I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Modera Argyle Project (Project) and its potential environmental effects, along with a listing of the proposed Project design features and mitigation measures. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included herein are an overview of the purpose, focus, and organization of this Draft EIR; a brief discussion of areas of controversy; a description of the public review process to date for the Project; and a summary of the alternatives to the Project evaluated in this Draft EIR.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Sections 15123(a) and 15362, an EIR is an informational document intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to evaluate the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, which addresses the significance determinations of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning

and Research (OPR), responsible agencies, and other interested parties on August 18, 2017, for a 30-day review period, as well as a revised NOP on August 23, 2017.[1] The Initial Study, NOP, revised NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources
- Greenhouse Gas (GHG) Emissions
- Land Use
- Noise
- Public Services (including police protection, fire protection, schools, libraries, and parks and recreation)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water supply and wastewater)
- Energy Conservation and Infrastructure

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to agricultural and forest resources; objectionable odors; biological resources, including conflicts with an adopted habitat conservation plan or natural community conservation plan; geology and soils; hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; airport or airstrip-related noise; displacement of people or housing; changes in air traffic patterns; hazardous design features; inadequate emergency access; stormwater drainage facilities; landfill capacity; and compliance with federal, state, and local statutes related to solid waste. Therefore, these areas are not analyzed in this Draft EIR. The Initial Study demonstrating that less than or no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

[1] *The NOP was recirculated on August 23, 2017 to correct the public scoping meeting date. No other changes were made.*

In addition, although no impacts were found pursuant to Public Resources Code (PRC) Section 21099(d), the Initial Study analyzed aesthetics (visual character, views, light/glare, and shading) for informational purposes only.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.

II. Project Description. This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.

III. Environmental Setting. This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the Project vicinity.

IV. Environmental Impact Analysis. This section contains the environmental setting, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources; greenhouse gas emissions; land use; noise; public services (police protection, fire protection, schools, libraries, and parks and recreation); transportation; tribal cultural resources; utilities and service systems (water supply and infrastructure and wastewater); and energy conservation and infrastructure.

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Zoning Compliant Alternative; Reduced Density Alternative; and Community Plan Update–Compliant Alternative.

VI. Other CEQA Considerations. This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the Project's mitigation measures. Lastly, a summary of the

possible effects of the Project that were determined not to be significant within the Initial Study is provided.

VII. References. This section lists the references and sources used in the preparation of this Draft EIR.

VIII. Acronyms and Abbreviations. This section provides a list of acronyms and abbreviations used in this Draft EIR.

IX. List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A—Initial Study, NOP, Revised NOP, and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—Notice of Preparation
  - Appendix A.3—Revised Notice of Preparation
  - Appendix A.4—NOP Comment Letters
- Appendix B—Technical Appendix for Air Quality and Greenhouse Gas Emissions
- Appendix C—Cultural Resources Appendix
  - Appendix C.1—Historic Report
  - Appendix C.2—Archaeological Memo
  - Appendix C.3—Paleontological Records Search
- Appendix D—Noise Calculation Worksheets
- Appendix E—LAFD Response Letter
- Appendix F—LAPD Response Letter
- Appendix G—LAUSD Response Letter
- Appendix H—DRP Response Letter
- Appendix I—LAPL Response Letter

- Appendix J—Traffic Appendix
  - Appendix J.1—Traffic Study
  - Appendix J.2—LADOT Assessment Letter
  - Appendix J.3—ITE 9th Edition/10th Edition Comparison
- Appendix K—Tribal Cultural Resources Report
- Appendix L—Utility Report
- Appendix M—Energy Calculations
- Appendix N—Alternatives Appendix
  - Appendix N.1—Alternatives Traffic Memo
  - Appendix N.2—Alternative 4 Air Quality Calculations

4. Thresholds of Significance

In 2006, the City published the *L.A. CEQA Thresholds Guide* (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning (DCP) has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency—in this case, the DCP—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states "because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide."[2]

[2] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. 3.*

In light of an evolving regulatory environment, recent case law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the DCP has begun to update its CEQA guidance. At this point in time, the DCP has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this Draft EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

In January 2018, OPR proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. The update also added energy and wildfire questions to Appendix G. The updated CEQA Guidelines became effective on December 28, 2018 and are reflected throughout this Draft EIR, with the exception of Transportation question (b) relating to new CEQA Guidelines Section 15064.3(b), as explained further below.

The CEQA Guidelines updates included the addition of Section 15064.3(a), which states "a project's effect on automobile delay does not constitute a significant environmental impact" and amended a number of the Appendix G questions. CEQA Guidelines Section 15064.3(c) indicates the provisions of Section 15064.3 shall apply statewide beginning on January 1, 2020 but that a lead agency may elect to be governed by its provisions immediately upon adoption. The City has begun the process of moving from assessing transportation impacts based on level of service (LOS) and driver delay to assessing impacts based on vehicle miles traveled (VMT), but has not yet adopted a VMT threshold or corresponding methodology. Accordingly, the City has adopted the current Appendix G's Transportation thresholds (a), (c), and (d), but has not yet adopted Transportation threshold (b) addressing consistency with new CEQA Guidelines Section 15064.3(b). The previous threshold (b) pertaining to Congestion Management Programs (CMPs) is therefore addressed in Section IV.G, Transportation, of this Draft EIR.

5. Existing Project Site Conditions

The Project Site is currently developed with six commercial buildings totaling approximately 61,816 square feet of floor area, as well as surface parking, all of which would be demolished to provide for the Project. The buildings are currently occupied by a commercial audio/video equipment rental and sales business, offices, and a commercial printing shop. Landscaping within the Project Site is limited, with one lemon gum tree located toward the southeastern portion of the Project Site. In addition, three ficus and three evergreen pear street trees are located outside of the property line along Selma and

Argyle Avenues. All existing on- and off-site trees would be removed to accommodate the development of the Project. The Project Site is located in a transit priority area as defined by Senate Bill (SB) 743 and City of Los Angeles Zoning Information File (ZI) 2452, and there are multiple public transportation opportunities in the immediate vicinity of the Project Site.

The Project Site is located within the planning boundary of the Hollywood Community Plan (Community Plan), adopted in December 1988. Under the adopted Community Plan, the Project Site is designated for Commercial Manufacturing land uses. This land use designation is inconsistent with all surrounding properties, which are designated for Regional Center Commercial land uses by the Community Plan. The Community Plan also states that the Commercial Manufacturing land use designation corresponds to the CM (Commercial Manufacturing) and P (Parking) zoning designations, neither of which are consistent with the Project Site's current zoning.

The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as [Q]C4-1VL-SN (Commercial with Q Condition, Height District 1-VL, Hollywood Signage Supplemental Use District [HSSUD]). As noted above, the C4 zoning designation is inconsistent with the Community Plan's current Commercial Manufacturing land use designation for the Project Site. The C4 zone permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C4 zone also permits any land use permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. However, the Project Site's existing Q condition, imposed by Ordinance 165,662 in 1990, prohibits residential uses at the Site.

The Height-District 1-VL designation, in conjunction with the C4 zone, imposes a height limit of 3 stories or 45 feet and a maximum floor area ratio (FAR) of 1.5:1. The "SN" in the Project Site's zoning prefix indicates that the Project Site is located in the HSSUD, which establishes signage regulations in addition to those of the LAMC.

The Project Site is also located within the boundaries of the Hollywood Redevelopment Project Area, the former Los Angeles State Enterprise Zone, and the Sunset and Vine Business Improvement District.

6. Description of the Proposed Project

a. Project Overview

The Project proposes to develop a mixed-use project on the 1.1-acre Project Site located in Hollywood. As described in more detail below, the Project would provide

276 residential units, approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, up to 412 vehicle parking spaces, and 182 required bicycle parking spaces.[3] Alternatively, a 27,000 square foot grocery store could be constructed on the ground floor in lieu of the proposed retail and restaurant uses.[4] To provide for the new uses, approximately 61,816 square feet of existing commercial uses and associated surface parking areas would be demolished.

The proposed uses would be located within a mid-rise, seven-story building containing a ground floor level with a mezzanine and six residential levels above four subterranean parking levels.[5] The maximum height of the building would be 92 feet 1 inch to the top of the parapet, and 99 feet 1 inch to the top of the uppermost stair/elevator enclosure. For the retail/restaurant option, the ground floor of the proposed building would include neighborhood-serving retail and restaurant uses fronting Selma and Argyle Avenues, a residential lobby/lounge accessed from Argyle Avenue, and indoor and outdoor residential open spaces. For the grocery store option, the ground floor would include a grocery store and loading dock fronting Argyle Avenue, a residential lobby/lounge accessed from the corner of Argyle Avenue and Selma Avenue, and indoor and outdoor residential open spaces. The remaining Project features would not change under either the retail/restaurant or grocery store option. Specifically, the Project's short-term bicycle parking spaces would be located on the ground level within the public right-of-way, accessible from Selma Avenue. The ground floor mezzanine level would include additional commercial floor area, as well as additional residential clubhouse open space areas.[6] Levels two through seven would include the 276 residential units, with a pool, courtyard, additional clubhouse open space, and landscaped yards provided at the second level. The proposed residential unit mix is anticipated to include 46 studio units, 196 one-bedroom units, and 34 two-bedroom units of varying sizes and configurations. Vehicular parking would be provided in four subterranean levels. Long-term bicycle parking would be provided in the 1st subterranean level. Overall, the proposed building would contain approximately 260,250 square feet of floor area.

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[3] *The number of required parking spaces, before accounting for potential bicycle parking reductions, would be 358 spaces for this Project option.*

[4] *Under the grocery store option, the Project's ground floor layout would be slightly reconfigured, but the Project's overall footprint, height, massing, and total floor area would not change.*

[5] *The proposed mezzanine would contain floor area that is accounted for in the Project's total maximum floor area, but would not constitute an additional story, pursuant to Los Angeles Building Code Section 505.*

[6] *The mezzanine FAR would be part of the total FAR for the Project and is included in the analysis presented in this Draft EIR.*

b. Building Design

The proposed mid-rise building has been designed to be modern in style and to integrate into the Selma Avenue and Argyle Avenue street frontages while promoting a pedestrian environment. Specifically, the façade of the building has been articulated along all street frontages through the use of balconies, recessed windows, and architectural treatments. The building's architectural mass is also broken down by giving priority to building corners and clearly delineating the Project's commercial base from the residential units above. In addition, the proposed neighborhood-serving commercial uses at the ground level are intended to promote pedestrian activity and further activate the streets in the surrounding area. Furthermore, the Project would include the development of sidewalks in conformance with all applicable Mobility Plan and other City requirements that would be separated from the street with trees, bike parking, and other landscape features.

c. Open Space and Recreational Amenities

The Project would include a lobby/lounge, clubhouse, and outdoor patio area located on the ground floor. On the second level, a pool and courtyard would be provided, along with a second clubhouse area and landscaped rear and side yard setback areas which will be used as planting areas. The Project also includes an outdoor terrace on Level 7. Private balconies would be provided for the majority of units in the Project.

For the retail/restaurant option, the Project would provide a minimum of 28,665 square feet of open space, consisting of 9,939 square feet of common outdoor areas, 11,800 square feet of private outdoor areas in the form of residential balconies, and 6,926 square feet of common interior areas. The grocery store option would provide 28,785 square feet of open space, with 7,046 square feet of common interior open space in addition to 9,939 square feet of common outdoor areas and 11,800 square feet of private outdoor areas in the form of residential balconies. The additional common open space would be located on Level 1.

As part of the Project, the six existing ficus and evergreen pear street trees along Selma and Argyle Avenues are expected to be removed, as well as the one lemon gum tree located on the Project Site. In addition, a minimum of 69 new trees would be planted along the parkways and on the Project Site, in accordance with LAMC requirements.

d. Signage and Lighting

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at

parking garage entrances, elevator lobbies, vestibules, and residential corridors. No off-site advertising is proposed as part of the Project, and all signage would comply with the requirements of the LAMC and HSSUD.

Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Low-level exterior lights would also be incorporated on the building and along pathways for security and wayfinding purposes as well as to accent signage, architectural features, and landscaping elements throughout the site. Project lighting would be shielded and directed on site in order to minimize light trespass from the Project Site. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations, and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

e. Access, Circulation, and Public Transportation

Vehicular access for both the commercial and residential components of the Project would be from Selma Avenue via two driveways. One driveway would provide one-way ingress and egress for delivery trucks to a loading zone, while the second driveway would provide two-way ingress and egress for vehicular access to the Project's below-grade parking areas. The grocery store option would also include an additional driveway for delivery trucks to access a loading area off of Argyle Avenue.

Pedestrian access to the ground-floor neighborhood-serving commercial uses would be from both Argyle and Selma Avenues. Pedestrian access to the grocery store, if constructed, would be from Argyle Avenue, as well as an elevator and stairs to the parking garage. Project residents would access the Project Site from a residential lobby located on Argyle Avenue. The residential uses would also be accessed from all levels of the parking garage.

There are multiple public transportation opportunities in the Project Site's immediate area. In particular, the Metro Red Line Hollywood/Vine Station is located 0.2 mile northwest of the Project Site. Additionally, Metro and Los Angeles Department of Transportation (LADOT) operate numerous bus lines with stops located in close proximity to the Project Site.

f. Parking

Parking for the proposed uses would be provided in accordance with LAMC requirements. Pursuant to LAMC Section 12.22-A,25(d)(1), the Project is required to provide one vehicle parking space for each residential dwelling unit with 0–1 bedroom and two parking spaces for each residential dwelling unit with 2–3 bedrooms. Pursuant to

LAMC Section 12.21-A,4(x)(3)(2), the Project is required to provide one vehicle parking space for each 500 square feet of commercial floor area. A total of 358 vehicle parking spaces would be required, without taking potential bicycle parking reductions into account,[7] if the retail and restaurant option is constructed. For the grocery store option, 364 vehicle parking spaces would be required, again without taking potential bicycle parking reductions into account. The Project would provide up to 412 vehicle parking spaces in four subterranean levels under both options.

Pursuant to LAMC Section 12.21-A,16(a), the Project would be required to provide 158 residential bicycle parking spaces consisting of 14 short-term spaces and 144 long-term spaces under both options. Under the retail and restaurant option, an additional 12 short-term commercial spaces and 12 long-term commercial spaces would be required, and under the grocery store option, an additional 14 short-term commercial spaces and 14 long-term commercial spaces would be required. Accordingly, the Project with retail and restaurant uses would provide a total of 182 bicycle parking spaces, which would include 26 short-term spaces and 156 long-term spaces. For the grocery store option, the Project would provide a total of 186 bicycle parking spaces, which would include 28 short-term spaces and 158 long-term spaces.

g. FAR, Density, and Setbacks

The Project is requesting a General Plan Amendment to change the Project Site's land use designation from Commercial Manufacturing to Regional Center Commercial, to become consistent with the land use designations of the surrounding properties. The Project is also seeking a Vesting Zone and Height District Change to remove the Project Site's existing Q condition and change to Height District 2, resulting in a rezoning from [Q]C4-1VL-SN to (T)(Q)C4-2D-SN. Following the approval of these requests, the Project Site's land use designation and zoning, coupled with the Project's mix of residential and commercial uses, would permit density equivalent to the R5 (Multiple Residential) zone, or one dwelling unit per 200 square feet of lot area, pursuant to LAMC Section 12.22-A,18.

Following an anticipated 15-foot radius corner dedication at Selma and Argyle, the Site will include 48,403 square feet of lot area, which permits a maximum base density of 243 dwelling units. Pursuant to State density bonus law and LAMC Section 12.22-A,25, the Project would set aside 5 percent of the base density units (or 13 units) for Very Low Income households. This qualifies the Project for up to a 20 percent density bonus, or a

[7] *Pursuant to LAMC Sections 12.21 A.4 and 12.21 A.16, one required vehicular parking space may be replaced by four bicycle parking spaces, up to a maximum reduction of 15 percent for the Project's residential vehicular parking and 30 percent for the Project's commercial vehicular parking, due to the Project Site's location within 1,500 feet of the Metro Red Line Hollywood/Vine Station.*

maximum of 292 units. The Project's proposed unit count of 276 units is below this maximum (and equivalent to an approximately 14 percent density bonus).

Following approval of the requested General Plan Amendment and Vesting Zone and Height District Change, the base FAR for the Site would be 4.5:1, consistent with the floor area limits contemplated by both the Community Plan and Hollywood Redevelopment Plan (Redevelopment Plan) for properties designated as Regional Center Commercial. Pursuant to State density bonus law and LAMC Section 12.22-A,25(f), the Project's provision of 5 percent Very Low Income units allows the use of one on-menu development incentive, which the Applicant has elected to utilize as a 20-percent increase in floor area.[8] This permits the maximum FAR for the Site to increase from 4.5:1 to 5.4:1, or 261,376 square feet. The Project's proposed floor area of 260,250 square feet is below this maximum amount.

In connection with the Project's requested Vesting Tentative Tract Map, the Applicant is requesting that Argyle Avenue be designated the Site's front yard, to correlate to the orientation of the Project and the proposed location of its primary commercial and residential entrances. In accordance with the LAMC, the Project would be constructed up to the property line along Selma and Argyle Avenues, and would provide a southerly side yard and an easterly rear yard starting at the first level containing residential units. The Applicant is requesting that the Advisory Agency approve up to a 20-percent reduction in the required rear yard pursuant to LAMC Section 17.03.

h. Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The design of the Project will also incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED® Certified or equivalent green building standards. The sustainability features to be incorporated into the Project would include the following:

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[8] *As previously noted, the Project's entitlement applications, including its vesting tentative tract map application, were deemed complete by the City on October 16, 2016, prior to the passage of Measure JJJ. Therefore, the Project is vested against the provisions of Measure JJJ, which has been interpreted by the City to not allow the utilization of a density bonus in conjunction with a General Plan Amendment or Zone/Height District Change.*

(1) Water Conservation

- High-efficiency toilets (maximum 1.28 gallons per flush), including dual-flush water closets, and no-flush or waterless urinals in all non-residential restrooms as appropriate.

- Non-residential restroom faucets with a maximum flow rate of 0.5 gallon per minute and non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute. Restaurant kitchen faucets shall have pre-rinse self-closing spray heads with a maximum flow rate of 1.6 gallons per minute.

- Non-residential restroom faucets of a self-closing design (i.e., that would automatically turn off when not in use).

- Residential bathroom faucets with a maximum flow rate of 1.0 gallon per minute. and kitchen faucets with a maximum flow rate of 1.5 gallons per minute. No more than one showerhead per shower stall, with a flow rate no greater than 1.75 gallons per minute.

- High-efficiency clothes washers either within individual units (with water factor of 6.0 or less) and/or in common laundry rooms (commercial washers with water factor of 7.5 or less).

- Installation of tankless and on-demand water heaters in commercial kitchens and restrooms, when appropriate.

- Individual metering and billing for water use of all residential uses and exploration of such metering for commercial spaces.

- Installation of a leak detection system for any swimming pool, Jacuzzi, or other comparable spa equipment introduced on-site.

- Installation of high-efficiency Energy Star-rated dishwashers in all residential units, and within kitchen/food preparation areas minimum per City ordinance requirements.

- Use of landscape contouring to minimize precipitation runoff.

- Use of LID flow-through planters within common site areas that are not located above subterranean parking, where required.

(2) Energy Conservation and Efficiency

- Installation of Energy Star–labeled products and appliances where required.

- Exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent for energy efficiency, based on the 2016 Energy Efficiency Standards requirements. Examples of design methods and technologies that could be implemented may include, but not be limited to, high performance glazing on windows, appropriately-oriented shading devices, high efficiency boilers (if single metered), instantaneous water heaters (if individual meters), and enhanced insulation to minimize solar and thermal gain.

- Application of energy-saving technologies and components to reduce the project's electrical usage-profile. Examples of these components include compact fluorescent light bulbs (CFL), energy saving lighting schemes such as occupancy-sensing controls (where applicable), use of light emitting diode (LED) lighting or other energy-efficient lighting technologies where appropriate, and energy-efficient heating and cooling equipment.

(3) Transportation

- Provision of on-site bicycle storage for visitors and employees.

- Accessibility to multiple public transportation lines adjacent to the Project Site.

- Allocation of preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.

- Provision of electric vehicle charging stations in accordance with LAMC requirements (i.e., provide electric vehicle supply wiring equal to 5 percent of the total number of parking spaces).

(4) Air Quality

- Participation in fundamental refrigerant management to preclude the use of chlorofluorocarbons (CFCs) in HVAC systems.

- Use of adhesives, sealants, paints, finishes, carpet, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

(5) Solid Waste

- Provide on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers.

(6) Water Quality

- Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site.
- During construction of the Project, Best Management Practices (BMPs) would be implemented to control stormwater runoff and minimize pollutant loading and erosion effects.
- During operation, BMPs will be employed to control stormwater runoff and detain post-project flows to at minimum pre-project conditions would be implemented.
- During operation, BMPs would be implemented to minimize pollutant loading in stormwater runoff.

(7) Noise Management

- All building outdoor mounted mechanical and electrical equipment for the Project would be designed to meet the noise requirements of LAMC, Chapter XI, Section 112.02

(8) Construction and Design Elements

- Contractors will reference Partnership for Advancing Technology in Housing (PATH) and other current references for state-of-the-art construction methods, materials, and mechanical equipment and utilize same where applicable.
- Recycling and reuse of building and construction materials to the maximum extent feasible, including the on-site recycling and reuse of concrete removed during demolition and salvaging of existing appliances and fixtures.
- Waste diversion accounting will be utilized.

i. Project Construction and Scheduling

Construction of the Project would commence with demolition of the existing structures and surface parking lot, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to occur over a 30 month period and be completed in 2023. The estimated depths of excavation expected for the subterranean parking and building foundations would be up to approximately 50 feet below grade. It is estimated that approximately 89,000 cubic yards of soil export would be hauled from the Project Site during the excavation phase.

As part of the Project, a Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to LADOT review and approval. Haul trucks leaving the Project Site are anticipated to travel north on Argyle Avenue to US-101 South, south on US-101 to CA-2/N. Alvarado Street, north on CA-2 to CA-134 East, east on CA-134 to Figueroa Street exit, exit at Figueroa Street then head north on Scholl Canyon Road to arrive at the Scholl Canyon Landfill. Haul trucks would come to the site from the US-101 Freeway southbound to Gower Street, turn right onto Selma Avenue, and proceed to the Project Site.

7. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but are not limited to, the following:

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Hollywood Community Plan from Commercial Manufacturing to Regional Center Commercial;

- Pursuant to LAMC Section 12.32-F and Q, a Vesting Zone/Height District Change [Q]C4-1VL-SN to (T)(Q)C4-2D-SN to remove the Project Site's existing Q condition prohibiting residential uses (per Ordinance No. 165,662), and to establish Height District No. 2 with a base FAR of 4.5:1;

- Pursuant to LAMC Section 12.22-A,25, a Density Bonus Compliance Review for a total of 276 residential units (reflecting a 14-percent density bonus) with 5 percent of the Project Site's permitted base density (13 units) set aside as Very Low Income Household Units and utilizing Parking Option No. 1. Pursuant to LAMC Section 12.22-A,25(f)(4)(i), an On-Menu Incentive to permit a 20-percent increase in the allowable FAR (from 4.5:1 to 5.4:1);

- Pursuant to LAMC Section 12.24-W,1, a Master Conditional Use Permit (CUB) for the sales and/or dispensing of alcoholic beverages for three (3) on-site full line permits in connection with the Project's proposed restaurant uses; or one (1) off-site full line permit in connection with the Project's grocery store option;

- Pursuant to LAMC Section 16.05, Site Plan Review;

- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to create one ground lot comprising the entire Project Site and multiple above and/or below grade airspace lots, to effectuate a proposed airspace vacation, to designate Argyle Avenue as the Site's front yard, to allow up to a 20-percent reduction in

the Project's required rear yard pursuant to LAMC Section 17.03, and to grant approval of a haul route;

- Construction permits, including building, grading, excavation, foundation, and associated permits;
- Other discretionary and ministerial permits and approvals that may be deemed necessary.

8. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. These areas include Project impacts related to on-site construction noise and on- and off-site construction vibration (related to human annoyance); as well as cumulative impacts with respect to on- and off-site construction noise and on- and off-site construction vibration (related to human annoyance).[9]

9. Public Review Process

As previously indicated, the City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, OPR, responsible agencies, and other interested parties on August 18, 2017, for a 30-day review period. A Revised NOP was circulated on August 23, 2017 to correct an error on the Public Scoping Meeting date. The Initial Study, NOP, Revised NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 46-day public comment period in accordance with CEQA requirements.[10] Following the public comment period, a Final EIR will be prepared that will include responses to any comments raised regarding this Draft EIR.

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[9] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project Nos. 40, 49, and 84 occur concurrently with Project construction. Additionally, should peak construction traffic associated with Related Project Nos. 40, 49, and 84 be completed prior to commencement of Project construction, or occur after the completion of the Project's excavation phase, the cumulative off-site construction noise and vibration impacts may not occur.*

[10] *CEQA requires a 45-day circulation. An extra day has been added to account for Memorial Day, which falls on Monday, May 27, 2019.*

10. Summary of Environmental Impacts

Table I-1 on page I-19 provides a summary of the Project's environmental impacts, which are summarized further in the sections that follow.

Table I-1
Summary of Project Impacts

Environmental Issue	Project Impact[a]
A. AIR QUALITY	
Air Quality Plan Consistency	Less Than Significant
Construction	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Operation	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
B. CULTURAL RESOURCES	
Historic Resources	Less Than Significant
Archaeological Resources	Less Than Significant with Mitigation
Paleontological Resources	Less Than Significant with Mitigation
C. GREENHOUSE GAS EMISSIONS	Less Than Significant
D. LAND USE	
Land Use Consistency	Less Than Significant
Land Use Compatibility	Less Than Significant
E. NOISE	
Construction	
On-Site Noise	**Significant and Unavoidable**
Cumulative On-Site Noise	**Significant and Unavoidable**[b]
Off-Site Noise	Less Than Significant
Cumulative Off-Site Noise	**Significant and Unavoidable**[b]
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Cumulative On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Cumulative Off-Site Vibration (Human Annoyance)	**Significant and Unavoidable**[b]
Operation	
On-Site Noise	Less Than Significant
Off-Site Noise	Less Than Significant
F. PUBLIC SERVICES	
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant

Table I-1 (Continued)
Summary of Project Impacts

Environmental Issue	Project Impact[a]
Schools	
Construction	Less Than Significant
Operation	Less Than Significant
Libraries	
Construction	Less Than Significant
Operation	Less Than Significant
Parks and Recreation	
Construction	Less Than Significant
Operation	Less Than Significant
G. TRANSPORTATION	
Construction	Less Than Significant
Operation	
Intersection Levels of Service	Less Than Significant
Access and Circulation	Less Than Significant
Public Transit	Less Than Significant
Bicycle and Pedestrian Facilities	Less Than Significant
Congestion Management Plans	Less Than Significant
Emergency Access	Less Than Significant
H. TRIBAL CULTURAL RESOURCES	Less Than Significant
I. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
J. ENERGY CONSERVATION AND INFRASTRUCTURE	
Construction	Less Than Significant
Operation	Less Than Significant

[a] *Significant and Unavoidable cumulative impacts are included.*

[b] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project Nos. 40, 49, and 84 occur concurrently with Project construction. Additionally, should peak construction traffic associated with Related Project Nos. 40, 49, and 84 be completed prior to commencement of Project construction, or occur after the completion of the Project's excavation phase, the cumulative off-site construction noise and vibration impacts may not occur.*

Source: Eyestone Environmental, 2019.

a. Less Than Significant Impacts

(1) Air Quality

(a) Applicable Air Quality Plans

With regard to air quality management plan (AQMP) consistency, which is primarily concerned with the long-term influence of the Project on air quality in the Air Basin, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project includes similar growth projections that form the basis of the 2016 AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP. Furthermore, while the Project does not implement any air quality mitigation measures, the Project would comply with all applicable regulatory standards and would incorporate the project design features in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, that would serve to reduce the criteria air pollutants. Additionally, as the Project would support the City of Los Angeles and South Coast Air Quality Management District's (SCAQMD's) objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures. Thus, the Project would not conflict with or obstruct implementation of the AQMP. Furthermore, the Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality. Therefore, as detailed in Section IV.A, Air Quality, of this Draft EIR, the Project would not conflict with or obstruct implementation of an applicable air quality plan, and impacts would be less than significant.

(b) Construction

(i) Regional Emissions

As presented in Table IV.A-5 in Section IV.A, Air Quality, of this Draft EIR, construction-related daily maximum regional construction emissions would not exceed any of the SCAQMD daily significance thresholds. Therefore, regional construction emissions resulting from the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Regional construction emissions resulting from the Project would result in a less-than-significant air quality impact.

(ii) Localized Emissions

Project-related localized construction impacts are evaluated based on SCAQMD Localized Significance Thresholds (LST) methodology which takes into account ambient

pollutant concentrations. Based on SCAQMD methodology, localized emissions which exceed LSTs would also cause an exceedance of ambient air quality standards. Project-related construction emissions would not exceed localized thresholds. Therefore, localized construction emissions resulting from the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.

(iii) On-Site Construction Activities (Criteria Pollutants)

Maximum on-site daily construction emissions for nitrogen oxides (NO_X), carbon monoxide (CO), respirable particular matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1 based on a one-acre site. Potential impacts were evaluated at the closest off-site sensitive receptor, which are future residences located adjacent to the southern and eastern boundaries of the Project Site. Consistent with SCAQMD's LST methodology, pollutant impacts were evaluated at the closest sensitive receptor (approximately 25 meters).

As presented in Table IV.A-7 in Section IV.A, Air Quality, of this Draft EIR, maximum construction emissions would not exceed the SCAQMD-recommended localized screening thresholds. The Project's on-site construction activities, including the generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations. Project-related construction activities would result in a less-than-significant impact with regard to localized emissions.

(iv) Off-Site Construction Activities (Toxic Air Contaminants)

Given the short-term construction schedule of approximately 30 months, the Project would not result in a long-term (i.e., 70-year) source of toxic air contaminant (TAC) emissions. Additionally, the SCAQMD CEQA guidance does not require a Health Risk Assessment for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. The Project's off-site construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Project-related TAC impacts during construction would be less than significant.

(c) Operation

(i) Regional Emissions

SCAQMD's CalEEMod was used to calculate regional area, energy, mobile source, and stationary emissions. The Project would incorporate project design features to support and promote environmental sustainability. For purposes of the air quality analysis, project design features incorporated in this analysis include the Project Site's increase in accessibility to transit and increase in diversity of uses and density. These project characteristics are explained further in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce greenhouse gas emissions, they would also serve to reduce criteria air pollutants.

As shown in Table IV.A-1 in Section IV.A, Air Quality, of this Draft EIR, regional emissions resulting from operation of the Project would not exceed any of SCAQMD's daily regional operational thresholds. Therefore, regional operational emissions resulting from the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Air quality impacts from Project operational emissions would be less than significant.

(ii) Localized Emissions

Project-related operational emissions were also evaluated based on SCAQMD LST methodology. While SCAQMD LST methodology evaluates emissions from on-site sources (e.g. water heaters, cooking appliances, HVAC), off-site sources such as Project-related vehicle trips were also evaluated for potential exceedances of ambient air quality standards. Project-related operational emissions from on-site and off-site sources would not exceed localized thresholds. Therefore, localized operational emissions resulting from the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Localized operational emissions resulting from the Project would result in a less-than-significant air quality impact.

(iii) On-Site Operational Activities (Criteria Pollutants)

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.A-7 in Section IV.A, Air Quality, of this Draft EIR. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to five acres in size, were used to evaluate potential localized impacts. As shown in Table IV.A-7, on-site operational emissions would not exceed any of the LSTs. The Project's on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, localized

operational emissions resulting from the Project would result in a less-than-significant air quality impact.

(iv) Off-Site Operational Activities (Toxic Air Contaminants)

As the Project would not contain substantial TAC sources and would be consistent with the California Air Resources Board (CARB) and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

(v) Off-Site Operational Activities (CO "Hot Spots" Analysis)

Consistent with the CO methodology discussed in Section IV.A, Air Quality, of this Draft EIR, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection would be approximately 70,000 trips at the Sunset Boulevard and Vine Street intersection,[11] which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[12] This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Sunset Boulevard and Vine Street intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP.[13] Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. The supporting data for this analysis is included in Appendix B of this Draft EIR. The Project's off-site operational activities, including the highest average daily trips, would not expose sensitive receptors to substantial pollutant concentrations. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

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[11] *Gibson Transportation Consulting Inc., Transportation Impact Study for the Modera Argyle Project, City of Los Angeles, February 2019. See Appendix K.1 of this Draft EIR.*

[12] *The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.*

[13] *It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.*

(d) Odors

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, the Project would not create objectionable odors impacting a substantial number of people. Therefore, no impacts from objectionable odors would occur.

(2) Cultural Resources

(a) Historical Resources

(i) Direct Impacts

There are no historic resources on the Project Site. Construction activities including excavation, impaction, pile driving, shoring, etc. may have the potential to directly impact the Hollywood Palladium Theater (City of Los Angeles Historic Cultural Monument No. 1130, California Landmark No. CA-5000, and listed in the National Register), which is located south of the Project Site. However, a new development (Related Project No. 49) is proposed to be constructed on the northern portion of the Hollywood Palladium Theater property. This new development would be located between the Project Site and the Hollywood Palladium Theater and would be primarily impacted by construction activities on the Project Site. Thus, Project construction activities would not be expected to directly impact the Hollywood Palladium Theater. Project construction activities also would not be expected to directly impact the Hollywood Palladium Theater if Related Project No. 49 is not constructed by the time Project construction begins, due to the distance between the proposed Project building and the Hollywood Palladium Theater, which is approximately 100 feet. No other historical resource is close enough to the Project Site for Project construction activities to result in direct impacts. As such, the Project would not cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5, and the Project would not result in direct impacts to historic resources.

(ii) Indirect Impacts

The Project would have a less-than-significant indirect impact on the historical resources located near the Project Site, which include the Hollywood Palladium Theater, CBS Columbia Square, Hollywood Legion Stadium, Fonda Theatre, 1616 Vista del Mar Street, Hollywood Boulevard Commercial and Entertainment District, Home Saving and Loan building, Pete's Flowers/Morgan Camera building, Earl Carroll Theater, and the 6200 Block of Leland Way.

The Project is smaller in scale and mass than of many buildings in the surrounding area. Given the existing high-rise construction and varied landscape of development in the area, the Project would not substantially change the relationship of the Hollywood

Palladium to its setting such that the significance of the historical resource would be materially impaired. The Project, which would develop a comparatively smaller building on a nearby property, would not substantially alter the setting of the surrounding area such that the significance of CBS Columbia Square would be materially impaired. Furthermore, the Project would not be readily visible from the historic portion of CBS Columbia Square, which fronts Sunset Boulevard. The Hollywood Legion Stadium and the Fonda Theatre are located approximately 500 feet and 750 feet northeast of the Project Site, respectively, and there is generally no visibility between the two sites. The 1616 Vista del Mar Street building is significant as a multi-family residential building and not for its architecture, and its setting has not been identified as a character-defining feature and has been altered considerably since the building was constructed in 1922. In addition, the residential building is located approximately 330 feet northeast of the Project Site and would have limited visibility of the Project.

While there is visibility between the Earl Carroll Theater and the Project Site, the Earl Carroll Theater is located approximately 680 feet south of the Project Site, and is located on Sunset Boulevard, a wide, busy, commercial thoroughfare. The setting of the Earl Carroll Theater does not relate in any way to the Project Site.

In addition, the Hollywood Boulevard Commercial and Entertainment District, consisting of numerous contributing structures located along Hollywood Boulevard, is located approximately 600 feet northwest of the Project Site. The Home Savings and Loan building is located at the northeast corner of Sunset Boulevard and Vine Street, approximately 650 feet southwest of the Project Site. The Pete's Flowers/Morgan Camera building is located approximately 680 feet southwest of the Project Site. The 6200 Block of Leland Way is located approximately 1,000 feet south of the Project Site. Due to the number of intervening high-rise buildings, there is no visibility between the Project Site and these historical sites. Furthermore, the Project is not located in the immediate surroundings of the Hollywood Boulevard Commercial and Entertainment District or its contributing buildings, the Home Savings and Loan building, the Pete's Flowers/Morgan Camera building, or the 6200 Block of Leland Way.

Thus, as detailed in Section IV.B, Cultural Resources, of this Draft EIR, the Project would not alter the setting of the ten historical resources in the vicinity of the Project Site such that the significance of the historical resources would be materially impaired. Therefore, the Project would not result in an indirect impact to the Hollywood Palladium Theater, CBS Columbia Square, Hollywood Legion Stadium, Fonda Theatre, 1616 Vista del Mar Street, the Hollywood Boulevard Commercial and Entertainment District or any of its contributors, Home Savings and Loan building, Pete's Flowers/Morgan Camera building, Earl Carroll Theater, and 6200 Block of Leland Way.

(3) Greenhouse Gas Emissions

As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, a plan consistency analysis was conducted and demonstrates that the Project would comply with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan*, SCAG's 2016–2040 RTP/SCS, the LA Green Plan/ClimateLA, the Sustainable City pLAn, and the City's Green Building Code. Consistency with these plans would reduce the Project's incremental contribution of GHG emissions. The Project would also implement specific Project design features to further support and promote environmental sustainability. Because the Project would be consistent and would not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

In addition, Section IV.C, Greenhouse Gas Emissions, quantifies the Project's incremental contribution to GHG emissions. When taking into consideration implementation of the Project design features as well as compliance with the requirements set forth in the City of Los Angeles Green Building Code and full implementation of current state mandates, the GHG emissions for the Project in 2023 (i.e., Project buildout) would equal 100 metric tons CO_2e ($MTCO_2e$) per year (amortized over 30 years) during construction and 1,949 $MTCO_2e$ per year during operation, for a combined total of 2,049 $MTCO_2e$ per year.

Section IV.C, Greenhouse Gas Emissions, also includes a long-term analysis of GHG emissions in light of the State's existing and proposed regulatory framework relative to specified GHG reduction targets for 2030 and 2050. While it was determined that an evaluation of post-2030 Project emissions would be speculative, the Project's consistency with SCAG's RTP/SCS demonstrates that the Project will be consistent with post-2020 GHG reduction goals. Moreover, by furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets beyond 2020.

(4) Land Use

The Project Site is located within the Hollywood Community Plan area and is zoned by the LAMC as [Q]C4-1VL-SN (Commercial with Q Condition, Height District 1-VL, Hollywood Signage Supplemental Use District [HSSUD]). The C4 zone permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C4 zone also permits any land use permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. However, the Project Site's existing Q condition, imposed by

Ordinance 165,662 in 1990, prohibits residential uses at the Project Site. The Height District 1-VL designation, in conjunction with the C4 zone, imposes a height limit of 3 stories or 45 feet and a maximum FAR of 1.5:1. The "SN" in the Project Site's zoning prefix indicates that the Project Site is located in the HSSUD, which establishes signage regulations in addition to those of the LAMC.

As discussed above, the Project is requesting a General Plan Amendment to change the Project Site's land use designation from Commercial Manufacturing to Regional Center Commercial, to become consistent with the land use designations of the surrounding properties. The Project is also seeking a Vesting Zone and Height District Change to remove the Project Site's existing Q condition and change to Height District 2, resulting in a rezoning from [Q]C4-1VL-SN to (T)(Q)C4-2D-SN. Following the approval of these requests, the Project Site's land use designation and zoning, coupled with the Project's mix of residential and commercial uses, would permit density equivalent to the R5 (Multiple Residential) zone, or one dwelling unit per 200 square feet of lot area, pursuant to LAMC Section 12.22-A,18. As such, the allowed base FAR for the Site would be 4.5:1, consistent with the floor area limits contemplated by both the Community Plan and Hollywood Redevelopment Plan for properties designated as Regional Center Commercial. Pursuant to State density bonus law and LAMC Section 12.22-A,25(f), the Project's provision of 5 percent Very Low Income units allows the use of one on-menu development incentive, which the Applicant has elected to utilize as a 20-percent increase in floor area.[14] This permits the maximum FAR for the Site to increase from 4.5:1 to 5.4:1, or 261,376 square feet. The Project's proposed floor area of 260,250 square feet would be below this maximum amount.

(a) Physical Division of an Established Community

As discussed Section VI, Other CEQA Considerations, of this Draft EIR, and in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, the Project would not divide an established community. Therefore, related impacts would be less than significant.

(b) Land Use Policy Consistency

As discussed in detail in Section IV.D, Land Use, of this Draft EIR, the Project would be generally consistent with applicable goals, policies, and objectives in local and regional

[14] *The Project's entitlement applications, including its vesting tentative tract map application, were deemed complete by the City on October 16, 2016, prior to the passage of Measure JJJ. Therefore, the Project is vested against the provisions of Measure JJJ, which has been interpreted by the City to not allow the utilization of a density bonus in conjunction with a General Plan Amendment or Zone/Height District Change.*

plans that govern development on the Project Site. Such regulatory documents include the General Plan Framework's various chapters, General Plan Elements, Hollywood Community Plan, Mobility Plan 2035, applicable LAMC requirements, Hollywood Redevelopment Plan, Hollywood Signage Supplemental District, and SCAG's 2016–2040 RTP/SCS. Therefore, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency adopted for the purposed of avoiding or mitigating an environmental effect. As such, impacts related to land use consistency would be less than significant.

(c) Land Use Compatibility

As discussed in detail in Section IV.D, Land Use, of this Draft EIR, despite the increase in density, scale, and height of Project over the existing on-site uses and existing uses to the north of the Project Site, the Project would be consistent with the character with the surrounding area, which is highly urbanized and contains a varied mix of land uses at various scales of development, including low- to high-rise buildings occupied by neighborhood-serving commercial/retail uses, entertainment uses, offices, hotels, and multi-family residences. The Project would not substantially or adversely change the existing land use relationships between the Project Site and existing off-site uses or have a long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect. Impacts related to land use compatibility would be less than significant.

(5) Noise

(a) Construction

(i) Project-Level Off-Site Construction Noise

Off-site construction noise sources may include materials delivery, concrete trucks, and haul trucks (construction trucks), as well as construction worker vehicles accessing the Project Site during construction. Typically, construction trucks generate higher noise levels than construction worker vehicles. The major noise sources associated with off-site construction trucks would be associated with delivery/haul trucks, during the Project's grading/excavation phase. As shown in Table IV.E-12 in Section IV.E, Noise, of this Draft EIR and based on the estimated number of construction-related trips, including haul/delivery trucks and worker vehicles, and the estimated noise levels along the anticipated haul routes, Project-related construction traffic is estimated to be below the relevant 5-dBA significance criteria along the anticipated haul routes. Therefore, temporary noise impacts from off-site construction traffic would be less than significant.

(ii) Project-Level and Cumulative On-Site Construction Vibration (Building Damage)

With regard to potential building damage, the Project would generate ground-borne construction vibration during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. The Federal Transit Administration (FTA) has published standard vibration velocities for various construction equipment operations. Table IV.E-20 in Section IV.E, Noise, of this Draft EIR provides the estimated vibration levels (in terms of inch per second PPV) at the nearest off-site structures to the Project Site. It is noted that since impact pile driving methods would not be used during construction of the Project, in accordance with Project Design Feature NOI-PDF-3, impact pile driving vibration is not included in the on-site construction vibration analysis. As indicated in Table IV.E-20, the estimated vibration velocity levels from all construction equipment would be below the building damage significance criteria of 0.12 PPV for the historic Hollywood Palladium building to the south, the significance criteria of 0.2 PPV for the single-story commercial building to the north, and the significance criteria of 0.5 PPV for the newly constructed residential buildings to the east and west and the future Palladium Residences buildings to the south and east. Therefore, construction vibration impacts associated with potential building damage would be less than significant.

The nearest related project to the Project Site is Related Project No. 49 (the Palladium Residences), which is located directly south and east of the Project Site. As described above, Project construction activities would be below the significance criteria for building damage at the off-site building structures surrounding the Project Site. Related Project No. 49 would likely utilize standard construction and would generate similar vibration levels as the Project. Therefore, there is no potential for a cumulative construction vibration impact with respect to building damage associated with ground-borne vibration from on-site sources.

(iii) Project-Level and Cumulative Off-Site Construction Vibration (Building Damage)

Construction delivery/haul trucks would generally travel between the Project Site and the US-101 Freeway via Argyle Avenue, Gower Street, and Selma Avenue. Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[15] According to the FTA "[i]t is unusual for

[15] *FTA, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.*

vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the Project's anticipated haul route(s) that are situated approximately 25 feet from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.016 PPV, as provided in the noise calculation worksheets included in Appendix D of this Draft EIR. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts with respect to building damage from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant.

In addition, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be well below the most stringent building damage significance criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.

(b) Operation

(i) On-Site Stationary Noise Sources

The Project's on-site stationary noise sources would include outdoor mechanical equipment (e.g., air ventilation equipment), activities within the proposed outdoor spaces (i.e., the ground level plaza; pool and courtyard decks and landscaped yard on Level 2; and terrace on Level 7), parking facilities, and loading dock and trash compactors. Estimated noise levels at the identified off-site receptor locations resulting from operation of the Project's various on-site stationary noise sources are presented in Table IV.E-13, Table IV.E-14, Table IV.E-15, and Table IV.E-16 in Section IV.E, Noise, of this Draft EIR. During Project operations, the estimated noise levels from the mechanical equipment, use of outdoor areas, subterranean parking, and loading and trash areas at all off-site receptor locations would be below the existing ambient noise levels and the significance criteria of 5 dBA (L_{eq}) above ambient noise levels. Therefore, the Project 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, and noise impacts from on-site stationary noise sources would be less than significant.

(ii) Off-Site Mobile Noise Sources

The Project's off-site mobile noise sources would consist of roadway traffic.

(1) Future Plus Project

As shown in Table IV.E-17 in Section IV.E, Noise, of this Draft EIR, the Project is estimated to result in a maximum increase of up to 1.0 dBA (CNEL) in traffic-related noise levels along Selma Avenue between Argyle Avenue and Gower Street, under both the Retail/Restaurant Option and the Grocery Store Option. The increase in traffic noise levels would be well below the relevant 3 dBA CNEL significance criteria (applicable to noise levels within the "normally unacceptable" land use category). In addition, a noise increase of less than 1 dBA is generally considered negligible. Therefore, the Project 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, and off-site traffic noise impacts under Future Plus Project conditions would be less than significant.

(2) Existing Plus Project

As shown in Table IV.E-18 in Section IV.E, Noise, of this Draft EIR, when compared with existing conditions, the Project would result in a maximum increase of 1.1 dBA CNEL in traffic-related noise levels along Selma Avenue between Argyle Avenue and Gower Street, under both the Retail/Restaurant Option and the Grocery Store Option. The estimated noise increase due to Project-related traffic would be below the relevant 3 dBA CNEL significance criteria. Therefore, the Project 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 and, off-site traffic noise impacts based on Existing Plus Project Conditions would be less than significant.

(iii) Composite Noise

The noise analysis for the Project also included an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined) at the analyzed sensitive receptor locations. This evaluation of composite noise levels from all on-site project noise sources, evaluated using the CNEL noise metric, was conducted to determine the contributions at the noise-sensitive receptor locations in the vicinity of the Project Site. Table IV.E-19 in Section IV.E, Noise, of this Draft EIR presents the estimated composite noise levels in terms of CNEL at the off-site sensitive receptor locations from the Project-related noise sources. As indicated therein, the estimated composite plus ambient noise levels would be below the significance criteria at all off-site receptor locations. Therefore, composite noise level impacts due to Project operations would be less than significant.

(iv) Land Use Compatibility

Based on the measured ambient noise levels, the exterior noise levels at the Project Site were 59.4 dBA CNEL at the southeastern corner (measured at R1) and 69.2 dBA CNEL near the western boundary (measured at R2). According to the City of Los Angeles Guidelines for Noise Compatible Land Use (refer to Table IV.E-2 on page IV.E-7 of this Draft EIR), the Project Site would be considered "conditionally acceptable" for residential development, up to 70 dBA CNEL. In accordance with regulatory requirements, the Project would include necessary noise insulation features, such as insulated glass windows and doors, to achieve an interior noise environment that does not exceed 45 dBA CNEL for residential use and 50 dBA L_{eq} for non-residential uses. Therefore, noise impacts associated with land use compatibility would be less than significant.

(6) Public Services—Fire Protection

(a) Construction

Project construction would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain adequate levels of service. Therefore, impacts to Los Angeles Fire Department (LAFD) fire protection services and emergency medical services (EMS) during Project construction would be less than significant, and no mitigation measures are required.

(b) Operation

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for the Project would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new facilities. Notwithstanding, to enhance fire safety, pursuant to Project Design Feature FIR-PDF-1, the Project would install automatic fire sprinklers in all proposed buildings, which would reduce the demand placed on the LAFD. In addition, emergency access to the Project Site and surrounding uses would be maintained, and Project-related traffic would not be anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Overall, impacts with regard to response distance, emergency access, and response times would be less than significant. Furthermore, the Project would meet fire flow requirements and related impacts would be less than significant.

As such, Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not inhibit LAFD emergency response. Therefore, operation of the Project would not result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant

environmental impacts, in order to maintain acceptable fire protection and emergency medical services. Impacts to fire protection and emergency medical services during Project operation would be less than significant.

Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new fire station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location of any future station, would be speculative and beyond the scope of this document.

(7) Public Services—Police Protection

(a) Construction

With implementation of the Project design features and compliance with state law, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the Los Angeles Police Department (LAPD) to serve the Project Site. In addition, Project construction would not cause a substantial increase in emergency response times as a result of increased traffic congestion. As such, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capacity to serve the Project Site. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

The Project is not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. Furthermore, the Project would not adversely affect LAPD emergency response as a result of traffic congestion attributable to the Project. Therefore, Project operation would not necessitate

the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site. Thus, impacts to police protection services would be less than significant.

Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new police station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location of any future station, would be speculative and beyond the scope of this document.

(8) Public Services—Schools

(a) Construction

As discussed above, the construction-related employment generated by the Project would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. As such, impacts on school facilities during Project construction would be less than significant.

(b) Operation

The Project would directly generate students through the construction of 276 new residential dwelling units. As shown in Table IV.F.3-3 in Section IV.F.3, Public Services—Schools, of this Draft EIR, using applicable Los Angeles Unified School District (LAUSD) student generation rates, the Project's Grocery Store Option would generate a greater number of students than the Retail/Restaurant Option. Under the Grocery Store Option, the Project would generate approximately 132 new students, consisting of 72 elementary school students, 19 middle school students, and 41 high school students. In order to provide a conservative analysis, the impact discussion detailed is based on the students

generated by the Grocery Store Option. Based on existing enrollment and capacity data and future capacity data from LAUSD, Grant Elementary School and Joseph Le Conte Middle School would not have adequate capacity to serve the Project-generated students, while Hollywood High School would have capacity to serve the Project-generated students.

Pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. Accordingly, with adherence to existing regulations, impacts on schools would be less than significant.

(9) Public Services—Parks and Recreation

(a) Construction

Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services. The Project construction would not interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. Thus, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities during construction such that substantial physical deterioration of the facilities would occur or be accelerated. As such, impacts on parks and recreational facilities during Project construction would be less than significant.

(b) Operation

The Project's Retail/Restaurant Option would provide a minimum of 28,665 square feet of open space, consisting of 6,926 square feet of common interior areas, 9,939 square feet of common outdoor areas, and 11,800 square feet of private outdoor areas in the form of residential balconies. The Project's Grocery Store Option would provide 28,785 square feet of open space, consisting of 7,046 square feet of common interior areas, 9,939 square feet of common outdoor areas, and 11,800 square feet of private outdoor areas in the form of residential balconies. As such, the Project would provide open space and recreational amenities to serve the recreational needs of Project residents in accordance with LAMC requirements. Due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site amenities to meet their recreational needs. As detailed in Section IV.F.4, Public Services—Parks and Recreation, of this Draft EIR, the Project would meet the applicable requirements set forth in LAMC Sections 12.21, 17.12, 12.33, and 21.10.3(a)(1) regarding the provision of useable open space and the dedication of parkland or the payment of in-lieu fees. The Project would not meet the parkland provision goals set forth

in the Public Recreation Plan. However, these are Citywide goals and are not intended to be requirements for individual development projects. Moreover, compliance with the above-referenced LAMC regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Thus, the Project would be adequately accommodated by existing or planned facilities, and the Project would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Therefore, impacts to parks and recreational facilities would be less than significant and mitigation measures are not required.

(10) Public Services—Libraries

(a) Construction

The construction employment generated by the Project would not result in a notable increase in the resident population or an overall corresponding demand for library services in the vicinity of the Project Site. In addition, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the Los Angeles Public Library (LAPL), which would result in the need for new or altered facilities, or substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Therefore, impacts on library facilities during Project construction would be less than significant.

(b) Operation

Project operation would not create any new exceedance of the capacity of the four identified libraries (i.e., Frances Howard Goldwyn Hollywood Regional Branch Library, John C. Fremont Branch Library, Will and Ariel Durant Branch Library, and Wilshire Branch Library) to adequately serve the existing residential population, based on target service populations or as defined by the LAPL. Under both existing and future conditions, without or with the Project, the four libraries would continue operations without meeting the recommendations contained in the LAPL's 2007 Branch Facilities Plan. However, the increase in demand for library services would be expected to be dispersed between the primary regional branch library and the other three local branch libraries identified by the LAPL. As these four libraries are already undersized in existing conditions, the Project would not be anticipated to result in a substantial increase in demand that would necessitate new or physically altered facilities, the construction of which would cause environmental impacts. Therefore, impacts on library facilities during operation of the Project would be less than significant.

(11) Transportation

(a) Consistency with Applicable Plans, Ordinances, and Policies

(i) Construction Traffic

As shown in Tables IV.G-6 and IV.G-7 in Section IV.G, Transportation, of this Draft EIR, the Project is expected to generate approximately 2,013 net new daily trips during a typical weekday, including approximately 170 net A.M. peak hour vehicle trips (43 inbound and 127 outbound) and 179 net new P.M. peak hour vehicle trips (128 inbound and 51 outbound) under the Retail/Restaurant Option, and approximately 1,971 net new daily vehicle trips, including approximately 117 net new A.M. peak hour vehicle trips (16 inbound, 101 outbound) and 192 net new P.M. peak hour vehicle trips (128 inbound, 64 outbound) under the Grocery Store Option. The most intensive truck activity would occur during the excavation and grading phase which is estimated to generate 250 daily haul truck trips, equivalent to 500 daily PCE trips (42 inbound and 42 outbound trips each hour) outside peak hours, while the building construction phase is estimated to generate 132 daily construction worker vehicle trips. Thus, construction of the Project would generate significantly fewer trips than operation of the Project, which as described below, will not result in any significant traffic impacts.

In addition, the Project would submit a construction work site traffic control plan to LADOT for review and approval prior to the start of construction activity. The construction work site traffic control plan would identify all temporary roadway lane and/or sidewalk closures needed during construction. Furthermore, as recommended by LADOT and pursuant to Project Design Feature TR-PDF-1, a detailed Construction Traffic Management Plan would be prepared to identify street/lane closure information, a detour plan, haul route(s), and a staging plan. The Construction Traffic Management Plan would also include features such as notification to adjacent project owners and occupants of upcoming construction activities, coordination with City and emergency service provides to ensure adequate access is maintained to the Project Site and neighboring properties, advance notification regarding any temporary transit stop relocations, and limitation of any potential roadway lane closure(s) to off-peak travel periods, to the extent feasible. As haul truck trips would be scheduled to occur outside commuter peak hours to the extent possible (pursuant to Project Design Feature TR-PDF-1), and since construction worker trips would occur outside of the typical weekday commuter peak hours, haul truck and construction worker activities would not be anticipated to contribute a substantial amount of traffic during the weekday A.M. and P.M. peak hours. Therefore, construction-related traffic impacts would be less than significant.

(1) Transit and Parking

During construction, the existing Metro bus layover stop adjacent to the Project Site on Selma Avenue may have to be temporarily relocated either east of the Project Site boundary or west of Argyle Avenue. In addition, up to six metered parking spaces on Argyle Avenue adjacent to the Project Site would be temporarily removed to accommodate construction activities. As these temporary relocations and removals would be coordinated with Metro and LADOT, pursuant to Project Design Feature TR-PDF-1, the Project would not result in changes to bus service or parking such that a substantial inconvenience to riders and users would occur. Furthermore, construction workers and construction-related vehicles would be prohibited from parking on adjacent streets. As such, construction-related impacts associated with transit and parking are anticipated to be less than significant, and the implementation of the Construction Traffic Management Plan would further reduce those impacts.

(ii) Operation

(1) Signalized Intersection Analysis

(a) Existing With Project Conditions—Retail/Restaurant Option

As shown in Table IV.G-8 in Section IV.G, Transportation, of this Draft EIR, all 22 signalized intersections are projected to operate at LOS D or better during both the A.M. and P.M. peak hours under the Existing with Project Conditions for the Retail/Restaurant Option. In addition, none of the 22 signalized intersections would undergo incremental increases in the V/C ratios resulting from Project traffic that would exceed LADOT significance thresholds. Therefore, traffic impacts at all 22 signalized intersections would be less than significant during both the A.M. and P.M. peak hours under Existing With Project Conditions for the Retail/Restaurant Option.

(b) Existing With Project Conditions—Grocery Store Option

As shown in Table IV.G-9 in Section IV.G, Transportation, of this Draft EIR, during both A.M. and P.M. peak hours, all 22 signalized study intersections are anticipated to continue to operate at LOS D or better. As such, during Existing with Project Conditions for the Grocery Store Option, the incremental increases in V/C ratios at the 22 signalized study intersections would not exceed significant impact thresholds of LADOT. Therefore, traffic impacts at all 22 signalized intersections would be less than significant during both the A.M. and P.M. peak periods under the Existing With Project Conditions for the Grocery Store Option.

(c) Future With Project Conditions—Retail/Restaurant Option

As shown in Table IV.G-10 in Section IV.G, Transportation, of this Draft EIR, 17 of the 22 signalized study intersections are projected to operate at LOS D or better during both the A.M. and P.M. peak hours under Future With Project Conditions for the Retail/Restaurant Option. The remaining five intersections (i.e., Intersection Nos. 2, 9, 16, 19, and 21) are projected to operate at LOS E or F during at least one of the peak periods under Future With Project Conditions. However, the addition of Project traffic for this option would not result in a change to the V/C ratio that would exceed the significance thresholds at any of the 22 signalized intersections. Therefore, traffic impacts at all study intersections would be less than significant during both the A.M. and P.M. peak hours under the Future With Project Conditions for the Retail/Restaurant Option.

(d) Future With Project Conditions—Grocery Store Option

As shown in Table IV.G-11 in Section IV.G, Transportation, of this Draft EIR, 17 of the 22 signalized study intersections are projected to operate at LOS D or better during the A.M. and P.M. peak hours under Future With Project Conditions for the Grocery Store Option. The remaining five intersections (i.e., Intersection Nos. 2, 9, 16, 19, and 21) are projected to operate at LOS E or F during at least one of the peak periods under Future With Project Conditions. However, the addition of Project traffic for the Grocery Store Option would not result in a change to the V/C ratio that would exceed the significance thresholds at any of the 22 signalized intersections. Therefore, traffic impacts at all study intersections would be less than significant during both the A.M. and P.M. peak hours under the Future With Project Conditions.

(2) Unsignalized Intersection Analysis

In compliance with LADOT's *Transportation Impact Study Guidelines,* an LOS analysis was conducted at seven unsignalized study intersections for the Project in order to determine the need for installation of a traffic signal or other traffic control device. Based on the analysis during existing with Project and future with Project conditions, further signal warrant analyses were conducted for the four unsignalized intersections projected to operate at LOS E or F during either the A.M. and P.M. peak hours. As shown in Table IV.G-16 and detailed in Section IV.G, Transportation, of this Draft EIR, for both Project Options, Intersection No. 25: Gower Street & US-101 Southbound Off-Ramp/Yucca Street would meet the minimum volume and delay thresholds of Warrant 3 under Existing and Future Conditions. The satisfaction of the warrant threshold alone, however, is not the same as a significance threshold for determining a significant impact and does not in and of itself dictate the requirement of the installation of a traffic control signal. That decision is made by LADOT and other applicable agencies which would consider additional factors such as spacing with adjacent intersections and interruption of traffic flow on the major streets. Furthermore, based on the analysis above, the Project does not create the need for a traffic

signal at the Intersection No. 25, as traffic volumes without the Project would also result in LOS F conditions.

(iii) Public Transit

Transit trips generated by the Project under both options would be less than 0.1 percent of the available average capacity during the A.M. and P.M. peak hours. Accordingly, it is concluded that the Project would not cause the capacity of the transit system to be substantially exceeded. Therefore Project impacts on the transit systems serving the Project area would be less than significant.

(iv) Access and Circulation

Vehicular access to the Project Site would be provided via one full access driveway along Selma Avenue that would lead into the parking garage and accommodate right- and left-turn ingress and egress movements. The driveway would be designed in accordance with LADOT standards. In addition, truck loading access would be provided via a separate driveway along Selma Avenue. The grocery store option would also include an additional driveway for delivery trucks to access a loading area off of Argyle Avenue.

As shown in Tables IV.G-10 and IV.G-11 in Section IV.G, Transportation, of this Draft EIR, all three intersections nearest to the primary Project Site access (i.e., Intersection Nos. 10, 13, and 14) are projected to operate at LOS C or better during both peak periods under Future With Project Conditions for both the Retail/Restaurant Option and the Grocery Store Option. In addition, while traffic along the surrounding roadways would increase with implementation of the Project, the traffic generated by the Project would not result in any significant impacts on the study intersections analyzed in the Traffic Study. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Thus, as also discussed below, existing emergency access to the Project Site and surrounding uses would be maintained during Project operation. Therefore, Project impacts with regard to access and circulation would be less than significant.

(v) Bicycle and Pedestrian Facilities

As detailed in Section IV.G, Transportation, of this Draft EIR, the Project would implement a multi-modal transportation strategy that includes multiple vehicular access points for adequate and convenient access, enhanced transit and pedestrian access, and a safe internal pedestrian circulation plan with minimal vehicular conflicts. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing bicycle and pedestrian facilities and impacts would be less than significant.

(b) Congestion Management Plans

(i) Arterial Monitoring Stations

The two CMP arterial monitoring intersections within 1.5 miles of the Project Site are located at Santa Monica Boulevard & Western Avenue and at Santa Monica Boulevard & Highland Avenue, approximately 1.1 miles southeast and 1.0 mile southwest from the Project Site, respectively. Both of these arterial monitoring intersections are located beyond the boundaries of the study area As discussed in Section IV.G, Transportation, of this Draft EIR, the Project would not add more than 50 peak-hour trips at each of the arterial monitoring intersections closest to the Project Site under either the Grocery Store Option or Retail/Restaurant Option. As such, Project impacts to a CMP arterial intersection would be less than significant, and no further analysis is required.

(ii) Freeway Segments

One mainline freeway monitoring location is identified on US-101 south of Santa Monica Boulevard, approximately 1.4 miles southeast of the Project Site. As discussed in Section IV.G, Transportation, of this Draft EIR, the Project would not add more than 150 trips (in either direction) during either the A.M. or P.M. peak hour under either the Grocery Store Option or Retail/Restaurant Option. As such, Project impacts to the CMP mainline freeway monitoring location would be less than significant, and no further analysis is required.

(iii) Transit

The Project's vehicle trips would result in an estimated increase of 283 person trips during the A.M. peak hour and 297 person trips during the P.M. peak hour, which equates to approximately 42 net new transit trips in the A.M. peak hour and 45 net new transit trips in the P.M. peak hour under the Retail/Restaurant Option, and an estimated increase of 197 person trips during the A.M. peak hour and 318 person trips during the P.M. peak hour, which equates to approximately 30 net new transit trips in the A.M. peak hour and 48 net new transit trips in the P.M. peak hour under the Grocery Store Option. The peak capacity of the transit system serving the Project Site is approximately 6,993 trips during the A.M. peak hour and 5,851 trips during the P.M. peak hour. Project-generated transit trips would be less than 0.1 percent of the available average capacity during the A.M. and P.M. peak hours. Accordingly, it is concluded that the Project would not cause the capacity of the transit system to be substantially exceeded and that the Project would not create a significant impact on the transit systems serving the Project area.

(c) Hazardous Design Features

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, the Project's design does not include

hazardous features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the development of the Project would not result in any proposed modifications to the street system or any dangerous design features. Furthermore, the Project would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Thus, no impacts related to increased hazards due to a design feature would occur.

(d) Emergency Access

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In particular, in the vicinity of the Project Site, Hollywood Boulevard, Sunset Boulevard, and Vine Street are designated disaster/emergency routes by the City's Safety Element, and Highland and Santa Monica Boulevard are designated disaster/emergency routes by County of Los Angeles Department of Public Works.[16,17]

Project construction activities would be anticipated to encroach into the public right-of-way (e.g., sidewalk and roadways), narrowing the northbound land on Argyle Avenue and the eastbound land on Selma Avenue adjacent to the Project Site. Construction activities associated with the Project (i.e., movement of construction equipment, hauling of soil and materials, daily construction worker traffic, utility line connections, etc.) would potentially impact the public services provided by the LAFD and the LAPD in the vicinity of the Project Site, as a result of construction impacts to the surrounding roadways. As such, these short-term and temporary construction activities could temporarily increase response times for emergency vehicles along Sunset Boulevard, Vine Street, Argyle Avenue, Selma Avenue, and other main connectors due to travel time delays caused by traffic during the Project's construction phase. With implementation of the Construction Traffic Management Plan in accordance with Project Design Feature TR-PDF-1, however, emergency access would not be impeded. The Construction Traffic Management Plan would require approval from LADOT prior to the start of construction to ensure that adequate and safe access will remain available within and near the Project Site during construction activities. In addition, the Project would ensure that travel lanes would continue to be maintained in each

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[16] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit H, adopted November 26, 1996.*

[17] *County of Los Angeles Department of Public Works, Disaster Route Maps, Los Angeles—Central, August 8, 2013.*

direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster routes along Hollywood Boulevard, Sunset Boulevard, and Vine Street. As such, construction-related impacts associated with emergency access would be less than significant. Therefore, impacts to emergency access, including emergency routes, during construction of the Project would be less than significant.

With regard to emergency vehicle access during Project operation, while traffic along the surrounding roadways would increase with implementation of the Project, the traffic generated by the Project would not result in any significant impacts to the study intersections analyzed in the Traffic Study. The main intersections along disaster routes that provide direct access to the Project Site include Intersection No. 10: Argyle Avenue & Hollywood Boulevard, and Intersection No. 17: Argyle Avenue & Sunset Boulevard. Under Future With Project Conditions, Intersection No. 17 is projected to operate at LOS A and Intersection No. 10 is projected to operate at LOS C or better during both peak periods. In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. All Project driveways would also be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Thus, existing emergency access to the Project Site and surrounding uses would be maintained during Project operation. Therefore, the Project would not result in adequate emergency access, and impacts would be less than significant.

(12) Tribal Cultural Resources

In compliance with the requirements of AB 52, the City provided formal notification of the Project on June 6, 2017, to a number of California Native American tribes listed on the City's AB 52 contact list, including: Gabrieleño Tongva Indians of California Tribal Council; Gabrieleño Band of Mission Indians—Kizh Nation; Gabrieleño/Tongva Nation; Gabrieleño/Tongva San Gabriel Band of Mission Indians; San Fernando Band of Mission Indians; Soboba Band of Luiseño Indians; Torres Martinez Desert Cahuilla Indians; and Fernandeño Tataviam Band of Mission Indians. One response was received by the City on June 20, 2017 from Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation (Tribe). No communication or request for consultation was received from any other of the notified tribes within the 30-day response period, which ended on July 6, 2017.

On June 28, 2017, initial consultation occurred between the City and the representatives from the Tribe by phone conference. Department of City Planning staff,

Tribal Chairman Salas, and a biologist representing the tribe, Mr. Matthew Teutimez, participated in the AB 52 consultation conference call and discussed the Tribe's concerns regarding tribal cultural resources as they relate to the Project Site. Specifically, Tribal Chairman Salas and Mr. Teutimez noted that they were not aware of any tribal cultural resources in the vicinity of the Project, but indicated that the area was known to have been in proximity to prehistoric trade routes and was attributed with unique ecological conditions that supported the presence of important traditional natural resources. Tribal Chairman Salas noted that a traditional trade route ran along Sunset Boulevard though Cahuenga Canyon and referred to the historic presence of numerous springs throughout the Hollywood area, and the City was provided with an LA Weekly article and a *Human Ecology* journal article. The City reviewed the articles and provided the Tribe with a synopsis of topics discussed on during the conference call. On June 29, 2017, Mr. Teutimez confirmed receipt of the City's email.

On July 23, 2018, the City requested via email additional information regarding the potential for tribal cultural resources within the Project area. A representative of the Tribe responded that day via email with two historic maps showing the trade routes and villages present in the vicinity of the area. These maps included an 1881 map of Los Angeles prepared by H.J. Stevenson and the 1938 Kirkman-Harriman Historical Map. In addition to these maps, mitigation measures proposed by the Tribe were sent to the City. The proposed mitigation measures included retaining a Native American Monitor approved by the Tribe, and measures to be implemented in the event of the unanticipated discovered of various types of tribal cultural or archaeological resources.

On January 11, 2019, the City sent a follow-up email and requested that the Tribe submit any evidence of the presence of tribal cultural resources within the Project area within 14 days of receipt of the email. No response to this request was received. On February 22, 2019 the City sent a notification letter to the Tribe, stating the completion of consultation for the Project, pursuant to AB 52. The letter summarized the consultation efforts and stated that a review of the documents submitted by the Tribe and/or the information included in the Tribal Cultural Resources (TCR) Report did not find substantial evidence to suggest that there are existing tribal cultural resources within the Project area. Additionally, the City found that there was no sufficient evidence to consider the Project Site sensitive enough to require monitoring.

Tribal Chairman Salas, having reviewed the Draft EIR's summary of consultation and the City's proposed management strategy for tribal cultural resources (as discussed below), expressed disagreement by email on February 22, 2019. Tribal Chairman Salas indicated that oral history and documentation provided by the Tribe did meet the threshold of substantial evidence required to be determined a TCR landscape. While the process of ongoing consultation did further illustrate the Tribe expressed cultural value of the surrounding area, no new information relating to a specific geographically defined TCR,

defined in its size and scope, was identified. Sufficient information required for evaluation pursuant of subdivision PRC Section 5024.1(c) was not provided through consultation. Based on information reviewed, it appears that no known on-site TCR has been identified to date that could be impacted by the Project. The City, acting in good faith and after reasonable effort, has concluded that mutual agreement cannot be reached (as provided for in PRC Section 21080.3.2(b)(1)-(2)). Consultation is considered concluded; however, the City welcomes any additional information relating to TCRs that may be provided through the duration of the Project.

In summary, while it is evident from the information provided by the Tribe that the Hollywood area has been traditionally occupied and utilized for its resources by the Tribe, government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a known tribal cultural resources within or near the Project Site that would be impacted. As such, with the close of tribal consultation by the City on February 22, 2019, the City has fulfilled the requirements of AB 52. Documents related to the AB 52 consultation are included in Appendix B of the TCR Report, which is included as Appendix K of this Draft EIR.

Furthermore, the results of the records searches (i.e., South Coast Central Information Center and California Native American Heritage Commission) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or in its vicinity. Furthermore, based on the information and materials received from the Tribe, the City has determined that sufficient substantial evidence has not been provided to demonstrate that impacts to tribal cultural resources would occur pursuant to PRC Section 21074(2). As also discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no listed or eligible historic resources located on the site and construction/operation of the Project would not result in a significant impact to any historic resource. CEQA only requires mitigation measures if substantial evidence exists of potentially significant impacts. CEQA Section 15126.4(a)(4)(A) states that there must be an essential nexus between the mitigation measure and a legitimate governmental interest (i.e., potential significant impacts). Based on the above, the Project Site does not contain any resources determined by the City, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1, and, as such, impacts related to tribal cultural resources would be less than significant.

Nonetheless, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes

that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Project Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resource monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. As a result, potential impacts to tribal cultural resources would continue to be less than significant.

(13) Utilities and Service Systems—Water Supply and Infrastructure

(a) Water Infrastructure

(i) Construction

As discussed in the Utility Report included as Appendix L to this Draft EIR and as summarized below, the Project would require new construction and upgrades to existing water distribution lines on-site to serve the proposed development. Specifically, the Project proposes a 4-inch domestic water connection and a 6-inch fire water connection to the existing 8-inch water main in Selma Avenue. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the lines below surface. In addition, installation of new water infrastructure would include on-site water distribution improvements, off-site work associated with connections to the public main, and upgrades required by LADWP and LAFD. As the design and installation of new service connections would be required to meet applicable City standards, the Project contractors would coordinate with LADWP to identify the locations and depth of all lines prior to ground disturbance. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities in order to avoid water lines and disruption of water service.

Overall, construction activities associated with the Project would not require or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. In addition, the existing water distribution capacity would be adequate to serve the construction of the Project. Furthermore, as discussed above, minor offsite construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to motorists or pedestrians. As such, construction-related impacts to water infrastructure would be less than significant.

(ii) Operation

The Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. The Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gallons per minute (gpm) from four to six adjacent hydrants flowing simultaneously with a minimum residual pressure of 20 psi. Three public fire hydrants are located near the Project Site: one is located on the west side of Argyle Avenue (approximately mid-way between Selma Avenue and Sunset Boulevard), and two fire hydrants are located on the north side of Selma Avenue (near the intersection of Selma Avenue and El Centro Avenue, and the intersection of Selma Avenue and Argyle Avenue). Based on the Information of Fire Flow Availability test conducted by LADWP for the Project (see Exhibit 5 of the Utility Report, which is included as Appendix L of this Draft EIR) these three fire hydrants would deliver 7,500 gpm flowing simultaneously with residual pressures of 76 psi, 73 psi, and 73 psi, respectively. Based on discussion with the LAFD Hydrants and Access unit, the installation of a new fire hydrant on Argyle Avenue would likely be required since there are currently no existing hydrants along the Project frontage, and installation would be required to comply with all LAFD and LADWP requirements. In addition, as discussed above, pursuant to Project Design Feature FIR-PDF-1, the Project would also include the installation of an automatic fire sprinkler suppression system in all proposed buildings, which would reduce or eliminate water demand upon the fire hydrants.

Furthermore, as shown in the Service Advisory Request results (Exhibit 6 of the Utility Report), the proposed 4-inch domestic service and 6-inch fire service combination has been approved by LADWP to provide services to the Project. In addition, the LADWP provided a will-serve letter confirming that water service would be available for the Project (see Exhibit 9 of the Utility Report). Installation of the proposed automatic fire sprinklers would be subject to LAFD review and approval during LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for the Project, as set forth in LAMC Section 57.118.

Based on the above, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site. Accordingly, the Project would not require or result in the construction or relocation of new water facilities or expansion of expanded water facilities, the construction or relocation of which could cause significant environmental effects. In addition, the water distribution capacity would be adequate to serve the Project. Therefore, the Project's operational impacts on water infrastructure would be less than significant.

(b) Water Supply

(i) Construction

Construction activities for the Project would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, the short-term and intermittent water use during construction would be anticipated to be less than the net new water consumption of the Project at buildout. In addition, water use during construction would be offset by the reduction of water demand currently consumed by the existing uses, which would be removed as part of the Project.

Furthermore, as concluded in LADWP's 2015 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during an all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040. Construction of the Project would occur over a 30-month period that would commence as early as 2020 and end in 2023. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. As such, the Project would have sufficient water supplies available, and construction-related impacts to water supply would be less than significant.

(ii) Operation

Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. As shown in Table IV.I.1-4 in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, assuming constant water use throughout the year, the Project's Retail/Restaurant Option is estimated to result in a net increase of 46,172 gallons per day (gpd), and the Grocery Store Option is estimated to result in a net increase of 29,304 gpd. However, these estimates do not reflect proposed sustainability features such as efficient plumbing features, updated landscaping, modern irrigation, and efficient appliances that would reduce the Project's net increase in water demand by at least 20 percent pursuant to the requirements of the City of Los Angeles Green Building Code and Project Design Feature WAT-PDF-1.

The 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry, and multiple-dry years through the year 2040.

Furthermore, as outlined in the 2015 UWMP, LADWP is committed to providing a reliable water supply for the City through a variety of means including demand reduction (i.e., conservation), recycling, and alternative sources of water supplies. In addition, the Project's population, housing, and employment would fall within SCAG's growth projections for the City of Los Angeles, which form the basis for the 2015 UWMP water demand forecasts. Therefore, LADWP would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project's operation-related impacts on water supply would be less than significant.

(14) Utilities and Service Systems—Wastewater

(a) Wastewater Treatment

(i) Construction

During construction, temporary restroom facilities (such as portable toilet and hand wash areas) would be provided on-site, and associated wastewater would be hauled off-site rather than discharged into the public sewer system. As such, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows. Thus, wastewater generation associated with construction of the Project would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB) or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City of Los Angeles Integrated Resources Plan. Therefore, impacts to the wastewater system and treatment requirements as a result of Project construction activities would be less than significant.

(ii) Operation

As detailed in Section IV.I.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project's Grocery Store Option would generate an estimated 32,310 gpd, and the Retail/Restaurant Option would generate an estimated 46,027 gpd. The increase in average daily wastewater flow of 0.046 million gallons per day (mgd) would represent approximately 0.03 percent of the current 175 mgd remaining available capacity of the Hyperion Water Reclamation Plant (HWRP). Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP, and impacts would be less than significant.

In addition, the Project's net increase in average daily wastewater generation of 0.046 mgd would represent approximately 0.008 percent of the Hyperion Service Area's assumed future capacity of 550 mgd and approximately 0.01 percent of the HWRP's design capacity of 450 mgd. In addition, the Project's net increase in average daily

wastewater generation of 0.046 mgd plus the current flows of approximately 275 mgd to the HWRP would represent approximately 61 percent of the HWRP's estimated future capacity of 450 mgd. The Project's net increase in average daily wastewater generation of 0.046 mgd plus the current flows of approximately 338.2 mgd to the Hyperion Service Area would represent approximately 61.5 percent of the Hyperion Service Area's estimated future capacity of 550 million gallons per day. Thus, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant.

Furthermore, as the estimate of the Project's wastewater flow does not account for wastewater reduction requirements, the wastewater analysis likely overstates the Project's potential impacts on wastewater treatment and conveyance facilities. In addition, wastewater generated from the Project Site would be conveyed via the local collector sanitary sewer system to the HWRP for treatment. The discharge of effluent from the HWRP into Santa Monica Bay is regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As the City of Los Angeles Bureau of Sanitation (LASAN) monitors the treated wastewater, wastewater generated from the Project Site during operation would not exceed wastewater treatment requirements of LARWQCB.

(b) Wastewater Infrastructure

(i) Construction

Construction activities associated with the installation of new or relocated sewer line connections would be confined to trenching in order to place the sewer lines below surface. Such activities would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Vehicular and pedestrian access within and immediately surrounding the Project Site may be temporarily affected during installation of sewer line connections. However, as set forth in TR-PDF-1, a Construction Traffic Management Plan would be implemented to reduce impacts to pedestrian and traffic flow from off-site utility work. In addition, activities related to the installation of any required wastewater infrastructure would be coordinated through LASAN so as not to interrupt existing service to other users. As such, Project construction impacts to the wastewater conveyance and treatment infrastructure system would be less than significant.

(ii) Operation

There are three existing sanitary sewer connections to the Project Site from Argyle Avenue and Selma Avenue. The Project proposes one sewer connection to the existing 8-inch sewer main on Argyle Avenue and one sewer connection to the 8-inch sewer main on Selma Avenue. Based on LASAN's Wastewater Service Information (WWSI) response

included as Exhibit 7 of the Utility Report (see Appendix L of this Draft EIR) and current approximate flow levels and design capacities in the sewer system, and the Project's estimated wastewater flow, the City determined that the existing 8-inch sewer mains on Argyle Avenue and Selma Avenue may have adequate capacity to accommodate the additional demand generated by the Project, future growth, and existing demand. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In the event the public sewer has insufficient capacity, the Project would be required to install sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit would be made at that time. All Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards.

Therefore, based on the above, operation of the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Thus, the Project's operational impacts with respect to wastewater treatment and infrastructure capacity would be less than significant.

(15) Energy Conservation and Infrastructure

(a) Wasteful, Inefficient, or Unnecessary Use of Energy

The Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Project construction is estimated to require 27,632 kWh of electricity, 29,604 gallons of gasoline, and 205,265 gallons of diesel. Project operation would generate an annual net demand for 1,725,539 kWh of electricity, 5,319,230 cf of natural gas, 101,433 gallons of gasoline, and 23,043 gallons of diesel fuel. As detailed in Section IV.J, Energy Conservation and Infrastructure, of this Draft EIR, the Project's energy requirements would not significantly affect local or regional supplies or capacity, and energy usage during base and peak periods would be consistent with future energy projections for the region. During construction the Project would comply with on-road fuel economy Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements, such as LEED® Certified equivalency. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standard. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

(b) Consistency with State or Local Plans

The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, 2016 CALGreen building code, and City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. In addition, the Project would implement measures to achieve LEED® Certified equivalency which would exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016 RTP/SCS which incorporates VMT targets established by SB 375. The Project's mixed-use development and proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards, and impacts associated with regulatory consistency would be less than significant.

(c) Energy Demand Relative to Available Supply and Distribution Infrastructure

As demonstrated in Section IV.J, Energy Conservation and Infrastructure, of this Draft EIR, Project construction and operation would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. In particular, as provided in Appendix L of this Draft EIR, LADWP and the Southern California Gas Company have confirmed the Project's electricity and natural gas demands can be served by the facilities in the Project area. Therefore, related energy impacts would be less than significant during construction and operation.

b. Less Than Significant with Mitigation

(1) Cultural Resources

(a) Archaeological Resources

The results of the archaeological records search conducted through the South Central Coastal Information Center indicate that there are no identified archaeological

resources within the Project Site and one archaeological resource is located within a 0.5-mile radius of the Project Site. While these findings do not preclude the potential for an archaeological site to be identified during construction activities associated with the Project, it is unlikely since the Project Site has previously been graded as part of previous construction activities, including the construction of a basement beneath Building A. However, excavation to construct the Project's subterranean parking garage would extend to a depth of approximately 50 feet below grade, which is greater than previously excavated depths. Therefore, it is possible that archaeological resources that were not identified during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-1, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The implementation of Mitigation Measure CUL-MM-1 would ensure that any potential impacts related to archaeological resources would be less than significant.

(b) Paleontological Resources

A records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. The closest identified localities in proximity to the Project Site are LACM 6297-6300, collected at depths between 47 and 80 feet below the surface along Hollywood Boulevard between the US-101 Freeway and Western Avenue. While the Project Site has been subject to grading and development in the past, excavation to construct the subterranean parking garage would extend to a depth of approximately 50 feet below grade, which is greater than previous excavation depths to construct a basement under Building A. Thus, it is possible that paleontological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-2, a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The implementation of Mitigation Measure CUL-MM-2 would ensure that any potential impacts related to paleontological resources would be less than significant.

c. Significant and Unavoidable

(1) Noise

(a) Construction

(i) Project-Level and Cumulative On-Site Construction Noise

As presented in Table IV.E-11 in Section IV.E, Noise, of this Draft EIR, estimated noise levels from Project construction activities would exceed the 5 dBA significance criteria at receptors R1 through R5, by up to 30.3 dBA. Although the existing use at receptor R1 is an open parking lot, the noise impact analysis at receptor R1 assumed the proposed mixed-use development at this location (the Palladium Residences project) would be completed and occupied during the Project construction. In addition, in the event the proposed Palladium Residences project is built before the Project is constructed, the Project-related construction noise at receptor R5 would be reduced by a minimum of 10 dBA by the Palladium Residences building (east of the Project Site), which would reduce the impact to a less-than-significant level. It is estimated that the noise level associated with Project construction activities would be below the significance criteria at receptors R6 and R7. Therefore, noise impacts associated with the Project's on-site construction activities would be significant at receptors R1 through R5 prior to mitigation.[18]

Implementation of Mitigation Measure NOI-MM-1 provided below would reduce the Project's and cumulative construction noise levels. Specifically, installation of temporary sound barriers would reduce the noise generated by on-site construction activities by minimum of 5 to 11 dBA at receptor locations R2 to R5, which would reduce the noise impacts to a less-than-significant level at those locations. In the event that the proposed mixed-use development at receptor location R1 is constructed and occupied prior to Project construction, the proposed temporary sound barrier would provide a minimum 15 dBA noise reduction at receptor location R1. However, Project construction-related noise would still exceed the 5 dBA significance criteria at this location, even with mitigation. Thus, potential impacts associated with the Project's on-site construction activities would remain significant and unavoidable.[19]

In addition, cumulative construction noise impacts associated with on-site noise sources would remain significant and unavoidable if nearby Related Project Nos. 40, 49, and 84 were to be constructed concurrently with the Project.

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[18] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project Nos. 40, 49, and 84 occur concurrently with Project construction.*

[19] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project Nos. 40, 49, and 84 occur concurrently with Project construction.*

(ii) Cumulative Off-Site Construction Noise

Off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. Specifically, based on the existing daytime ambient noise level of 66.8 dBA (L_{eq}) measured at receptor location R2, it is estimated that up to 58 truck trips per hour could occur along Argyle Avenue without exceeding the significance criteria of 5 dBA above ambient noise levels (i.e., 71.8 dBA). Therefore, if the total number of trucks from the Project and related projects were to add up to 59 truck trips per hour along Argyle Avenue, the estimated noise level from 59 truck trips per hour would be 71.8 dBA, which would exceed the ambient noise levels by 5 dBA and exceed the significance criteria. Since the Project would generate up to 16 truck trips per hour during peak construction period (site grading), it is conservatively assumed that truck traffic related to construction of the Project and other related projects could cumulatively add up to 59 or more hourly truck trips. Therefore, cumulative noise due to construction truck traffic from the Project and other related projects has the potential to exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be significant.[20]

(iii) Project-Level and Cumulative On-Site Construction Vibration (Human Annoyance)

Table IV.E-21 in Section IV.E, Noise, of this Draft EIR provides the estimated vibration levels at the off-site sensitive uses due to construction equipment operation and compares the estimated vibration levels to the specified significance criteria for human annoyance. Per FTA guidance, the significance criteria for human annoyance is 72 VdB at residential uses and 65 VdB for studio (recording) uses, assuming there are a minimum of 70 vibration events occurring during a typical construction day. As indicated in Table IV.E-21, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at off-site receptors R3, R5, R6 and R7. The Project-related construction activities would exceed the 72 VdB significance criteria at receptors R1 (if future development is constructed and occupied) and R2, and exceed the 65 VdB significance criteria at receptor R4 (applicable to recording studio uses). Therefore, vibration impacts during construction of the Project would be significant pursuant to the significance criteria for human annoyance.

With regard to cumulative impacts, the nearest sensitive uses to the Project and Related Project No. 49 include the Camden Apartments (receptor location R2), which is

[20] *Should peak construction traffic associated with Related Project Nos. 40, 49, and 84 be completed prior to commencement of Project construction, or after the completion of the Project's excavation phase, the cumulative off-site construction noise impact may not occur.*

located approximately 80 feet from both the Project and Related Project No. 49. As analyzed above, the estimated vibration from Project construction would be approximately 72 VdB at receptor R2. The vibration levels generated by the Related Project No. 49 would also be similar to the Project, based on the assumption that the Related Project No. 49 would utilize similar standard construction equipment. Therefore, cumulative construction vibration impacts pursuant to the significance criteria for human annoyance would be significant in the event concurrent construction of the Project and Related Project No. 49 were to occur.

Additional mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction.[21] In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level and cumulative vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.

(iv) Project-Level and Cumulative Off-Site Construction Vibration (Human Annoyance)

Per FTA guidance, the significance criteria for human annoyance is 72 VdB for residential uses and 65 VdB for recording studio uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road.[22] There are residential and recording studio uses along Argyle Avenue and Gower Street between the Project Site and the US-101 Freeway. As indicated in the noise calculation worksheets included in Appendix D of this Draft EIR, the temporary vibration levels could reach approximately 72 VdB periodically as trucks pass by the residences along Argyle Avenue and Gower Street and the recording studio along Argyle Avenue. The estimated ground-borne vibration from the construction trucks would exceed the 72 VdB significance criteria for residential uses and the 65 VdB significance criteria for recording studio uses. Therefore, although temporary and intermittent, potential vibration

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[21] *Caltrans, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.*

[22] *FTA, "Transit Noise and Vibration Impact Assessment," May 2006, Section 7.2.1.*

impacts with respect to human annoyance from construction trucks traveling along the anticipated haul route would be significant during the Project's site grading phase.

Furthermore, as related projects, including Related Project No. 49 (adjacent to the Project Site), would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks from the related projects would generate similar vibration levels along the anticipated haul route (i.e., Argyle Avenue, Gower Street, and Selma Avenue). Therefore, to the extent that other related projects use the same haul route as the Project, potential cumulative human annoyance impacts associated with temporary and intermittent vibration from haul trucks traveling along the designated haul routes would be significant.[23]

There are no feasible mitigation measures that would reduce the potential vibration human annoyance impacts. Although impacts would be temporary, intermittent, and limited to daytime hours when the haul truck is traveling within 25 feet of a sensitive receptor, Project-level and cumulative vibration impacts from off-site construction with respect to human annoyance would remain significant and unavoidable.

11. Project Design Features

The following project design features are applicable to the Project:

a. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED® Certified or equivalent green building standards. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Certified certification shall include, but are not limited to the following:

a. Exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.

b. Use of Energy Star–labeled products and appliances.

c. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight

[23] *Should peak construction traffic associated with Related Project Nos. 40, 49, and 84 be completed prior to commencement of Project construction, or after the completion of the Project's excavation phase, the cumulative off-site construction vibration impact may not occur.*

harvesting and dimming controls, where appropriate, to reduce electricity use.

d. Water-efficient plantings with drought-tolerant species;

e. Fenestration designed for solar orientation; and

f. Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking.

Project Design Feature GHG-PDF-2: The Project would prohibit the use of natural gas-fueled fireplaces in the proposed residential units.

Project Design Feature GHG-PDF-3: The Applicant shall provide at least 20 percent of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles (EVs) at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Project Design Feature GHG-PDF-4: A minimum of 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Project plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.

b. Noise

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

Project Design Feature NOI-PDF-2: Where power poles are available, electricity from power poles and/or solar powered generators rather than

temporary diesel or gasoline generators shall be used during construction.

Project Design Feature NOI-PDF-3: Project construction would not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-4: All outdoor mounted mechanical equipment would be enclosed or screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-5: Loading and trash collecting areas would be screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-6: Outdoor amplified sound systems (e.g., speaker and stereo systems, amplification systems, or other sound-producing devices) would be designed so as not to exceed the maximum noise level of: (i) 75 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified sound systems at the ground level outdoor patio area; and (ii) 85 dBA (L_{eq-1hr}) at a distance of 25 feet at the second level outdoor pool and courtyard and at the Level 7 amenity terrace.

c. Public Services—Fire Protection

Project Design Feature FIR-PDF-1: Automatic fire sprinkler systems shall be installed in all new buildings.

d. Public Services—Police Protection

Project Design Feature POL-PDF-1: During construction, the Project Applicant or its successor shall implement appropriate temporary security measures, including, but not limited to, security fencing, low-level security lighting, and locked entry. During construction activities, the Project's contractor will document the security measures being implemented.

Project Design Feature POL-PDF-2: The Project shall design building entrances and exits, spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Lobby areas shall be made visible from the public streets or entry ways. Publicly accessible facilities shall be located strategically, in convenient and accessible locations, in order to increase use and the perception of safety, not in areas that are remote from areas of frequent activity. The Project shall also design public spaces to be easily patrolled and accessed by on-site security personnel.

Project Design Feature POL-PDF-3: Prior to the issuance of a building permit, the Project Applicant or its successor shall consult with LAPD's Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project.

Project Design Feature POL-PDF-4: During operation, the Project shall include access controls in the forms of private on-site security, a closed circuit security camera system, and keycard entry for the residential building and the residential parking areas.

Project Design Feature POL-PDF-5: During operation, Project residents shall be provided information on local Neighborhood Watch groups and the like and encouraged to participate in community groups and workshops, strengthening the connections between Project residents and their neighbors in the community.

Project Design Feature POL-PDF-6: During operation, the Project shall provide security to monitor entrances and exits, manage and monitor the fire/life/safety systems, patrol the perimeter of the property, and control and monitor activities in the public spaces and private outdoor areas. Contact information for on-site security staff shall be prominently displayed throughout the project.

e. Transportation

Project Design Feature TR-PDF-1: Prior to the start of construction, the Project Applicant will prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan will include street closure information, a detour plan, haul routes, and a staging plan. The Construction Traffic Management Plan will also include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan will include, but not be limited to, the following measures:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Argyle Avenue and Selma Avenue, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets.

- Containment of construction activity within the Project Site boundaries, per the Worksite Traffic Control Plan.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Coordination with Metro to address the relocation of the bus layover stop located east of Argyle Avenue along Selma Avenue adjacent to the Project Site.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Installation of truck crossing signs within 300 feet of the exit of the Project Site in each direction.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

f. Utilities and Service Systems—Water Supply

Project Design Feature WAT-PDF-1: The Project design shall incorporate the following design features to support water conservation in excess of LAMC requirements:

- Residential bathroom faucets with a maximum flow rate of 1.0 gallon per minute. and kitchen faucets with a maximum flow rate of 1.5 gallons per minute. No more than one showerhead per shower stall, with a flow rate no greater than 1.75 gallons per minute.
- Non-residential restroom faucets with a maximum flow rate of 0.5 gallon per minute and non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute. Restaurant kitchen faucets shall have pre-rinse self-closing spray heads with a maximum flow rate of 1.6 gallons per minute.
- Non-residential restroom faucets of a self-closing design (i.e., that would automatically turn off when not in use).
- High-efficiency clothes washers either within individual units (with water factor of 6.0 or less) and/or in common laundry rooms (commercial washers with water factor of 7.5 or less).
- Installation of tankless and on-demand water heaters in commercial kitchens and restrooms.
- Individual metering and billing for water use of all residential uses and exploration of such metering for commercial spaces.
- Installation of a leak detection system for any swimming pool, Jacuzzi, or other comparable spa equipment introduced on-site.
- Use of landscape contouring to minimize precipitation runoff.
- Use of LID flow-through planters within common site areas that are not located above subterranean parking, where required.

12. Mitigation Measures

The following mitigation measures are applicable to the Project:

a. Cultural Resources

Mitigation Measure CUL-MM-1: A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of

excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

Mitigation Measure CUL-MM-2: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

b. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the western property line of the Project Site between the Project construction areas and the Camden Apartments building (receptor location R2). The temporary sound barrier shall be designed to provide a minimum 11-dBA noise reduction at the ground level of receptor location R2.
- Along the northern property line of the Project Site between the Project construction areas and the hotel building on Argyle Street (receptor location R4). The temporary sound barrier shall be

designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R4.

- Along the eastern property line of the Project Site between the Project construction areas and the Hollywood Proper Residences building (receptor location R5). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R5. [Note: This mitigation is only needed if the Palladium Residences development, which would adequately attenuate the Project's on-site construction noise at receptor location R5, has not been built prior to Project construction.]
- Along the southern property line of the Project Site between the construction areas and new mixed-use development located adjacent to the south of the Project Site (receptor location R1). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at ground level of receptor location R1.[24]

13. Summary of Alternatives

This Draft EIR examines four alternatives to the Project in detail, which include the No Project/No Build Alternative; the Zoning Compliant Alternative; the Reduced Density Alternative; and the Community Plan Update-Compliant Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives relative to those of the Project.

a. Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. The Project Site would continue to be occupied by six commercial buildings totaling approximately 61,816 square feet of floor area and surface parking. No new construction would occur.

[24] *This mitigation is only needed if the proposed development is built and occupied prior to or during Project construction.*

b. Alternative 2: Zoning Compliant Alternative

Alternative 2, the Zoning Compliant Alternative, would remove the six existing commercial buildings totaling approximately 61,816 square feet of floor area and surface parking to construct a three-story commercial building with approximately 72,604 square feet of total floor area and a maximum FAR of 1.5:1 in accordance with the Project Site's existing [Q]C4-1VL-SN zoning designation, compared to 260,250 square feet of floor area and a FAR of 5.39:1 with the Project. The proposed building would have a maximum height of 45 feet, compared to 99 feet 1 inch with the Project, and would contain approximately 15,000 square feet of high-turnover restaurant uses on the ground floor and 57,604 square feet of retail uses on Level 2 and Level 3. Alternative 2 would include more retail and restaurant uses than the Project, and no residential units compared to 276 with the Project. Alternative 2 would be required to provide a minimum of 145 vehicle parking spaces based on a rate of two spaces per 1,000 square feet pursuant to LAMC Section 12.21-A.4(x)(3), compared to the minimum of 358 required by the Project. In addition, the Zoning Compliant Alternative would provide a minimum of 72 bicycle parking spaces (36 long-term and 36 short-term) in accordance with LAMC Section 12.21-A.16(a)(2), which is less than the minimum of 182 provided by the Project. The required vehicle and bicycle parking spaces would be located at grade and within two subterranean parking levels, compared to four subterranean levels with the Project. Construction of Alternative 2 would require less excavation and grading since only two subterranean levels would be constructed. Accordingly, the overall total amount of construction activities and duration under Alternative 2 would be less than that of the Project.

c. Alternative 3: Reduced Density Alternative

Alternative 3, the Reduced Density Alternative, would remove the six existing commercial buildings totaling approximately 61,816 square feet of floor area and surface parking to develop the Project Site with similar uses as the Project, but at a reduced density. Specifically, under Alternative 3, the proposed housing units would be reduced from 276 units to 207 units. Affordable housing units would not be provided under Alternative 3 because a density bonus would not be requested. In addition, the commercial uses (restaurant and retail) would be reduced by 25 percent to approximately 18,000 square feet of floor area compared to 24,000 square feet with the Project. Like the Project, the Reduced Density Alternative would develop neighborhood-serving commercial uses on the ground floor, with all residential dwelling units located on the upper levels. Total floor area developed under Alternative 3 would be reduced to approximately 195,869 square feet compared to 260,250 square feet with the Project and building height would be reduced to 6 stories and a maximum height of approximately 85 feet compared to 7 stories and 99 feet 1 inch with the Project. Architectural elements, lighting and signage, and access to and within the Project Site under Alternative 3 would be similar to that of the Project. Similar to the Project, Alternative 3 would include a request for a zone and height

district change on the Project Site from the existing [Q]C4-1VL-SN zone to the (T)(Q)C4-2D-SN zone to remove the Project Site's existing Q condition prohibiting residential uses (per Ordinance No. 165,662), and to establish Height District No. 2 with a base FAR of 4.5:1. However, the Reduced Density Alternative would only achieve a FAR of approximately 4.05:1.

The total number of vehicle and bicycle parking spaces required under Alternative 3 would be less than the amount required by the Project due to the reduction in residential units and commercial floor area. Vehicle and bicycle parking for the proposed uses would be provided on the ground level and within three subterranean parking levels. Since the number of subterranean levels proposed under Alternative 3 would be reduced by one level compared to the Project, the amount of excavation and soil export would also be reduced. Thus, the overall total amount of construction activities and duration under Alternative 3 would be less than that of the Project.

d. Alternative 4: Community Plan Update-Compliant Alternative

Alternative 4, the Community Plan Update–Compliant Alternative, would remove the six existing commercial buildings totaling approximately 61,816 square feet of floor area and surface parking to develop a six-story mixed-use residential and commercial building containing approximately 217,814 square feet of total floor area, resulting in a maximum FAR of 4.5:1 in accordance with the [Q]C4-2D-SN-CPIO zone proposed for the Project Site under the draft proposed Hollywood Community Plan Update.[25] Specifically, Alternative 4 would develop approximately 15,000 square feet of ground-level high-turnover restaurant uses, 33,500 square feet of office uses, and 200 residential units, compared to 24,000 square feet of retail/restaurant uses and 270 residential units with the Project. The total proposed 48,500 square feet of commercial uses would achieve a 1:1 commercial FAR as required by the draft Hollywood Community Plan Update for projects containing residential uses. The proposed building under Alternative 4 would have a maximum height of approximately 85 feet compared to 99 feet 1 inch with the Project and four subterranean parking levels, similar to the Project. Architectural elements, lighting and signage, and access to and within the Project Site under Alternative 4 would be similar to that of the Project.

In accordance with LAMC requirements, Alternative 4 would provide 97 commercial parking spaces and approximately 300 residential parking spaces, compared to a minimum

[25] *Note that at the time of the publication of this Draft EIR, the proposed Hollywood Community Plan Update exists in draft form, and has not yet been adopted by the City.*

of 48 commercial spaces and 310 residential spaces. Alternative 4 would also provide a minimum of 164 bicycle parking spaces (140 long-term and 24 short-term) in accordance with LAMC requirements, which is less than the Project. Vehicle and bicycle parking would be provided on the ground floor and within the four subterranean levels.

The total amount of building construction required under Alternative 4 would be less than the Project since the total floor area and building height would be reduced (217,814 square feet compared to the 260,250 square feet proposed by the Project and six stories compared to the seven stories proposed by the Project). However, the amount of excavation and soil export would be similar since the number of subterranean levels proposed under Alternative 4 is the same as the Project. Thus, the overall construction duration under the Community Plan Update–Compliant Alternative would be slightly shorter than that of the Project.

e. Environmentally Superior Alternative

The CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Zoning Compliant Alternative, would be the Environmentally Superior Alternative. Alternative 2 would not avoid the Project's significant and unavoidable environmental impacts related to noise and vibration during construction. However, Alternative 2 would reduce more of the Project's less-than-significant impacts than any other alternative analyzed. Nevertheless, Alternative 2 would not construct a mixed-use development that would include residential uses. Thus, Alternative 2 would not meet two of the Project's basic objectives related to the provision of residential uses. Therefore, Alternative 2 would not meet the underlying purpose of the Project or satisfy the Project objectives to the same extent as the Project.