Sycamore Avenue, North Orange Drive and De Longpre Avenue. The City of Los Angeles, Bureau of Engineering (BOE) Planning Case Referral Form (PCRF), which shows the Project's dedication and improvement requirements.

The following documents were reviewed to evaluate whether the Project would conflict with or would interfere with the City's implementation of a City plan, program, or policy related to the transportation network.

- **City of Los Angeles Mobility Plan 2035**, which serves as the City's General Plan circulation element. The mobility plan incorporates "complete streets" principles and lays the policy foundation. The mobility plan also identifies corridors proposed to enhance modes (bicycle, pedestrian, transit, and vehicle). These corridors are categorized as:
 - Neighborhood Enhanced Network (NEN) is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes such as walking, bicycling, or other slow speed motorized means of travel. North Orange Drive within the study area is identified as part of the NEN as Tier 1, which means that there is an opportunity for pedestrian and bicycle safety enhancements in compliance with the City's Mobility Plan.
 - Transit Enhanced Network (TEN) is the network of arterial streets enhanced to improve transit service performances and/or the overall experience of people who walk and take transit. None of the streets in the study area is identified as part of the TEN.
 - Bicycle Enhanced Network (BEN) is a network of streets planned for protected bicycle lanes and bicycle paths to provide bikeways to a variety of users. Sunset Boulevard within the study area is identified as a Tier 3 bicycle lane. Tier 3 bicycle lanes are bicycle lanes along streets that are defined by pavement striping and signage to delineate the portion of a roadway dedicated for bicycle travel.
 - Vehicle Enhanced Network (VEN) is a selection of streets that prioritize vehicular movement and that offer safe, consistent travel speeds and reliable travel times. None of the streets in the study area is identified as part of the VEN.
 - Pedestrian Enhanced District (PED) is a selection of streets that enhance the environment to promote more walking, reduce reliance on other modes for shorter trips, promote

health, increase the vitality of streets, and more. Sunset Boulevard within the study area is identified as part of the PED.

North Orange Drive and Sunset Boulevard within the Project's study area are included as part of the complete street's corridors outlined in the 2035 Mobility Plan. Based on a review of the Project's proposed land uses and design features, there are no substantial changes to the public right of way along North Orange Drive or Sunset Boulevard that would preclude the City from completing complete streets infrastructure as identified in the 2035 Mobility Plan. As described in **Appendix B**, the Project would be consistent with and would not impede the City's implementation of the Mobility Plan 2035.

- **The Hollywood Community Plan** is one of the 35 Community Plans in the City of Los Angeles; adopted in December 1988, it was designed to accommodate development to the year 2010. As discussed above, an update to the Hollywood Community Plan is currently in process that will guide the development of the Hollywood community area through 2040. The Hollywood Community Plan Update was adopted in May 2023 by the Los Angeles City Council; however, the Plan's implementing ordinances have not been finalized. One of the major objectives of the current 1988 Hollywood Community Plan is to make provisions 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. While this is a citywide objective, the Project would support its implementation. Specifically, the Project Site is located in a highly urbanized area that is well-served by public transit. The Project would include streetscape improvements such as landscaping to encourage walkability. Furthermore, the Project would provide short-term and long-term bicycle parking spaces. Thus, the Project would promote the use of alternative modes of transportation, including use of public transportation, walking, and bicycling. The Project would also be consistent with the mobility goals and objectives within the Hollywood Community Plan Update, which include providing a range of housing and employment opportunities. The Project proposes residential and retail land uses, which would provide a variety of housing opportunities (affordable and market rate housing). The Project would be consistent with the policies of the adopted and Hollywood Community Plan Update.
- **Vision Zero Los Angeles** is a plan with the goal of eliminating traffic deaths in Los Angeles and to design streets to increase the safety of pedestrians. The High-Injury Network (HIN) represents 6% of city streets (over 450 miles) that account for 70% of deaths and severe injuries for people walking. The Project Site is located on Sunset Boulevard, which is included in the High Injury Network. Although the Project Site is located along the HIN (Sunset Boulevard), it would not add new vehicular access points on Sunset Boulevard and therefore would be consistent with, and not conflict with, the implementation of future Vision Zero projects in the public right-of-way.
- **LAMC Section 12.21 A.16 (Bicycle Parking)** is an ordinance in the Los Angeles County Municipal Code (LAMC) General Provisions section. This ordinance requires bicycle parking spaces and end use facilities for new developments or additions based on the floor area.
 - **Residential Land Use** - The LAMC requires 1 short-term bicycle parking space per 10 units for 1-25 units, 1 short-term bicycle parking space per 15 units for 26-100 units, and 1 short-term bicycle parking space per 20 units for 100-200 units. Additionally, 1 long-term bicycle parking space per unit for 1-25 units, 1 long-term bicycle parking space per 1.5 units for 26-100 units, and 1 long-term bicycle parking space per 2 units for 100-200 units

is required per LAMC. Eight short-term stalls and 81 long-term stalls would be required for bicycle parking per the LAMC.

- Commercial Land Uses – The LAMC requires 1 short-term and 1 long-term bicycle parking space per 2,000 sf of commercial area. One short-term stall and 1 long-term stall would be required for bicycle parking per the LAMC.

The Project is proposing 93 bicycle parking spaces, including 83 long-term spaces and 10 short-term spaces. Long-term bicycle parking would be provided on the ground level and short-term bicycle parking spaces would be located along North Sycamore Avenue. The bicycle parking would comply with all requirements of the LAMC.

Based on the results of the analysis of the Project's consistency with plans, programs, and policy, the Project would be consistent/comply with, and would not impede, the City's implementation of the Mobility Plan 2035, the policies of the Hollywood Community Plan, Vision Zero Los Angeles and requirements of the LAMC Section 12.21 A.16 (Bicycle Parking).

Vehicle Miles Traveled Analysis (Threshold T - 2.1)

Per the LADOT Transportation Assessment Guidelines, one objective of the Los Angeles Mobility Plan 2035 is to decrease vehicle miles traveled (VMT) per capita by 20% by 2035. To meet this objective, a proposed land use projects is required to assess whether it would cause a substantial VMT if the proposed project does not meet the screening criteria.

Screening Criteria

This section describes the City's screening criteria that are used to determine if a project requires a VMT analysis. If the project requires a discretionary action, and the answer is "no" to either of the following, further analysis will not be required for Threshold T-2.1, and a "no impact" determination can be made for the threshold:

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

The following additional screening criteria are used to determine any potential significant impacts for projects that meet the first two screening criteria:

- If the project includes retail uses, does the portion of the project that contain retail uses exceed a net 50,000 square feet?
- Would the Project or Plan located within a one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential units?

Impact Criteria

The City's impact criteria for development projects that require a VMT analysis are as follows:

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

- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT.
- For other land use types where the threshold is not further specified below, measure VMT impacts for the work trip element using the criteria for office projects above.

Table 8: LADOT VMT Impact Criteria (15% Below APC Average)

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT Per Employee
Central*	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1
*Project is located in Central APC. Source: LADOT TAG		

Analysis

The Project's potential daily trip generation was calculated using the City's VMT calculator (Version 1.4) trip generation rates for multi-family/affordable housing and general retail. In addition, an existing trip generation credit was captured for the existing 6,690 sf adult day care building on the Project Site. The Project is anticipated to generate a net increase of 425 daily trips after capturing an existing use credit of 78 daily trips.

Because the Project would be generating more trips than the City's 250 daily vehicle trips threshold, an analysis is required to assess whether the Project would cause substantial VMT. Additionally, the LADOT Referral Form confirms the requirement of a VMT analysis.

Methodology and Assumptions

Based on the Project's proposed land use information, the residential land uses for market rate multifamily housing and affordable housing were analyzed. Per the LADOT Transportation Assessment Guidelines, the retail portion of the Project would screen out of the VMT analysis since it would be under 50,000 sf (2,875 sf); therefore, the retail portion of the Project is presumed to result in no VMT impact.

The City of Los Angeles VMT calculator, as outlined in the LADOT Transportation Assessment Guidelines, was used to determine the Project's VMT for its residential uses. The VMT estimation tool generates VMT estimates in a manner that is consistent with OPR's guidelines. As the Project Site is located within the Central APC, and the Project proposes residential uses, the VMT impact criteria applicable to the Project is 6.0 daily household VMT per capita, as shown in **Table 8** above.

VMT Analysis

VMT was calculated for the Project's proposed residential land use using the City's VMT calculator, in compliance with the Transportation Assessment Guidelines. The Project's proposed residential area

would result in an estimated VMT per capita of 4.4, which would be below the City's threshold for the Central APC and, therefore, the residential portion of the Project is presumed to have a less than significant VMT impact. The detailed VMT calculator results are shown in **Appendix B**.

Geometric Design Feature Review (Threshold T- 3.1)

Per the LADOT Transportation Assessment Guidelines, projects are evaluated to determine if there are potential geometric design feature impacts and potential increases in hazards related to the design of the Project's access points.

Screening Criteria

This section describes the City's screening criteria that are used to determine if a project requires a geometric design feature review. If the project requires a discretionary action, and the answer is "yes" to any of the following questions, further analysis will be required to assess whether the proposed project would cause a potential increase of hazards:

- Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?
- Is the project proposing to make any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?
- Would the land use project add 25 or more trips to any freeway off ramp in either the morning or afternoon peak hour?

Impact Criteria

The City considers the following factors when evaluating a project's access plans to determine if the project would substantially increase hazards due to a geometric design feature:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that the project introduces that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle safety hazards.
- The project location, or project-related changes to the public right-of-way, relative to proximity to the High Injury Network or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

Analysis

Pedestrian and Bicyclists

Pedestrian access into the Project would be separated from vehicle access points. Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks along North Sycamore Avenue and Sunset Boulevard. A prominent entry plaza located at the northwestern corner of Sunset Boulevard and North Sycamore Avenue would lead into the commercial areas that would front Sunset Boulevard. A second entry from Sunset Boulevard would provide access into the residential leasing office located east of the commercial area. An additional pedestrian entrance into the residential lobby would be located on North Sycamore Avenue. Bicycle parking facilities would be provided on-site as part of the Project, which includes short term and long-term bicycle stalls. The Project's access locations would be designed in compliance with City standards and safety requirements to provide adequate sight distance, sidewalks, crosswalks and pedestrian movement controls.

Vehicular Access

Vehicular access to the Project Site is currently provided by one driveway on North Sycamore Avenue. The Project proposes to close the existing driveway on North Sycamore Avenue and provide vehicle access to the Project Site via a new driveway along the eastern side of North Sycamore Avenue that would provide a two-way ingress/egress to the at-grade parking and one subterranean parking level beneath the Project. Five (5) parking spaces for the retail uses and four (4) parking spaces for the residential uses would be on the ground floor. From the ground floor parking area, vehicles would access the underground parking level via a two-way ramp.

The subterranean parking level would include 41 standard and two (2) Americans with Disabilities Act (ADA) compliant residential automobile spaces. The subterranean parking level would also include eight (8) retail spaces (60 spaces total in both the subterranean and ground floor).

Although Sunset Boulevard within the study area is along the City's HIN, the Project's driveways would be along North Sycamore Ave (not on the HIN) and designed to comply with LADOT standards. The proposed driveway is on a low-volume local street with no existing bike lane or transit stops. Hence, the Project would not be expected to increase hazards or conflicts.

Caltrans Freeway Impact Analysis

A Caltrans Freeway Ramp Impact Analysis is required when a Project is expected to add more than 25 trips to any freeway off-ramp in either the AM or PM peak hour. Based on the AM and PM peak hour trips, it was determined that the Project would not add more than 25 trips to any freeway off-ramp in either the AM or PM peak hour, and therefore, a freeway off-ramp analysis is not required.

For all the foregoing reasons, the Project would meet the conditions described in CCR Section 15332 (d) in that approval of the Project would not result in any significant effects relating to traffic.

2.6 Discussion of CCR Section 15332(d): Noise

Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.²¹

This section is based on the *Acoustical Assessment 7022 Sunset Boulevard Project*, prepared by Kimley-Horn, July 2024 (Appendix C).

²¹ Each of these topic areas (traffic, noise, air quality, and water quality) is discussed in its own section below.

Background

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).²²

Noise is defined as loud, unexpected, or annoying sound.²³ The fundamental model consists of a noise source, a receptor, and the propagation path between the two.²⁴ The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound.²⁵ A typical noise environment consists of ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this ambient noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micro-pascals (μPa) as a point of reference, defined as 0 dB.²⁶ Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA.²⁷ Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA.²⁸ Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier

²² California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013. Available at <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

²³ Harris, Cyril M., *Noise Control in Buildings: A Practical Guide for Architects and Engineers*, 1994

²⁴ California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013

²⁵ Ibid.

²⁶ Ibid.

²⁷ Compiled from James P. Cowan, *Handbook of Environmental Acoustics*, 1994, and Cyril M. Harris, *Handbook of Noise Control*, 1979

²⁸ Ibid.

urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:²⁹

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss. While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.³⁰

Annoyance. Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance.³¹

Ground-Borne Vibration

Sources of ground-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions or heavy equipment used during construction). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero.³² Several different methods are typically used to quantify vibration amplitude. One is vibration decibels (VdB) (the vibration velocity level in decibel scale). Other methods are the peak particle velocity (PPV) and the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave and expressed in terms of inches-per-second (in/sec). The RMS velocity is defined as the average of the

²⁹ Compiled from California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013, and FHWA, *Noise Fundamentals*, 2017.

³⁰ U.S. Department of Labor, Occupational Safety and Health Standards, 29 CFR 1910 (Occupational Noise Exposure).

³¹ Federal Interagency Committee on Noise, Federal Agency Review of Selected Airport Noise Analysis Issues, August 1992.

³² Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018

squared amplitude of the signal and is expressed in terms of VdB.³³ The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 9: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The human annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where ground-borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible.³⁴ Common sources for ground-borne vibration are planes, trains, and construction activities such as earth-moving, which requires the use of heavy-duty earth moving equipment.³⁵ For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) was used to evaluate construction-generated vibration for building damage and human complaints.

Table 9: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Caltrans Vibration Annoyance Potential Criteria	Caltrans Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	--	Extremely fragile historic buildings, ruins, ancient monuments	--
0.08	Readily Perceptible	--	--
0.01	--	--	--
0.04	--	--	--
0.1	Begins to Annoy	Fragile buildings	--
0.12	--	--	Buildings extremely susceptible to vibration damage
0.2	Annoying	--	Non-engineered timber and masonry buildings
0.25	--	Historic and some old buildings	--
0.3	--	Older residential structures	Engineered concrete and masonry
0.4	Unpleasant	--	--
0.5	--	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel or timber (no plaster)
PPV = peak particle velocity; in/sec = inches per second; FTA = Federal Transit Administration Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit Administration, Transit Noise and Vibration Assessment Manual, 2018.			

³³ Ibid.

³⁴ Ibid.

³⁵ Ibid.

Ground-Borne Noise

Ground-borne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.³⁶ The relationship between ground-borne vibration and ground-borne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, ground-borne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a ground-borne noise level that is approximately 50 decibels lower than the velocity level. For ground-borne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the ground-borne noise level will be approximately 35 dB lower than the velocity level. For ground-borne vibration that cause high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the ground-borne noise level will be approximately 20 dB lower than the velocity level.³⁷ The FTA provides a ground-borne noise threshold of 43 dBA for infrequent vibration events in Category 2 buildings such as residences and buildings where people normally sleep. For frequent and occasional vibratory events, the FTA established ground-borne noise thresholds of 35 dBA and 38 dBA, respectively.³⁸

Regulatory Setting

To limit population exposure to physically or psychologically damaging, as well as intrusive, noise levels, the Federal government, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise.

Federal

Federal Transit Administration Noise and Vibration Guidance

The Federal Transit Administration (FTA) has published the Transit Noise and Vibration Impact Assessment Manual (FTA Transit Noise and Vibration Manual) to provide guidance on procedures for assessing impacts at different stages of transit project development.³⁹ The report covers both construction and operational noise impacts and describes a range of measures for controlling excessive noise and vibration. In general, the primary concern regarding vibration relates to potential physical damage from construction. The guidance document establishes criteria for evaluating the potential for damage to various structural categories from vibration.

State of California

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services.⁴⁰ The guidelines rank noise land use compatibility in terms of “normally acceptable,” “conditionally acceptable,” “normally unacceptable,” and “clearly unacceptable” noise levels for various land use types. Under these guidelines, single-family homes are located in “normally acceptable” exterior noise environments up to

³⁶ Ibid.

³⁷ Ibid.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ State of California Governor’s Office of Planning and Research, General Plan Guidelines, Appendix D: Noise Element Guidelines, page 374, 2017, https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf. Accessed October 5, 2023.

60 CNEL and in “conditionally acceptable” exterior noise environments up to 70 CNEL. Multiple-family residential uses are located in “normally acceptable” exterior noise environments up to 65 CNEL and in “conditionally acceptable” exterior noise environments up to 70 CNEL. Schools, libraries, and churches are located in “normally acceptable” exterior noise environments up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Assembly Bill 1307

On September 7, 2023, Governor Newsom signed AB 1307, which added section 21085 to the Public Resources Code to read, in pertinent part, “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”.⁴¹

Local

City of Los Angeles Municipal Code

The City has adopted regulations to control unnecessary, excessive, and annoying noise, as set forth in the City’s Noise Ordinance (Chapter XI, Noise Regulation, of the Los Angeles Municipal Code [LAMC]). The City’s Noise Ordinance establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones and provides procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources.

With regard to vibration, LAMC Section 91.3307.1 states, “Adjoining public and private property shall be protected from damage during construction, remodeling, and demolition work. Protection must be provided for footings, foundations, party walls, chimneys, skylights, and roofs. Provisions shall be made to control water runoff and erosion during construction or demolition activities.”

With regard to construction noise, LAMC Section 112.05 sets forth a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard shall not apply where compliance therewith is technically infeasible. In addition, LAMC Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. and after 6:00 p.m. on Saturday or any national holiday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. and 9:00 p.m. and Saturdays and national holidays between 8:00 a.m. and 6:00 p.m.). Construction may be permitted outside of these hours if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners.

Section 111.02 (Sound Level Measurement Procedure and Criteria) of the LAMC provides procedures and criteria for the measurement of the sound level of “offending” noise sources. According to the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. Section 112.01 (Radios, Television Sets, and Similar Devices) of the LAMC prohibits the production of noise from any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or

⁴¹ AB 1307, Public Resources Code Section 21085

any reasonable person residing or working in the area, or that exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than 5 dBA.

Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment) limits increases in ambient noise levels created by air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

City of Los Angeles General Plan

The Noise Element of the Los Angeles City General Plan (Noise Element) provides guidance for the control of noise to protect residents, workers, and visitors from potentially adverse noise impacts. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element defers regulation of temporary, point-source noises such as construction activities to the City's Municipal Code Noise Ordinance. With regard to long-term noise impacts, the Noise Element contains stated goals, objectives, policies, and implementation programs for noise control.

Goal: A city where noise does not reduce the quality of urban life.

Objective 2: Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Policy 2.2: Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3: Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

Implementation P5: Continue to enforce, as applicable, city, state and federal regulations intended to abate or eliminate disturbances of the peace and other intrusive noise.

Implementation P11: For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.

Implementation P16: Use, as appropriate, the "Guidelines for Noise Compatible Land Use" (Exhibit I),¹ or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter, within a CNEL of 65 dB airport noise exposure areas and within a line-of-sight of freeways, major highways, railroads or truck haul routes.

L.A. CEQA Thresholds Guide

In 2006, the City set forth the L.A. CEQA Thresholds Guide, which was intended to provide guidance, as a voluntary tool, for CEQA impact analyses. Today, these thresholds are only used as guidance in instances where City staff finds they are beneficial to use and supported with substantial evidence.⁴² In addition, the L.A. CEQA Thresholds Guide recognizes that its applicability and use may be re-evaluated after a period of use.

Updates to Thresholds and Methodology for Construction Noise and Vibration

The City of Los Angeles recently adopted (February 2024) Thresholds and Methodology for Construction Noise and Vibration (Noise and Vibration Thresholds Update).

The construction thresholds included in the Noise and Vibration Thresholds Update are intended to be suited to the generally urban nature of the City, while still recognizing the importance of human health, including sleep disruption. The thresholds are intended to account for reasonable expectations regarding construction noise and vibration during daytime and nighttime hours, and also include absolute maximum noise levels that are intended to protect human health. As part of the Noise and Vibration Thresholds Update, the City requires environmental protection measures (EPMs) to be implemented as part of proposed development projects.

Proposed Daytime Construction Noise Thresholds

Increase Over Ambient. For construction activities that occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays, no numerical threshold above ambient noise levels is proposed.

Absolute Thresholds. On- and off-site construction noise during daytime hours (7:00 a.m. and 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays) would be limited to a maximum 80 dBA Leq(8-hour) absolute threshold at sensitive uses (at the property line with outdoor uses or at the exterior of the building), including outdoor public recreational areas.

This threshold applies to residential uses (at the property line with outdoor uses or at the exterior of the building); including expansive upper-level deck/open spaces areas that provide for the recreational use of residents. Examples include large patios or decks that are the primary outdoor use area in an apartment complex. However, this standard does not apply to private residential balconies which may or may not extend past the exterior of a building.

Proposed Nighttime Construction Noise Thresholds

Nighttime construction activities shall not be permitted unless a variance is approved by the City of Los Angeles Police Commission. In the event that such variance is granted, the following thresholds shall apply. The Project is not applying for nighttime construction. Therefore, proposed nighttime thresholds would not apply.

Proposed Vibration Thresholds for Human Annoyance

⁴² City of Los Angeles, Construction Noise and Vibration Proposed Updates to Thresholds and Methodology, August 2024..

For construction activities that occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays, no numerical threshold is proposed related to human annoyance.

During nighttime hours (between 7:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturdays), and anytime on Sundays or national holidays, construction activities shall not generate groundborne vibration levels that exceed 0.80 VdB at the exterior of a sensitive use building.

Proposed Vibration Thresholds for Building Damage

Architectural Building Damage—Construction activities shall not exceed the following building damage thresholds for the identified structures:

- Fragile Buildings: 0.1 PPV
- Historic Buildings: 0.25 PPV
- Older⁴³ Residential Structures: 0.3 PPV
- New Residential Structures: 0.5 PPV
- Modern Industrial/Commercial Buildings: 0.5 PPV

Existing Conditions

Existing Noise Sources

The Project Site is currently impacted by various noise sources. Mobile sources of noise, including traffic along Sunset Boulevard and North Sycamore Avenue are the most common and prominent existing sources of noise in the Project Site area. Other noticeable existing sources of noise on and near the Project Site include parking lot noise and mechanical equipment noise (e.g., heating, ventilation, and air conditioning [HVAC] units) operating at the Project Site and noise from existing nearby commercial and residential uses, and other urban-related activities (e.g., idling cars/trucks, pedestrians, car radios and music playing, dogs barking, etc.).

Noise Measurements

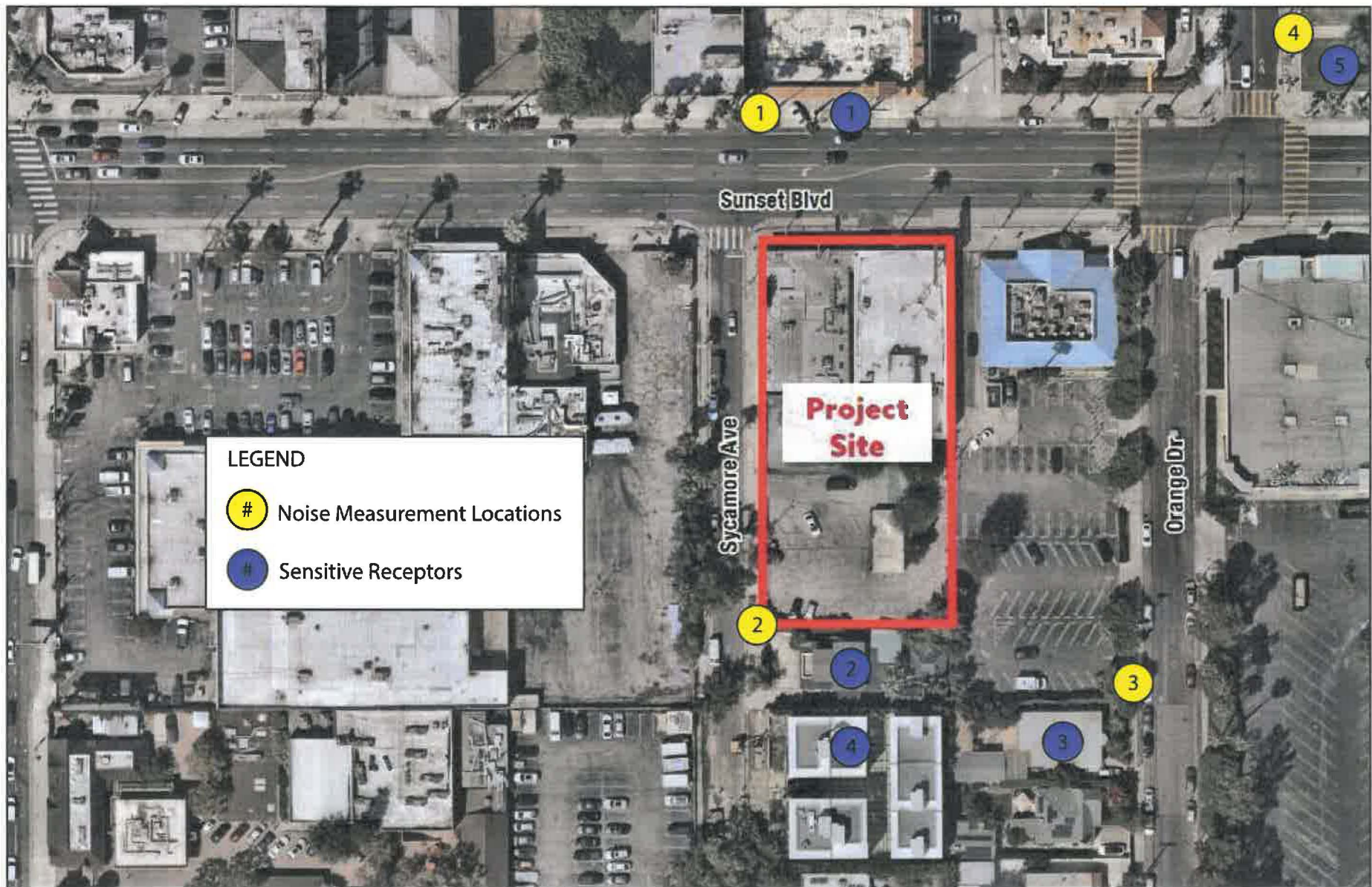
To quantify existing ambient noise levels in the Project Site area, Kimley-Horn conducted four short-term (15-minute) measurements on Tuesday, October 10, 2023; see **Appendix C** for additional details regarding how the ambient noise measurements were taken.⁴⁴ The noise measurement sites were selected to be representative of the existing ambient noise levels at the noise-sensitive uses immediately adjacent to the Project Site. The 15-minute daytime measurements were taken between 9:37 a.m. and 10:48 a.m. Measurements of L_{eq} are considered representative of the noise levels throughout the day. The average noise levels measured at each location are listed in **Table 10: Existing Noise Measurement Locations and Measurements** and shown on **Figure 13: Noise Measurement Locations**.

⁴³ A building over 50 years can be considered an “older” residential structure. Source: City of Los Angeles, Proposed Updates to Thresholds and Methodology for Construction Noise and Vibration, 2023.

⁴⁴ The ambient noise measurements were taken in accordance with the City’s standards, which require ambient noise to be measured over a period of at least 15 minutes; See Section 111.01 of the LAMC.

Table 10: Existing Noise Measurement Locations and Measurements

Site	Location	Measurement Period	Duration	Daytime Average L _{eq} (dBA) ¹
ST-1	Sunset Boulevard north of Sycamore Avenue	10:16 a.m.	15 min	72.1
ST-2	Sycamore Avenue between Sunset Boulevard and DeLongpre Avenue	9:57 a.m.	15 min	56.8
ST-3	Orange Drive between Sunset Boulevard and DeLongpre Avenue	9:37 a.m.	15 min	60.8
ST-4	North of the intersection of Orange Drive and Sunset Boulevard	10:33 a.m.	15 min	67.3
Source: Noise measurements taken by Kimley-Horn and Associates, October 10, 2023. See Appendix C for noise measurement results.				



SOURCE: KTG Architecture + Planning, 2024



FIGURE 13: Noise Measurements Locations

7022 SUNSET BOULEVARD

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. The City of Los Angeles General Plan Noise Element defines sensitive noise receptors as residences, long-term care facilities, dormitories, motels, hotels, transient lodging, houses of worship, hospitals, libraries, schools, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, and parks.⁴⁵ Sensitive receptors near the Project Site are shown in **Table 11: Sensitive Receptors** (see Figure), along with the Noise Measurement Location that represents each sensitive receptor.

Table 11: Sensitive Receptors

Receptor Description	Distance ¹ and Direction from the Project
Sensitive Receptor 1 - Palihotel (represented by noise measurement ST-1)	100 feet north of Project Site
Sensitive Receptor 2 - Sunset Montessori Pre-School (represented by noise measurement ST-2)	Adjacent to Project Site to the south
Sensitive Receptor 3 - Residential (represented by noise measurement ST-3)	40 feet southeast of Project Site
Sensitive Receptor 4 - Residential (represented by noise measurement ST-2)	50 feet south of Project Site
Sensitive Receptor 5 - Hollywood High School (represented by noise measurement ST-4)	270 feet northeast of Project Site
Source: Google Earth, 2024.	
¹ Distance measured from the property line of the Project Site to the nearest receptor property line.	

Significance Criteria And Methodology

CEQA Thresholds

California Environmental Quality Act (CEQA) Guidelines Appendix G contains analysis guidelines related to noise impacts. The City has determined to use these guidelines as thresholds of significance for this analysis. A project would create a significant environmental impact if it would:

- Generate 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;
- Generate excessive ground-borne vibration or ground-borne noise levels; and
- 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, expose people residing or working in the Project area to excessive noise levels.

Construction Noise

On-Site and Off-Site Construction. The City of Los Angeles released proposed updates to the City's current construction noise thresholds and methodologies, entitled Proposed Updates to Thresholds and Methodology for Construction Noise and Vibration (Noise and Vibration Thresholds Update) and received public comments on those updates until February 19, 2024.⁴⁶ Pursuant to the proposed Noise and Vibration Thresholds Update, on- and off-site construction noise occurring between the hours of 7:00 a.m.

⁴⁵ City of Los Angeles, General Plan Noise Element, 1999

⁴⁶ City of Los Angeles, Proposed Updates to Thresholds and Methodology for Construction Noise and Vibration, 2023.

and 7:00 p.m. Monday through Friday and between the hours of 8:00 a.m. and 6:00 p.m. on Saturdays up to a maximum 80 dBA L_{eq} absolute threshold at sensitive uses would be less than significant; no numerical threshold above ambient noise levels has been proposed.

Operational Noise

On-Site Operations. With respect to on-site operational noise, the significance criteria used in the noise analysis is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the City of Los Angeles CEQA Thresholds Guide (Noise Regulations).⁴⁷

Off-Site Operations. The Noise Regulations do not apply to off-site traffic (i.e., vehicles traveling on public roadways). Therefore, the City has determined to assess the significance of the Project's off-site traffic noise based on whether the Project creates, or contributes to, an increase in the ambient noise level of 3 dBA in CNEL if the plus project noise levels fall within the "normally unacceptable" or "clearly unacceptable" category, as specified in the City's Noise Element, or an increase of 5 dBA in CNEL if the plus project noise levels fall within the "conditionally acceptable" or "normally acceptable" category at noise-sensitive uses.

Composite Operational Noise. In addition, the City has determined to assess the significance of the Project's composite noise levels (on-site and off-site sources) based on whether the Project's composite noise levels create an increase in the ambient noise level of 3 dBA or 5 dBA in CNEL (depending on where in the acceptable/unacceptable categories the noise levels fall as discussed above) at noise-sensitive uses.

Vibration

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used, the location of that equipment relative to the receptor, and the operations involved.

Structural Damage. Heavy construction equipment (e.g., a large bulldozer), which would generate the highest vibration level of the equipment expected to be used for Project construction, would generate a vibration level of up to 0.089 in/sec PPV at a distance of 50 feet from the equipment.⁴⁸ With respect to potential building damage, pursuant to the proposed Noise and Vibration Thresholds Update, construction vibration shall not exceed the following thresholds for the identified class of structures:⁴⁹

- Fragile Buildings: 0.1 PPV
- Historic Buildings: 0.25 PPV
- Older⁵⁰ Residential Structures: 0.3 PPV
- New Residential Structures: 0.5 PPV
- Modern Industrial/Commercial Buildings: 0.5 PPV

⁴⁷ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

⁴⁸ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

⁴⁹ City of Los Angeles, Proposed Updates to Thresholds and Methodology for Construction Noise and Vibration, 2023.

⁵⁰ A building over 50 years can be considered an "older" residential structure. Source: City of Los Angeles, Proposed Updates to Thresholds and Methodology for Construction Noise and Vibration, 2023.

There are seven historical resources present within a one-block-adjacent area of the Project Site.⁵¹ Hollywood High School, located approximately 300 feet to the northeast of the Project Site, is within the Hollywood High School Historic District and is designated as a National Register Property and listed in the California Register. The former Charlie Chaplin Studio⁵² at 1416 N. La Brea Avenue, located approximately 540 feet to the southwest of the Project Site, is designated as a Los Angeles Historic Cultural Monument. Five residential properties located along DeLongpre Avenue and North Mansfield Avenue, located more than 500 feet to the south of the Project Site, have been identified as potentially eligible for designation. This evaluation uses the City's Noise and Vibration Thresholds Update structural damage criteria of 0.25 in/sec for these historic land uses, 0.3 in/sec PPV at older residential structures (adjacent structure to the south), and 0.5 in/sec PPV at modern industrial/commercial buildings (commercial use to the east).

Human Annoyance. In accordance with the Noise and Vibration Thresholds Update, no numerical threshold is proposed related to human annoyance for construction activities occurring between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays. According to the City, intermittent human annoyance from construction activity is commonplace during daytime hours.

Potential Impacts

Project-Level Impacts

Threshold Would the Project generate 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?

Construction

On-Site Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation). Noise generated by construction equipment, including earth movers and material handlers, can reach high levels that can affect noise-sensitive uses near the construction site. Construction activities for the Project would include demolition, grading, excavation, paving, building construction, and architectural coating. Noise levels associated with individual construction equipment to be used during Project construction are listed in **Table 12: Project Construction Equipment Noise Levels**.⁵³

It should be noted that the noise level values shown in Table 12 are for the equipment when operating at full power 50 feet from the sensitive receptor, without taking into account any intervening structures or topography that may reduce noise levels. Construction noise was calculated accounting for each piece of equipment's usage factor, or the fraction of time that the equipment would be in use at full power over a specific period of time, based on Table 1 of the Federal Highway Administration's (FHWA's) Roadway

⁵¹ City of Los Angeles, Los Angeles Historic Resources Inventory. <https://hpla.lacity.org/>

⁵² Formerly the Charlie Chaplin studios, occupied by the Jim Hensen Studios since 2000.

⁵³ Federal Highway Association, Roadway Construction Noise Model, User Guide 2005.

Construction Noise Model (RCNM).⁵⁴ Other primary sources of acoustical disturbance may include random incidents, which would last less than one minute (such as dropping of materials or the hydraulic movement of machinery lifts). It should also be noted that due to the constraints of the Project Site and standard construction practices, only a limited amount of equipment can operate on the Project Site at a particular time. Following the City's proposed update to Thresholds and Methodology for Construction Noise and Vibration (released December 2023), construction noise was predicted at the nearest noise-sensitive receptors utilizing the FHWA's RCNM.⁵⁵ Following the City's Noise and Vibration Thresholds Update, when calculating construction noise, the loudest piece of equipment was assumed to operate at the property line nearest to the studied receptor while all other equipment anticipated for each individual construction phase was assumed to operate at the center of the Project Site.⁵⁶ This methodology accounts for equipment operating throughout the Project Site and not at a fixed location for extended periods of time.⁵⁷ Therefore, the distances used in the RCNM model were measured from the property line of the Project Site to the nearest receptor property line (or 10 feet for adjacent receptors) for the loudest piece of equipment and from the center of the Project Site to the receptor property line for all other pieces of equipment.

Table 12: Project Construction Equipment Noise Levels

Construction Phase	Equipment ¹	Typical Noise Level (dBA L _{max}) at 50 feet from Source	Usage Factor (%)
Demolition	Concrete Saw	90	20
	Backhoe	78	40
Site Preparation	Backhoe	78	40
Grading	Grader	85	40
	Backhoe	78	40
	Auger Drill Rig	84	20
Building Construction	Crane	81	16
	Forklift	85	50
	Tractors/Loaders/Backhoes	78	40
Paving	Paver	77	50
	Roller	80	20
Architectural Coating	Compressor	78	40

Source: Noise level and usage factor source: Federal Highway Association, Roadway Construction Noise Model, User Guide 2005
 1. Equipment compiled based on air quality modeling defaults and contractor input.

Table 13: Project Construction Noise Levels shows the estimated maximum exterior construction noise levels at the nearest receptors to the Project Site.⁵⁸ The Project shall comply with a combination of the following City of Los Angeles Environmental Protection Measures (EPMs), which will be included in Project construction plans, to minimize construction noise to the extent feasible. EPM NV1-1 requires the proper maintenance of construction equipment and the installation of noise shielding/muffling devices. The Federal Highway Administration (FHWA) states that muffler systems can reduce noise levels by 10 dBA or more.⁵⁹ Other noise shielding methods may include the use of sound aprons/shields attached to construction equipment to dampen/shield noise emanating from equipment engines, providing noise

⁵⁴ Ibid.

⁵⁵ City of Los Angeles, Proposed Updates to Thresholds and Methodology for Construction Noise and Vibration, December 2023

⁵⁶ Ibid.

⁵⁷ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

⁵⁸ For predicted construction noise levels for all construction phases, see Appendix C.

⁵⁹ Federal Highway Administration, *Special Report - Measurement, Prediction, and Mitigation*, Chapter 4 Mitigation, 2017.

level reductions of between 10 and 20 dBA.⁶⁰ EPM NV1-2 prohibits the use of driven (impact) pile systems except where the underlying geology renders other methods infeasible. The analysis herein assumes the use of drilled piles and that impact piles will not be needed. EPM NV1-3 requires the enclosure or screening of outdoor mechanical equipment. EPM NV1-4 requires locating construction staging areas as far away from sensitive uses as reasonably possible. EPM NV1-5 requires the use of temporary noise barriers such as plywood walls with a minimum ½-inch thickness or sound blankets meeting a sound transmission class (STC) rating of 25. Sound blankets meeting a STC 25 rating can achieve a minimum 7 to 10 dBA reduction for construction equipment with 200 Hz or lower frequency.⁶¹ With implementation of EPM NV1-1, EPM NV1-3, and EPM NV1-5, an up to 20 dBA reduction in noise is achievable and it is reasonable and feasible to assume that construction noise levels would not exceed the applicable daytime construction noise threshold of 80 dBA L_{eq} . See **Appendix C** for predicted construction noise for each individual construction phase.

- EPM NV1-1 Noise Shielding and Muffling.** Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment shall be properly maintained, and the Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.
- EPM NV1-2 Use of Driven Pile Systems.** Driven (impact) pile systems shall not be used, except in locations where the underlying geology renders drilled piles, sonic, or vibratory pile drivers infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.
- EPM NV1-3 Enclosure or Screening of Outdoor Mechanical Equipment.** All outdoor mechanical equipment (e.g., generators, compressors) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line of sight between the equipment and any off-site Noise-Sensitive Uses.
- EPM NV1-4 Location of Construction Staging Areas.** Construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving what constitutes "as far as possible" shall be upon the Applicant or Owner, in consideration of the above factors.
- EPM NV1-5 Temporary Walls.** Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected between construction activities and Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of

⁶⁰ FHWA. Special Report – Measurement, Prediction, and Mitigation. Chapter 4 Mitigation.

https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

⁶¹ Environmental Noise Control. *Portable Acoustic Panels*, 2024. Available at: Portable Acoustic Panels - Environmental Noise Control (environmental-noise-control.com)

proving that compliance is technically infeasible shall be upon the Applicant or Owner. Technical infeasibility shall mean that noise barriers cannot be located between construction activities and Noise-Sensitive Uses due to site boundaries, topography, intervening roads and uses, and/or operational constraints.

Table 13: Project Construction Noise Levels

Receptor	Maximum Noise Level at Receptor Prior to EPMs (L_{eq}) ^{1, 2}	Maximum Noise Level at Receptor with EPMs (L_{eq}) ^{1, 2}	Noise Threshold (dBA L_{eq}) ³	Exceeded?
Sensitive Receptor 1 – Palihotel	77.8	57.8	80	No
Sensitive Receptor 2 - Sunset Montessori Pre-School	96.6	76.6		No
Sensitive Receptor 3 – Residential (Southeast)	84.8	64.8		No
Sensitive Receptor 4 – Residential (South)	83.1	63.1		No
Sensitive Receptor 5 - Hollywood High School	70.4	50.4		No
1. Per the methodology described in the City’s Construction Noise and Vibration Thresholds Update, it is assumed that the loudest piece of equipment would be operated near the Project property boundary and all other equipment would operate at the center of the Project Site.				
2. Assumes noise level reductions (up to 20 dBA) provided by EPM NV1-1 (Noise Shielding and Muffling), EPM NV-3 (Enclosure or Screening of Outdoor Mechanical Equipment), and EPM NV1-3 (Temporary Walls).				
3. Per the City’s Construction Noise and Vibration Thresholds Update, daytime construction noise shall be limited to a maximum of 80 dBA L_{eq} at sensitive uses.				
Source: Federal Highway Administration, <i>Roadway Construction Noise Model</i> , 2006. Refer to Appendix C for noise modeling results for each construction phase.				

As shown in **Table 13, Project Construction Noise Levels**, Project construction noise would not exceed the City's Noise and Vibration Thresholds Update significance criterion of 80 dBA L_{eq} at any of the studied sensitive receptors including residential, hotel, and school uses. As discussed above, the Project would be subject to City EPMs including the use of muffling devices, screening, and temporary barriers which would minimize construction noise. The Project would be subject to, PDF TRAF-1 that would require coordination with Hollywood High School as well. In addition, construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels in the area. Construction activities would also be prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday and 6:00 p.m. to 8:00 a.m. on Saturdays, and at any time on Sunday.⁶² The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. For all of these reasons, the Project would not result in the 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 during construction. Construction noise impacts would be less than significant, and no mitigation measures are required.

Off-Site Construction Noise

In addition to on-site construction noise, the Project would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. Haul trucks would travel to and from the Project Site using Sunset Boulevard and Sycamore Avenue. Haul and delivery trucks and construction workers are expected to arrive at the Project Site

⁶² Note that the City's Noise and Vibration Thresholds Update designates daytime hours as between the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday. Project construction is not anticipated to occur after 7:00 p.m. Monday through Friday.

before construction starts and leave when construction ends, and thus, would not overlap with the noise generated by the Project's construction equipment. Although construction workers would arrive from various directions, worker trips would likely all utilize Sunset Boulevard and Sycamore Avenue to arrive at the Project Site. It is reasonable to assume that workers would already have arrived at the Project Site to begin grading activities prior to the arrival of haul trucks. The greatest contributor to on-road traffic noise during construction would be haul trucks traveling from State Route 101 to the Project Site via Sunset Boulevard and Sycamore Avenue. Therefore, this analysis only considers noise generated by haul trucks. According to modeling assumptions included in the air quality assessment prepared by Kimley-Horn in February 2024 (found in **Appendix B** of this document), the construction phase with the highest assumed number of haul trucks would be grading, when it was assumed there would be up to 32 daily haul truck trips accessing the Project Site. Assuming that all 32 haul trucks would pass through the same roadway segment along Sunset Boulevard or Sycamore Avenue within a 15-minute period, the estimated noise level from the grading phase haul truck trips would be 59.2 dBA L_{eq} at 50 feet from the roadway centerline. This worst-case noise level would not exceed the City's Noise and Vibration Thresholds Update significance criterion of 80 dBA L_{eq} for on- and off-site construction activities. Therefore, approval of the Project would not result in any significant effects relating to off-site construction traffic noise.

Operations

The Project consists of a 7-story residential and commercial mixed-use development with one level of subterranean parking. Project operations would result in the generation of noise from mechanical equipment (e.g., HVAC, etc.), potential amplified music on rooftop terraces, parking and access noise, and trash/recycling truck pickup noise. Although these noise sources would be consistent with existing noise sources in the Project Site vicinity and with the noise generated by the existing uses on the Project Site, existing on-site operational noise has not been accounted for in the analysis below to provide a conservative analysis.

On-Site Mechanical Equipment Noise

Potential stationary noise sources related to long-term Project operations would include mechanical equipment (e.g., HVAC equipment) located on the rooftop. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet.⁶³ Pursuant to LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), the operation of any air conditioning, refrigeration, or heating equipment shall not create any noise which would cause the noise level at another occupied property to exceed the ambient noise level by more than 5 dBA. Assuming that the Project's mechanical equipment would be located within a portion of the rooftop nearest to each receptor, and without accounting for shielding that would be provided by potential screening or architectural features, noise levels that would be generated by the mechanical equipment have been calculated and are shown in **Table 14: Mechanical Equipment Noise Levels**. As shown, mechanical equipment noise levels would not increase the ambient noise levels beyond the acceptable levels (5 dBA over ambient). Project mechanical equipment would not result in the generation of a substantial 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. Therefore, approval

⁶³ Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.

of the Project would not result in any significant effects relating to the operation of on-site mechanical equipment.

Table 14: Mechanical Equipment Noise Levels

Receptor	Distance to Receptor (feet) ¹	Level at Receptor (dBA) ²	Ambient Level (dBA) ³	Ambient + Project Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Palihotel	151	42.4	72.1	72.1	0.0	5.0	No
2 – Sunset Montessori Pre-School	40	53.9	56.8	58.6	1.8	5.0	No
3 – Residential (Southeast)	100	46.0	60.8	60.9	0.1	5.0	No
4 – Residential (South)	85	47.4	56.8	57.3	0.5	5.0	No
5 – Hollywood High School	330	35.6	67.3	67.3	0.0	5.0	No
1. Distance estimated assuming equipment location in the center of the northern rooftop for receptors 1 and 5 and the center of the southern rooftop for receptors 2, 3, and 4. 2. Distance attenuation calculated assuming reference noise level of 52 dBA Leq at 50 feet: Source for reference level: Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, <i>Noise Navigator Sound Level Database with Over 1700 Measurement Values</i> , July 6, 2010. * See Table 1 and Table for representative ambient noise levels.							

Open Space

The Project would include several outdoor living (open) spaces for residents of the new building. Per AB 1307, Section 21085 of the Public Resources Code, for residential uses, the effects of noise generated by Project occupants and their guests on human beings is not a significant effect on the environment. Therefore, no further analysis is required.

Amplified Music

Noise levels from the potential installation of an amplified sound system at the rooftop terraces (common open spaces located on the ground floor and second floor are proposed to be enclosed and shielded by the proposed building) have been estimated. This analysis does not apply to personal speakers (i.e., personal stereos or speakers) that may be operated by residents of the Project. It is assumed that the use of amplified sound systems would be allowable only during daytime hours (7:00 a.m. to 10:00 p.m.) as detailed in **Project Design Feature - 1 (PDF-NV-1)**, below.

Project Design Feature

PDF-NV--1: Amplified Music: Operation of permanently wired amplified sound systems at the rooftop terraces shall be limited to between the hours of 7:00 a.m. and 10:00 p.m. and shall not exceed a volume of 80 dBA measured at 3 feet from any speaker. In addition, all speakers shall be designed and installed to direct sound toward the center of the Project terraces.

Although amplified music from residential living areas typically includes background music that allows for conversation to take place, it has been assumed that sound levels would equate to loud music playing on a stereo to ensure a worst-case analysis. Music playing on a stereo generates noise levels of approximately 80 dBA at 3 feet from the speaker.⁶⁴ Although the outdoor living spaces would be elevated, direct line-of-sight may not be available, and shielding could be provided by building walls and architectural features, noise level reductions (for shielding or additional attenuation due to building height) have not been assumed in the modeling. Consequently, maximum noise levels reaching each receptor from each outdoor

⁶⁴ Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.

living space have been combined to provide an overall worst-case estimate of potential amplified music, assuming all three terraces would utilize amplified sound systems simultaneously.

The southern portion of the proposed building would include a roof deck at the third floor that provides casual seating and open space. The northern portion of the proposed building would consist of 7 stories with a rooftop pool deck and two roof terraces: the northern roof terrace would include a pool and is located along Sunset Boulevard; the western roof terrace would be located along Sycamore Avenue.

As shown in **Table 15: Outdoor Amplified Music Noise Levels**, noise levels from the outdoor open spaces generated by a permanent amplified sound system would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient pursuant to the City's Noise Regulations). Project open space areas would not result in the generation of a substantial permanent increase in ambient noise levels due to amplified music 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, approval of the Project would not result in any significant effects relating to noise from outdoor open space generated by amplified music.

Table 15: Outdoor Amplified Music Noise Levels

Receptor ¹	Combined Amplified Noise Level at Receptor (dBA)	Ambient Level (dBA) ²	Ambient + Amplified Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Palihotel	50.4	72.1	72.1	0.0	5.0	No
2 – Sunset Montessori Pre-School	56.6	56.8	59.7	2.9	5.0	No
3 – Residential (Southeast)	50.8	60.8	61.2	0.4	5.0	No
4 – Residential (South)	51.8	56.8	58.0	1.2	5.0	No
5 – Hollywood High School	42.7	67.3	67.3	0.0	5.0	No

1. Distance measured from center of terrace area to receptor property line.

On-Site Parking

Passenger vehicles would access the Project Site's ground floor parking level via a driveway on Sycamore Avenue, where seven surface parking stalls would be provided to serve the proposed retail uses and two parking stalls would be provided to serve the proposed residential uses, along with a ramp to the subterranean parking level where additional residential parking spaces would be provided. Noises associated with parking activities include noise associated with vehicles starting and stopping, vehicle doors closing, car horns and car alarms, loading and unloading and conversations. The noise levels from these activities range from 53 to 61 dBA and are short-term.⁶⁵ Ground floor access from the ground floor parking level and the ground floor parking areas would be shielded by the Project building and, further, nearby sensitive receptors would not have line-of-sight to the ground level parking and subterranean access. When a noise barrier such as the Project building is located between a noise source and receiver, the line of sight is interrupted, which reduces the level of the noise that reaches the receiver. The amount of the reduction depends on the mass and rigidity of the barrier.⁶⁶

⁶⁵ Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.

⁶⁶ California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013

The noise level reaching the receiver can be reduced by approximately 15 dBA when a building stands between the noise source and receiver.⁶⁷ The residential parking spaces within the subterranean parking garage, which would be entirely enclosed, would not result in any measurable increases in ambient noise levels within the Project Site area. Therefore, noise levels generated by Project parking activities, vehicle access, loading and unloading would not result in the generation of a substantial 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. Approval of the Project would not result in any significant effects relating to parking activities, vehicle access, or loading and unloading.

Trash/Recycling Truck Pickups

The residential and retail trash and recycling rooms would be located within a central area of the ground floor level of the proposed building. Trash/recycling trucks and pickup activities customarily generate noise levels of approximately 85 dBA.⁶⁸ However, the trash and recycling disposal receptacles would be fully enclosed within the central portion of the Project Site and shielded by the Project buildings, and, as a result, the trash/recycling truck pickup activity would not result in measurable increases in ambient noise levels at nearby sensitive receptors. In addition, trash/recycling truck pickup activity servicing the Project Site area currently occurs under existing conditions and would not be a new noise source. The hours of trash/recycling pickup activity would depend on the service provider and would not be regulated by the Project. Therefore, approval of the Project would not result in any significant effects relating to trash/ recycling truck pickup noise levels.

On-Site Composite Noise

An evaluation of the Project's composite noise levels, including all on-site 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 noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-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 amplified music at outdoor spaces. **Table 16: Composite On-Site Noise Levels**, presents the estimated composite noise from on-site Project-related noise sources at noise sensitive receptors. As reported in **Table 16**, the Project would result in a maximum increase of 3.9 dBA at the Sunset Montessori school located to the south of the Project Site. Composite Project noise levels would be below the 5 dBA significance threshold. Composite operational noise levels would not result in the generation of a substantial 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. Therefore, approval of the Project would not result in any significant effects relating to the on-site composite noise level.

Table 16: Composite On-Site Noise Levels

Receptor ¹	Mechanical Equipment (dBA)	Amplified Noise (dBA)	Ambient Level (dBA) ¹	Ambient + Project Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?

⁶⁷ Federal Highway Administration, *Roadway Construction Noise Model User Guide*, Appendix A. June 2017 Available at: https://www.fhwa.dot.gov/ENVIRONMENT/noise/construction_noise/rcnm/rcnm10.cfm#appa

⁶⁸ Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010

1 – Palihotel	42.4	50.4	72.1	72.1	0.0	5.0	No
2 – Sunset Montessori Pre School	53.9	56.6	56.8	60.7	3.9	5.0	No
3 – Residential (Southeast)	46.0	50.8	60.8	61.3	0.5	5.0	No
4 – Residential (South)	47.4	51.8	56.8	58.4	1.6	5.0	No
5 – Hollywood High School	35.6	42.7	67.3	67.3	0.0	5.0	No

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments. According to the Average Daily Traffic (ADT) Volumes provided in the traffic analysis prepared by Kimley-Horn (see **Appendix B** of the Categorical exemption),⁶⁹ the Project would increase the ADT volume, which would result in noise increases on Project Site study area roadways. Traffic noise levels on roadways primarily affected by Project-generated trips were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling was conducted for conditions with and without the Project, based on traffic volumes from the Transportation Assessment. As shown in **Table 17: Opening Year and Opening Year Plus Project Traffic Noise Levels**, Opening Year Plus Project traffic-generated noise levels on Project Site study area roadways would range between 58.6 dBA CNEL and 65.6 dBA CNEL at 100 feet from the roadway centerline, and the Project would result in a maximum increase of 2.3 dBA CNEL along Sycamore. Increases in traffic noise would not result in increases beyond acceptable levels (see Thresholds section above). Therefore, approval of the Project would not result in any significant effects relating to off-site traffic noise.

Table 17: Opening Year and Opening Year Plus Project Traffic Noise Levels

Roadway Segment	Opening Year		Opening Year + Project		Incremental Increase	Significant Impact?
	ADT	dBA CNEL ¹	ADT	dBA CNEL ¹		
Sunset between Sycamore and Orange	35,138	65.5	35,308	65.6	0.1	No
De Longpre between Sycamore and Orange	2,755	52.7	2,798	52.8	0.1	No
Sycamore between Sunset and De Longpre	627	46.3	1,052	48.6	2.3	No
Orange between Sunset and De Longpre	2,348	52.0	2,369	52.1	0.1	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Equivalent Noise Level
 1. Traffic noise levels are at 100 feet from the roadway centerline.
 Source: Based on traffic data provided by Kimley-Horn and Associates, Inc., February 2024. Refer to Appendix B for traffic noise modeling results.

Threshold **Would the Project generate excessive ground-borne vibration or ground-borne noise levels?**

Construction

On-Site Construction Vibration

Increases in ground-borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

⁶⁹ Kimley-Horn and Associates, Inc.,

The FTA and Caltrans have published standard vibration velocities for construction equipment operations. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. Receptors susceptible to building damage include all structures located adjacent to the Project Site. This evaluation uses the structural damage criteria proposed by the City's Draft Noise and Vibration Thresholds Update of 0.25 in/sec PPV for historic structures, 0.3 in/sec PPV at older residential structures, and 0.5 in/sec for modern industrial and commercial structures.⁷⁰

Table 18: Typical Construction Equipment Vibration Levels lists the reference vibration levels for typical construction equipment (measured at 25 feet). The ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As shown in Table 18, based on FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.076 to 0.21 in/sec PPV at 25 feet from the source of activity. Equipment expected to be used at the Project site that FTA guidance includes reference vibration levels for include loaded haul trucks, vibratory compactor/roller, and drill.⁷¹ A drill would be required for shoring activities to provide support during excavation, approximately 20 feet from the Montessori building to the south. Haul trucks would be staged at locations that would provide ease of access/egress from the Project Site and onto the roadway network. Loaded trucks would travel at distances greater than 25 feet from adjacent structures. A vibratory compactor/roller could be used during the construction of surface parking area, which is located within the northern portion of the Project Site, approximately 25 feet from the commercial building to the east and at least 100 feet from all other surrounding structures (including historical resources). As shown in Table 18, at 25 feet, the operation of loaded haul trucks and a vibratory roller/compactor would not exceed the City's threshold of 0.3 in/sec PPV for older residential uses or 0.5 in/sec PPV for modern commercial buildings. At 20 feet, the use of a drill would generate vibration velocities of 0.124 in/sec PPV, which would not exceed the City's threshold of 0.3 in/sec PPV at the Montessori building to the south. Approval of the Project would not result in any significant effects relating to on-site construction vibration.

Table 18: Typical Construction Equipment Vibration Levels

Equipment	Reference Level PPV at 25 Feet (in/sec)	PPV at 20 Feet (in/sec)
Loaded Trucks	0.076	--*
Vibratory compactor/roller	0.210	--*
Caisson Drilling	0.089	0.124
Structural Damage Threshold	0.30	0.30
Exceeds Thresholds?	No	No
Source: Federal Transit Administration, <i>Transit Noise and Vibration Impact Assessment Manual</i> , September 2018.		
* Equipment not anticipated to be required at this distance.		

Off-Site Construction Vibration

With regard to construction trucks, Project construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. During excavation, soil would be

⁷⁰ City of Los Angeles, Proposed Updates to Thresholds and Methodology for Construction Noise and Vibration, 2023.

⁷¹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. For equipment where FTA guidance does not include reference vibration levels for are assumed to not require analysis.

stockpiled within designated areas of the Project Site prior to export. Due to the size constraints of the Project Site, the amount of space needed for a heavy-duty haul truck to maneuver, and designation of loading areas, it is assumed that one truck would be arriving/leaving the Project Site at a time. According to the FTA's Transit Noise and Vibration Impact Assessment, a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when on a roadway.⁷² The factors influencing levels of ground-borne vibration include vehicle speed, vehicle suspension, and wheel condition and type. The frequency of vibration events is not listed as an influencing factor for vibration velocity by the FTA.⁷³ As such, multiple trucks traveling along the roadway would increase the frequency of vibration events but would not affect the vibration velocity experienced by receptors. Therefore, approval of the Project would not result in any significant effects relating to off-site construction vibration.

On-Site Ground-Borne Noise

According to the FTA, airborne noise levels would be higher than ground-borne noise levels; therefore, if a project's airborne noise levels would not result in significant effects, then it is assumed that ground-borne noise would similarly not result in significant effects.⁷⁴ Unless indoor receptors have substantial sound insulation (e.g., recording studio) and would be exposed to vibration velocities great enough to cause substantial levels of ground-borne noise, ground-borne noise does not need to be assessed.⁷⁵ Ground-borne noise is typically assessed for locations where subway or tunnel operations, where there is no airborne noise path, are present.⁷⁶ The Project would not include a subway or tunnel, and all construction equipment would be located at grade. In addition, there are no substantially insulated indoor noise receptors located within 100 feet of the Project Site. Therefore, the effects of airborne noise would be greater than ground-borne noise levels.

According to the FTA, ground-borne A-weighted noise levels can be estimated utilizing the average vibration velocity level.⁷⁷ For low frequency ground vibration such as that generated by construction equipment, the ground-borne noise level is estimated by subtracting 50 dB from the vibration velocities (VdB).⁷⁸ The use of a drill at approximately 20 feet from the Sunset Montessori Pre School to the south would generate vibration velocities of up to 90 VdB and ground-borne noise levels of up to 40 dBA. This level would not exceed the FTA's standard of 43 dBA at Category 2 Buildings (residences and buildings where people normally sleep) for infrequent vibration events.^{79, 80} Therefore, approval of the Project would not result in any significant effects relating to ground-borne noise during Project construction.

Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles used by employees, customers, and residents accessing the surface and subterranean parking, and occasional loading and unloading. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to

⁷² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

⁷³ Ibid.

⁷⁴ Ibid.

⁷⁵ Ibid.

⁷⁶ Ibid.

⁷⁷ Ibid.

⁷⁸ Ibid.

⁷⁹ Ibid.

⁸⁰ The use of a drill is required to place piles for temporary shoring and support and would not be operated on a frequent basis.

buildings in the vicinity.⁸¹ According to the FTA’s Transit Noise and Vibration Impact Assessment, trucks such as delivery trucks, refuse collection trucks, and occasional moving trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when they are on roadways.⁸² Therefore, approval of the Project would not result in any significant effects relating to ground-borne vibration during Project operation.

Threshold 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?

The Project Site is located approximately 6.7 miles south of the Hollywood-Burbank Airport and is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport. The Project Site is not located within an existing or projected noise contour associated with any private or public airport. Therefore, approval of the Project would not result in any significant effects relating to excessive airport/airstrip noise.

2.7 Discussion of CCR Section 15332(d): Air Quality

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.⁶³

This section is based on the following item, included as **Appendix D, Air Quality Assessment 7022 Sunset Boulevard Project City of Los Angeles, California** of this CE:

Environmental Setting

Air Pollutants of Concern

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by state and federal laws. These regulated air pollutants are known as “criteria air pollutants” and are categorized into primary and secondary pollutants.

Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_x), sulfur dioxide (SO₂), coarse particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead are primary air pollutants. Of these, CO, NO_x, SO₂, PM₁₀, and PM_{2.5} are criteria pollutants.⁸³ ROG and NO_x are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere.⁸⁴ For example, the criteria pollutant ozone (O₃) is formed by a chemical reaction between ROG and NO_x in the presence of sunlight. O₃ and nitrogen dioxide (NO₂) are the principal secondary pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 19: Air Contaminants and Associated Public Health Concerns**.

⁸¹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

⁸² Ibid.

⁸³ U.S. Environmental Protection Agency, *Criteria Air Pollutants*, <https://www.epa.gov/criteria-air-pollutants>

⁸⁴ Ibid.

Table 19: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources	Human Health Effects
Particulate Matter (PM ₁₀ and PM _{2.5})	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O ₃)	Formed by a chemical reaction between reactive organic gases/volatile organic compounds (ROG or VOC) ¹ and nitrogen oxides (NO _x) in the presence of sunlight. Motor vehicle exhaust industrial emissions, gasoline storage and transport, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO ₂)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO ₂)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O ₃ . Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Due to the phase out of leaded gasoline, metals processing is the major source of lead emissions to the air today. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers.	Exposure to lead occurs mainly through inhalation of air and ingestion of lead in food, water, soil, or dust. It accumulates in the blood, bones, and soft tissues and can adversely affect the kidneys, liver, nervous system, and other organs. Excessive exposure to lead may cause neurological impairments such as seizures, mental retardation, and behavioral disorders. Even at low doses, lead exposure is associated with damage to the nervous systems of fetuses and young children, resulting in learning deficits and lowered IQ.
1. Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROG and VOCs. Both ROG and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).		
Source: U.S. Environmental Protection Agency, <i>Criteria Air Pollutants</i> , https://www.epa.gov/criteria-air-pollutants , accessed October 2023.		

Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic or cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting

operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.⁸⁵

CARB has identified diesel particulate matter (DPM) as a toxic air contaminant. DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles (such as DPM) and gases produced when an engine burns diesel fuel. DPM includes the particle-phase constituents in diesel exhaust. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.⁸⁶

Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than is the general population. The City of Los Angeles CEQA Thresholds Guide defines sensitive receptors with respect to air quality as residences, schools, childcare centers, hospitals, parks, and similar uses.⁸⁷ Sensitive land uses nearest to the Project are listed in **Table 20: Sensitive Receptors**.

Table 20: Sensitive Receptors

Receptor Description	Distance¹ and Direction from the Project
Sensitive Receptor 1 - Palihotel ²	100 feet north of Project Site
Sensitive Receptor 2 - Sunset Montessori Pre-School	Adjacent to Project Site to the south
Sensitive Receptor 3 - Residential	40 feet southeast of Project Site
Sensitive Receptor 4 - Residential	50 feet south of Project Site
Sensitive Receptor 5 - Hollywood High School	270 feet northeast of Project Site
Source: Google Earth, 2023.	
¹ Distance measured from the property line of the Project Site to the nearest receptor property line.	
² Hotel uses are not considered sensitive receptors for air quality purposes. However, Palihotel is listed here to maintain consistency with the Acoustical Analysis (Kimley-Horn, 2024).	

Regulatory Setting

Federal

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA; 42 U.S.C. §§ 7401 et seq.) and its amendments. Under the FCAA, the United States Environmental Protection Agency (U.S. EPA) developed the primary and secondary National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants including O₃, NO₂, CO, SO₂, PM₁₀, PM_{2.5}, and lead. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

⁸⁵ California Air Resources Board, *Common Air Pollutants*, 2024. Available at: <https://ww2.arb.ca.gov/resources/common-air-pollutants>.

⁸⁶ California Air Resources Board, *Overview: Diesel Exhaust & Health*, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>

⁸⁷ City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006

The U.S. EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two years of Federal notification, the U.S. EPA is required to develop a Federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The U.S. EPA has designated enforcement of air pollution control regulations to the individual states.

State of California

California Air Resources Board

CARB administers the air quality policy in California. The California Ambient Air Quality Standards (CAAQS) were established in 1969 pursuant to the Mulford-Carrell Act. These standards are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility-reducing particulates, hydrogen sulfide, and sulfates.⁸⁸

The California Clean Air Act (CCAA) requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. These AQMPs also serve as the basis for the preparation of the State Implementation Plan for meeting the federal clean air standards for the State of California.⁸⁹ Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc. are not considered violations of a state standard, and are not used as a basis for designating areas as nonattainment.

Regional

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that state and federal ambient air quality standards are attained and maintained in the SCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing each AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies to reduce emissions from stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the

⁸⁸ California Air Resources Board, *California Ambient Air Quality Standards*, <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>

⁸⁹ South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017. Available at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>

development and implementation of transportation control measures. CARB, in coordination with federal agencies, has jurisdiction over mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017.⁹⁰ The purpose of the 2016 AQMP is to set forth a comprehensive and integrated program that would lead the SCAB into compliance with those NAAQS for which the basin is in nonattainment (i.e., the federal 24-hour PM_{2.5} air quality standard), and to provide an update to the SCAQMD's commitments towards meeting the federal 8-hour O₃ standards. The 2016 AQMP incorporated the latest scientific and technological information and planning assumptions, including the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) and updated emission inventory methodologies for various source categories.⁹¹

On October 1, 2015, the U.S. EPA strengthened the NAAQS for ground-level O₃. The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the strengthened requirements for meeting the 2015 ground-level 8-hour O₃ standard.⁹² The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour ozone standard. Like earlier AQMPs, the 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the *2020-2045 RTP/SCS* and updated emission inventory methodologies for various source categories.⁹³

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008).⁹⁴ The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by California Environmental Quality Act (CEQA) and suggests thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of SCAQMD's CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments.

⁹⁰ South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017. Available at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>.

⁹¹ Southern California Association of Governments, *The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016. Available at: <https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557>.

⁹² South Coast Air Quality Management District, *2022 Air Quality Management Plan*, December 2022. Available at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>.

⁹³ Southern California Association of Governments, *Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy)*, September 2020. Available at: <https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020>.

⁹⁴ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, July 2008. Available at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The state and federal attainment status designations for the SCAB are summarized in **Table 21: South Coast Air Basin Attainment Status**. The SCAB is currently designated as a nonattainment area with respect to the State O₃, PM₁₀, and PM_{2.5} standards, as well as the national 8-hour O₃ and PM_{2.5} standards. The SCAB is designated as attainment or unclassified for the remaining state and federal standards.

Table 21: South Coast Air Basin Attainment Status

Pollutant	State	Federal
Ozone (O ₃) (1 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Ozone (O ₃) (8 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Particulate Matter (PM _{2.5}) (24 Hour Standard)	–	Non-Attainment (Serious)
Particulate Matter (PM _{2.5}) (Annual Standard)	Non-Attainment	Non-Attainment (Moderate)
Particulate Matter (PM ₁₀) (24 Hour Standard)	Non-Attainment	Attainment (Maintenance)
Particulate Matter (PM ₁₀) (Annual Standard)	Non-Attainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Attainment (Maintenance)
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO ₂) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO ₂) (Annual Standard)	Attainment	Attainment (Maintenance)
Sulfur Dioxide (SO ₂) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO ₂) (24 Hour Standard)	Attainment	–
Lead (Pb) (30 Day Standard)	–	Unclassifiable/Attainment
Lead (Pb) (3 Month Standard)	Attainment	Nonattainment (Partial) ¹
Sulfates (SO ₄₋₂) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H ₂ S) (1 Hour Standard)	Unclassified	–

Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2022; U.S. Environmental Protection Agency, *Nonattainment Areas for Criteria Pollutants (Green Book)*, 2024.

The following is a list of SCAQMD rules with which construction activities associated with the Project must comply:

- **Rule 401 (Visible Emissions)** – A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.
- **Rule 402 (Nuisance)** – This rule prohibits the 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. This rule does not apply to

odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM₁₀ suppression techniques are summarized below.
 - a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
 - b) All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.
 - c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
 - d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
 - e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the work day to remove soil from pavement.
- **Rule 431.2 (Sulfur Content of Liquid Fuels)** – This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.
- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

Significance Criteria and Methodology

Air Quality Thresholds

State CEQA Guidelines Appendix G

Based upon the criteria derived from CEQA Guidelines Appendix G, the City has determined that the Project normally would have a significant effect on the environment if it would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable state or federal ambient air quality standard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

South Coast Air Quality Management District

Mass Emissions Thresholds. Pursuant to the significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the CEQA Guidelines Appendix G, an air quality

impact is considered significant if the Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for criteria pollutant and precursor emissions during construction and operational activities of land use development projects, as shown in **Table 22: South Coast Air Quality Management District Emissions Thresholds**.

Table 22: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Daily Emissions (pounds/day)	
	Construction-Related	Operational-Related
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO _x)	100	55
Sulfur Oxides (SO _x)	150	150
Coarse Particulates (PM ₁₀)	150	150
Fine Particulates (PM _{2.5})	55	55

Source: South Coast Air Quality Management District, *CEQA Air Quality Significance Thresholds*, March 2023.

Localized Carbon Monoxide. In addition to the daily thresholds listed above, development associated with the Project would also be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts known as the CO “hot spots” analysis. An analysis of CO “hot spots” determines whether the change in the level of service (LOS) of an intersection as a result of Project activities would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that one of the greatest contributors of CO to outdoor air is cars.⁹⁵ Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent).⁹⁶ With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.^{97, 98}

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the SCAB by the SCAQMD is useful for current evaluations of the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD’s 2003 *Air Quality Management Plan*.⁹⁹ Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of air quality management plans. The SCAB was re-designated as attainment (as reported in Table 21, above) in 2007 and CO is no longer addressed in the SCAQMD’s Air Quality Management Plan (AQMP).

The 2003 *Air Quality Management Plan* is the most recent AQMP that addressed CO concentrations. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an analysis was performed utilizing

⁹⁵ U.S. Environmental Protection Agency, *Basic Information about Carbon Monoxide (CO) Outdoor Air Pollution*, 2023. Available at: <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution#:~:text=The%20greatest%20sources%20of%20CO,can%20affect%20air%20quality%20indoors.>

⁹⁶ California Code of Regulations Section 1961, Exhaust Emission Standards and Test Procedures – 2004 through 2019 Model Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, 2022. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-02/cleancomplete_leveghg_regs_11_2022.pdf.

⁹⁷ South Coast Air Quality Management District, *Carbon Monoxide Redesignation Request and Maintenance Plan*, February 2005. Available at: https://ww2.arb.ca.gov/sites/default/files/classic/planning/sip/sccosip05/sccosip_redesig_mplan.pdf.

⁹⁸ U.S. Environmental Protection Agency, *Carbon Monoxide Trends*, 2023. Available at: <https://www.epa.gov/air-trends/carbon-monoxide-trends>.

⁹⁹ South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003. Available at: <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/2003-aqmp>.

dispersion modeling.¹⁰⁰ The Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard. As an initial screening step, if a project roadway segment does not exceed an ADT of 100,000 per day, then the project does not need to prepare a detailed CO hot spot analysis.

Localized Significance Thresholds. In addition to the CO hotspot analysis, the SCAQMD developed LSTs for emissions of NO₂, CO, PM₁₀, and PM_{2.5} generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contributing to an exceedance of the most stringent state or federal ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is required for all projects that disturb 5 acres or less on a single day. The Project Site is located within SCAQMD SRA 1 (Central Los Angeles). **Table 23: Local Significance Thresholds for Construction/Operations**, shows the LSTs for 1-acre, 2-acre, and 5-acre projects in SRA 1 with sensitive receptors located within 25 meters of the Project Site, which represents the closest distance for LSTs.

Table 23: Local Significance Thresholds for Construction/Operations

Project Size	Nitrogen Oxide (NO _x) – lbs/day	Carbon Monoxide (CO) – lbs/day	Coarse Particulates (PM ₁₀) – lbs/day	Fine Particulates (PM _{2.5}) – lbs/day
1 Acre	74/74	680/680	5/2	3/1
2 Acres	108/108	1,048/1,048	8/2	5/2
5 Acres	161/161	1,861/1,861	16/4	8/2

Source: South Coast Air Quality Management District, *Localized Significance Threshold Methodology*, July 2008.

LSTs associated with all acreage categories are provided in Table 25 for informational purposes. Table 23 shows that the LSTs increase as acreages increase. It should be noted that LSTs are screening thresholds and are therefore conservative. The construction LST acreage is determined based on daily acreage disturbed. The operational LST acreage is based on the total area of the Project Site.

Potential Impacts

Air Quality Analysis

Threshold: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Ambient Air Quality Standards (CAAQS) require an air quality attainment plan to be prepared for areas designated as

¹⁰⁰ Ibid.

nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs.¹⁰¹ The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). Air quality management planning is a regional and multi-agency effort including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the U.S. EPA. The AQMPs' pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's 2016 and 2022 AQMPs.

Criteria for determining consistency with the AQMPs are defined by the following indicators:

- **Consistency Criterion No. 1:** The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs.
- **Consistency Criterion No. 2:** The Project will not exceed the assumptions in the AQMPs or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and National Ambient Air Quality Standards (NAAQS).¹⁰²

The violations to which Consistency Criterion No. 1 refers are exceedances of the CAAQS or NAAQS. As shown below, the Project would not exceed the construction or operational standards. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs. Thus, the Project would be consistent with the AQMP under the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts (SCAG's 2020-2045 RTP/SCS). SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The Project is consistent with the City of Los Angeles General Plan land use designations and with the zoning for the Project Site and, therefore, the growth associated with the Project at the Project Site has been accounted

¹⁰¹ South Coast Air Quality Management District, *2022 Air Quality Management Plan*, page ES-2, December 2022.
<http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

¹⁰² South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

for in SCAG's latest growth forecasts. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.¹⁰³ Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that the number of households within the City will increase from 1,367,000 in 2016 to 1,793,000 in 2045, an increase of 426,000 households¹⁰⁴. The 2024-2050 RTP/SCS was adopted by SCAG on April 4, 2024 and the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed their review and provided their joint air quality conformity determination. Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 1,398,600 in 2019 to 1,828,200 in 2050, an increase of 429,600 households.¹⁰⁵ The Project would include 112 units, which represents 0.03 percent of the anticipated increase for the City by 2045 and 2050. The housing growth attributed to the Project would be within local and regional population projections under the 2020-2045 and 2024-2050 RTP SCS. Thus, the Project would also be consistent with the AQMP under the second criterion.

In addition, the Project would not conflict with or obstruct implementation of the City's General Plan Air Quality Element.¹⁰⁶ 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:

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.

The Project's development on an already developed infill site located within an existing developed urban area with available transit would reduce VMT and related vehicle emissions in comparison to a project

¹⁰³ Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

¹⁰⁴ Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579

¹⁰⁵ Southern California Association of Governments, Connect SoCal (2024–2050 RTP/SCS), Demographics and Growth Forecast adopted April 4, 2024, <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecastfinal-040424.pdf?1712261839>

¹⁰⁶ Department of City Planning Los Angeles, General Plan Air Quality Element, November 1992, https://planning.lacity.org/odocument/Off9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

located in a non-urban environment. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT.

As shown below, the air pollutant emissions resulting from Project implementation would not exceed the SCAQMD localized significance thresholds. Localized significance thresholds were developed to ensure no exceedances of the California or federal ambient air quality standards would occur if project emissions were below thresholds.¹⁰⁷ 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 also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, approval of the Project would not result in any significant effects relating to a conflict with or obstruction of the implementation of the SCAQMD's AQMP or the City's General Plan Air Quality Element.

Threshold 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 state or federal ambient air quality standard?

The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance are considered to result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.¹⁰⁸ Therefore, a project whose emissions would exceed SCAQMD thresholds would also make a cumulatively considerable contribution to a significant cumulative impact and, conversely, a project whose emissions would be below SCAQMD thresholds would not make a cumulatively considerable contribution to a significant cumulative impact.

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the SCAB include ozone-precursor pollutants (i.e., ROG and NO_x), PM₁₀, and PM_{2.5}. Construction-generated emissions of these criteria pollutants would be short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD's thresholds of significance.

Project construction would result in the temporary generation of criteria pollutant emissions from all phases of construction, including demolition, site grading, building construction, and architectural coating, as well as from motor vehicle exhaust associated with construction equipment, materials

¹⁰⁷ South Coast Air Quality Management District, *Localized Significance Thresholds*, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

¹⁰⁸ South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. Available at: <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf>

deliveries and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance; the volume of airborne particulate matter is largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

Construction activities for the Project were assumed to begin in the first quarter of 2025. Construction-generated emissions associated with the Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod), version 2022, which is designed to model emissions for land use development projects based on typical construction requirements. It was assumed that all construction equipment operated during each individual phase would be operated simultaneously, to provide a conservative analysis.

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in **Table 24: Project Construction Criteria Pollutant Emissions**. As noted in Table 26, the Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403, fugitive dust control measures. Fugitive dust control measures include proper maintenance of mobile and other construction equipment, quick replacement of ground cover in disturbed areas, water exposed surfaces three times daily, and water all haul roads twice daily.

Table 24: Project Construction Criteria Pollutant Emissions

Construction Year	Emissions (pounds per day) ¹					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 1 (2025)	0.85	7.91	11.20	0.03	2.24	0.49
Year 2 (2026)	6.92	5.44	10.86	0.01	1.00	0.37
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	No	No	No	No	No	No
1. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust assumed. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to Appendix D for Model Data Outputs.						
Source: CalEEMod version 2022. Refer to Appendix D for model outputs.						

The results summarized in Table 24 show that the Project's regional criteria pollutant emissions during construction would remain below applicable thresholds.

Project construction would also comply with SCAQMD Rules 402 (Nuisance)¹⁰⁹ and 1113 (Architectural Coatings)¹¹⁰ and CARB's anti-idling regulations, which prohibit idling for more than five minutes; however, compliance with these rules was not assumed when estimating the Project's construction emissions for Table 24, above. Therefore, the Project's maximum-day construction emissions of criteria pollutants would be even lower when the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations are taken into account.

¹⁰⁹ SCAQMD Rule 402 prohibits the discharge of quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public or have a natural tendency to cause injury or damage to business or property.

¹¹⁰ SCAQMD Rule 1113 sets limits on the VOC content of architectural coatings.

As shown above, the Project's estimated criteria pollutant emissions during construction would be below their respective thresholds such that approval of the Project would not result in any significant project-level effects relating to regional construction air pollutant emissions.

Operational Emissions

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, etc.), energy sources, and mobile sources (i.e., motor vehicle use). Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Long-term operational emissions attributable to the Project are summarized in **Table 25: Operational Criteria Pollutant Emissions**. The operational emissions sources are described below.

- **Area Source Emissions.** Area source emissions would be generated due to on-site equipment, architectural coating, and landscape maintenance equipment.
- **Energy Source Emissions.** Energy source emissions would be generated due to electricity usage associated with the Project. Primary energy uses include space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. The Project would be all-electric and would not utilize natural gas.
- **Mobile Source Emissions.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_x, PM₁₀, and PM_{2.5} are all pollutants of regional concern. NO_x and ROG react with sunlight to form O₃, known as photochemical smog. Additionally, wind currents readily transport PM₁₀ and PM_{2.5}. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions are based on the trip generation estimates and have been incorporated into CalEEMod, as recommended by the SCAQMD. The Project would generate 503 total daily vehicle trips.¹¹¹ It should be noted that this analysis conservatively does not account for emissions reductions associated with trips generated by the existing uses.

Table 25: Operational Criteria Pollutant Emissions

Source	Emissions (pounds per day) ^{1, 2}					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	2.70	0.06	6.48	<0.01	<0.01	<0.01
Energy	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Mobile	1.50	1.04	10.90	0.03	2.36	0.61
Proposed Project Total	4.20	1.11	17.38	0.03	2.36	0.61
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	No	No	No	No	No	No
1. Worst-case seasonal maximum daily emissions are reported.						
Source: CalEEMod version 2022. Refer to Appendix D for model outputs.						

As shown in Table 25, and discussed above, operational (i.e., area, energy, mobile) emissions would not exceed SCAQMD thresholds for any criteria pollutant. Therefore, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. As a result,

¹¹¹ Kimley-Horn Associates, Inc., 7022 Sunset Street Project Transportation Assessment, July 2024.

approval of the Project would not result in any significant project-level effects relating to operational air quality impacts.

As discussed above, Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance are considered to result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.¹¹² As such, because the Project's project-level emissions would be below SCAQMD thresholds, the Project would not make a cumulatively considerable contribution to a significant cumulative impact. Therefore, approval of the Project would not result in any significant effects relating to a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable state or federal ambient air quality standard.

Threshold Would the Project expose sensitive receptors to substantial pollutant concentrations?

Localized Construction Significance Analysis

The nearest sensitive receptor to the Project Site is the Sunset Montessori Pre-School located immediately adjacent to the Project Site to the south. To assess the potential for Project construction to create impacts to sensitive receptors, the SCAQMD recommends utilizing its LSTs for construction. The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and are based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the state or federal ambient air quality standard (the more stringent of the two).¹¹³ The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance.¹¹⁴ The LST methodology assists lead agencies in their project-specific analysis of the potential localized impacts associated with proposed projects.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 26: Equipment-Specific Grading Rates** was used to determine the maximum daily disturbed acreage for the LST analysis.¹¹⁵ For this Project, the appropriate source receptor area (SRA) for the LSTs is the Central LA (SRA 1) area, since this area includes the Project Site. LSTs only take into consideration emissions of NO_x, CO, PM₁₀, and PM_{2.5}.¹¹⁶ The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres

¹¹² South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. Available at: <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf>

¹¹³ South Coast Air Quality Management District, *Localized Significance Thresholds*, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

¹¹⁴ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, Accessed October 2023.

¹¹⁵ South Coast Air Quality Management District, *Sample Construction Scenarios for Projects Less than Five Acres in Size*, February 2005. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-sample-construction-scenario-report.pdf?sfvrsn=2>.

¹¹⁶ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, Accessed October 2023.

in size.¹¹⁷ Based on the daily equipment modeled in CalEEMod, Project construction is anticipated to disturb approximately 1.5 acres in a single day. Thus, the LSTs applicable to this Project uses the SCAQMD-produced look up tables for a 1.5-acre site.

Table 26: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Tractor/Backhoe	2	0.5	8	1
	Grader	1	0.5	8	0.5
Total Acres Graded per Day					1.5
Source: CalEEMod version 2022					

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."¹¹⁸ Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (or approximately 82 feet) or less from the Project Site.¹¹⁹ Therefore, the LSTs for 1.5 acre at 25 meters were used for the construction analysis, which is consistent with the SCAQMD LST methodology.

Table 27: Localized Significance of Construction Emissions presents the emissions modeling results for the Project's localized emissions during construction. As stated above, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for Table 27. Therefore, the Project's maximum-day localized construction emissions would actually be even lower than reported in Table 27. Table 27 shows that the emissions of these pollutants on the peak day of construction would not exceed the LSTs and therefore would not be expected to create substantial concentrations of pollutants at the sensitive receptors closest to the Project Site or cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, approval of the Project would not result in any significant effects relating to localized construction air pollutant concentrations.

Table 27: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day) ^{1,2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Demolition (2025)	2.37	3.28	1.62	0.30
Site Preparation (2025)	1.10	1.91	0.04	0.04
Grading (2025)	5.18	7.87	0.39	0.23
Building Construction (2025)	5.14	6.94	0.22	0.20
Building Construction (2026)	4.81	6.91	0.19	0.17
Paving (2026)	2.09	2.67	0.10	0.09
Architectural Coating (2026)	2.57	3.40	0.07	0.06
Maximum Daily Emissions	5.18	7.87	1.62	0.30

¹¹⁷ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, Accessed October 2023.

¹¹⁸ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, Accessed October 2023.

¹¹⁹ Ibid.

Source/Activity	Emissions (pounds per day) ^{1,2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
SCAQMD LST (for 1.5 acre at 25 meters)	91	864	7	4
Maximum Daily Emissions Exceed SCAQMD Threshold?	No	No	No	No
1. Worst-case seasonal maximum daily emissions are reported. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Source: CalEEMod version 2022. Refer to Appendix D for model outputs.				

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, operational LSTs apply only to on-site sources.¹²⁰ LSTs for receptors located at 25 meters for SRA 1 were utilized in this analysis. The 1.0-acre LST threshold was conservatively used for the Project Site.¹²¹ The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in

Table 28: Localized Significance of Operational Emissions

Table 28: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day) ^{1, 2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Emissions (Area and Energy Sources)	0.07	6.48	<0.02	<0.01
SCAQMD Localized Screening Threshold (adjusted for 1.0 acre at 25 meters)	74	680	2	1
Exceed SCAQMD Threshold?	No	No	No	No
1. As recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported. 2. On-site emissions consist of area sources and energy sources. Source: CalEEMod version 2022. Refer to Appendix D for model outputs.				

The operational emissions shown on Table 28 include all on-site Project-related sources (i.e., area and energy). On-site operational sources include stationary sources and/or on-site mobile equipment and off-site mobile emissions should not be included.¹²² The results of the LST analysis show that the Project would not cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, approval of the Project would not result in any significant effects relating to operational air pollutant concentrations.

Carbon Monoxide Hotspots

As discussed above, projects that would not produce traffic volumes resulting in more than 100,000 daily vehicles along project area roadway segments would not require preparation of a detailed CO hot spot analysis. The Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. According to daily traffic volume data, Sunset Boulevard between Sycamore and Orange has an existing vehicle count of 34,444, De Longpre between Sycamore

¹²⁰ Ibid.

¹²¹ Construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 1.5 acre. For operations, the size of the Project Site has been used.

¹²² South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

Avenue and Orange Drive has an existing vehicle count of 2,701, Sycamore Avenue between Sunset and De Longpre Avenue has an existing vehicle count of 615, and Orange Drive between Sunset Boulevard and De Longpre Drive has an existing vehicle count of 2,302. As CO hotspots were not created at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodated 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any of the intersections in the vicinity of the Project Site from an additional 503 daily vehicle trips attributable to the Project. Therefore, approval of the Project would not result in any significant effects relating to CO concentrations.

For all of these reasons, approval of the Project would not result in any significant effects relating to air quality.

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

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

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.

During construction, emissions from construction equipment, such as diesel exhaust, and from volatile organic compounds contained in architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly.

Operational

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes the construction of a mixed-use project which would not involve the types of uses that would emit objectionable odors affecting substantial numbers of people. The Project would not include any of the land uses that have been identified by the SCAQMD as significant odor sources.

Therefore, approval of the Project would not result in any significant effects relating to other air emissions affecting substantial numbers of people.

2.8 Discussion of CCR Section 15332(d): Water Quality

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

Surface Water Quality

Construction

During construction of the Project, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As construction of the Project would disturb less than one acre of soil, the Project would not be required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Even so, however, the Project would be required to implement Best Management Practices (BMPs) as required in the Project's Stormwater Pollution Prevention Plan (SWPPP) following the latest guidelines of the California Stormwater Quality Association (CASQA) handbook as part of the City's grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sediment and erosion.

Therefore, with compliance with 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.

With compliance with regulations in place, construction of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Los Angeles River) to a degree which would unreasonably affect the beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which would create a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health, affect an entire community or neighborhood, or any considerable number of persons, or occur during or as a result of the treatment or disposal of wastes. Furthermore, such mandatory compliance measures would ensure that construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. Therefore, approval of the Project would not result in any significant effects relating to water quality during construction.

Operation

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under the City's Low Impact Development (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 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"). The implementation of BMPs required by the City's LID Ordinance would target the pollutants identified above that could potentially be carried in stormwater runoff. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. As the majority of potential contaminants are

anticipated to be contained within the “first flush” storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

Approval of the Project would not result in any significant effects relating to surface water quality during Project operation.

Ground Water Quality

Construction

Groundwater depth is estimated to be 19 feet below the surface.¹²³ Depth of grading is estimated to be 15 feet and would not likely encounter groundwater. However, in the event that groundwater was encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements. The treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (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.

In addition, the construction activities would be typical of a residential and commercial project and would not involve activities that could impact the underlying groundwater quality. Further, 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.

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, approval of the Project would not result in any significant effects relating to groundwater quality during construction.

Operation

The Project does not include the installation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project Site would not increase concentrations of trash in the Los Angeles River Watershed because it would not dump trash into the storm drain system. The Project would meet the requirements of the City’s LID ordinance.

Through required compliance with the City’s LID Ordinance, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Los Angeles River) to a degree which would unreasonably affect the beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which would create a hazard to the public health through poisoning or through the spread of diseases; or (3) a nuisance that would be injurious to health, affect an entire community or neighborhood, or any considerable number of persons, or occur during or as a result of the treatment or disposal of wastes. As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project would include

¹²³ Phase I ESA, Orswell & Kasman, Inc. August 31, 2022

sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The release of pollutants listed above would be reduced or minimized through the Project's implementation of approved LID BMPs.

The Project does not include the installation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Operational activities that could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks would be operated by the Project. The Project would not expand any potential areas of contamination, increase the level of 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. 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. The Project does not involve drilling to or through a clean or contaminated aquifer.

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Stormwater infrastructure on the Project Site, in compliance with LID BMP requirements, would control and treat stormwater runoff to account for the 85th percentile storm event. Implementation of LID BMPs would ensure operational impacts on surface water quality are less than significant. Therefore, approval of the Project would not result in any significant effects relating to surface water quality or groundwater quality.

The Project Site does not currently contain any LID systems. Implementation of a development that complies with the current requirements of the LID ordinance and handbook would improve the condition of the Site.

For all the foregoing reasons, approval of the Project would not result in any significant effects relating to water quality.

2.9 Discussion of CCR Section 15332(e): Public Services and Utilities

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

Fire

Fire protection and emergency medical services for the Project and the Project Site would be provided by the Los Angeles Fire Department (LAFD). The LAFD's 3,510 uniformed fire personnel protect life, property and the environment through their direct involvement in fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service. An equally committed non-sworn cadre of 392 professional support personnel provide technical and administrative expertise in their corresponding pursuit of the department's mission. A total of 1,018 uniformed firefighters are on duty at fire department facilities citywide, including 106 neighborhood fire stations located across the Department's 468.74 square-mile jurisdiction.¹²⁴

¹²⁴ <https://www.lafd.org/about/about-lafd/our-mission>, accessed April 6, 2024.

The LAFD has two fire stations located less than one mile from the Project Site that would provide initial response to the Project Site: Fire Stations 41 and 27.¹²⁵ **Table 29: LAFD Fire Stations Located in the Vicinity of the Project Site**, provides information on the location, the approximate distance/direction from the Project Site, and the average response time.¹²⁶

Table 29: LAFD Fire Stations Located in the Vicinity of the Project Site

Fire Station ^a	Address ^a	Approximate Distance/Direction from Project Site	Average Operational Response Time ^b
Fire Station 41	1439 North Gardner St.	0.62 mile	8:01 (EMS) 8:11 (non EMS) 7:02 (Critical ALS) 5:44 (Structural Fire)
Fire Station 27	1327 North Cole Ave.	0.71 mile	7:13 (EMS) 7:00 (non EMS) 5:40 (Critical ALS) 5:47 (Structural Fire)

Structural Fire: The type of call reserved when the Los Angeles Police Department receives a report of a building or structure that is actively burning.
EMS = Emergency Medical Services; ALS = Advanced Life Support
Sources:
^a From January to February 2024. LAFD, Find Your Station. <https://www.lafd.org/fsla/stations-map>.
^b FIRESTATLA <http://www.lafd.org/fsla/stations-map>. Accessed April 6, 2024.

Construction

Typical of construction projects in general, construction activities associated with the Project may potentially increase the demand for fire protection and emergency medical services temporarily, and cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, as applicable, construction activities would be required to comply with the 2019 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC. Additionally, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Furthermore, fire suppression equipment specific to construction would be maintained on the Project Site.

During construction, traffic on North Sycamore Avenue and Sunset Boulevard could be intermittently disrupted due to vehicle loading and unloading. Such intermittent travel lane closures may disrupt local traffic, including fire and emergency vehicles. However, **PDF TRAF-1: Construction Management Plan**, would be implemented that would include a worksite traffic control plan in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks, and would provide for safe and efficient movement fire and emergency services.

¹²⁵ <https://www.lafd.org/fsla/stations-map>, accessed April 6, 2024.

¹²⁶ <https://www.lafd.org/fsla/stations-map>, accessed April 6, 2024.

Operation

Operational activities associated with the Project could potentially increase the demand for fire protection and emergency medical services. However, the Project would be required to comply with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the LAMC, and the LAFD to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project pursuant to LAFD review and guidance include the following:

- **Building Design:** Fire resistant doors and materials, as well as walkways, stairwells, and elevator systems (including emergency and fire control elevators) that meet code requirements.
- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes, if not already installed, to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system.
- **Emergency Safety Provisions:** Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g., floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.
- **LAFD Access:** Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access.

The City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading be prepared for review and approval by the LAFD. The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which system would be subject to Fire Department review and approval during the design and permitting of the Project.

The Project Site vicinity is well served by nearby fire stations within close proximity to one another and the Project Site. These LAFD fire stations provide fire protection and emergency medical services to the Project Site area and are dispatched based on availability and the nearest unit to a service call. With the Project's compliance with applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access), the Project's location close to several LAFD stations, and with its incorporation of a Construction Management Plan, the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD. Furthermore, the LAFD would review the Project and make recommendations, including any potential modifications to building plans, to reduce the risk of and susceptibility to the spread of fires, as determined by LAFD.

For all the foregoing reasons, the Project would be adequately served by the LAFD.

Police Protection

Police protection for the Project and the Project Site would be provided by the Los Angeles Police Department (LAPD). The nearest LADP station to the Project Site is the Hollywood Community Police Station, which is located at 1358 N. Wilcox Avenue, approximately 0.67 miles from the Project Site.

Some of the communities in this area served by this station are Argyle, Cahuenga Pass, East Hollywood, Hobart, Hollywood, Hollywood Hills, Hollywood/La Brea, Little Armenia, Los Feliz, Melrose District, Mount Olympus, Sierra Vista, Spaulding Square, Sunset Strip, Thai Town, and Vine/Willoughby.¹²⁷

Construction

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the demand for police services. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. If not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, the Project would include fencing around the perimeter of the Project construction site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

During construction, traffic on North Sycamore Avenue and Sunset Boulevard could be intermittently disrupted due to vehicle loading and unloading and materials deliveries. Such intermittent travel lane closures may disrupt local traffic. However, **PDF TRAF-1: Construction Management Plan**, would be implemented that would include a worksite traffic control plan in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks, and would provide for safe and efficient movement police services.

Operation

Operational activities associated with the Project could increase the demand for police protection. The addition of 112 units would translate into a population growth of 302 persons.¹²⁸ However, the potential demand for police services can be reduced with site-specific security designs and features. The Project would include security measures such as security lighting, secure access to parking areas, non-public areas and residential access points. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In addition, the LAPD will require that the commanding officer of the Station be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response.

For all the foregoing reasons, the Project would be adequately served by the LAPD.

Schools

¹²⁷ <https://www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/>, Accessed April 6, 2024.

¹²⁸ Based on average City of Los Angeles household size of 2.70 persons per household. Source U.S. Census, City of Los Angeles, Population Estimate July 2023.

The Project is located within one mile of the following Los Angeles Unified School District (LAUSD) schools:¹²⁹

- Hollywood High School, 1521 Highland Avenue
- Gardner Street Elementary, 7450 Hawthorn Street
- Hubert Howe Bancroft Middle School, 929 N Las Palmas Avenue

Pursuant to the California Government Code Section 65995 and California Education Code Section 17620, mandatory payment of the school fees established by LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, ensure that the Project Site can be adequately served by the LAUSD.

Parks

The Project would increase the number of residents and employees at the Project Site. The Project would provide 15,064 sf of open space for residents, including 1,650 sf of private open space in the form of balconies attached to the residential uses and 13,414 sf of common open space for the residents.

On the ground floor, the open space and amenities would include a residential lobby, a mail room, an office, an enclosed indoor common area and a lower courtyard. The second floor would feature a recreation room, and a courtyard podium deck. The third floor would feature a lower roof deck with a seating area, outdoor kitchen and enclosed dog run. In addition, the roof would feature two deck seating areas and a pool. The Project would exceed the 11,425 sf of open space required by the LAMC. The availability of onsite open space and amenities would reduce the Project's demand on parks.

In September 2016, the City adopted a Park Fee Ordinance (Ordinance), which became effective on January 11, 2017. The aim of the Ordinance is to increase the opportunities for park space creation and expand the Quimby fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Ordinance amended LAMC Sections 12.21, 12.33, 17.03, 17.12 and 17.58, deleted LAMC Sections 17.07 and 19.01, and added LAMC Section 19.17. The Ordinance increased Quimby fees, imposed a new impact fee on non-subdivision projects, eliminated the deferral of park fees for market rate projects that include residential units, increased the fee spending radii from the site from which the fee is collected, provided for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updated the provisions for credits against park fees.

The Project would be required to pay the in-lieu fee prior to the issuance of a certificate of occupancy. With the on-site open space included in the Project and the Project's payment of applicable fees, the Project Site would be adequately served by park and recreational facilities.

Other Public Facilities

The City of Los Angeles Public Library (LAPL) provides library services throughout the City. LAPL's 73 locations serve the largest population of any public library system in the United States.¹³⁰ There are three

¹²⁹ LAUSD School Explorer: <https://explore.lausd.org/search?address=7022-W-Sunset-Blvd-Los-Angeles-CA-90028-USA&tags=7022%20sunset>, Accessed April 6, 2024.

¹³⁰ LAPL Strategic Plan. 2015-2020. https://lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf. Accessed May 6, 2024.

LAPL library branches within two miles of the Project Site: the Will & Ariel Durant Branch Library located at 7140 W. Sunset Boulevard (0.2 mile); the Frances Howard Goldwyn - Hollywood Regional Branch Library located at 1623 Ivar Avenue, (0.8 mile); and the John C. Fremont Branch Library located at 6121 Melrose Avenue (1.8 miles).¹³¹

With the shift in technology from books to computers, the demand for physical library facilities is changing. Members of the LAPL have access to thousands of podcasts, audiobooks, DVDs, CDs, media publications, and instructional content online and via smartphone applications.¹³² Recognizing these facts, the Los Angeles Public Library Strategic Plan 2015-2020¹³³ places emphasis on the employment of new technology for meeting future needs and includes objectives for increasing digital collections, e-mail circulation and use of mobile apps. This emphasis has the result of allowing the LAPL to meet increased demand from increased service populations demand by means other than the provision of new physical facilities.

The Project's residential units would be equipped to receive individual internet service, which would offer residents the opportunity to access the LAPL's online database system that includes podcasts, audiobooks, media publications, and instructional content. The availability of such resources to Project residents would reduce their demand on physical library space.

In addition, the Project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. These fees and mechanisms would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service that would result from the Project.

Therefore, the Project Site would be adequately served by the City's libraries.

Wastewater

The City of Los Angeles has one of the largest sewer systems in the world, including approximately 6,439 miles of sewers serving a population of more than four million. The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.¹³⁴ The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by the Los Angeles Bureau of Sanitation (BOS). The existing design capacity of the Hyperion Sewer System Service Area is approximately 450 million gallons per day (consisting of 450 MGD at the Hyperion Treatment Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).¹³⁵ Beginning in December 2011, California began experiencing the longest duration of drought on record, which led to increased conservation of water resources. In turn, the

¹³¹ https://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 April 7, 2024.

¹³² <https://www.lapl.org/services-programs/>, Accessed May 6, 2024.

¹³³ https://www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf, Accessed May 6, 2024.

¹³⁴ City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf>, Accessed April 7, 2024.

¹³⁵ https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=17jkelqawo_82&_afLoop=21735430323215481#!, Accessed January 8, 2024.

drought and increased water conservation led to significant reductions in wastewater flows conveyed by the City's collection system over the past decade. An indication of these significant reductions is the wastewater flow at Hyperion, which went from approximately 350 MGD to 260 MGD average daily flow.¹³⁶

As shown on **Table 30, Project Estimated Wastewater Generation**, the Project would generate a total of approximately 11,282 gallons of wastewater per day (or 0.011 mgd). This figure is a conservative estimate as it does not take credit for removal of the existing uses or for any of the Project's proposed sustainable and water conservation features. Currently up to 300 MGD are treated at the Hyperion Treatment Plant, resulting in an available treatment capacity of 150 MGD, which means the Project would account for approximately 0.0001 percent of the available capacity of the Hyperion Treatment Plant.

As part of the permitting process for the Project, the Project Applicant would be required to coordinate with the LADWP to determine if the existing water supply infrastructure maintains sufficient capacity to accommodate the Project's demand for water. The Project Applicant will initiate a Service Advisory Request (SAR), which when completed, will provide information regarding the range of flows and pressures that can be expected at the requested service location. The type and cost of improvements are also provided in the SAR. The Project Applicant then be required to participate in the cost of any necessary new water main extensions and/or replacements required. If a deficiency or service problem were discovered during the permitting process that would prevent the Project Site from receiving an adequate level of service, the Project Applicant would be required to fund the required upgrades to adequately serve the Project. This requirement would ensure that the Project's impacts to the wastewater conveyance system would be less than significant.

Therefore, the Project Site would be adequately served by the City's wastewater facilities.

Table 30: Project Estimated Wastewater Generation

Land Use	Units/Square Feet (sf)	Generation Rate (gpd/unit) ¹	Total Wastewater Generation (gpd)
<i>Proposed Uses</i>			
Studio units	42	75 gallons / unit	3,150
One-bedroom units	61	110 gallons / unit	6,710
Two-bedroom units	9	150 gallons / unit	1,350
Retail	2,875 sf	25/1,000 sq. ft.	72
Total			11,282
1. LADWP Sewage Factors, https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart , Accessed April 3, 2024.			

Water

Domestic water would be provided to the project site by the Los Angeles Department of Water and Power (LADWP). The LADWP provides domestic water for Hollywood and for portions of both the City and County of Los Angeles. The primary sources of water for LADWP are the Los Angeles Aqueducts, local groundwater, State Water Project, and the Colorado River Aqueduct.

¹³⁶ City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf>, accessed January 7, 2024.

As concluded in the 2020 Urban Water Management Plan (UWMP), LADWP does not anticipate water shortages as demands are met by the available supplies under all hydrologic scenarios through 2045. Achieving LADWP's water supply would include multiple strategies to achieve and maintain water use reductions, including investments in state-of-the-art technology; recycled water; stormwater recapture, installation of water-efficient fixtures and appliances, expansion and enforcement of prohibited water uses, reductions in outdoor water use, extending education and outreach efforts; and encouraging regional conservation efforts. Conservation and water use efficiency are a foundational component of LADWP's water resource planning efforts and will continue to be central to the City's water use efficiency goals over the long term.¹³⁷

According to the reliability data in the LADWP 2020 UWMP, LADWP has sufficient supply to meet a total water demand of 746,000 in acre feet (af), by the year 2045. LADWP has programs to reduce the demand to 565,800 afy by 2045, a difference of 180,200 afy. As noted in the LADWP UWMP, the City's water usage today is lower than it was in the 1970s despite an increase in population of over one million people and reflects the success and importance of the City's conservation strategies that include water conservation regulations, ordinances, and behavior changes resulting from customer outreach and educational programs.

Construction

Water for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction, etc. Based on construction projects of similar size and duration, a conservative estimate of construction water use would range from 1,000 to 2,000 gallons per day (gpd). The estimated construction-period demand would be significantly less than the Project's estimated operational demand, which as described below, could be accommodated by estimated water supplies and the existing infrastructure. It is therefore anticipated that estimated water supplies and the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

Operation

Water consumption estimates for the Project for the new development are shown in **Table 31: Estimated Water Demand For The Project**, based on the Los Angeles Bureau of Sanitation sewerage generation factors. An additional 20 percent has been added the sewerage generation factors to provide a conservative estimate for water consumption. As shown on **Table 31**, the Project would demand a total of approximately 13,538 gallons of water per day (or 0.011mgd). This is a conservative estimate as the total does not take credit for removal of the existing uses or any proposed sustainable and water conservation features of the Project.

¹³⁷ https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln?_afLoop=242685679229984&_afWindowMode=0&_afWindowId=1b2yajr4zp_1#%40%3F_afWindowId%3D1b2yajr4zp_1%26_afLoop%3D242685679229984%26_afWindowMode%3D0%26_adf.ctrl-state%3D1b2yajr4zp_17, accessed April 2, 2023.

Table 31: Estimated Water Demand For The Project

Land Use	Units/Square Feet (sf)	Generation Rate (gpd/unit) ¹	Total Wastewater Generation (gpd)
<i>Proposed Uses</i>			
Studio units	42	75 gallons / unit	3,150
One-bedroom units	61	110 gallons / unit	6,710
Two-bedroom units	9	150 gallons / unit	1,350
Retail	2,875 sf	25/1,000 sq.ft.	72
Subtotal			11,282
Total with 20% Contingency²			13,538
¹ LADWP Sewage Factors, https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart , Accessed April 3, 2024. ² A 20% contingency is applied for conservative estimation of water consumption to account for water usage and irrigation.			

The Project's increase in water demand would fall within the available and projected water supplies reported in the LADWP 2020 UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply. It is therefore anticipated that estimated water supplies and the existing water infrastructure would similarly meet the Project's water demand, and that the Project Site would be adequately served by water.

Solid Waste

The City of Los Angeles Sanitation & Environment (LASAN) is responsible for the collection and removal of all solid materials and waste in the City of Los Angeles. The City collects an average of 6,652 tons per day of refuse, recyclables, yard trimmings, horse manure and bulky items from more than 750,000 homes.¹³⁸ LASAN operates the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) to reduce contractual costs to manage and transport materials to recycling and disposal facilities.¹³⁹ The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the Countywide Integrated Waste Management Plan (CIWMP) Annual Report. 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. The most recent annual report, the CIWMP 2021 Annual Report, published in December 2022, provides disposal analysis and facility capacities for 2021, as well as projections to the CIWMP's horizon year of 2036.¹⁴⁰ As stated within the CIWMP 2021 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.¹⁴¹ A variety of strategies, including mandatory commercial recycling, diversion of organic waste, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion) would be implemented to ensure that the County would be able to accommodate the solid

¹³⁸ https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c?_adf.ctrl-state=1ckwnuqkc0_5&_afLoop=31845256187445751#! Accessed May 6, 2024.

¹³⁹ https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c?_adf.ctrl-state=1ckwnuqkc0_5&_afLoop=31845256187445751#! Accessed May 6, 2024.

¹⁴⁰ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, 2022. <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF>.

¹⁴¹ Ibid

waste generated through the horizon year of 2036.¹⁴²

In 2021, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and out-of-County landfills was approximately 11.1 million tons (including an import amount of 179,872) tons.¹⁴³ The remaining disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 137 million tons as of December 2021, the most recent data available.¹⁴⁴

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025.¹⁴⁵

As shown on **Table 32: Estimated Solid Waste Generation**, the Project would generate a total of approximately 109 tons per year of solid waste. This total does not take credit for removal of the existing uses and the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with the City's Zero Waste Plan.

Table 32: Estimated Solid Waste Generation

Land Use	Size	Rates	Pounds Day/Tons per Year
Proposed Project			
Residential	112 units	5 lb/dwelling unit /day	560 lbs/102.2 tons
Retail	2,875	13 lb/1,000 sq ft /day	37 lbs/6.7 tons
Proposed Total			597 lbs/109 tons
Solid waste generation factors from https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates			
Table: Kimley-Horn, 2024			

Based on the above, the landfills that serve the Project Site have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project. Therefore, the Project Site would adequately be served by existing solid waste facilities.

For all the foregoing reasons, the Project would comply with CCR Section 15332(e) in that there would be adequate utilities and public services available to the Project Site.

2.10 Guideline 15300.2. Exceptions: (a) Location.

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

¹⁴² Ibid

¹⁴³ Ibid.

¹⁴⁴ Ibid.

¹⁴⁵ Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd/s-lsh-wwd-s-zwswirp?_afLoop=18725113866790843&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=17nhb0cqxu_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D18725113866790843%26_afWindowMode%3D0%26_adf.ctrl-state%3D17nhb0cqxu_5, accessed December 6, 2023.

The Project is seeking a Class 32 Exemption, not a Class 3, 4, 5, 6, or 11 exemption. The Project is proposed to be developed on an already developed infill site that is located within an urban area of the City.

Therefore, this exception to a categorical exemption for the Project does not apply.

2.11 Guideline 15300.2. Exceptions: (b) Cumulative Impact.

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

Table 33 provides a LADOT provided a list of 13 related Projects within 0.5 miles of the Project Site. The list of related projects was provided by LADOT in an email on January 25th, 2024. **Table 33, Summary of Related Projects** summarizes the land uses for the Related Projects.

Table 33: Summary of Related Projects

Map No.	Project Name	Address	Description	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
1	6753 Selma Mixed-Use Project	6753 W Selma Ave	51 Apartments and 438 Retail SF	286	5	13	18	14	10	24
2	Hawthorn Mixed-Use	6831 W Hawthorn Ave	140 Residential Units & 1,207 Restaurant/Café SF	545	16	35	51	31	19	50
3	Fast Food with Drive Through	6800 W Sunset Blvd	2,129 SF Fast-Food with Drive Through	343	18	18	36	15	14	29
4	6766 Hawthorn Micro-Housing Mixed-Use	6766 W Hawthorn Ave	58 Apartments (7 affordable) & 220 Retail SF	225	0	0	0	0	0	0
5	Hollywood Central Mixed-Use	1633 N Cherokee Ave	633 Apartments, 44,778 Office SF, and 67,328 Restaurant/Retail SF	6539	179	257	436	271	159	430
6	CMNTY Culture Campus Office and Restaurant	6767 W Sunset Blvd	498,190 Office SF and 5,330 Restaurant SF	2707	337	51	388	47	326	373
7	Tesla Santa Monica	7001 W Santa Monica Blvd	34 Charging/Parking Spaces and 4,440 Café SF	351	9	13	22	5	12	17
8	Las Palmas Mixed-Use	1149 N Las Palmas Avenue	81,424 Office SF, 485 Retail SF	618	113	15	128	20	101	121
9	Hollywood Mixed-Use	7107 W Hollywood Blvd	410 Apartments, 5,000 Retail SF, 5000 Restaurant SF	2637	49	157	206	167	86	253
10	Highland Mixed-Use	1233 N Highland Ave	72 Apartments (2022 Construction)	714	11	27	38	38	28	66
11	Crossroads Hollywood	6701 W Sunset Blvd	Crossroads Hollywood Mixed-Use	14833	381	498	879	733	548	1281
12	6901 Santa Monica Mixed-Use	6901 W Santa Monica Blvd	231 Apartments, 5,000 Restaurant SF, 10,000 Retail SF (In Construction)	1010	0	78	78	86	19	84
13	Chaplin Hotel Project	7219 W Sunset Blvd	93 Hotel Rooms and 2,800 Restaurant SF	761	27	18	45	27	29	56
Total				31,569	1,145	1,180	2,325	1,454	1,351	2,784

Source: LADOT, January 25th, 2024

Transportation

Plan Consistency

Similar to the Project, the Related Projects considered in this cumulative analysis would be individually responsible for complying with relevant plans, programs, ordinances, or policies addressing the circulation system. Thus, the Project, together with the Related Projects, would be consistent with each of the plans, ordinances, and policies reviewed. No cumulative impact has been identified with this Project that would preclude the City's implementation of any transportation related policies, programs, or standards. Therefore, the Project does not have a significant transportation impact under CEQA Threshold T-1 (Conflicting with Plans, Programs, Ordinances, or Policies).

VMT

Whether a project would have a potential cumulative VMT impact is determined by assessing its consistency with the Southern California Association of Government's (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), per the LADOT Transportation Assessment Guidelines. Projects that are consistent with the RTP/SCS in terms of location, density, and land-use are deemed to be consistent with the RTP/SCS as they would assist in meeting the region's air quality and greenhouse gas (GHG) goals.¹⁴⁶

As discussed above, the Project Site is currently split zoned. The northern portion of the Project Site has a General Plan Land Use designation of Regional Center Commercial and is zoned C4-2D-SN. The southern portion of the Project Site has a General Plan land use designation of Low Medium II Residential and is zoned RD1.5-1XL. The C4 zone permits commercial uses, including office, retail and restaurant uses. The RD1.5-1XL zone restricts uses to one-family dwellings, two-family dwellings, apartment houses, and multiple dwellings. The SN designation indicates that the Project Site is located in the Hollywood Signage Supplemental Use District.

The Project would be consistent with the SCAG RTP/SCS as it is an infill development and located in an area that promotes the use of a variety of transportation options, which include walking, biking, and the use of public transportation. The proposed Project's land use is similar to the existing use and surrounding uses. The Project is not requesting either a General Plan amendment or a zone change. The Project's proposed retail uses are contained only in the northern portion of the Project Site, and the southern portion of the Project Site contains only residential uses. Furthermore, the Project Site is located within close proximity to similar land uses such as residential and commercial uses. As such, the Project would be consistent with the RTP/SCS as its location, density and land use are similar to the assumptions included in the RTP/SCS for the Project Site area. Because the Project is consistent with the RTP/SCS and has a less than a significant VMT impact, as discussed above, the Project would have a less than significant cumulative impact on VMT.

Therefore, the cumulative impact on transportation from successive projects of the same type in the same place over time would not be significant.

¹⁴⁶ As described in the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG), https://ladot.lacity.gov/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf

Noise

Construction

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels for the reasons stated above. The Project could contribute to cumulative construction project noise impacts if the construction activities were conducted concurrently. Noise from the construction of projects is typically localized and has the potential to affect noise-sensitive uses only within 500 feet from the construction site, as construction noise would be attenuated by distance and intervening buildings, as typical in an urban setting. Thus, the noise from construction activities for two projects located within 1,000 feet of each other could contribute to a cumulative noise impact for receptors located between the two construction sites. The Related Project nearest to the Project Site is located at 6800 Sunset Boulevard, which is approximately 750 feet from the Project Site to the east. Residential uses that are located in between and within 500 feet of both the Project Site and the Related Project could hypothetically experience a cumulative noise impact. However, as of July 2024, however, construction scheduling and information is not yet available for 6800 Sunset Boulevard and construction start dates are unknown. As such, it would be speculative to assume that construction activities for 6800 Sunset would occur concurrent with the Project's construction. Moreover, based on the Project-level noise analysis above, the Project's construction-related noise impacts would be less than significant.

No other related projects are located within 1,000 feet of the Project Site. In addition, construction activities at other planned and approved projects near the Project Site would be required to comply with applicable City rules related to noise and would take place during daytime hours on the days permitted by the applicable Municipal Code, and projects requiring discretionary City approvals would be required to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its source, noise impacts would be limited to the Project Site and vicinity. Therefore, Project construction would not result in a cumulatively considerable contribution to significant cumulative impacts, assuming such a cumulative impact existed, and impacts in this regard are not cumulatively considerable.

Operation

Cumulative Off-Site Traffic Noise. The cumulative mobile noise analysis is conducted in a two-step process. First, the combined effects from both the Project and other projects are assessed. Second, for combined effects that are determined to be cumulatively significant, the Project's incremental effects are then analyzed. A project's contribution to a cumulative traffic noise increase would be considered significant when the combined effect exceeds perception level (i.e., auditory level increase) threshold. The combined effect compares the "Cumulative With Project" condition to "Existing" conditions. This comparison accounts for the traffic noise increase generated by the Project combined with the traffic noise increase generated by cumulative projects.

The following criteria are used to evaluate whether the cumulative with Project noise level would create a significant cumulative noise increase and whether the Project has an incremental effect in the cumulative noise increase.

- **Combined Effect.** The cumulative with Project noise level (“Cumulative With Project”) would cause a significant cumulative impact if a 3.0 dB increase over “Existing” conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use.
- **Incremental Effects.** The “Cumulative With Project” causes a 1.0 dBA increase in noise over the “Cumulative Without Project” noise level.

Thus, although there may be a significant noise increase due to the Project in combination with identified cumulative projects (combined effects), it must also be demonstrated that the Project has an incremental effect. In other words, a significant portion of the noise increase must be due to the Project.

A significant impact would result only if both the combined and incremental effects criteria have been exceeded and if noise levels exceed acceptable noise levels. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed Project and growth due to occur in the general area would contribute to cumulative noise impacts. Increases in local volumes from related projects within a half-mile radius of the Project Site have been estimated and included in cumulative traffic conditions. **Table 34: Cumulative Plus Project Buildout Conditions Traffic Noise Levels** identifies the traffic noise effects along roadway segments in the vicinity of the Project site for “Existing,” “Cumulative Without Project,” and “Cumulative With Project,” conditions, and net cumulative impacts.

Table 34: Cumulative Plus Project Buildout Conditions Traffic Noise Levels

Roadway Segment	CNEL @ 100 feet from Centerline			Combined Effects	Incremental Effects	Cumulatively Significant Impact?
	Existing	Cumulative Without Project	Cumulative With Project	dBA Difference: Existing and Cumulative With Project	dBA Difference: Cumulative Without and With Project	
Sunset between Sycamore and Orange	65.4	66.3	66.3	0.9	0.0	No
DeLongpre between Sycamore and Orange	52.6	53.4	53.5	0.9	0.1	No
Sycamore between Sunset and DeLongpre	46.2	47.4	49.3	3.1	1.9	No
Orange between Sunset and DeLongpre	52.0	52.4	52.4	0.4	0.0	No
ADT = average daily trips; dBA = A-weighted decibels; CNEL = day-night noise level 1. Traffic noise levels are at 100 feet from the roadway centerline. Refer to Appendix B for traffic noise modeling assumptions and results.						

First, it must be determined whether the “Cumulative With Project” 3.0 dB increase above existing conditions (*Combined Effects*) is exceeded. Next, under the *Incremental Effects* criteria, cumulative noise impacts are defined by determining if the forecast ambient (“Cumulative Without Project”) noise level is increased by 1.0 dB or more. As shown in Table 36, Combined Effects (3.0 dB) and Incremental Effects (1.0 dB) criteria have been exceeded along Sycamore between Sunset and DeLongpre. However, cumulative traffic noise levels remain within Normally Acceptable conditions for residential land uses.¹⁴⁷ Thus, the Project, in combination with cumulative background traffic noise levels, would result in a less

¹⁴⁷ City of Los Angeles, General Plan Noise Element, Exhibit I. https://planning.lacity.gov/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf

than significant cumulative impact. The Project's contribution to traffic noise would not be cumulatively considerable.

Cumulative Stationary Noise. Stationary noise sources of the Project would result in an incremental increase in non-transportation noise sources in the Project Site vicinity. However, as discussed above, operational noise caused by the Project would be less than significant. Similar to the Project, other planned and approved projects would be required to mitigate for stationary noise impacts at nearby sensitive receptors, if necessary. As stationary noise sources are generally localized, there is a limited potential for other projects to contribute to cumulative noise impacts.

No known past, present, or reasonably foreseeable projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City regulations that limit operational noise. Therefore, the Project, together with other projects, would not create a significant cumulative impact, and even if there were such a significant cumulative impact, the Project would not make a cumulatively considerable contribution to significant cumulative operational noises.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project Site and vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with Project specific noise impacts, would not be cumulatively significant.

Therefore, the cumulative impact on noise from successive projects of the same type in the same place over time would not be significant.

Air Quality

The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the construction and operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SCAB's existing air quality conditions. In addition, Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance are considered to result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.¹⁴⁸ Therefore, a project whose emissions would exceed SCAQMD thresholds would also make a cumulatively considerable contribution to a significant cumulative impact and, conversely, a project whose emissions would be below SCAQMD thresholds would not make a cumulatively considerable.

Construction

The SCAB is designated nonattainment for O₃, PM₁₀, and PM_{2.5} under the State standards and nonattainment for O₃ and PM_{2.5} under the federal standards. As discussed above, the Project's construction-related emissions, by themselves, would not exceed the SCAQMD significance thresholds for

¹⁴⁸ South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. Available at: <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf>

criteria pollutants. As discussed above, if a project is estimated to result in emissions that do not exceed SCAQMD thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be considered to be cumulatively considerable.¹⁴⁹ As shown in Table 26 above, Project construction-related emissions would not exceed the SCAQMD significance thresholds for any of the criteria pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions as outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be used during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, which would include the related projects. The Project's construction-related impacts would be less than significant, and its compliance with SCAQMD rules and regulations would further minimize the Project's construction-related emissions. Therefore, Project-related construction emissions, in combination with those from other, related projects in the area, would not substantially deteriorate the local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Operation

As discussed above, projects that would result in operational emissions that do not individually exceed SCAQMD regional thresholds of significance are not considered to make a cumulatively considerable contribution to a significant cumulative impact on air quality in the SCAB. The Project's operational emissions would not exceed the SCAQMD thresholds. As a result, operational emissions associated with the Project would not make a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, cumulative operational impacts would be less than significant.

AQMP Consistency

The SCAQMD's approach to assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with requirements of the FCAA and CCAA and analysis of project-level impacts.¹⁵⁰ For the reasons discussed above, the Project would be consistent with the AQMP, which is intended to bring SCAB into attainment for all criteria pollutants. Additionally, since the Project's estimated construction and operational emissions would not exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining both NAAQS and CAAQS, cumulative impacts would be less than significant.

Therefore, the cumulative impact on air quality from successive projects of the same type in the same place over time would not be significant.

Water Quality

The Project Site and any Related Projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally

¹⁴⁹ Ibid.

¹⁵⁰ South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. Available at: <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf>

does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites.

Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, the cumulative water quality impact of successive projects of the same type in the same place over time would not be significant.

Public Services

Fire Protection

The Project, in combination with any Related Projects, could increase the demand for fire protection services in the Project Site area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. However, this need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and Related Projects would contribute.

It is LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the City of Hayward v. Board of Trustees of California State University ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire and emergency services.

Additionally, similar to the Project, the Related Projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-density buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance with existing regulations and LAMC, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, the cumulative impact to fire protection from successive projects of the same type in the same place over time would not be significant.

Police Protection

The Project, in combination with any Related Projects, would increase the demand for police protection services in the Project Site area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. However, this need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. It is LAPD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the City of Hayward v. Board of Trustees of California State University ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including police protection services. Additionally, similar to the Project, the Related Projects would be subject to the review and oversight of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Therefore, the cumulative impact to police protection from successive projects of the same type in the same place over time would not be significant.

Schools

The Project, in combination with any Related Projects, would be expected to result in a cumulative increase in the demand for school services. However, similar to the Project, the applicants of all the Related Projects would be required to pay the state mandated applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, the cumulative impact to schools from successive projects of the same type in the same place over time would not be significant.

Parks

The Project, in combination with any Related Projects, could result in an increase in permanent residents residing in the Project area. However, the applicants of related residential projects would be subject to the City's parkland fees (e.g., Quimby Fees and/or Park and Recreation fees for non-subdivision projects) and to minimum open space requirements, ensuring that any potential impacts to parks and recreational facilities would be less than significant. Therefore, the cumulative impact to parks from successive projects of the same type in the same place over time would not be significant.

Other Public Facilities

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 enhanced library services, as deemed appropriate. Therefore, the Project would not contribute considerably to any cumulative impacts to libraries, and cumulative libraries impacts would be less than significant. Therefore, the cumulative impact to libraries from successive projects of the same type in the same place over time would not be significant.

Utilities

Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from BOS, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (MGD) and the existing average daily flow for the system is approximately 300 MGD. Currently up to 300 MGD is treated at the Hyperion Treatment Plant resulting in a treatment capacity of 150 MGD. The estimated wastewater generation increase of the Project would represent less than one percent of the available capacity in the system. Therefore, the Project would not contribute considerably to any cumulative impacts to wastewater, and cumulative wastewater impacts would be less than significant.

Water

All of the related projects are subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic water and fire water demands of each project. Developers are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval by LADWP and LAFD, with funding by the developers.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands within its jurisdiction. The UWMP prepared by LADWP is based on the growth projections that are provided in the SCAG RTP/SCS,

which is updated on 4-year cycles to account for changes in growth rates, and which accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses.

The Project's net demand on water supplies would fall within the available and projected water supplies projected in LADWP's UWMP and impacts would be less than significant. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements. The Project's contribution to a cumulative impact on water supply would not be cumulatively considerable and the cumulative impact regarding water supply would be less than significant. Therefore, the cumulative impact to water supply from successive projects of the same type in the same place over time would not be significant.

Solid Waste

Implementation of the Project combined with the related Projects would increase the demand on landfill capacity. All development in the City is required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance to minimize the amount of solid waste generated and the need for landfill capacity.

As discussed above, the landfills serving the Project Site area have more than adequate capacity to accommodate the Project. Therefore, the Project's contribution to cumulative solid waste impacts would not be cumulatively considerable. Therefore, the cumulative impact to solid waste from successive projects of the same type in the same place over time would not be significant.

2.12 Guideline 15300.2. Exceptions: (c) Significant Effect.

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

Unusual Circumstances

The Project Site is located in an area that is highly urbanized. The Project Site is currently fully developed with buildings, and is flat. There are no unusual circumstances related to the development of the Project's uses at this location.

The Project proposes an infill development that is consistent with the existing zoning, General Plan land use designation, Redevelopment Plan and the Hollywood Community Plan.

The Project Site is not located within a designated significant ecological area or other overlay that would denote unusual circumstances.

The approximate height and design of proposed building would be comparable to other structures in the area, and thus the Project would not introduce an incompatible scenic element into the community.

Therefore, the Project would be compatible with the existing and future developments in the neighborhood.

Methane

According to the City of Los Angeles ZIMAS mapping system, the Project Site is not within a Methane Hazard Zone.

Oil and Gas Fields

According to the Phase I Environmental Site Assessment (ESA) Report prepared for the Project by Orswell & Kasman, Inc., August 31, 2022 (**Appendix E**), there are no producing, idle or abandoned oil wells on or adjacent to the Project Site.

Geotechnical Considerations

According to the California Department of Conservation, the Project Site is not located within an earthquake fault zone, a liquefaction zone or within a landslide zone.

The Project will be completed in accordance with the provisions of the most current applicable building code and requirements of the LADBS, including the preparation of a soils and geology report, which will be reviewed by LADBS.

Conclusion

Therefore, there are no unusual circumstances regarding the Project Site or the Project; consequently, there is no reasonable possibility that the Project will have a significant effect on the environment due to unusual circumstances, and this exception does not apply to the Project.

2.13 Guideline 15300.2. Exceptions: (d) Scenic Highways.

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

There are no designated state scenic highways on, across or within the vicinity of the Project Site. The nearest state-designated scenic highways are a 55-mile segment of SR-2 (Angeles Crest Highway) located over 13 miles to the northeast of the Project Site and a 2.5-mile segment of SR-27 (Topanga Canyon Boulevard) located over 14 miles southwest of the Project Site. In addition, the nearest highways eligible for designation as state scenic highways are SR 187 located over 10 miles to the southwest of the Project Site and I-210 (Foothill Freeway) located over 10 miles to the northeast of the Project Site¹⁵¹. Further, as stated above, the Project Site is located in an area that is highly urbanized, and is currently fully developed with buildings, [what percent impervious?]. As such, the Project would not substantially damage scenic resources within a state scenic highway or on the Project Site.

Therefore, this exception does not apply to the Project.

¹⁵¹ <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-l-scenic-highways>

2.14 Guideline 15300.2. Exceptions: (e) Hazardous Waste Sites.

A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to section 65962.5 of the government code.

The following discussion is based on the Phase I Environmental Site Assessment (ESA) Report prepared for the Project by Orswell & Kasman, Inc., August 31, 2022 (**Appendix E**).

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Phase I ESA included a search of such environmental records published by local, state, tribal, and federal agencies pursuant to Government Code Section 65962.5.

The Phase I ESA also evaluated if there were any existing or potential recognized environmental conditions (RECs) affecting the Project Site that could indicate the potential for release of hazardous material into the environment. A REC is the presence or likely presence of any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

According to the Phase I ESA, the Project is not listed on the Federal Superfund list, or on the United States Environmental Protection Agency (USEPA), Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), or CalEPA or other list of hazardous materials sites compiled pursuant to Government Code Section 65962. There are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) affecting the Project Site. The Phase I ESA determined that there is no evidence of any historical recognized environmental conditions in connection with the Project Site. Thus, the Project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Therefore, this exception does not apply to the Project.

2.15 Guideline 15300.2. Exceptions: (f) Historical Resources.

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

The following analysis is based on the Memorandum prepared for the Project by Architectural Resources Group (ARG) contained in **Appendix F**. The Memorandum provides additional information on, and evaluative justification for, previous historical resources survey findings for the properties at 7014 and 7022 W. Sunset Boulevard located on the Project Site.

As discussed in the Memorandum, historic resources surveys of the Hollywood Redevelopment Area, in whole or in part, were completed in 1986, 1997, 2003, 2010, and 2020.¹⁵² None of the surveys identified 7022 W. Sunset Boulevard as potentially eligible for listing under any designation program criteria (national, state, or local). The Community Redevelopment Agency of the City of Los Angeles, Historic Resources Survey: Hollywood Redevelopment Area, prepared by Chattel Architecture, Planning & Preservation, February 2010 (2010 survey) identified 7014 W. Sunset Boulevard as potentially eligible for listing in the California Register of Historical Resources for its Mid-Century Modern architecture. The accompanying Department of Parks and Recreation (DPR) form did not list any alterations to the property.¹⁵³ However, the Community Redevelopment Agency of the City of Los Angeles, *Historic Resources Survey Report: Hollywood Redevelopment Plan Area* (prepared by Architectural Resources Group, GPA Consulting, and Historic Resources Group, January 28, 2020 (2020 survey update) did not identify 7014 W. Sunset Boulevard as a potentially eligible resource, noting “Does not meet any of the eligibility criteria for listing.”¹⁵⁴

As part of the Memorandum, ARG conducted additional research, site visits, and evaluations against federal, state, and local eligibility criteria, and Project Site analysis, and concluded that neither 7014 W. Sunset Boulevard nor 7022 W. Sunset Boulevard is eligible for listing in the National Register, California Register, or as a Los Angeles Historic-Cultural Monument due to the extensive alterations that have been made to each property.

Pursuant to Section 15064.5(a)(2) of the State CEQA Guidelines, the term “historical resource” includes a resource listed or determined eligible for listing in the California Register, listed in a local register of historical resources, or identified as significant in an historical resources survey meeting the requirements in Section 5024.1(g) of the PRC. The properties at 7014 and 7022 W. Sunset Boulevard do not meet any of these requirements. Therefore, they do not qualify as historical resources under Section 15064.5(a)(2).

Regarding indirect historic impacts, there are seven historical resources located adjacent to the Project Site: the Charlie Chaplin Studio (1416 N. La Brea Avenue) which is now the Jim Hensen Company Studio, the Hollywood High School Historic District (1521 N. Highland Avenue), and the residential properties at 6903 De Longpre Avenue, 7022 De Longpre Avenue, 7030 De Longpre Avenue, 7036 De Longpre Avenue, and 1413 N. Mansfield Avenue. As concluded in the Memorandum, the Project would not create indirect impacts on any of these resources, as it would not impair the significance of any of them.

For the reasons stated above and, in the Memorandum, the Project has been determined to not have either a direct or an indirect impact on historical resources. Furthermore, the Project would not result in a cumulative impact to any historical resources, and cumulative impacts to historical resources would be less than significant.

Therefore, this exception does not apply to the Project.

¹⁵² Community Redevelopment Agency of the City of Los Angeles, *Historic Resources Survey: Hollywood Redevelopment Area* (prepared by Chattel Architecture, Planning & Preservation, February 2010); CRA/LA, *Historic Resources Survey Report: Hollywood Redevelopment Plan Area* (prepared by Architectural Resources Group, GPA Consulting, and Historic Resources Group, January 28, 2020).

¹⁵³ Jenna Snow, DPR 523 form for 7014 W. Sunset Boulevard (prepared for the Community Redevelopment Agency of the City of Los Angeles, November 6, 2008).

¹⁵⁴ CRA/LA, Preliminary Findings Table: Ineligible Individual Resources (submitted by ARG/GPA/HRG to Hollywood Heritage December 2018 for review after completion of the reconnaissance survey phase). Per the methodology explained in the final survey report, properties identified as ineligible were not documented further after the reconnaissance phase. See CRA/LA, *Historic Resources Survey Report*, 1-2; 8-9.

