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February 8, 2013

NOTICE OF COMPLETION AND AVAILABILITY OF FINAL ENVIRONMENTAL IMPACT REPORT NO. ENV-2011-675-EIR STATE CLEARINGHOUSE NO. 2011041094

To: Owners of Property and Occupants and other interested parties.

PROJECT NAME: Millennium Hollywood Project

SITE LOCATION: The Project Site is located at the following addresses in Los Angeles, CA 90028: 1720, 1722, 1724, 1730, 1740, 1745, 1749, 1750, 1751, 1753, 1760, 1762, 1764, 1766, 1768, 1770 N. Vine Street; 6236, 6270, 6334 W. Yucca Street; 1733, 1741 N. Argyle Avenue; 1746, 1748, 1754, 1760, 1764 N. Ivar Avenue.

A Draft Environmental Impact Report (EIR) was circulated for public review from October 25, 2012 to December 10, 2012. Comments received during the public review period and the City's responses to those comments can be found in the Final EIR. The Final EIR, together with the Draft EIR, and its appendices, comprises the Final EIR as required under the California Environmental Quality Act.

DEVELOPMENT PROJECT DESCRIPTION: The proposed development project includes the construction of approximately 1,052,667 net square feet of new developed floor area. The historic Capitol Records Building and the Gogerty Building are within the Project Site. These historic structures would be preserved and maintained and are operating as office and music recording facilities under long term lease. Including the existing approximately 114,303 square-foot Capitol Records Complex, the Project would include a maximum of approximately 1,166,970 net square feet of floor area resulting in a 6:1 Floor Area Ratio averaged across the Project Site. The Project would also demolish and/or remove the existing approximately 1,800 square foot rental car facility.

The Project would develop a mix of land uses, including some combination of residential dwelling units, luxury hotel rooms, office and associated uses, restaurant space, health and fitness club uses, and retail uses. To facilitate long-term buildout of the Project, the Applicant is seeking approval of a Development Agreement. The Development Agreement would allow for development of the Project through 2035 and embody the Project's pre-defined limits regarding developable floor area, permitted land uses, design guidelines, and site-specific development standards, which would collectively control the scale and massing of the Project. The Project would also implement an Equivalency Program to provide development flexibility for the future demands of the market and economy. The Equivalency Program would define a framework within which permitted land uses and square footages could be exchanged for certain other permitted uses so long as the limitations of the program are satisfied and no additional environmental impacts occur above those studied in this EIR.

ENTITLEMENT REQUESTS: The Project would require the following discretionary actions: (1) Development Agreement to establish development parameters on the Project Site; (2) Vesting Tentative Tract Map for the mixed-use development components; (3) Vesting Zone Change from C4 Zone to the C2 Zone (to permit a Sports Club use); (4) Height District Change to remove the D Development limitation; (5) Conditional Use Permit for the limited sale and on-site consumption of alcoholic beverages, live entertainment, and floor area ratio averaging in a unified development; (6) Vesting Conditional Use Permit for a hotel within 500 feet of an R Zone; (7) Variance for sports club parking, and for restaurants with outdoor eating areas above the ground floor; (8) City Planning Commission Authority for Reduced On-Site Parking with Remote Off-site Parking or Transportation Alternatives to allow for shared parking/reduced on-site parking; (9) Demolition, grading, excavation, and foundation permits; (10) Haul route approval; (11) Community Redevelopment Agency of Los Angeles approval through the Designated Local Authority or by the City Planning Department through transfer of authority to permit a floor area ratio in excess of 4.5:1; and (12) any other discretionary actions or approvals that may be required to implement the Project.

DOCUMENT REVIEW: If you wish to review a copy of the Final EIR or the documents referenced in the Final EIR, you may do so at the City of Los Angeles, Department of City Planning, at 200 N. Spring Street, City Hall, Los Angeles, CA, Room 750. Copies of the Final EIR are also available at the following Library Branches:

1. Frances Howard Goldwyn-Hollywood Regional Library, 1623 N. Ivar Avenue, Hollywood, CA 90028
2. Will and Ariel Durant Branch Library, 7140 W. Sunset Boulevard, Los Angeles, CA 90046
3. John C. Fremont Branch Library, 6121 Melrose Avenue, Los Angeles, CA 90038
4. Los Angeles Central Library, 630 W. 5th Street, Los Angeles, CA 90071

The Final EIR is also available online at the Department of City Planning's website [(http://cityplanning.lacity.org/ (click on "Environmental" and then "Final Environmental Impact Reports")]. The Final EIR can be purchased on cd-rom for $7.50 per copy. Contact Srimal Hewawitharana of the City of Los Angeles at (213) 978-1359 to purchase one.

Michael J. LoGrande
Director of Planning

Srimal P. Hewawitharana

Srimal Hewawitharana
Environmental Specialist II
Environmental Analysis Section

City of Los Angeles

Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

FINAL ENVIRONMENTAL IMPACT REPORT

HOLLYWOOD COMMUNITY PLAN AREA

This document, together with the Draft EIR and its appendices, comprise the Final EIR as required under the California Environmental Quality Act

Millennium Hollywood Project

Case Number: ENV-2011-675-EIR
State Clearinghouse Number: 2011041094

Project Location: 1720, 1722, 1724, 1730, 1740, 1745, 1749, 1750, 1751, 1753, 1760, 1762, 1764, 1766, 1768, 1770 N. Vine Street; 6236, 6270, 6334 W. Yucca Street; 1733, 1741 N. Argyle Avenue; 1746, 1748, 1754, 1760, 1764 N. Ivar Avenue, Los Angeles, California, 90028
Council District: 13

Project Description: The proposed project includes the construction of approximately 1,052,667 net square feet of new developed floor area. The historic Capitol Records Building and the Gogerty Building are within the Project Site. These historic structures would be preserved and maintained and are operating as office and music recording facilities under long term lease. Including the existing approximately 114,303 square-foot Capitol Records Complex, the Project would include a maximum of approximately 1,166,970 net square feet of floor area resulting in a 6:1 Floor Area Ratio averaged across the Project Site. The Project would also demolish and/or remove the existing approximately 1,800 square foot rental car facility.

The Project would develop a mix of land uses, including some combination of residential dwelling units, luxury hotel rooms, office and associated uses, restaurant space, health and fitness club uses, and retail uses.

APPLICANT:
Millennium Hollywood LLC

PREPARED BY:
CAJA Environmental Services

ON BEHALF OF:
The City of Los Angeles
Department of City Planning
Environmental Analysis Section

February 2013

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I. INTRODUCTION

A. Purpose

Before approving a project, the California Environmental Quality Act (CEQA) requires the lead agency to prepare and certify a Final Environmental Impact Report (Final EIR). The contents of a Final EIR are specified in Section 15132 of the *CEQA Statute and Guidelines*, as follows:

> *The Final EIR shall consist of:*
>
> *(a) The Draft EIR or a revision of the Draft.*
>
> *(b) Comments and recommendations received on the Revised Draft EIR either verbatim or in summary.*
>
> *(c) A list of persons, organizations, and public agencies commenting on the Revised Draft EIR.*
>
> *(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
>
> *(e) Any other information added by the Lead Agency.*

The evaluation and response to public comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; and (5) the ability to discover public concerns.

B. Process

As defined by Section 15050 of the CEQA Guidelines, the City of Los Angeles Planning Department is the Lead Agency for the Project. A Notice of Preparation (NOP) was prepared and circulated on April 28, 2011 through May 31, 2011 for the required 30-day review period.

The public review period for the Draft EIR for the Millennium Hollywood Project was October 25, 2012 to December 10, 2012, for a 45-day review period.

Comments on the Draft EIR were received during the comment period, and those comments are set forth and are responded to in this Final EIR.

The Draft EIR and this Final EIR will be submitted to the Planning Commission and City Council for requested certification and action on the Project.

C. Organization of the Final EIR

Together with the Draft EIR, this document constitutes the Final EIR for the Project and includes the following sections:

Section I. Introduction: This section provides an introduction to the Final EIR.

Section II. List of Commenters: This section includes a list of the persons and agencies who submitted comments on the Draft EIR.

Section III. Responses to Comments: This section includes responses to each of the comments submitted by persons and agencies listed in Section II.

Section IV. Corrections and Additions to the Draft EIR: This section provides corrections and additions to the Draft EIR, based on comments received during and after the public review period and based on staff-initiated text changes.

Section V. Mitigation Monitoring and Reporting Program: This section includes all of the mitigation measures identified to reduce or avoid environmental impacts of the project and notes the monitoring phase, the enforcement phase, and the applicable department or agency responsible for ensuring that each mitigation measure is implemented.

Appendices: The appendices to this document include copies of all the comments received on the Draft EIR and additional information cited to support the responses to comments.

D. Review and Certification of the Final EIR

Consistent with State law (Public Resources Code 21092.5), responses to agency comments are being forwarded to each commenting agency more than 10 days prior to the public hearing. In addition, at the same time responses are being distributed to all commenters who provided an address.

The Final EIR is available for public review at the following locations:

Srimal Hewawitharana
City of Los Angeles
Department of City Planning
200 Spring Street, Room 750
Los Angeles, CA 90012
Telephone: (213) 978-1359
E-Mail: srimal.hewawitharana@lacity.org

Central Library
630 W. 5th Street
Los Angeles, CA 90071

Frances Howard Goldwyn-Hollywood Regional Branch Library
1623 N. Ivar Avenue
Hollywood, CA 90028

John C. Fremont Branch Library
6121 Melrose Avenue
Los Angeles, CA 90038

Will and Ariel Durant Branch Library
7140 W. Sunset Boulevard
Los Angeles, CA 90046

The Final EIR is also available online at the Department of City Planning's website [http://planning.lacity.org/ (click on "Environmental" and then "Final EIR")]. The Final EIR can be purchased on cd-rom for $7.50 per copy. Contact Srimal Hewawitharana of the City of Los Angeles at srimal.hewawitharana@lacity.org to purchase one.

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II. LIST OF COMMENTERS

The City of Los Angeles Department of City Planning received a total of 105 comment letters on the Draft EIR. Each comment letter has been assigned a corresponding number, and distinct comments within each comment letter are also numbered. For example, comment letter "1" is from the State Clearinghouse and Office of Planning and Research. The comments in this letter are numbered "1-1", "1-2", "1-3", etc.

The agencies and organizations/persons listed below provided written comments on the Draft EIR to the City of Los Angeles during and after the formal public review period, which was from October 25, 2012 to December 10, 2012. Copies of the comments are included in Appendix A to this document.

Public Agencies

1. State Clearinghouse and Office of Planning and Research (#1) on December 11, 2012
2. State Clearinghouse and Office of Planning and Research (#2) on December 12, 2012
3. California Department of Transportation (Caltrans) on December 10, 2012
4. Council Office of Eric Garcetti on November 2, 2012
5. Metro (Scott Hartwell, CEQA Review Coordinator) on November 6, 2012
6. Native American Heritage Commission (Dave Singleton, Program Analyst) on October 29, 2012
7. South Coast Air Quality Management District on December 11, 2012
8. Southern California Association of Governments on December 10, 2012

Neighborhood Councils, Homeowners Associations, Private Organizations

9. AMDA on December 10, 2012
10. Beachwood Canyon Neighborhood Association on November 1, 2012
11. Greater Griffith Park Neighborhood Council on November 21, 2012
12. Hollywood Dell Civic Association (#1) on December 6, 2012
13. Hollywood Dell Civic Association (#2) on December 6, 2012
14. Hollywood Heritage on December 10, 2012
15. Hollywood United Neighborhood Council (#1) on November 30, 2012

16. Hollywood United Neighborhood Council (#2) on December 10, 2012
17. Hollywoodland Homeowners Association (#1) on December 8, 2012
18. Hollywoodland Homeowners Association (#2) on December 9, 2012
19. Los Angeles Conservancy on December 10, 2012
20. Montalbán Foundation on December 4, 2012
21. Oaks Homeowners Association on December 10, 2012
22. Sunset Hills Homeowners Association on December 11, 2012

Individuals

23. Abrahams, George on December 4, 2012
24. Anderson, Robert on December 10, 2012
25. Baumgart, Ted on December 10, 2012
26. Becklund, Laurie on October 29, 2012
27. Brackett, Alan on December 10, 2012
28. Brosseau, Deborah on November 12, 2012
29. Caplan, Randi on December 9, 2012
30. Carey, Sabine on December 10, 2012
31. Clark, George on December 9, 2012
32. Clark, Josephine and Bryan on December 8, 2012
33. Clements, Chip on December 10, 2012
34. Conrad, Jack (#1) on December 8, 2012
35. Conrad, Jack (#2) on December 11, 2012
36. Conti, Fabio on December 4, 2012
37. Coviello, Gail on December 8, 2012

38. D'Antonio, Joanne on December 9, 2012
39. de Varennes, Monique on December 9, 2012
40. Dillard, Joyce on December 10, 2012
41. Drabeck, Katrina on December 10, 2012
42. Duke, Olivia (#1) on December 10, 2012
43. Duke, Olivia (#2) on December 11, 2012
44. Dyer, Brian on December 10, 2012
45. England, Suzanne on November 30, 2012
46. Ferry, Emily on October 27, 2012
47. Folb, Brian on December 6, 2012
48. Geoghan, Jim (#1) on December 4, 2012
49. Geoghan, Jim (#2) on December 8, 2012
50. Gerger, Terri on December 11, 2012
51. Goldstein, Jeffrey on December 10, 2012
52. Goodwin, John on December 9, 2012
53. Green, Wendy on December 6, 2012
54. Gregorian, Lucy on December 10, 2012
55. Hallinan, Eda on December 9, 2012
56. Hodous, Barbara on December 10, 2012
57. Holmes, Mary on December 6, 2012
58. Iles, Alexa on December 6, 2012
59. Jordon, David on December 10, 2012
60. Kahana, Tal on December 10, 2012

61. Katz, Dean on December 10, 2012
62. Kruse, Ziggy (#1) on December 4, 2012
63. Kruse, Ziggy (#2) on December 10, 2012
64. Kuhrt, Stacey on November 29, 2012
65. Ledding, Mary on December 10, 2012
66. Lond, Harley (#1) on November 15, 2012
67. Lond, Harley (#2) on December 10, 2012
68. Manzo, Nita on December 10, 2012
69. Mason, Jean Clyde on December 11, 2012
70. McDonough, Barbara on December 8, 2012
71. Morrow, Michael on December 10, 2012
72. Negri, Patti on December 7, 2012
73. Nelson, Todd on December 11, 2012
74. Page, Barb on December 10, 2012
75. Phillips, Suzanne on December 9, 2012
76. Poole, Nancy Carla on December 9, 2012
77. Reichenbach, Fran (#1) on December 4, 2012
78. Reichenbach, Fran (#2) on December 4, 2012
79. Reichenbach, Fran (#3) on December 6, 2012
80. Reznik, Benjamin (#1) on December 6, 2012
81. Reznik, Benjamin (#2) on December 10, 2012
82. Rosby, Lois on December 10, 2012
83. Rosenfeld, Jack on December 7, 2012

84. Rosenthal, Jamie on December 10, 2012

85. Sanjurjo, Erik on November 30, 2012

86. Schoenfeldt, Jay on December 5, 2012

87. Schwab, Christof on December 9, 2012

88. Shelton, Marty on December 9, 2012

89. Shepodd, Lynn on December 8, 2012

90. Shontz, Lexis on November 7, 2012

91. Smith, Craig on December 10, 2012

92. Smith, Jimmie on November 4, 2012

93. Smith, MD Sam on December 6, 2012

94. Tabor, Maureen on December 9, 2012

95. Tager, Alisa on December 9, 2012

96. Thaler, Scott (#1) on December 9, 2012

97. Thaler, Scott (#2) on December 9, 2012

98. Thaler, Scott (#3) on December 11, 2012

99. Thoelke, Scott on December 10, 2012

100. Turner, David on December 8, 2012

101. Van Zyl, Jennifer and Rudy on December 9, 2012

102. Vinitsky, Ellen on October 28, 2012

103. Westbrook, Yvonne on December 9, 2012

104. Whitm, Judith on December 10, 2012

Received After the Public Review Period Closed

105. Melrose Hill Neighborhood Association on February 1, 2013

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III. RESPONSES TO COMMENTS
A. TOPICAL RESPONSES

During the comment period, the Lead Agency received a number of comments that make common claims and raise similar environmental issues. The Final EIR responds to all comments that were received during the comment period. The topical responses below (Topical Responses) are designed to provide a general and topical response to common themes presented in the comment letters, and thereby reduce the redundancy of responding to each common comment individually with the same response. Accordingly, the individual responses to each comment submitted will occasionally reference back to these Topical Responses.

This Final EIR presents the following Topical Responses:

1. Draft EIR Review Period Extension Request

Several comments were received on the Draft EIR regarding extending the comment period. In accordance with the CEQA requirements outlined below, a 45-day public review period for the Draft EIR began on October 25, 2012, and ended on December 10, 2012. With respect to the public review period for a Draft EIR under CEQA, the California Public Resources Code, Section 21091(a) states:

> *The public review period for a draft environmental impact report may not be less than 30 days. If the draft environmental impact report is submitted to the State Clearinghouse for review, the review period shall be at least 45 days, and the lead agency shall provide a sufficient number of copies of the document to the State Clearinghouse for review and comment by state agencies.*

In addition, Section 15105(a) of the State CEQA Guidelines states:

> *The public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse.*

Finally, Section 15203 of the State CEQA Guidelines, addresses "Adequate Time for Review and Comment" and states:

> *The Lead Agency shall provide adequate time for other public agencies and members of the public to review and comment on a draft EIR or Negative Declaration that it has prepared.*

It also provides that:

> *Public agencies may establish time periods for review in their implementing procedures and shall notify the public and reviewing agencies of the time for receipt of comments on EIRs. These time periods shall be consistent with applicable statutes, the State CEQA Guidelines, and applicable Clearinghouse review periods.*

Just prior to the public review period for the Draft EIR, a Notice of Availability of the Draft EIR was sent to owners, occupants within a 500-foot radius of the Project Site, as well as interested parties, and those who requested notification. The Notice of Availability was also published in the Los Angeles Times on October 25, 2012. At the beginning of the public review period, CD copies of the Draft EIR were provided to persons that attended the scoping meeting for the Project, persons that commented on the Notice of Preparation of the Draft EIR, interested parties, and numerous public agencies. As of October 25, 2012, the Draft EIR was also made available for public review at three local libraries, at the City of Los Angeles Department of City Planning, Council Offices (both City Hall and the field offices), and the City Clerk's Office. In addition, the Draft EIR was also available for review on the City's website. Copies of the Draft EIR were also submitted to the State Clearinghouse.

With regard to the size of the Draft EIR, the Draft EIR is comprised of seven volumes, including two volumes comprising the impact analysis sections of the Draft EIR and five volumes that comprise the technical appendices. The technical appendices are largely comprised of technical modeling runs and data. The size of the Draft EIR does exceed the 300-page guideline set forth in Section 15141 of the State CEQA Guidelines. However, the size of the Draft EIR is comparable to other Draft EIRs prepared for large-scale projects within the City of Los Angeles.

In addition, Section I, Introduction/Summary, of the Draft EIR, provides a comprehensive summary of the Draft EIR that includes a description of the Project, a summary of the environmental impacts and mitigation measures for each environmental issue evaluated within the Draft EIR, and an overview of the alternatives to the Project that were evaluated. Also note that the page guideline for Draft EIRs provided in Section 15141 of the CEQA Guidelines is the original recommendations from 1970, when CEQA was first enacted, and has not been revised to reflect the fact that the analytical requirements for EIRs have expanded substantially over the last four decades.

Although CEQA allows for time extensions to the standard 45-day comment period, CEQA does not require such extensions, and such extensions are at the discretion of the Lead Agency. As described above, the Draft EIR has been made available for widespread review and has been easily accessible by the public. Moreover, the City has received 105 comment letters from the public, which indicates that a substantial number of public agencies and members of the public reviewed and commented on the Draft EIR within the statutory timeframe. Thus, the City, as Lead Agency, has determined that the 45-day public comment period was consistent with both the letter and intent of CEQA.

Specifically, on December 5, 2012, Michael LoGrande, Director of City Planning, wrote a letter that stated in part:

> *However, upon further review, it has been decided that an extension will not be warranted. Therefore, the public comment period will not be extended to 60 days and the comment period will end on December 10, 2012, as stated on the Notice of Availability/Completion of the Draft Environmental Impact Report, dated October 25, 2012.*

Although the statutory review time for the Draft EIR has closed, the public will have several opportunities to provide comments regarding the Project during the upcoming public hearing process. Based on the above, the City of Los Angeles fully complied with the CEQA statutory time requirements for public review and notification of the Draft EIR for the Project.

The comments requesting an extension of the comment period are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

2. AESTHETICS

2A. Views of the Capitol Records Building

Several comments were received on the Draft EIR regarding how the Project could affect views of the Capitol Records Building from the street level, as well as from vantage points located in the Hollywood Hills. Section IV.A.1 in the Draft EIR includes a detailed analysis of potential view impacts (both from a focal view and panoramic view perspective) on the Capitol Records Building. In addition, the Draft EIR's analysis of the Project's potential aesthetics impacts is supported by an *Aesthetics Impacts Report*, which was prepared by Roschen Van Cleve Architects and is included as Appendix IV.A of the Draft EIR, which presents additional evidence regarding the Project's potential aesthetic impacts on the Capitol Records Building. As further discussed below, the Draft EIR and the *Aesthetics Impacts Report* conclude that the Project only has a significant impact on one focal view perspective (i.e., View 6) of the Capitol Records Building. The Draft EIR also concludes that the Project would have a less than significant impact on views of the Capitol Records Building from panoramic view perspectives from the Hollywood Hills. The information below, and in the Draft EIR, further supports these conclusions.

To be aesthetically sensitive to the Capitol Records Building, the Project has been designed with setbacks and view corridors necessary to honor and highlight the Capitol Records Building. Specifically, the *Millennium Hollywood Project Development Regulations: Guidelines and Standards* (included as Appendix II to the Draft EIR) in Section 1.2.2(b) state that one of the objectives of the Project is to:

> *Preserve public views from certain key vantage points to the Capitol Records Building by creating grade level open space / civic plazas on the East Site adjacent to the Jazz Mural and Capitol Records Building and West Site across from the Capitol Records Building.*

To illustrate how the Project design preserves view corridors to the Capitol Records Building, the Draft EIR includes Figure IV.A.1-10, Capitol Records View Corridors. This figure illustrates that there are three wide view corridors, which allow the Capitol Records Building to be visible even after development of the Project. The corridors are generally along Hollywood Boulevard west of Vine Street; generally along the Hollywood Freeway east of Argyle Avenue; and generally along the Hollywood Freeway west of Vine Street. In addition, the Draft EIR includes several figures (Figures II-9, Conceptual Architectural Rendering of the Project looking West along Argyle Avenue, II-10, Conceptual Architectural Rendering of the Project looking North from Hollywood Boulevard and Vine Street, and II-11, Conceptual

Architectural Rendering of the Project looking East from Vine Street) that show how the Capitol Records Building remains visible from adjacent streets, including Argyle Avenue, the intersection of Hollywood Boulevard and Vine Street, and Vine Street. These images demonstrate how the Project is aesthetically compatible with the Capitol Records Building and how it has been used as a centerpiece of the Project's design.

As thoroughly discussed in the Draft EIR, the Project can be implemented in a variety of height and massing permutations. The Draft EIR presents numerous view simulations (as shown in Figure IV.A.1-11 through Figure IV.A.1-20) that disclose the level of aesthetic impacts and view obstructions that could occur if the Project was developed at any of the proposed height and massing scenarios. These various view simulations indicate that there are no development scenarios that would fully block views of the Capitol Records Building from the street-level perspectives, especially at the Hollywood Boulevard and Vine Street intersection.

Ultimately, the Draft EIR concludes that the Project would have less than significant visual obstruction impacts to focal views of the Capitol Records Building according to the 550-foot-high and 585-foot-high massing envelopes. To present the most conservative analysis, and in accordance with the aesthetic elements of the L.A. CEQA Thresholds Guide, the Draft EIR also concludes that the Project would result in a significant visual obstruction of the Capitol Records Building when viewed from the corner of Hollywood Boulevard and Vine Street according to the 220-foot high and 400-foot high massing envelopes, which create more bulk (and thereby view obstruction of the Capitol Records Building) at the street level.

The Draft EIR also contains mitigation measures to ensure the Project is developed in a manner consistent with the aesthetic images and environmental impact analysis contained in the Draft EIR. These measures ensure preservation of valued focal views of the Capitol Records Building. Specifically, Mitigation Measure A.1-2 is included in the Draft EIR to ensure that the Development Regulations are implemented and enforced as the Project is developed. It states that:

> *The Project shall be developed in conformance with the Millennium Hollywood Development Standards, including, but not limited to, the Density Standards, the Building Height Standards, the Tower Massing Standards, and Building and Streetscape Standards. Prior to construction, Site Plans and architectural drawings shall be submitted to the Department of City Planning to assess compatibility with the Development Standards.*

2B. Views of the HOLLYWOOD Sign

Several comments were received on the Draft EIR regarding how the Project could affect views of the HOLLYWOOD Sign. The Draft EIR analyzes view impacts on the HOLLYWOOD Sign within the context of the visual character of the area surrounding the Project. The Draft EIR contains images and view simulations that illustrate how the Project integrates with the existing visual environment. From these images, it is clear that views of the HOLLYWOOD Sign from areas around the Project are often

seen in conjunction with other urban elements and within the wider view perspectives that include the Hollywood Hills as a topographical backdrop. In its existing condition, the immediate Project area offers only intermittent and partially obstructed views of the HOLLYWOOD Sign due to existing buildings and urban fabric surrounding the Project Site.

In particular, the Draft EIR illustrates this intermittent type of view of the HOLLYWOOD Sign in View 8, shown in Figure IV.A.1-18, Conceptual Visual Simulation Renderings, of the Draft EIR, which depicts the existing view from Sunset Boulevard a few blocks south of the Project Site. From this location the Project Site is less visually prominent; however it was selected for evaluation as a representative view of an area from which the HOLLYWOOD Sign is visible at the street level. As shown in Views 8(a) and 8(b), in Figure IV.A.1-18, development on the West Site would potentially block the HOLLYWOOD Sign. It should be noted, however, that this is only one of many areas where the HOLLYWOOD Sign is visible from sidewalk vantage points in the Hollywood area. These types of view perspectives are momentary and experienced as a pedestrian walks along streets in in the vicinity of the Project. The view perspective changes constantly as the pedestrian walks along the street and intermittent views of the HOLLYWOOD Sign come into and out of the pedestrian viewshed experience. These types of view perspectives are not considered prominent public viewing locations for the HOLLYWOOD Sign. Nonetheless, the Draft EIR includes analysis of these view perspectives to fully disclose potential aesthetic impacts to the valued visual character of the area around the Project.

As the Draft EIR points out, even under existing conditions, there is only a sliver view of the sign from this vantage point and it is flanked by existing urban structures, which represents the typical urban character of the existing aesthetic environment in the vicinity of the Project Site. The visibility of the HOLLYWOOD Sign within this contextual urban background would still remain visible from intermittent fixed locations within the urban landscape for pedestrians walking along Sunset Boulevard in this vicinity. Furthermore, since the Development Regulations mandate smaller floor-plates for the towers above 220 feet above grade, the taller tower scenarios would increase the visibility of the sign because the towers become narrower as the tower heights increase. As shown in conceptual Views 8(c) and 8(d), the HOLLYWOOD Sign is not obstructed at all by the Project with taller towers that cover a smaller portion of the Project Site area.

2C. Views of Hollywood from the Hollywood Hills

Several comments were received on the Draft EIR regarding how the Project would affect views of Hollywood from the Hollywood Hills. The Draft EIR analyzes this issue in detail and includes an entire section (with multiple view simulations) dedicated to the analysis of scenic vista views from the Hollywood Hills into the Los Angeles Basin. Ultimately, the Draft EIR concludes that the Project would have a less than significant impact on scenic vistas.

The Draft EIR's description of the existing environmental setting recognizes that the Hollywood Hills rise to an elevation of approximately 1,000 feet above sea level and, as such, afford long-range panoramic views of the Hollywood area and Los Angeles Basin to the south. As shown in Figure IV.A.1-11,

Conceptual Visual Simulation Renderings – View 1, of the Draft EIR, the Capitol Records Building is visible and is one of many historic structures at the predominately 150-foot height datum that characterizes many structures along Hollywood Boulevard in the Project vicinity. In this context, development of the Project, especially at the 550 and 585-foot high massing envelope, would result in two prominent high-rise buildings that would alter the skyline and potentially impact existing views of other high-rise structures such as The W Hotel and Residences complex (approximately 150 feet above grade), the Taft Building (approximately 150 feet above grade), the Guarantee Building (approximately 150 feet above grade), the Knickerbocker Hotel (approximately 124 feet above grade), the Hollywood Equitable Building (147 feet above grade), and the Sunset Media Tower (approximately 310 feet above grade) from certain vantage points. Views of the Capitol Records Building would be unobstructed from most vantage points from the north, as the Capitol Records Building is situated in the north of the Project Site and would not be obstructed by the new structures which are situated to the south on the Project's East Site.

To illustrate the Project's potential impacts, the Draft EIR includes Figure IV.A.1-20, Conceptual Visual Simulation Renderings – View 10, which is a representative scenic view from the Hollywood Hills Hotel and is characteristic of both public and private views that exist from vantage points to the northwest of the Project Site. This location provides a scenic panoramic view of the Hollywood area and the Los Angeles Basin, and demonstrates the urbanized context of the Basin-wide views from vistas in the Hollywood Hills. The Capitol Records Building is visible within the skyline, but its prominence is limited by viewing distance and the numerous structures that occupy the skyline. From this vantage point, the Project would block the existing view of the Capitol Records Building, as the West Site is positioned directly in line with the Capitol Records Building. The Project's new structures would become the focal point of the skyline, as they would be considerably higher than the surrounding buildings, especially since the field of view primarily includes the area north of Franklin Avenue. While the Project would alter this existing vista view, it would not otherwise block or materially detract from the panoramic vista view of the Hollywood Area and Los Angeles Basin. For these reasons the Draft EIR concludes that the Project's potential to obstruct broader long-range panoramic views would be considered less than significant.

In addition, the Draft EIR contains the *Aesthetics Impacts Report*, which was prepared by Roschen Van Cleve Architects and is included as Appendix IV.A of the Draft EIR. It provides additional technical evidence regarding the potential impacts the Project could have on views from the Hollywood Hills. In particular it states that:

> *The existing scenic vistas from the Hollywood Hills are a diverse expanse of urban Los Angeles, which should be described as a basin wide perspective. These views include multiple urban centers such as downtown, Century City and the Wilshire corridor. The full texture and fabric of these views involves high-rise, low rise and single-family neighbors combining into an architecturally diverse picture of the Los Angeles Basin. The texture and fabric of the Project is consistent with this basin view and will add urban figure and form in balance with the other*

urban centers represented in the scenic vista views of the Los Angeles Basin from viewpoints in the Hollywood Hills.

Based on this evidence, the view simulations contained in the Draft EIR, and detailed impact analysis, the Draft EIR concludes that development of the Project in accordance with the Development Regulations would result in a less than significant visual impact related to obstruction of visual resources from scenic vantage points located within the Hollywood Hills.

2D. Nighttime Lighting and Daytime Glare

Several comments were received on the Draft EIR regarding how the Project would create nighttime lighting pollution and daytime lighting glare. The Draft EIR analyzes this issue within the context of adjacent uses and the relatively high level of existing ambient light in the urban area surrounding the Project.

Nighttime Lighting

The Draft EIR establishes that the existing conditions around the Project Site have relatively high levels of nighttime lighting. The predominant sources of lighting are from vehicle headlights and streetlights on surrounding streets, architectural lighting, security lighting, and building illumination. The Project would introduce new lighting sources. With respect to outdoor illumination, the Project would promote an active pedestrian environment with public open space, plazas, and mid-block pedestrian linkages that require adequate lighting. The Project will also include at-grade entrances to the parking garages that will require adequate illumination and directional signage. Thus, the Project will generate new sources of exterior lighting to provide for an active and safe pedestrian environment. As analyzed in the Draft EIR, the Project does not include an intensive lighting program or off-site advertising components that require high-intensity lighting. Furthermore, the Project would be required to comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6, and design interior and exterior lighting such that zero direct-beam illumination leaves the Project Site. To further reduce the potential impacts of nighttime lighting, the Project would also be required to meet or exceed exterior lighting levels and uniformity ratios for lighting using the following strategies:

1. Shield all exterior luminaries or provide cutoff luminaires per Section 123 (b) of the California Energy Code;

2. Contain interior lighting within each source;

3. Allow no more than .01 horizontal lumen foot-candles to escape 15 feet beyond the Site boundary; and

4. Automatically control exterior lighting dusk to dawn to turn off or lower light levels during inactive periods.

Accordingly, the Draft EIR concludes that compliance with the provisions stated in the Los Angeles Municipal Code and Green Building Code related to signage guidelines and exterior illumination standards to reduce light pollution would reduce the Project's impacts regarding nighttime lighting to a less than significant level.

In addition, Section 9.5 of the Development Regulations contains site-specific Lighting Standards. Pursuant to Subsection 9.5.1, lighting located at the perimeter of each parcel is required to supplement the street lighting. Its purpose is to improve color rendering, fill in shadows, light pedestrians' faces, articulate the building base-level facades, reinforce the residential and pedestrian character of the development and adjoining neighborhoods, increase security, and visually activate the nighttime streetscape. Lighting for this purpose shall be energy efficient, attractive, and easy to maintain.

To further ensure the Project complies with the Building Code requirements, the Draft EIR also includes Mitigation Measure A.1-3, which requires the Project's lighting be in conformance with the lighting requirements of the City of Los Angeles Green Building Code to reduce light pollution. That mitigation measure states:

> *The Project shall include low-level directional lighting at ground, open terrace and tower levels of the exterior of the proposed structures to ensure that architectural, parking and security lighting does not spill onto adjacent residential properties. The Project's lighting shall be in conformance with the lighting requirements of the City of Los Angeles Green Building Code to reduce light pollution.*

Daytime Glare

The Draft EIR explains that glare in the Project area is currently generated by reflective materials on existing buildings and from vehicles passing on the surrounding streets. Further, substantial glare is currently present on the Project Site since it consists primarily of an un-shaded paved surface parking lot occupied with vehicles during the day. However, the extent of the daytime glare effect is limited to the ground surface level. The Project would include a high-rise development constructed of glass and other architectural materials that may be reflective, and contribute to new sources of glare. However, impacts associated with glare could be reduced to less than significant levels with the implementation of Mitigation Measure A.1-4, which states:

> *The Project's façades and windows shall be constructed or treated with low-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.*

3. AIR QUALITY AND GREENHOUSE GAS EMISSIONS

3A. Construction Dust

A number of comments received on the Draft EIR reflect concern with respect to potential air quality and dust impacts caused by the Project during construction activities. Specifically, a few comments have

been directly related to fugitive dust, and in particular, the potential for dust to accumulate on nearby properties and cars during the construction of the Project. As described in Section IV.B.1-1, Air Quality, of the Draft EIR, the Project's construction impacts were assessed on a regional and localized basis in accordance with the South Coast Air Quality Management District (SCAQMD) methodology and thresholds of significance. A discussion of localized construction air quality impacts, which includes a quantified modeled analysis for particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$) emissions during construction can be found starting on page IV.B.1-43 of the Draft EIR. As summarized in Table IV.B-14, Localized On-Site Daily Construction Emissions - Unmitigated, the Proposed Project's unmitigated construction related air quality emissions are anticipated to be below the threshold of significance for both PM_{10} and $PM_{2.5}$, respectively. Under the mitigated scenario (see Table IV.B.1-15), the Project's construction-related PM_{10} and $PM_{2.5}$ emissions are further reduced to below significance. This is in large part due to the fact that the Proposed Project is required to comply with the SCAQMD's Rule 403, which requires the project contractors to implement best available control measures to mitigate fugitive dust. Compliance with Rule 403 is mandatory for all construction projects within the South Coast Air Basin. As such, compliance with Rule 403 was assumed in the Project's unmitigated and mitigated scenarios. As detailed at the end of Section IV.B.1-1, Air Quality, Mitigation Measure B.1-1 would reduce fugitive dust impacts to the maximum extent feasible. Specifically, the best available control measures under Rule 403 – Fugitive Dust, are as follows:

- Use watering to control dust generation during demolition of structures or break-up of pavement;
- Water active grading/excavation sites and unpaved surfaces at least three times daily;
- Cover stockpiles with tarps or apply non-toxic chemical soil binders;
- Limit vehicle speed on unpaved roads to 15 miles per hour;
- Sweep daily (with water sweepers) all paved construction parking areas and staging areas;
- Provide daily clean-up of mud and dirt carried onto paved streets from the Site;
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more; and
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

All of these control measures are proposed as part of the Project and would be effective in reducing potential construction related fugitive dust impacts to the maximum extent feasible.

3B. Greenhouse Gas Emissions

With regard to Greenhouse Gas Emissions, several commenters noted the need for an explanation of the Draft EIR's less than significant level of significance. According to Section IV.B.2 Air Quality – Greenhouse Gas Emissions, of the Draft EIR, the Project, through its density, combination of residential, hotel and commercial land uses and its proximity to the regional public transportation system is a smart-growth project, which will promote energy efficiency and reduce GHG emissions. The Project is in close proximity to the MTA Hollywood and Vine Redline Subway Station, located approximately 500 feet to the southeast of the Project Site, and numerous other bus stops located within a quarter-mile of the Project Site. The Project is also situated in a well-established commercial and entertainment area, which provides numerous neighborhood-serving establishments such as grocery, restaurants, and retail uses within walking distance. As such, the Project's trip generation and vehicle miles traveled are anticipated to be reduced as a function of the Project's mixed-use nature and location, when compared to a project in a location without transit access and a project without mixed-use characteristics.

With respect to analyzing the Project's contribution to GHG emissions, the *L.A. CEQA Thresholds Guide* does not provide guidance as to how climate change issues are to be addressed. Furthermore, neither the SCAQMD nor the CEQA Guidelines Amendments recently adopted by the Natural Resources Agency on December 30, 2009, provide any adopted thresholds of significance for addressing GHG emissions. Nonetheless, the new Sections 15064.4, 15064.7 and 15126.4 of the CEQA Guidelines Amendments serve to assist lead agencies in determining the significance of the impacts of GHGs. These can be found in Section IV.B.2, Air Quality – Greenhouse Gas Emissions, of the Draft EIR. In reliance upon the CEQA Guideline Amendments, the opinions of project and City planning and environmental experts, and the judicial precedent established in *CREED v. Chula Vista*, the City determines in good faith based to the extent possible on scientific and factual data, that the Project would have significant cumulative environmental impact if it would:

> (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with or obstructing the goals or strategies of AB 32. The Project can demonstrate that it will not conflict with the goals and strategies of AB 32 by either of the following:
>
> (1) providing a quantitative analysis demonstrating that the Project will be constructed and operated at GHG levels that are at least 16% below the Project's theoretical BAU emission levels; or
>
> (2) by providing a qualitative analysis demonstrating the Project is consistent with the goals and strategies of AB 32.
>
> (b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases by failing to comply with the LA Green Building Code.

Overall, the Project is required to comply with the LA Green Building Code, which is qualitatively consistent with AB 32's 2011 Scoping Plan. Compliance with the LA Green Building Code is required by law and thereby is an innate feature of all projects. Mitigation Measure B.1-3 in Section IV.B.1, Air Quality, of the Draft EIR, states that the Project shall meet the requirements of the City of LA Green Building Code. Specifically, as it relates to the reduction of air quality emissions, the Project shall: (a) be designed to exceed Title 24 2008 Standards by 15%; (b) reduce potable water consumption and wastewater generation by 20% through the use of low-flow water fixtures; and (c) provide readily accessible recycling areas and containers. The inclusion of Mitigation Measure B.1-3 ensures the Project will comply with the requirements of the LA Green Building Code, and compliance will be monitored through the City's Mitigation and Monitoring Reporting Plan.

As concluded in Section IV.B.2, Air Quality – Greenhouse Gas Emissions, of the Draft EIR, the Project would be consistent with CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Therefore, the Project's generation of GHG emissions would not be considered cumulatively considerable and cumulative impacts would be less than significant.

4. CULTURAL RESOURCES

4A. Project Compatibility with Historic Resources

Several comments were received on the Draft EIR regarding the Project's potential impacts on historic resources. The comments question the compatibility of the Project, considering its overall size and scale, with the Capitol Records Building and other adjacent historic resources. The Draft EIR provides a detailed analysis of the Project's potential impacts to historic resources. A Historic Resources Report prepared by the Historic Resources Group supports the analysis in the Draft EIR. Ultimately, the Draft EIR concludes that the Project's impacts to historic resources on the Project Site, and adjacent to it, are less than significant. This conclusion stands because overall the Capitol Records Building, the Gogerty Building, the Hollywood Boulevard Commercial and Entertainment District, and the commercial building at 6316-6324 Yucca Street (which are all considered historic resources) would retain enough integrity after Project development to remain eligible for listing in the National Register and/or the California Register. In other words, development of the Project consistent with the Development Regulations would not impair the significance of any onsite or offsite historical resources.

To help further explain how the Project is compatible with the surrounding historic environment, the Project does not propose the demolition, destruction, relocation, or alteration of any historic resource either on the Project Site or in the vicinity of the Project Site. The Project would preserve in place the Capitol Records Building and the Gogerty Building. The Project would also protect the portion of the Walk of Fame along Vine Street during construction by complying with the City's Hollywood Walk of Fame Terrazzo Pavement, Installation and Repair Guidelines. The Draft EIR recognizes and discloses the fact that the Project will, however, alter the immediate surroundings of historic resources on the Project Site and in the vicinity by constructing new low-rise and high-rise structures.

The Draft EIR specifically acknowledges that the Project will potentially add considerable height and density in areas currently used for surface parking and one small, single-story commercial building. The immediate surroundings of the on-site and adjacent historic resources will be altered. In order for this alteration to be considered a substantial adverse change under CEQA, however, it must be shown that the integrity and/or significance of the historic resources would be materially impaired by the proposed alteration. The Draft EIR provides extensive analysis regarding potential alteration to the surroundings of the Capitol Records Building, the Gogerty Building, the retail storefronts located at 6316-6324 Yucca Street, and the Hollywood Boulevard Commercial and Entertainment District. The Draft EIR concludes that the Project will not have a significant impact on the surroundings of any of these historic resources.

Furthermore, protection of the historic significance of the Capitol Records Building is a stated objective of the Project. To meet that objective, the Project includes Development Regulations that include standards for grade-level open space, and tower massing that seek to protect important public views to the Capitol Records Building and help ensure that it is appropriately distanced from the new construction so that the mass and scale of the Project does not overwhelm architectural significance of the Capitol Records Building.

Also of note, the Draft EIR discloses that the Capitol Records Building is significant for its association with the music industry in Los Angeles. The Draft EIR, thus, incorporates mitigation measures designed to protect the Capitol Records Building's unique underground recording studios. The Draft EIR recognizes that excavation and construction associated with the Project has the potential to damage the special acoustical properties of the underground studios. Therefore, the Draft EIR includes Mitigation Measure C-2 identified in Section IV.C, Cultural Resources, of the Draft EIR, which is designed to protect adjacent historic resources and minimize the Project's potential construction impacts on the underground studios the in the Capitol Records Building.

Moreover, as described in Section IV.C, Cultural Resources, of the Draft EIR, the Project incorporates several design features that buffer the Project from adjacent historic resources. Similarly, development of the Project must comply with the Development Regulations, which shift the Project's mass and scale up and away from the on-site historic and adjacent off-site historic resources. Therefore, based on the information above, the detailed analysis in the Draft EIR, and the supporting Historic Resources Report the Project ultimately has a less than significant impact on historic resources.

III. RESPONSES TO COMMENTS
B. INDIVIDUAL RESPONSES

The purpose of the public review of the Draft EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the CEQA Guidelines states the following regarding standards from which adequacy is judged:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

CEQA Guidelines Section 15088(a) states:

> *The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments.*

The purpose of each response to a comment on the Draft EIR is to address the significant environmental issue(s) raised by each comment. This typically requires clarification of points contained in the Draft EIR. Section 15088(c) of the CEQA Guidelines describes the evaluation that CEQA requires in the response to comments. It states that:

> *The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.*

Section 15204(a) (Focus of Review) of the CEQA Guidelines helps the public and public agencies to focus their review of environmental documents and their comments to lead agencies. Case law has held that the lead agency is not obligated to undertake every suggestion given them, provided that the agency

responds to significant environmental issues and makes a good faith effort at disclosure. Section 15204.5(a) of the CEQA Guidelines clarifies this for reviewers and states:

> *In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*

The guideline encourages reviewers to examine the sufficiency of the environmental document, particularly in regard to significant effects, and to suggest specific mitigation measures and project alternatives. Given that an effect is not considered significant in the absence of substantial evidence, subsection (c) advises reviewers that comments should be accompanied by factual support. Section 15204(c) states:

> *Reviewers should explain the basis for their comments, and, should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*

Written comments made during the public review of the Draft EIR intermixed points and opinions relevant to project approval/disapproval with points and opinions relevant to the environmental review. The responses acknowledge comments addressing points and opinions relevant to consideration for project approval, and discuss as necessary the points relevant to the environmental review. The response "comment noted" is often used in cases where the comment does not raise a substantive issue relevant to the review of the environmental analysis. Such points are usually statements of opinion or preference regarding a project's design or its presence as opposed to points within the purview of an EIR: environmental impact and mitigation. These points are relevant for consideration in the subsequent project approval process. In addition, the response "comment acknowledged" is generally used in cases where the commenter is correct.

Note that there may be spelling and/or grammar errors in the Comment Letters. These are replicated here exactly as they were delivered to the City.

LETTER NO. 01 - STATE CLEARINGHOUSE AND OFFICE OF PLANNING AND RESEARCH (#1)

Scott Morgan
Director, State Clearinghouse
State of California, Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
1400 Tenth Street P.O. Box 3044, Sacramento, California 95812-3044

December 11, 2012

Comment No. 01-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 10, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 211 04(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response to Comment No. 01-1

This comment is stating that the State Clearinghouse submitted the Draft EIR to selected state agencies for review. The enclosed comment letter is referring to the Native American Heritage Commission letter dated October 29, 2012. This letter was also received electronically, on time. The letter and its response are included as Letter No. 06 (Native American Heritage Commission).

LETTER NO. 02 - STATE CLEARINGHOUSE AND OFFICE OF PLANNING AND RESEARCH (#2)

Scott Morgan
Director, State Clearinghouse
State of California, Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
1400 Tenth Street P.O. Box 3044, Sacramento, California 95812-3044

December 12, 2012

Comment No. 02-1

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on December 10, 2012. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2011041094) when contacting this office.

Response to Comment No. 02-1

This comment is stating that the State Clearinghouse is forwarding noticing information about the Project, but the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

The enclosed comment letter is referring to the California Department of Transportation (Caltrans) letter dated December 10, 2012. This letter was also received electronically, on time. The letter and its response are included as Letter No. 03 (Caltrans).

LETTER NO. 03 - CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

Dianna Watson
IGR/CEQA Branch Chief
District 7, Regional Planning
100 Main Street, MS#16, Los Angeles, CA 90012-3606

December 10, 2012

Comment No. 03-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would. include the construction of approximately 1 million square feet of developed t1oor area. The historic Capitol Records Building and the Gogerty Building would remain within the project site. The Project would demolish and/or remove the existing rental car facility. The project would develop a mix of land uses including 461 residential dwelling units, 254 luxury hotel rooms, 264,303 square feet of office space, 25,000 square feet of restaurant space, 80,000 square feet of health and fitness club space, and 100,000 square feet of retail space.

Below are Caltrans' major concerns with the Draft Environmental Impact Report (DEIR) for the Millennium Hollywood Project:

Response to Comment No. 03-1

The comment is an introduction and as such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. See Response to Comment Nos. 03-2 to 03-15 (Caltrans) for further detail.

Comment No. 03-2

1. Caltrans submitted a comment letter dated May 18, 2011, on the Notice of Preparation (NOP) and met with the developer's consultant on September 15, 2011, to discuss Caltrans' concerns about the project's impact on the US-101 freeway and on/off ramps within the 5 miles radius of the project site. The traffic consultant acknowledged Caltrans' concerns and it was understood by both parties that the traffic procedures for analyzing impacts to the state highway system would follow standard statewide procedures outlined in Caltrans Traffic Study Guide. However, the June 2012 Traffic Impact Study (TIS), which is the basis for the traffic impact discussion in the DEIR, did not follow those procedures and does not analyze the impacts to the state highway system.

Response to Comment No. 03-2

As cited in the comment, Caltrans was consulted during the NOP process. The concerns and recommendation of Caltrans were considered during the transportation analysis scoping process, including the use of the Caltrans draft procedures. Also taken into account were the concerns and recommendations of other NOP commenters, as well as the City of Los Angeles Department of Transportation (LADOT) policies and the past analyses conducted for similar projects by the City of Los Angeles (the lead agency). The comment states that the Traffic Study does not analyze the impacts to the state highway system; however, the Traffic Study analyzed key freeway ramps utilizing LADOT's signalized intersection LOS methodology and of freeway mainline segments utilizing the Congestion Management Program (CMP) recommended methodology. The Caltrans Traffic Study Guide was consulted in the preparation of the Traffic Study but it does not provide a definition of thresholds of significance; therefore, the CMP methodology was used because it defines thresholds of significance and is the standard methodology used by the lead agency for all traffic studies within the City of Los Angeles. The CMP, a state-mandated program, includes procedures and thresholds that provide a consistent evaluation of projects to address the potential impacts on the regional transportation system.

Comment No. 03-3

2. There was no analysis performed for any of the freeway elements. The TIS only used the Los Angeles County Congestion Management Program (CMP) criteria. However, the CMP fails to provide adequate information as to direct and cumulative impacts to the freeway mainline and ramps, per CEQA.

Response to Comment No. 03-3

The CMP criteria provide an initial review to determine if significant Project impacts may occur and in turn require further study. The initial review in the Traffic Study concluded that Project impacts would be less than significant, so subsequent analyses were determined to not be needed. Support for this conclusion is provided by the recently certified Hollywood Community Plan Update Environmental Impact Report which was also determined not to have a significant impact on the freeway system.

To address Caltrans' concerns, an additional model analysis was conducted. The analysis used the current Southern California Association of Governments (SCAG) model for year 2035, with LADOT refinements, for the initial future projections (the Base Model). See Appendix B, Transportation Modeling Procedures and Results, attached hereto for the model procedures and results. The model demonstrated that the Project will not result in the addition of 150 trips or more to any freeway segment. This analysis verifies that Project traffic impacts on the regional system will be less than significant.

Comment No. 03-4

3. Currently, the Level of Service (LOS) for US-101 is operating at LOS F. Any additional trips will worsen the existing freeway condition. The TIS did not include a cumulative traffic analysis tor US-101, which would consider the trips generated from the 58 related projects that are referred to in the DEIR, the

proposed NBC Universal Project, and growth from the Hollywood Community Plan (Plan). Because the TIS prepared for the Plan in 2005 determined that build-out of the Plan would result in significant transportation impacts to the US-101, the Plan created a Transportation Improvement and Mitigation Plan (TIMP) to identify future improvements to the US-101. Since the proposed project site is located within the Plan area, the identified improvements should have been taken into consideration, as well as improvements listed in Metro's Long Range Transportation Plan.

Response to Comment No. 03-4

The Project is not expected to generate more than 150 additional trips on the freeway system. Therefore, based on the CMP criteria used by the City of Los Angeles on this and other projects, the Project would not result in significant traffic impacts on the freeway mainline (see Response to Comment No. 03-3 (Caltrans) above). In addition, the Project will provide infill uses that reduce regional trip demand as called for by the Smart Growth Initiatives in the Demand Section of the Metro's Long Range Development Plan (LRDP) and in the Sustainable Community Strategies within the Regional Transportation Plan adopted by SCAG. As mitigation, the Project will participate in upgrades to the regional transportation system by funding or implementing other programs called for in the LRDP and TIMP. These programs include signal system upgrades, upgrades to the transit system (through the Project installing shelters at area bus stops, improving the pedestrian linkages to those stops, and funding of alternative mode lanes), and a TDM Program to help reduce project automobile trip demand. These mitigation measures will improve conditions on the Congestion Management Plan system, including the regional freeway system. Also, given the robust transit system in the Project's vicinity, a main focus of the transportation mitigation program is to reduce automobile trips by enhancing pedestrian and bicycle linkages to the transit system and investing in multi-modal transportation improvements. This focus is consistent with LADOT's Traffic Study Guidelines and the objectives identified in the Hollywood Community Plan Update.

Further, no applicable Hollywood Community Plan Update Transportation Improvement and Mitigation Plan (TIMP) requirements are listed in the comment and, after additional review of the TIMP, no applicable TIMP requirements or additional measures were identified. For example, the Capitol Improvement measures in the TIMP are not at locations identified as having unmitigatable significant Project impacts. Project participation in the program called for in the TIMP to "coordinate Caltrans' freeway traffic management system with the ATSAC/Adaptive Traffic Control System (ATCS) highway and street traffic signal management system" was discussed in the meeting which took place on December 4, 2012 between City, Project and Caltrans representatives but rejected by Caltrans representatives.

Comment No. 03-5

4. Page .IV.K.l-60 of the DEIR states: "'The Project would result in a less than significant impact with respect to trip generation upon CMP locations and on freeway segments. No mitigation is required." This conclusion is not based on any credible analysis that could be found anywhere in the DEIR. It is Cal

trans' opinion, based on the work that we have done in this area, that this project will result in significant impacts to the state highway system.

Response to Comment No. 03-5

The Traffic Study and the Draft EIR analyzed impacts to CMP locations and freeway segments based on the CMP criteria (see Response to Comment No. 03-2 (Caltrans)). Based on the data from this analysis, the Traffic Study concluded that Project impacts would be less than significant, so subsequent analyses were determined to not be needed. However, an additional model analysis was conducted using the current SCAG model for year 2035 for the initial future projections (the Base Model).This analysis also shows that Project traffic impacts on the freeway system will be less than significant. See the Response to Comment No.03-3 for additional details.

Comment No. 03-6

5. The submitted traffic analysis did not include the following ramp intersections that are closest to the project site, which may be significantly impacted by this development:

- SB Route 101 on-ramp from Argyle Avenue
- SB Route 101 off-ramp to Gower Avenue
- NB Route 101 off-ramp to Gower Avenue
- SB Route 101 off-ramp to Cahuenga Blvd.
- SB Route 101 on-ramp from Cahuenga Blvd.
- SB Route 101 off-ramp to Vine Street

The traffic analysis at these off-ramps needs to show projected queue build-up upstream of the off-ramp. Although most of the on-ramps are meter controlled, the analysis needs to show how the added/over-flow volume to the on-ramp may affect other nearby intersections, including off-ramps. Caltrans is concerned that the freeway ramps will back up, creating a potentially unsafe condition. To ensure the ramps do not back up, the intersections adjacent to the ramps must be able to absorb the off-ramp volumes at the same time as they serve local circulation and land uses.

Response to Comment No. 03-6

Standard City procedures as outlined in the LADOT Traffic Study Policies and Procedures, May 2012,were selected as the most appropriate for use in the Traffic Study. The study locations selected were those locations at which the Project traffic impacts have the potential to be significant and substantial. The locations at which traffic impacts may be significant are the critical capacity constraints

of the area roadway system. The freeway ramps, including the meters and weave sections on the ramps, are not the roadway system constraints in the Hollywood area. Rather, the signalized intersections and the freeway mainline sections were determined to form the capacity constraints in the Hollywood area. Queues from those constraints determine the conditions on the ramps and at other non-critical locations. The more minor (STOP controlled) intersections were determined not to constrain the system capacity. Further, according to LADOT guidelines, the analysis of unsignalized intersections in traffic impact studies is solely to assess the need for future signalizing by conducting warrant analyses. Only unsignalized intersections that serve as integral elements to the project site's access and circulation plan are included in such an analysis. Here, there are no unsignalized intersections that serve as integral elements to Project access and circulation and as such, no unsignalized intersections were studied.

Comment No. 03-7

6. As shown in the DEIR, Table 5 Project Trip Generation, the project will generate a 19,486 average daily vehicle trips with 1,064/1,888 vehicle trips during the AM/PM peak hours. These volumes appear to be low and Caltrans requests that the lead agency verify them. Also, the trip reduction credits taken are not in compliance with the Caltrans Traffic Impact Study Guide and any deviation should be properly justified and substantiated. For example, the 30% reduction of the retail pass-by trips is significantly high without justification. Utilizing such high reduction rates will result in inadequate identification of traffic impacts and mitigation, thus violating CEQA.

Response to Comment No. 03-7

LADOT, the responsible department within the City of Los Angeles (the lead agency), verified that the rates, equations, and calculations used in the Traffic Study were appropriate for the Project. All but one of the base generation estimates cited in the comment were prepared using the information and procedures in Trip Generation, 8th Edition, 2008 Manual, Institute of Transportation Engineers (ITE). (Information for the rental car facility use was not available from that source, so rates incorporated into the West Los Angeles Transportation and Mitigation Specific Plan, rates previously used by the City, were utilized.) Likewise, the pass-by trip adjustment cited in the comment is specified in the LADOT Policies and Procedures, May 2012 and was in turn based on a conservative implementation of the procedures in the ITE Trip Generation Manual. The data and procedures in the ITE Trip Generation Manual are nationally-accepted guidelines utilized by most agencies in Los Angeles County and are the most appropriate source for the trip generation estimates for the Project. Also, it should be noted that the trip generation rates identified in the ITE Trip Generation Manual are based on surveys of sites in suburban areas with little to no transit use, so it is common practice to allow for trip reduction credits to allow for potential transit trips, pass-by trips, and internal trips associated with mixed-use projects. Also see Response to Comment No. 59-27 (Jordon, David) for a discussion of other adjustments.

Comment No. 03-8

To address these concerns, an analysis for the project's impacts to the freeway system should be performed based on the proposed scope of the project as described in the DEIR and would need to include all of the following to determine the actual impact of this project on the State facilities in the project vicinity:

> a. If the project will be developed in phases, the project added demand and trip assignment to US-101 should be based on each phase of the project otherwise it should be based on 100% occupancy.

Response to Comment No. 03-8

Please see Response to Comment No.03-3 (Caltrans) concerning the project freeway impacts including impacts on the US 101. The Project does not have defined phases, so no phasing analysis is appropriate. The Traffic Study, the Draft EIR, and the analysis in Response to Comment No. 03-3 above analyzed the "worst-case scenario" of 100% occupancy.

Comment No. 03-9

> b. The Trip Generation figures and its distribution need to be forecasted based on a Select Zone Analysis. Based on the magnitude of the project and its close proximity to US-101, the trip assignment appears to be unreasonably low. Please elaborate on the trip assignment methodology utilized.

Response to Comment No. 03-9

The select zone analysis recommended in the comment is not considered appropriate for the Project. A select zone analysis fails to accurately analyze urban infill projects, including the Project. In particular, a select zone analysis does not take intercepted trips into account, and intercepted trips are a major factor for urban in-fill projects. Further, urban areas (such as the Traffic Study area in Hollywood)contain numerous more minor streets with signalized intersections that are not in the regional model network. Those intersections may be significantly impacted, but the streets and the intersections would not have trips assigned to them by a select zone analysis.

A manual approach was selected as the most appropriate method to be used for the Traffic Study. The manual procedures utilized separated the Project into components by land uses and separately assigned the trips to and from those components. The assignments considered the types of land uses in the surrounding area to which the component's trips would be linked. The assignments were individually reviewed and approved by LADOT and are detailed in the Traffic Study. See Appendix K.1 of the Draft EIR.

Comment No. 03-10

c. Trip Generation figures from other sources should be cross-referenced by the source, page number, year, and table numbers.

Response to Comment No. 03-10

Appendix D of the Traffic Study (Appendix K.1 of the Draft EIR) lists the source, land use codes (which may be within multi-page sections), source edition, and year. The land-use code and independent variable dictate the formula used. Tables were not used.

Comment No. 03-11

d. The off ramps on NB and SB US-101, between Vermont Avenue and Highland Avenue, which would represent the most impacted area by the proposed Development, should be analyzed utilizing the Highway Capacity Manual (HCM) 85th Percentile Queuing Analysis methodology with the actual signal timings at the ramps' termini.

Response to Comment No. 03-11

The CMA methodology was selected for use in the Traffic Study for all intersections. The CMA analysis is specified for use in traffic studies by the lead agency, the City of Los Angeles. Traffic Study Policies and Procedures, May 2012published by the City of Los Angeles, Department of Transportation specifies CMA calculations as the methodology to be used in City of Los Angeles traffic studies. The CMA methodology was selected for inclusion in the City of Los Angeles manual as it is a "Planning Methodology" rather than an "Operations Methodology". It should be noted that the methodology recommended in the comment would be dependent upon the signal timing remaining fixed through 2035 for the horizon year to be accurate, whereas the computerized signal systems now being employed in the City of Los Angeles vary the signal timing on an instantaneous basis. However, additional methodologies may be required to be used during detailed mitigation design by the agency approving implementation of a mitigation measure, with appropriate adjustments being made.

Comment No. 03-12

e. Similarly, the on ramps on NB and SB US-101, within the same area, should be analyzed utilizing the same methodology and with the actual metering rates. These rates can be obtained by contacting Ms. Afsaneh Razavi, Senior Transportation Engineer, Caltrans Ramp Metering Department at (323) 259- 1841.

Response to Comment No. 03-12

Standard City procedures as outlined in the LADOT Traffic Study Policies and Procedures, May 2012, were selected as the most appropriate for use in the Traffic Study. See Response to Comment Nos. 03-6 and 03-11 (Caltrans) for additional information.

Comment No. 03-13

> f. An HCM weaving analysis needs to be performed for both the NB and SB mainline segments, between the on and off ramps within the same area, utilizing balanced traffic demands entering and exiting the weaving segments.

Response to Comment No. 03-13

Standard City procedures as outlined in the LADOT Traffic Study Policies and Procedures, May 2012, were selected as the most appropriate for use in the Traffic Study. See Response to Comment Nos. 03-6 and 03-11 (Caltrans) for additional information.

Comment No. 03-14

Caltrans is concerned that the project impacts may result in unsafe conditions due to additional traffic congestion, unsafe queuing, and difficult maneuvering. These concerns need to be adequately addressed in the EIR.

Response to Comment No. 03-14

These concerns are adequately addressed in the Traffic Study and Section IV.K.1 Transportation-Traffic of the Draft EIR. The Traffic Study, the Draft EIR, and the additional analysis provided in Response to Comment No. 03-03 above adequately demonstrate traffic impacts resulting from the Project. See Response to Comment Nos.03-3 and 03-6 (Caltrans) for additional information.

Comment No. 03-15

In summary, without the necessary traffic analysis, Caltrans cannot recognize the TIS and DEIR as adequately identifying and mitigating the project's impacts to the State highway facilities.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 121036AL.

Response to Comment No. 03-15

The Traffic Study, the Draft EIR, and the additional analysis provided in Response to Comment No. 03-03 above adequately demonstrate traffic impacts resulting from the Project. See Response to Comment Nos. 03-2 through 03-11 (Caltrans) for additional information.

LETTER NO. 04 - COUNCIL OFFICE OF ERIC GARCETTI

Eric Garcetti
Councilmember, 13th District
Councilmember, City of Los Angeles District 13

November 2, 2012

Comment No. 04-1

The Planning Department has released the draft Environmental Impact Report (EIR) for the proposed Millennium Project at 1750 Vine Street, which commenced a 45 day public comment period: The proposed project is large in scale and includes what could be one of the tallest buildings in all of Hollywood. As I'm sure you are aware, the proposed project has generated controversy among my constituents. Accordingly, I request that the public comment period be extended to 60 days to increase the public's opportunity to comment on the draft EIR.

Response to Comment No. 04-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 05 - METROPOLITAN TRANSPORTATION AUTHORITY (METRO)

Scott Hartwell
CEQA Review Coordinator, Long Range Planning
Metropolitan Transportation Authority
One Gateway Plaza, Los Angeles, CA 90012-2952

November 6, 2012

Comment No. 05-1

The Los Angeles County Metropolitan Transportation Authority (LACMTA) is in receipt of the Draft Environmental Impact Report (EIR) for the Millennium Hollywood Project. This letter conveys recommendations from MTA concerning a number of issues in relation to the proposed project.

Response to Comment No. 05-1

This comment is an introduction and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 05-2

Congestion Management Program TDM Requirements

While the Draft EIR identifies transportation demand management (TDM) policies and programs that would be incorporated into the proposed project, CMP TDM Guidelines require that projects which include a non-residential development component exceeding 100,000 square feet incorporate a specific set of TDM measures into project design. These TDM requirements are detailed in Appendix C and summarized in Exhibit 4-1 in the 2010 CMP.

Response to Comment No. 05-2

As shown in Mitigation Measure K.1-4 on pages IV.K.1-55 through 56 of the Draft EIR (and revised to Mitigation Measure K.1-5 to accommodate a new Mitigation Measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR) the Project would be required to provide a TDM Program to mitigate the Project's traffic impacts on the surrounding roadway system. The TDM Program measures include, but are not limited to, providing an internal Transportation Management Coordination Program with an on-site transportation coordinator, car share amenities, parking as an option only for all leases and sales, provision of a self-service bicycle repair area and shared tools for residents and employees, and a guaranteed ride home program. The specific TDM strategies will comply with TDM requirements detailed in Appendix C of the 2010 CMP.

Comment No. 05-3

Potential Impacts to Metro Bus Service during Project Construction

Although the proposed project is not expected to result in any long-term impacts on transit: Several transit corridors with Metro bus service could be impacted by the project. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators including LADOT may also be impacted and therefore should be included in construction outreach efforts.

Response to Comment No. 05-3

Due to the staging during the construction period, the Project Site adjacent on-street parking spaces will be affected along Yucca Street, Ivar Avenue, Vine Street and Argyle Avenue. There is only one Metro bus that runs adjacent to the Project Site. Metro Bus 222 travels past the Project Site on Yucca Street and Argyle Avenue and could be affected by the construction activities. Metro Bus Operations Control Special Events Coordinator will be contacted to ensure the appropriate coordination. The following additional mitigation measure has been added in response to Metro's request to Section IV.K.1, Transportation - Traffic, of the Draft EIR. See Section IV, Corrections and Additions to the Draft EIR, of this Final EIR:

Mitigation Measure K.1-4 The Project Applicant shall contact the Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines.

LETTER NO. 06 - NATIVE AMERICAN HERITAGE COMMISSION

Dave Singleton
Program Analyst
Native American Heritage Commission
912 Capitol Mall, Room 364, Sacramento, CA 95814

October 29, 2012

Comment No. 06-1

The NAHC is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3.

The California Environmental Quality Act (CEQA - CA Public Resources Code 21000-21177, amendment s effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously.

The NAHC "Sacred Sites,' as defined by the Native American Heritage 'Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Response to Comment No. 06-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 06-2

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Response to Comment No. 06-2

This comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather suggests that the Applicant contact a list of Native American Tribes attached to the comment. These comments will be forwarded to the decision makers for their consideration and no further response is required.

It should be noted that the Applicant contacted the South Central Coastal Information Center and received a response from them on August 19, 2008, indicating that no archaeological resources were known to exist beneath the Project Site. Nevertheless, to ensure that potential impacts were reduced to less than significant levels, the Draft EIR includes Mitigation Measure C-6, C-7, and C-8 to mitigate potential impacts that could occur during excavation activities.

Comment No. 06-3

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seq. and NAGPRA (25 U.S.C. 3001- 3013) as appropriate. The 1992 Secretary of the Interiors Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation)

and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's Standards include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Response to Comment No. 06-3

The commenter first recites provisions of NEPA, which are not relevant to the Project. The commenter states to contact NAHC if the Project comes under the jurisdiction of NEPA and recites provisions of NEPA. However, the Project does not come under the jurisdiction of NEPA. Therefore, the provisions of NEPA are not relevant to the Project. Next, the commenter asks that the Applicant discuss conformance with the Secretary of the Interior's Standards for historic resources within the context of Native American resources. As discussed in Response to Comment No. 06-2 (Native American Heritage Commission) above, there are no known Native American or other archeological resources in the soils underneath the Project Site.

Regarding the Secretary of the Interior's Standards generally, the Draft EIR and the Historic Resources Report analyzed the Project's potential impacts on historic structures according to the applicable Secretary of the Interior's Standards for the Treatment of Historic Properties. The Historic Resources Report prepared by HRG analyzes the Secretary of the Interior's rehabilitation standards because those standards provide a more conservative impact analysis and account for the fact that the Capitol Records Building and Gogerty Building will likely require some form of protection during construction activities and ongoing maintenance over the term of the Development Agreement.

With regard to the commenter's statement about the discovery of human remains, the Draft EIR provides Mitigation Measure C-8, which states the following:

C-8 If human remains are discovered at the Project Site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

The last portion of the comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather suggests that the Lead Agency and project proponents have an ongoing relationship with the Native American Heritage Commission. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 06-4

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

Response to Comment No. 06-4

Please refer to Response to Comment No. 06-2 (Native American Heritage Commission), above, for more information.

LETTER NO. 07 - SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources
21865 Copley Drive, Diamond Bar, CA 91765-4182

December 11, 2012

Comment No. 07-1

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate. Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality benefits from projects that facilitate mixed land uses in close proximity to mass transit. However, given the significant health risk impacts from placing the proposed project's sensitive land uses (e.g., residential uses) within close proximity to the 101 Freeway (a significant source of Toxic Air Contaminants, TACs) it is crucial that the lead agency implement all feasible measures to reduce this impact. Further, AQMD staff recommends that the lead agency consider additional mitigation measures to minimize the project's significant regional construction and operations-related air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Lastly, the lead agency should consider updating the health risk assessment (HRA) based on more recent emission factors and traffic data. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Response to Comment No. 07-1

This comment identifies the SCAQMD as a responsible commenting agency pursuant to CEQA and summarizes the concerns and comments presented in further detail in Comment Nos. 07-2 through 07-4, below. In response to the SCAQMD's request to be provided with written responses to their comments, and in accordance with Section 15088 of the CEQA Guidelines, the Department of City Planning will provide a written response to the SCAQMD's comments at least 10 days prior to certifying an environmental impact report. The published Final EIR will include detailed written responses to all of the comments submitted during the Draft EIR comment period and will be published on the Department of City Planning's website in the same manner the Draft EIR was made available. An electronic copy of the

Final EIR on CD will also be mailed to all commenting governmental agencies. See Responses to Comment Nos. 07-2 to 07-5 (SCAQMD) for further detail.

Comment No. 07-2

Health Risk Mitigation

1. The Draft EIR concludes the residents living on the project site will be exposed to significant levels of air pollution from the nearby freeway. The lead agency also concludes that the one proposed mitigation measure (enhanced filtration in building's ventilation system) will not reduce this impact to a less than significant level. The HRA contained in the Draft EIR appropriately contains additional measures that seem to be feasible to reduce potential exposures. Specifically, the Final EIR should consider:

    a. Placing air intakes as far from the freeway as possible (for example, on the roof),

    b. Limiting the use of operable windows and/or balconies on portions of the site closest to the freeway,

    Also, the Final EIR should consider two additional measures:

    c. Provide a means to ensure that high efficiency filters will continue to be maintained and replaced for the life of the project (e.g., through a provision in covenants, conditions, and restrictions CC&Rs), and

    d. Consider maintaining positive pressure within the building's filtered ventilation system in living spaces to reduce infiltration of unfiltered outdoor air.

Response to Comment No. 07-2

This comment reiterates the findings of the Health Risk Assessment presented in the Draft EIR and requests that the lead agency consider implementing additional mitigation measures to further reduce potential exposures to unhealthy ambient air concentrations.

It should be noted that CEQA does not require an EIR to analyze or mitigate the impacts of the environment on a project. In this case, the air quality at the nearby 101 Freeway is part of an existing environmental condition. Although the Project brings people into this existing environmental condition, the existing air quality in the Project vicinity due to the 101 Freeway is not an impact of the Project on the environment. Instead, it is an impact of the environment on the Project. There are many other laws that regulate clean air, but the limited purpose of CEQA is to evaluate and mitigate impacts of a project on the environment. Accordingly, the City imposes the mitigation measures on the Applicant not because they are required in order to make the EIR compliant with CEQA, but out of an abundance of caution pursuant to the City's police powers to regulate land use. As numerous courts have affirmed, the purpose of

CEQA is "not to protect proposed projects from the existing environment" (*Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464; Pub. Res. Code Sections 21061, 21083(b), and 21060.5.) "[C]ourts have recognized that CEQA is not a weapon to be deployed against all possible development ills." (*South Orange County Wastewater Authority v. City of Dana Point* (2011) 196 Cal. App. 4th 1604, 1614.) It has a limited role. "The Legislature did not enact CEQA to protect people from the environment." (*Id*. at 1617-1618.) "We agree with [SOCWA v. County of Orange], that the Guidelines [15126.2]... is not an example of an environmental effect caused by development, but instead is an example of an effect on the project caused by the environment. Contrary to Guidelines section 15126.2, subdivision (a), we hold that an EIR need not identify or analyze such effects.... Although the Guidelines ordinarily are entitled to great weight, a Guidelines provision that is unauthorized under CEQA is invalid." (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 474.)] Based on this case law, it is clear that CEQA does not require the Lead Agency to adopt additional measures, as recommended in the comment letter, to mitigate the existing air quality environment around the Project Site.

Nonetheless, in a good-faith response to this comment, the following additional mitigation measures have been added to Section IV.B.1, Air Quality, of the Draft EIR. See Section IV, Corrections and Additions to the Draft EIR, of this Final EIR.

Mitigation Measure B.1-6 Heating Ventilation and Air Conditioning (HVAC) air intakes shall be located either on the roof of structures or within areas of the Project Site that are distant from the 101 Freeway to the extent that such placement is compatible with final site design.

Mitigation Measure B.1-7 For portions of new structures that contain sensitive receptors and are located within 500-feet of the 101 Freeway, the project design shall limit the use of operable windows and/or the orientation of outdoor balconies.

With respect to the SCAQMD's recommendations under items c and d, it should be noted that the Draft EIR already requires, in Mitigation Measure B.1-4, the Project to install residential air filtration systems meeting ASHRAE 52.2 minimum efficiency reporting value (MERV) of 13, to the satisfaction of the Department of Building and Safety. To further enhance this measure based on SCAQMD's request, the following underlined language will be added to the mitigation measure. See Section IV, Corrections and Additions to the Draft EIR, of this Final EIR.

Mitigation Measure B.1-4 The Project shall incorporate residential air filtration systems with filters meeting or exceeding ASHRAE 52.2 minimum efficiency reporting value (MERV) of 13, to the satisfaction of the Department of Building and Safety. <u>The CC&Rs recorded for the residential units on the Project Site will incorporate this measure and ensure that high efficiency filters shall be installed and maintained for the life of the Project</u>.

Comment No. 07-3

2. Given that the lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NOx and VOCs the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

a. Require electric car charging stations (not just wiring infrastructure) for both non-residential and residential uses at the project site.

Energy

b. Require the project site to include a solar photovoltaic or an alternate system with means of generation renewable electricity.

Other

c. Provide outlets for electric and propane barbecues in residential areas.

d. Require use of electric lawn mowers and leaf blowers.

e. Require use of electric or alternatively fueled sweepers with HEPA filters.

f. Require use of water-based or low VOC cleaning products.

Response to Comment No. 07-3

This comment correctly summarizes the Draft EIR's findings with respect to the Project exceeding the CEQA regional operational significance thresholds for NO_X, VOCs and presents additional recommendations to further reduce the Project's operational air impacts. The Project will be subject to the City's Green Building Code, which is one of the most stringent building codes in the nation with respect to energy efficiency standards. Compliance with these building standards substantially reduce the Project's impact on air quality.

With respect to the AQMD's recommendation to require electric car charging stations (not just wiring infrastructure) for both non-residential and residential uses at the Project Site, the Project will be compliant with this measure. Consistent with the LA Green Building Code, the Project shall provide: "a minimum number of 208/240 V 40 amp, grounded AC outlet(s), that is equal to 5 percent of the total number of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area." Thus, compliance with the LA Green Building Code will ensure that electric car charging stations will be provided on-site.

With respect to the AQMD's recommendation to require the Project Site to include a solar photovoltaic or an alternate system with means of generating renewable electricity, the Project will be in full compliance with the requirements of the LA Green Building Code's stipulation for pre-wiring for future electrical solar systems. CEQA requires the City to implement the AQMD's recommended measure unless there are legal, technological, social, economic, or other considerations that make it infeasible or the measure cannot be implemented within a reasonable period of time. In this case, a consideration that makes a commitment to installing solar panels infeasible is the lack of specific project building design, which would be required to determine whether or not a roof top photovoltaic system is technically feasible because the pitch of the roof and shading from other structures on the rooftop that would be known from a specific project building design are among the factors that affect technical feasibility. The City cannot forecast the future design of the building to a level of certainty that would allow the City to require solar panels as a feasible mitigation measure. It is too speculative. This consideration alone is sufficient to reject the recommended mitigation measure. However, separate and independent from this consideration is the social infeasibility of the recommendation. The social policies that balance all the competing interests of conservation, energy efficiency, economic growth, employment, and job creation were all debated and balanced at the time the City adopted its Green Building Code. The Green Building Code reflects the City's determination as to what is socially feasible with regards to photovoltaic systems on buildings and the Green Building Code stopped short of requiring installation of photovoltaic systems. Instead, what is socially feasible is to pre-wire the buildings for potential future electrical solar systems.

With respect to the AQMD's request to provide outlets for electric and propane barbecues in residential areas, this measure will be incorporated into the Final EIR and MMRP as follows:

Mitigation Measure B.1-8: The Project shall provide electric outlets on residential balconies and common areas for electric barbeques to the extent that such uses are permitted on balconies and common areas per the Covenants, Conditions and Restrictions recorded for the property.

With respect to the AQMD's request to require use of electric lawn mowers and leaf blowers, require electric or alternatively fueled sweepers with HEPA filters, and require the use of water-based or low VOC cleaning products, this measure will be incorporated into the Final EIR and MMRP as follows:

Mitigation Measure B.1-9: The Project shall use electric lawn mowers and leaf blowers, electric or alternatively fueled sweepers with HEPA filters, and use water-based or low VOC cleaning products for maintenance of the building.

Comment No. 07-4

Construction Equipment Mitigation Measures

3. The lead agency determined that the proposed project will exceed the CEQA construction significance threshold regionally for NOx and VOCs and locally for PM2.5 and NOX; therefore,

AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

Response to Comment No. 07-4

In response to this comment, the following additional mitigation measure has been added to Section IV.B.1, Air Quality, of the Draft EIR. See Section IV, Corrections and Additions to the Draft EIR, of this Final EIR.

Mitigation Measure B.1-3 Haul truck fleets during demolition and grading excavation activities shall use newer truck fleets (e.g., alternative fueled vehicles or vehicles that meet 2010 model year United States Environmental Protection Agency NO_X standards), where commercially available. At a minimum, truck fleets used for these activities shall use trucks that meet EPA 2007 model year NOx emissions requirements.

Comment No. 07-5

Health Risk Assessment

4. The proposed project will allow new high density residential units to be placed in close proximity to the 101 Freeway that currently carries over 200,000 vehicles per day. As a result, the project's sensitive land uses will be exposed to a significant source of TACs. In determining the potential health risks, the lead agency should use the most comprehensive and recent air quality data available. Therefore, the AQMD staff recommends that the lead agency consider revising its health risk assessment using the latest emissions factors from EMFAC2011 as opposed to the outdated CT-EMFAC2007, and using the Caltrans Performance Measurement System (PeMS)[1] to analyze the duration, volume, and speed of peak traffic activity on the 101 Freeway.

Response to Comment No. 07-5

The SCAQMD recommends that the lead agency update the HRA using the most comprehensive and current air quality data available. The Project HRA was based on the most current data available at the time the Project NOP was published. Section 15125(a) of the CEQA Guidelines requires that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the

[1] *http://pems.dot.ca.gov/*

time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

The SCAQMD provided a NOP comment letter on the Project dated May 6, 2011. In that letter, the SCAQMD did not request that any HRA's prepared for the Project should utilize a specific EMFAC version or specific traffic data. It should be noted that EMFAC 2011 was not available at the time the NOP was published. The NOP comment letter did suggest that any HRA's should be consistent with the Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. This guidance document was consulted prior to the preparation of the Project HRA and the Project HRA is consistent with the relevant guidance information from this document. Parker Environmental Consultants staff also consulted directly with SCAQMD[2] and Caltrans[3] staff with respect to general HRA assumptions and methodology and traffic data for use in the preparation of the Project HRA. Thus, consistent with the requirements and spirit of CEQA, the Project HRA used the best information available at the time the NOP was published to evaluate the Project's potential impacts through a good-faith and reasoned analysis.

Furthermore, although EMFAC2011 is now currently available, the use of EMFAC2007 for the Project HRA is consistent with the EMFAC2007 data that is built-in to CalEEMod, which is the model SCAQMD supports for a development project's generation of air quality emissions. Thus, the Project Draft EIR utilized EMFAC2007 via CalEEMod to estimate the Project's generation of air quality emissions, and similarly, the Project HRA utilized EMFAC2007 to evaluate impacts associated with the placement of sensitive receptors in close proximity to the 101 Freeway. Thus, the Draft EIR is internally consistent with its air quality modeling for all impact issues areas. Also, it should be noted that if the Project HRA were to be revised using EMFAC2011, the impacts would likely be reduced compared to the impacts disclosed in the Draft EIR. EMFAC2011 includes the latest data on California's car and truck fleets and travel activity. EMFAC2011 also reflects the emissions benefits of ARB's recent rulemakings including on-road diesel fleet rules, Pavley Clean Car Standards, and the Low Carbon Fuel Standard.[4] As these updates would effectively lower several emission factors, it is logical to infer that total emissions estimated for the 101 Freeway would decrease and associated exposure impacts disclosed in the Draft EIR would also likely decrease. As such, the Project HRA contained in the Draft EIR represents a reasonable and worst-case impact analysis and no further analysis is warranted.

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[2] *Multiple telephone and email correspondence with Ian MacMillan*, SCAQMD Program Supervisor, *CEQA Intergovernmental Review, August 2011.*

[3] *Email correspondence with Steven M. Malkson, Lead Transportation Engineer, Caltrans District 7 Traffic Monitoring, November* 8*, 2011.*

[4] *EMFAC2011 Technical Documentation* page 13*, California EPA, Air Resources Board, September 19, 2011.*

Finally, as noted above, the air quality at the 101 Freeway is part of an existing environmental condition. CEQA does not require the Draft EIR to analyze the impact of the environment on the Project. The case law cited above supports this position. The Draft EIR included the Project HRA to present a conservative analysis and in the spirit of full disclosure. Further analysis or HRA modeling is not required in the Final EIR.

LETTER NO. 08 - SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Jonathan Nadler
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Southern California Association of Governments
818 West Seventh Street, 12th Floor, Los Angeles, CA 90017-3435

December 10, 2012

Comment No. 08-1

Thank you for submitting the Draft Environmental Impact Report for the Millennium Hollywood Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Response to Comment No. 08-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-2

Based on SCAG staff's review, the proposed project supports the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (ATP/SCS) by focusing growth near transit areas and increasing the variety of available transportation and housing choices in the Hollywood neighborhood in Los Angeles California. SCAG staff comments are detailed in the attachment to this letter.

When available, please send a copy of the Final Environmental Impact Report to the attention of Pamela Lee at SCAG, 818 West 7th Street, 12th floor, Los Angeles, California, 90017 or by email to leep@scag.ca.gov. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or leep@scag.ca.gov. Thank you.

Response to Comment No. 08-2

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. However, the comment does state that the Project supports the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities

Strategy (RTP/SCS). As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-3

Summary

SCAG is the designated Regional Transportation Planning Agency under state law responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the adopted 2012-2035 RTP/SCS.

Based on SCAG staff review, the proposed project supports the applicable goals of the 2012-2035 RTP/SCS, and the analysis in the DEIR is properly based on the growth forecasts adopted as part of the 2012-2035 RTP/SCS.

Response to Comment No. 08-3

The comment describes SCAG's role and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. However, the comment does state that the Project supports the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the analysis in the Draft EIR is properly based on the growth forecasts adopted as part of that plan. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-4

2012-2035 RTP/SCS GOALS

The 2012-2035 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag .ca.gov). The goals included in the 2012 RTP/SCS, listed below, may be pertinent to the proposed project.

2012-2035 RTP/SCS GOALS	
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*
RTP/SCS G3:	*Ensure travel safety and reliability for all people and goods in the region*
RTP/SCS G4:	*Preserve and ensure a sustainable regional transportation system*
RTP/SCS G5:	*Maximize the productivity of our transportation system*
RTP/SCS G6:	*Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)*
RTP/SCS G7:	*Actively encourage and create incentives for energy efficiency, where possible*
RTP/SCS G8:	*Encourage land use and growth patterns that facilitate transit and non-motorized transportation*
RTP/SCS G9:	*Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*

Response to Comment No. 08-4

The comment discusses the overall goal of the 2012-2035 RTP/SCS and lists goals that may be pertinent to the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-5

SCAG Staff Comments

The proposed project would promote economic growth throughout the Hollywood neighborhood through the development of new amenities and land uses while attracting businesses, residents, and tourists that generate new revenue sources for the City of Los Angeles (DEIR page 1/-47; RTP/SCS Goal G1).

Response to Comment No. 08-5

The comment supports the overall adequacy of the Draft EIR with regards to growth strategy, overall economic development, and consistency with RTP/SCS Goal 1. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-6

The project will encourage land use and growth patterns that facilitate transit and non-motorized transportation. The project is located adjacent to a Metro Red Line Station near the Hollywood Boulevard and Vine Street intersection and includes pedestrian oriented, mixed-use community design features, The Los Angeles City Bicycle Plan designates several streets within the project site as bicycle lanes (DEIR page 1/1-36; RTP/SCS Goals G2, G5, G6, and G8).

Response to Comment No. 08-6

The comment supports the overall adequacy of the Draft EIR with regards to a growth strategy that facilitates transit and non-motorized transportation and consistency with RTP/SCS Goals G2, G5, G6, and G8. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-7

Through the implementation of a Transportation Demand Management Program (TDM) mitigation measure, the proposed project is expected to achieve a 15 percent reduction in project-generated vehicle trips and reduce associated traffic congestion and emissions (DEIR page 1V.B.1-41; RTPISCS Goals G2 and G6).

Response to Comment No. 08-7

The comment supports the overall adequacy of the Draft EIR with regards to growth strategy transportation demand management program implementation and consistency with RTP/SCS Goals G2 and G6. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-8

Through mixed-use, infill development near transit stations and major transit corridors, the proposed project encourages mobility and accessibility throughout the project site, encourages land use and growth patterns that facilitate transit and non-motorized transportation and supports regional connectivity. The proposed additional residential density and commercial uses would be located in an area currently served by public transit, including the Metro Rail Red Line, and would be located near existing transportation corridors, including Hollywood Boulevard (DEIR page IV.G-28; RTP/SCS Goals G2, G3, G5, G6, and G8).

Response to Comment No. 08-8

The comment supports the overall adequacy of the Draft EIR with regards to growth strategy, infill development near transit stations, and consistency with RTP/SCS Goals G2, G3, G5, G6, and G8. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-9

Active transportation will be encouraged throughout the proposed project's design. Pedestrian linkages, walkways, and bike locks will be provided as a part of the project to help provide a variety of travel choices (OEIR page IV.G-31; RTP/SCS Goals G2, G5, G6, and G8).

Response to Comment No. 08-9

The comment supports the overall adequacy of the Draft EIR with regards to growth strategy active transportation and design and consistency with RTP/SCS Goals G2, G5, G6, and G8. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-10

The project supports the preservation and productivity of our sustainable regional transportation system. The project accommodates growth and is located near mass transit, thereby reducing air quality impacts, greenhouse gas emissions and traffic congestion (DEIR page IV.G-44; RTP/SCS Goals G4, G5, and G6).

Response to Comment No. 08-10

The comment supports the overall adequacy of the Draft EIR with regards to growth strategy, productivity of a regional transportation system, and consistency with RTP/SCS Goals G4, G5, and G6. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-11

2012-2035 RTP/SCS REGIONAL GROWTH FORECASTS

The Draft EIR for the Millennium Hollywood Project should reflect the most recently adopted SCAG forecasts, which are the 2012-2035 RTP/SCS population, household and employment forecasts (adopted by the SCAG regional Council in April 2012). The forecasts for the region and jurisdiction are presented below.

Adopted SCAG Region Wide Forecasts			Adopted City of Los Angeles Forecasts		
	Year 2020	Year 2035		Year 2020	Year 2035
Population	19,663,000	22,091,000	Population	3,991,700	4,320,600
Households	6,458,000	7,325,000	Households	1,455,700	1,626,600
Employment	8,414,000	9,441,000	Employment	1,817,700	1,906,800

SCAG Staff Comments

Pages IV.I-4 and 1V.1-8 indicate that the Draft EIR population, household and employment analyses were based on the adopted SCAG 2012-2035 RTP/ISCS Regional Growth Forecasts.

Response to Comment No. 08-11

The comment supports the overall adequacy of the Draft EIR with regards to growth forecasts. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 08-12

MITIGATION

SCAG Staff Comments

SCAG staff recommends review of the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix for additional guidance, as appropriate. The SCAG List of Mitigation Measures may be found here: http://scag.ca.govligrlpdfISCAG IGRMMRP 2012.pdf

Response to Comment No. 08-12

The comment recommends a review of a list of mitigation measures for additional guidance but does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 09 - AMDA

Victor S. De la Cruz
Manatt, Phelps & Phillips, LLP
for AMDA College and Conservatory of the Performing Arts

December 10, 2012

Comment No. 09-1

This firm represents AMDA College and Conservatory of the Performing Arts ("AMDA"). On behalf of AMDA, thank you for providing us with the opportunity to comment on the Draft Environmental Impact Report ("DEIR") for the Millennium Hollywood Project (the "Project"). The proposed Project would be constructed directly adjacent to AMDA's' approximately 2-acre campus in Hollywood. In particular, AMDA's building at 1777 Vine Street ("AMDA's 1777 Vine Street Building"), a five-story facility housing the majority of AMDA's classrooms, acting rehearsal rooms, dance studios, and private voice rooms, shares a property line with the Project where one of the two proposed 585-foot high towers could be built without even the most minor of setbacks. Thus, the impacts of the proposed Project's construction alone could be catastrophic to AMDA if not properly mitigated in accordance with the California Environmental Quality Act ("CEQA").

As one of the key players in Hollywood's revitalization, first purchasing and painstakingly restoring 6305 Yucca Street, an eight-story Art Deco building (the "Vine Tower") that serves as the administrative and student hub of AMDA' s campus, and then building a formidable presence on the block bounded by Yucca Street, Vine Street, Ivar Avenue, and U.S.101 (the "Hollywood Freeway"), much of which is now used for student residences, AMDA is not opposed to the continued development and revitalization of the neighborhood it is so proud to call home. AMDA welcomes responsible development and looks forward to working with community stakeholders on the continued improvement of Hollywood.

Response to Comment No. 09-1

The comment is an introduction stating that the letter is being written on behalf of AMDA College and Conservatory of the Performing Arts. The comment does not challenge the adequacy of the Draft EIR, but is noted for the record. The letter then details what AMDA is and what it does. It should be noted that AMDA was aware of the Project and potential for development on the Project Site before AMDA purchased the 1777 Vine Street building. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 09-2

However, a massive one million-plus square foot project needs to be appropriately analyzed and mitigated under CEQA, something which this DEIR fails to do. As a threshold matter, although the DEIR

acknowledges that schools are sensitive receptors, it does not identify AMDA as a sensitive receptor. This is unacceptable; all of the Project's potentially significant impacts to AMDA must be disclosed, analyzed, and mitigated to the maximum extent feasible.

Response to Comment No. 09-2

This comment contends that AMDA should have been identified as a noise and vibration sensitive receptor in the Draft EIR. Please see Response to Comment No. 09-11 (AMDA) for a detailed response to this issue. To summarize, AMDA operations currently occur in commercial office buildings that are not designed to accommodate nor shield noise and vibration sensitive operations. Furthermore, the AMDA facility is located in a heavily urbanized submarket that has an inherent expectation for redevelopment, infill development, and general development construction activities. While the Draft EIR did not identify AMDA as a noise and vibration sensitive receptor, this designation would not change the impact determinations disclosed in the Draft EIR. Regardless of the land use designations, the Draft EIR provides an analysis of temporary construction related noise and vibration increases occurring within an approximate 500-foot radius of the Project Site.

Comment No. 09-3

Likewise, CEQA requires an accurate, stable, and finite project description, yet the DEIR's equivalency program would allow virtually any type of development to be built, irrespective of what the DEIR renderings and vague development regulations (the "Development Regulations") might indicate. Greater specificity about the project is necessary for the public to meaningfully participate in the approval process for the Project.

In short, the DEIR fails to comply with CEQA's minimum legal requirements in several respects and must be revised and re-circulated.

Response to Comment No. 09-3

The Project Description is designed to allow the Draft EIR to create a Project impact "envelope" that comprehends all of the impacts of a range of Project build-out combinations. As such, the Project Description is stable and presents the information required by CEQA to provide a meaningful basis for environmental review.

The Project Description, provided in Section II, Project Description, of the Draft EIR, contains the required contents set forth in Section 15124 of the CEQA Guidelines, which was cited by the Commenter. Specifically, Section 15124(a) of the CEQA Guidelines requires, "The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map." Consistent with these requirements, Figure II-1 on page II-3 of Section II, Project Description, of the Draft EIR depicts the regional vicinity of the Project Site, Figure II-5 on page II-17 and Figure II-6 on page II-19 provide Photo Location Maps of the Project Site, Figure

II-7 on page II-25 provides a site plan of the Project Site, and Figure II-2 on page II-2 provides an aerial view of the Project Site and its environs.

Section 15124(b) of the CEQA Guidelines requires, "A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project." Pages II-44 through II-48 of Subsection D, in Section II, Project Description, of the Draft EIR discusses the Project Objectives. In addition, as stated on page II-44, "The underlying purpose of the Project is to revitalize the Project Site from its existing use to a vibrant and modern mixed-use development that retains the iconic Capitol Records Complex while maximizing the opportunity for creative development consistent with the priorities of the City's urban land use policies for Hollywood and those expressed by various stakeholders."

Section 15124(c) of the CEQA Guidelines requires, "A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities." Pages II-15 through II-44 of Section II, Project Description, provides a discussion of the project's characteristics.

Section 15124(d) of the CEQA Guidelines requires, "A statement briefly describing the intended uses of the EIR". Pages II-49 through II-50 of Subsection E, in Section II, Project Description, of the Draft EIR provides a discussion of the "Intended Uses of the EIR."

Based on the above, the Project Description in the Draft EIR meets the requirements of CEQA and accurately describes the Proposed Project in an appropriate level of detail for evaluation and review of environmental impacts.

Further, CEQA does not require that detailed engineering design be presented in the EIR. To the contrary, CEQA Guideline Section 15124 provides: "The description of the project . . . should not supply extensive detail beyond that needed for evaluation and review of environmental impact." See also, Dry Creek Citizens Coalition v. County of Tulare, 70 Cal. App. 4th 20, 27 ‑ 28 (1990) (conceptual design satisfies CEQA's requirement for a general description of the project, and precise engineering design is not required). Therefore, the Project Description in the EIR includes a range of options that could result from the Project. CEQA does not prohibit an EIR from analyzing a range of potential options for a single project.

With regards to the adequacy of the Project Description, please refer to Response to Comments Nos. 81-2 and 81-3 (Reznik, Benjamin (#2)) for additional information.

Comment No. 09-4

I. AMDA AND ITS HOLLYWOOD CAMPUS

AMDA is one of the country's preeminent non-profit colleges for the performing arts, with its two campuses in New York City and Los Angeles recognized internationally for launching some of the most successful careers in theater, film, and television. Fully accredited by the National Association of Schools of Theater ("NAST")[5], AMDA's Los Angeles campus enrolls approximately 700 students from throughout the world and offers both a 4-year bachelor of fine arts and various 2-year certificate programs. Since 2003, AMDA's Hollywood campus has been a thriving community of young artists engaged daily in everything from general education courses typical of more traditional4-year colleges, to musical theater, dance studios, and voice recitals.

AMDA's campus is comprised of several buildings in the immediate vicinity of the Project. The Vine Tower, AMDA's main building, is kitty-corner from the Project and houses administrative offices, classrooms, studio spaces, a costume shop, a stage combat armory, a computer lab, the AMDA Cafe, the campus store and a black box theatre. AMDA's 1777 Vine Street Building across the street from the Vine Tower, and sharing a property line with the Project site, is a five-story facility with 23 classrooms, 11 private voice studios, acting rehearsal rooms, a student lounge, the film production office, the scene shop, and other ancillary AMDA uses. An outdoor performance space, a campus piazza, a performing arts library, and film, television and editing facilities are also located on campus.

Finally, six residential buildings, primarily on the same block as the Vine Tower, have been purchased, or are otherwise controlled by AMDA, for student housing (The Franklin Building, the Yucca Street Apartments, the Allview Apartments, Ivar Residence Hall, the Vine Street Apartments, and the "Bungalows").

Simply stated, AMDA's investment in, and commitment to the Hollywood community is sustained and substantial.

Response to Comment No. 09-4

This comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather discloses information about what AMDA is and what they do. These comments will be forwarded the decision makers for their consideration and no further response is required.

Comment No. 09-5

II. THE HOLLYWOOD MILLENNIUM PROJECT DRAFT ENVIRONMNTAL IMPACT REPORT

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[5] *NAST has been designated by the United States Department of Education as the agency responsible for the accreditation throughout the United States of freestanding institutions and units offering theatre and theatre-related. programs (both degree-and non-degree-granting). NAST cooperates with the six regional associations in the process of accreditation and, in the field of teacher education, with the National Council for Accreditation of Teacher Education. NAST consults with the American Alliance for Theatre and Education, the Association for Theatre in Higher Education, and similar organizations in the development of NAST standards and guidelines for accreditation.*

The DEIR has several flaws and must be revised and re-circulated to comply with CEQ A. Set forth below are our specific comments on the DEIR.

Response to Comment No. 09-5

This comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather states that the entire DEIR is flawed and must be revised. This is more of an introductory statement to the comments to follow. These comments will be forwarded the decision makers for their consideration and no further response is required.

Comment No. 09-6

A. The DEIR's Equivalency Program is Much Too Broad To Apprise the Public of the Project's Impacts

As a threshold matter, the DEIR is more a program-level EIR than a project-level EIR. The ultimate project that could be built under this DEIR could be almost all apartments, all condominiums, all hotel, all health/fitness club, all office, all restaurant, or all retail - so long as the total vehicle trip count falls within a cap set forth in the DEIR. As explained in greater detail throughout this comment letter, protection of the environment is about more than vehicle trip counts. Although CEQA does not foreclose equivalency program analysis, there comes a point when an equivalency program is so over-ambitious that the public has no idea what type of uses will ultimately be built, where on the site they will be, what their general design will be, and what the *ultimate environmental impacts* will be.

Response to Comment No. 09-6

The Draft EIR provides a worst-case impact analysis for each category of impact. For each category, the Draft EIR uses the scenario that would produce the greatest impact. Thus, the Project Description is designed to allow the Draft EIR to create a Project impact "envelope" that comprehends all of the impacts of a range of Project build-out combinations.

For a given environmental category, the Draft EIR analyzes the scenario most likely to cause the greatest impact for that category. This "worst‐case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. Dusek v. Redevelopment Agency, 173 Cal. App. 3d 1029, 1041 (1985); County of Inyo v. City of Los Angeles, 71 Cal. App. 3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved). Therefore, the Project Description in the EIR includes a range of options that could result from the Project. CEQA does not prohibit an EIR from analyzing a range of potential options for a single project.

With regards to the commenter's statement that the equivalency program is over-ambitious, please refer to Response to Comments 81-2 through 81-4 (Reznik, Benjamin (#2)) for additional information.

Comment No. 09-7

That is the case here. The DEIR'.s attempt to analyze every possible development scenario results in an environmental analysis that fails to disclose and analyze the most basic of things -like project driveways and ingress and egress from the Project's approximately 4.5 acre site. Will left-tums be allowed out of the Project's Vine driveways (assuming there will be Vine driveways)? The answer to that simple question can have a dramatic impact on traffic circulation in one of Hollywood's most congested areas, but the DEIR is silent on these basics. Likewise, the DEIR is completely inconsistent with the project that has been applied for, and which could be built under the proposed Development Agreement. For example, the Project applications call for approximately seven stories of above-ground parking. (See Exhibit A.) The DEIR, however, says there will likely be three. (See Exhibit B.) In other instances, key Project components, including a night-club and an outdoor viewing deck with a cafe and alcohol sales; are completely missing from the DEIR's environmental analysis. (See Exhibit C.) The DEIR's renderings and *discussion* about the "Development Regulations" might imply good design, but the plans submitted with the application would indicate that huge podium parking structures with large, massive, undifferentiated walls are back in vogue. (See Exhibit D) Ultimately, because the Project Development Agreement and Development Regulations are so vague, nothing in the DEIR would prevent the absurd, say twenty stories above-ground parking.

Response to Comment No. 09-7

The comment notes that the Development Agreement and Project Description are so vague that almost anything could be built at the Project Site. However, the Project Description is designed to allow the Draft EIR to create a Project impact "envelope" that comprehends all of the impacts of a range of Project build-out combinations. As such, the Project Description is stable and presents the information required by CEQA to provide a meaningful basis for environmental review. The Project Description, provided in Section II, Project Description, of the Draft EIR contains the required contents set forth in Section 15124 of the CEQA Guidelines.

The comment expresses concerns that the Project is not consistent with its original application to the City. There are some inconsistencies with the application submitted in 2008, like the levels of parking, however, the Project would have to comply with what was studied in the Draft EIR, not what the 2008 application describes. The Draft EIR provides a reasonable worst case impact analysis for each environmental category of impact, which complies with CEQA. Specifically, development proposed through the Equivalency Program allows the Project Applicant to construct land uses and structures that are consistent with the growth of Hollywood and local economy at the time of construction. It does not allow the Project Applicant to propose land uses that are not identified and studied in the Draft EIR. Through the analysis of the Concept Plan and two additional scenarios, the Commercial Scenario and the

Residential Scenario, the Draft EIR analyzes the greatest potential impact on each environmental issue area.

This comment asserts that the Draft EIR fails to identify the locations of driveways and ingress/egress points, specifically along Vine Street. The locations of driveways and ingress/egress points, including along Vine Street, are identified in the Draft EIR. As described in Section IV.K.1, Transportation – Traffic, on page IV.K.1-35 of the Draft EIR, under the Project, vehicular access to the West Site would be provided via two full-service driveways. One driveway would be located along Ivar Avenue and one would be located along Vine Street. Access to the East Site would be through three driveways – one driveway each on Vine Street, Yucca Street, and Argyle Avenue. All driveways would be mid-block (away from signalized intersections) and would be full service (left-turns are allowed to and from the driveways). The driveways would be similar to the existing driveways on these street segments, such as the existing rental car facility and Capitol Records driveways.

Due to the community's desire to enhance the pedestrian experience by not disrupting the Vine Street sidewalk, a No Vine Street Access Scenario was developed and analyzed (see Appendix K of Appendix K.1 to the Draft EIR). Under the No Vine Street Access Scenario, all new access to the Project would be provided from Ivar Avenue for the West Site and Argyle Avenue for the East Site. The existing Capitol Records Complex driveway along Yucca Street east of Vine Street would be maintained for access to the East Site. Contrary to the assertion in the comment, the Draft EIR contains a detailed analysis of the driveway access and analyzes scenarios with alternative driveway access patterns. The net AM and PM peak hour Project traffic volumes for the Project with No Vine Street Access are presented in Figures IV.K.1-17 and IV.K.1-18, respectively. The Critical Movement Analysis (CMA) Summary for the Project under the Existing (2011), Future (2020), and Horizon Year (2035) traffic conditions Without and With Project for the No Vine Street Access Scenario are presented in Table IV.K.1-22. The Significance of Traffic Impacts Comparison of Existing (2011), Future (2020), and Horizon Year (2035) traffic conditions with and without access from Vine Street is presented in Table IV.K.1-23, on page IV.K.1-113 of the Draft EIR.

The comment also states that the Draft EIR does not analyze certain components, such as alcohol sales; however, the Draft EIR states that the Project Applicant is requesting a master conditional use permit to permit the onsite sales and consumption and sale for offsite consumption of a full line of alcoholic beverages. Further, the Project Description also states that "[f]ood and beverage uses would be provided both on the ground floor and within the hotel, sports club and office and on a possible rooftop observation deck. The food and beverage uses would include full-service restaurants and a café. The full service restaurant would also include outdoor dining areas." See Section II, Project Description, page II-30. As such, pursuant to the Project Description, the full-service restaurants and café, the hotel and the dining area of the potential rooftop observation deck could serve alcohol. The Project Applicant is requesting a master conditional use permit to permit the onsite sales and consumption and sale for offsite consumption of a full line of alcoholic beverages. Because none of the specific operators of the alcohol-serving establishments can be known until after the Project is built, a master conditional use would require that each operator seek and obtain plan approval from the Zoning Administrator before the operator is

authorized to serve alcohol within the project. The purpose of the plan approval is to ensure that each operator proposes a use that is consistent and compatible with the master conditional use permit. These uses are discussed when analyzing the Project and its retail and commercial uses. Please see Response to Comment Nos. 81-7 and 81-10 (Reznik, Benjamin (#2)) for additional information regarding alcohol sales.

Comment No. 09-8

The case law on equivalency programs is limited, but the general principles behind CEQA are clear. First, an accurate, stable, and consistent project description is required for a legally sufficient EIR. Inconsistencies in the project description, including "using variable figures" can be fatal. *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 653 (holding that the failure to provide a stable and consistent project description invalidated the EIR); also see *City of Santee v. County of San Diego* (1989) 214 Cal. App. 3d 1438, 1454-55 (concluding that an EIR that did not contain an accurate, stable, and finite project description could not "adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences.").

Response to Comment No. 09-8

The comment states that case law on equivalency programs is limited and cites two cases regarding the adequacy of project descriptions under CEQA. The comment does not provide any specific information with respect to why or how the commenter believes the Draft EIR or the Project Description is insufficient in any way. The Project Description is stable and presents the information required by CEQA to provide a meaningful basis for environmental review. The Project Description complies with the requirements set forth in Section 15124 of the CEQA Guidelines.

An EIR requires an accurate and stable project description as described by the commenter. This does not mean, however, that the project description must be rigid or inflexible. *See County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 199 (1977). The Draft EIR provides a reasonable worst case impact analysis for each category of impact. For each category, the Draft EIR uses the scenario that would produce the greatest impact. Thus, the Project Description is designed to allow the Draft EIR to create a Project impact "envelope" that comprehends all of the impacts of the range of Project build-out combinations. For a given environmental category, the Draft EIR analyzes the scenario most likely to cause the greatest impact for that category.

See Response to Comment No. 81-2 (Reznik, Benjamin (#2)) for additional information as to the Project Description's adequacy under CEQA.

Comment No. 09-9

In short, we have no idea what will be built, except that it will likely be massive. And even if the DEIR analyzed ingress and egress for the Concept Plan, for example, that analysis would be meaningless because the Applicant has no obligation to build the Concept Plan or a project that looks anything like it.

An EIR cannot stultify CEQA's public disclosure requirements. *County of lnyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 198 ("A curtailed, enigmatic or unstable project description draws a red herring across the path of public input."); also see *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 405 ("An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.").

Response to Comment No. 09-9

The comment cites additional case law regarding the adequacy of project descriptions under CEQA and asserts that the analyses in the Draft EIR would be meaningless because the Project Applicant has no obligation to build the Concept Plan or a project that looks anything like it. As described in Section II, Project Description, of the Draft EIR, "[t]hrough the analysis of the Concept Plan and two additional scenarios, the Commercial Scenario and the Residential Scenario, further described below, this Draft EIR analyzes the greatest potential impact on each environmental issue area. The most intense impacts from each scenario represent the greatest environmental impacts permitted for any development scenario for the Project. The Project may not exceed any of the maximum impacts identified for each issue area from either the Concept Plan, the Residential Scenario, or the Commercial Scenario." Page II-21.

The EIR provides a reasonable worst-case impact analysis for each category of impact. For each category, the EIR uses the scenario that would produce the greatest impact. Thus, the Project Description is designed to allow the EIR to create a Project impact "envelope" that comprehends all of the impacts of a range of Project build-out combinations. For a given environmental category, the EIR analyzes the scenario most likely to cause the greatest impact for that category.

This "worst-case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. *Dusek v. Redevelopment Agency*, 173 Cal. App. 3d 1029, 1041 (1985); *County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved).

Further, CEQA does not require that detailed engineering design be presented in the EIR. To the contrary, CEQA Guidelines Section 15124 provides: "The description of the project . . . should not supply extensive detail beyond that needed for evaluation and review of environmental impact." See also, *Dry Creek Citizens Coalition v. County of Tulare*, 70 Cal. App. 4th 20 (1990) (conceptual design satisfies CEQA's requirement for a general description of the project, and precise engineering design is not required). In *Dry Creek Citizens Coalition*, the appellants contended that the EIR provided an inadequate conceptual description of the stream diversion structures and that actual design of the structures could not be deferred until after project approval. *Id.* at 27. The appellant further claimed that only precise engineering designs provide the necessary detail to analyze the environmental consequences of the entire project under CEQA. *Id.* The court rejected those contentions, relying on CEQA Guidelines Section

15124 and explained that CEQA requires general descriptions of the technical aspects of a project. *Id.* at 36. The conceptual description of the stream diversion structures for the mining project included dimensions, heights, the purposes of the structures, and figures relating to the structures.

Like the conceptual description of the stream diversion structures for the mining project in *Dry Creek Citizens Coalition*, here, the Project Description is legally adequate because it contains sufficient detail to enable the public and the decision makers to understand the environmental impacts of the proposed project. *Id.* at 36. A description of the technical and environmental characteristics of the Project are described and illustrated in the Project Description, including but not limited to details regarding the proposed uses, points of access, floor area averaging, maximum FAR, scale and massing, height ranges, and Project purposes and objectives. See Section II, Project Description of the Draft EIR. Therefore, the Project Description in the EIR includes a range of options that could result from the Project. CEQA does not prohibit an EIR from analyzing a range of potential options for a single project. As such, the analysis on impacts in the Draft EIR represents the greatest environmental impacts permitted for any development scenario for the Project.

Comment No. 09-10

The DEIR fails to provide a meaningful understanding of the Project. By analyzing the Concept Plan, the DEIR gives the public the impression that something approaching that plan will be built even though the Development Agreement allows different parts of the Project site to be sold to different developers who may choose to build something that bears no real resemblance to the Concept Plan. (See Development Agreement, Section 6.8.1.)(Exhibit E.) This is all the more shocking given that the Development Agreement also provides that no subsequent approvals/environmental review would be required for any subsequent build-out of the Project. (See Development Agreement, Section 3.1.5.)(Exhibit F.) Without discussing things as simple as ingress and egress (required analysis for much smaller projects), or what will ultimately be built, the DEIR's enigmatic project description has the effect of cutting the public out of some of the more important questions about the Project. And it certainly cannot provide the City Council with enough information to support a Statement of Overriding Considerations. CEQA requires more.

Response to Comment No. 09-10

The Project Description provides a meaningful understanding of the Project. As stated on Page I-7 in the Introduction/Summary, and thereafter throughout each substantive chapter, the Draft EIR "analyzes the greatest potential environmental impact of the Project for each issue area. The Project may not exceed these maximum impacts for each issue area." The Draft EIR informs the public as to the extent of the maximum potential impacts and, where feasible, the mitigation measures used to reduce each of those impacts below a level of significance. The Draft EIR thereby complies with the CEQA mandate that requires review of "entirety of the project," *San Joaquin Raptor Rescue Center v. County of Merced*, 149 Cal. App. 4Th 645, 654, 57 Cal. Rptr. 3d 663, 671 (5th Dist. 2007), including all reasonably foreseeable uses. *Id.* at 149 Cal. App. 4Th 660, 57 Cal. Rptr. 3d at 676.

The Development Agreement does permit, as is typical in such arrangements, for portions of the Project Site to be sold to and developed by third parties. Any such transfer cannot, however, affect the constraints placed on development of the Project Site by the CEQA approval and the Development Agreement itself. The maximum impacts identified in the EIR cannot be exceeded by the Project Applicant or a potential third part developer. Government Code Section 65868.5 requires that every Development Agreement be recorded after approval, and makes every such agreement "binding upon all successors in interest."

The Development Agreement provisions limiting further discretionary reviews or actions during the build-out phase is also a standard provision in development agreements, and reflects the central purpose of the Development Agreement Act, which is to provide private sector developers with "assurance. . .that upon approval of the project, the applicant may proceed with the project in accordance with existing policies, rules and regulations, and subject to conditions of approval. Government Code Section 65864(b). Subsequent discretionary reviews may still take place if consistent with the rules, regulations and policies in effect when the project was approved or to process a subsequent application by the developer for a new or amended approval. Government Code Section 65866.

Please refer to Response to Comments 81-2, 81-3, and 81-4 (Reznik, Benjamin #2)) for additional information regarding adequacy of the Project Description.

Comment No. 09-11

B. The DEIR Excludes Analysis and Mitigation of Clearly Significant and Adverse Noise and Vibration Impacts to AMDA and Avoids Meaningful Analysis and Mitigation of Noise and Vibration Impacts, Generally.

1. The DEIR Fails to Disclose and Analyze AMDA as a Sensitive Receptor.

The *L.A. CEQA Thresholds Guide* defines noise sensitive land uses to include residences, transient lodging, *schools,* libraries, churches, hospitals, nursing homes, *auditoriums, concert halls,* amphitheaters, playgrounds, and parks. *(L.A. CEQA Thresholds Guide,* p. I.1-2.) Although the DEIR acknowledges that schools, auditoriums, and concert halls are sensitive receptors at page IV.H-15, inexplicably AMDA- which shares a property line with the Project- is excluded from the list of sensitive land uses adjacent to the Project site.[6] The DEIR's omission of AMDA as a sensitive receptor is a material error in the DEIR that has prevented significant impacts from being disclosed and mitigated.

To be perfectly clear, AMDA is a school and the quintessential sensitive receptor. Within AMDA's 1777 Vine Street Building, for example, when students are not taking classes such as "Harmony Review Lab,"

[6] *AMDA has been a prominent member of the Hollywood community since 2003 and various principals of Millennium Hollywood LLC (the "Applicant") have been familiar with AMDA for several years, all of which makes the omission very confusing to AMDA. Moreover, since 2010, well before issuance of the DEIR's Notice of Preparation, all of AMDA's 1777 Vine Street Building was being used by the college.*

"Sight Singing Review Lab," and "Piano Lab," they may be practicing their singing in a private voice room, dancing ballet in one of the dance studios, or doing breathing exercises with a voice tutor. Every day, the AMDA campus is a thriving hub of productions, recitals, rehearsals, and classes from early morning until about 11:30 p.m., and in summer months AMDA's outdoor stage hosts multiple productions. How all this could continue to happen with the immediately adjacent construction of over one million square feet of towers is something the DEIR cannot ignore.

Response to Comment No. 09-11

This comment contends that AMDA should have been identified as a noise and vibration sensitive receptor in the Draft EIR. The Draft EIR's determination that the AMDA campus was not a sensitive receptor was based on building permit and land use codes reported on the City's Zoning Information and Map Access System (ZIMAS) database. Per the ZIMAS database, the property at 6305 W. Yucca Street is identified as a "store and office combination." There are no use permits on file indicating that the site is utilized as a school or institutional use with 700 students, student housing, amphitheaters, library, studio and classroom spaces.

AMDA applied for a building permit and certificate of occupancy in 2003 for interior renovations to change 10,590 square feet of office uses to a dance school including interior and exterior remodeling. However, this conditional certificate of occupancy has not been finalized, and as such, did not appear in the ZIMAS database. Therefore, AMDA's current use of the property at 6305 Yucca Street (also associated with addresses 6309-6317 W. Yucca Street and 1801-1805 N. Vine Street), appears to be a non-permitted use, as there appears to be no use permits on file authorizing the operation of a school.

AMDA's property at 1777 N. Vine Street is identified in the ZIMAS database as an office building. The only use permit on file for this property is a certificate of occupancy issued in 1962 for a six-story Type I professional office building and parking garage. There appears to be no existing use permits authorizing the use or operation of a school. Furthermore, at the time the NOP was published, this property had vacant storefronts on the ground floor and was advertising office spaces for lease. As such, it was determined that this building was operating as an office building with a commercial dance studio and was not considered a sensitive land use.

With respect to CEQA, it should be noted that when determining whether an environmental impact is significant, "the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons." *Mira Mar Mobile Community v City of Oceanside* (2004) 119 CA4th 477, 492, 14 CR3d 308. Here, the Draft EIR has adequately analyzed the noise impacts on the surrounding environment even though all of the AMDA facilities were not specifically listed as a sensitive uses for the reasons explained above. Regardless of the land use designations at AMDA, the Draft EIR provides an analysis of temporary construction related noise and vibration increases occurring within an approximate 500-foot radius of the Project Site. As shown on page IV.H-15 of the Draft EIR, all of AMDA's student housing facilities were in fact identified as sensitive receptors. Sensitive Receptor No. 1 included the multi-family residential uses north of the Project Site across Yucca. This includes the

Franklin Building, the Yucca Street Apartments, the Allview Apartments, Ivar Residence Hall, the Vine Street Apartments, and the "Bungalows," all of which are described as AMDA student housing. The construction noise impacts were quantified and reported in Table IV.H-9 on page IV.H-25 of the Draft EIR.

The Draft EIR concludes that short-term construction noise and vibration impacts upon adjacent land uses would be considered significant and unavoidable after mitigation. Specifically identifying AMDA's classrooms and studio uses as one singular land use that could be impacted would not change the level of construction impacts in the Project area. Furthermore, the Draft EIR includes mitigation measures that would ensure noise and vibration impacts upon adjacent land uses would be reduced to the maximum extent feasible, regardless of the land use designation or sensitive receptor identification. As such, the Draft EIR adequately disclosed all potential construction noise and vibration impacts upon adjacent land uses and provided a thorough and comprehensive mitigation strategy to reduce these impacts to the maximum extent feasible. The mitigation strategies recommended in the Draft EIR would serve to reduce the Project's construction-related noise impacts for all adjacent and nearby land uses that could be impacted, not just the sensitive land uses. Notwithstanding that no additions or corrections to the Draft EIR are warranted, the following changes are proposed to mitigation measures H-3 and H-7 and are recommended to address AMDA's concern that their use was not identified as a sensitive receptor:

H-3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from ~~the nearest noise- and vibration-sensitive~~ all adjacent land uses. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be operated efficiently to minimize noise impacts to the maximum extent feasible.

H-7 Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the adjacent land uses and surrounding noise-sensitive receptors to the maximum extent feasible during construction.

Also, please see Appendix J, Feasibility Assessment, for a detailed discussion regarding noise mitigation measures.

Comment No. 09-12

2. The DEIR Must Disclose, Analyze and Mitigate Significant Construction Noise Impacts to AMDA.

The DEIR must be re-circulated with information about the magnitude of construction and operational noise impacts to AMDA, as well as all feasible mitigation measures that would reduce those impacts. It is impossible to state the precise construction-related noise impacts to AMDA because the DEIR ignored

analysis of AMDA altogether, but there can be no question that the impacts will be extremely significant and adverse. Table IV.H-9 of the DEIR, for example, reveals that noise levels at the Pantages and Avalon Theaters, both of which are anywhere from two to ten feet from the Project, will skyrocket from 69.8 dBA L_{eq} to 113.9 dBA L_{eq} As DEIR Table IV.H-1 indicates, a dBA of 113.9 L_{eq} would be louder than a jet flying overhead at a height of 100 feet (throughout the entire day) and louder than a rock band in an indoor concert. This is troubling because the DEIR would allow construction next to AMDA at a similar distance from the Pantages Theater. There is no way that AMDA could continue operating in such an environment without specific mitigation that deals with AMDA as a sensitive receptor. Putting aside the fact that no school could teach music in the middle of a rock concert, the Project would be putting AMDA students and facu1ty in an environment that the DEIR states can cause temporary or permanent hearing loss. ("Frequent exposure to noise levels greater than 85 dBA over time can cause temporary or permanent hearing loss.") (DEIR, p. IV.H-3) Mitigation of these impacts on AMDA are of the utmost necessity.

Response to Comment No. 09-12

The comment asserts that it is impossible to state the precise construction-related noise impacts upon AMDA since it was not identified as a sensitive receptor in the Draft EIR, however, the comment describes noise levels predicted in the Draft EIR for other adjacent land uses that are substantially similar to the characteristics and setback distances of AMDA. The Draft EIR concludes that short-term construction noise and vibration impacts upon adjacent land uses would be considered significant and unavoidable after mitigation. Further, the Draft EIR did identify AMDA's student housing as sensitive land uses and as such, properly disclosed the noise impacts upon AMDA's residential land uses.

Specifically identifying AMDA's classroom and studio uses as one singular land use that could be impacted would not change the level of construction impacts for AMDA or the Project area. Furthermore, the Draft EIR includes mitigation measures that would ensure noise and vibration impacts upon adjacent land uses would be reduced to the maximum extent feasible, regardless of the land use designation or sensitive receptor identification. As such, the Draft EIR adequately disclosed all potential construction noise and vibration impacts upon adjacent land uses and provided a thorough and comprehensive mitigation strategy to reduce these impacts to the maximum extent feasible. As noted in response to comment 09-11, above, Mitigation Measures H-3 and H-7 have been revised to ensure that the construction equipment staging and barriers be positioned to protect all adjacent land uses including AMDA's building at 1777 Vine Street. Also, please see Appendix J, Feasibility Assessment for a detailed discussion regarding noise mitigation measures.

Comment No. 09-13

Furthermore, mitigation must address multiple different construction impacts- not just construction machinery. For example, the DEIR notes that "[t]he Yucca street parking curb lane will be retained for construction vehicle waiting and staging for the duration of Project construction during all hours ..." (DEIR, p. IV.K.2-22.) A revised DEIR should disclose that this truck staging area would literally divide

AMDA's main campus area (i.e., the Vine Tower and AMDA's 1777 Vine Street Building) and consider whether the noise impacts from this staging area can be relocated away from a sensitive receptor.

Response to Comment No. 09-13

Mitigation Measures H-3, H-8 and H-10 located on pages IV.H-43 and IV.H-44 of the Draft EIR include specific strategies to reduce impacts with respect to general construction activities, truck idling and staging, and haul route activities. These mitigation measures would ensure that construction related noise and vibration impacts upon all adjacent land uses would be reduced to the maximum extent feasible. As noted in Response to Comment 09-11, above, Mitigation Measure H-3 has been revised to ensure that the noise and vibration generating construction equipment be staged as far away as feasibly possible from all adjacent land uses to include AMDA's building at 1777 Vine Street. Also, please see Appendix J, Feasibility Assessment, for a detailed discussion regarding noise mitigation measures.

Comment No. 09-14

3. The DEIR's Use of the Equivalent Noise Level (L_{eq}) for Construction-Related Noise Hides the Project's True Noise Impacts.

The DEIR fails to fully disclose Project impacts by only reporting L_{eq} and not the full range of dBA increases that would result from the project. L_{eq}, or the equivalent energy noise level, "is the *average* acoustic energy content of noise for a stated period of time." (DEIR, p. IV.H-2.) The DEIR is required to not only disclose the average dBA over a period of time, but the full range of dBA (i.e., what will be the loudest noises that will be occurring throughout construction). Disclosure of the full range of dBA is important for many reasons. First, the *L.A. CEQA Thresholds Guide* provides that a Project will have a significant impact if construction activities lasting more than a day would exceed existing ambient exterior noise levels by 1 0 dB A or more at a noise-sensitive use, or 5 dBA or more at a noise-sensitive use for construction activities lasting more than ten days in a three-month period. (DEIR, p. IV.H-20.) The thresholds are not based on L_{eq}- they are based on dBA alone. By only disclosing L_{eq}, the DEIR underreports the true range and magnitude of significant impacts.

Response to Comment No. 09-14

The Draft EIR used the proper methodology to analyze potential noise impacts. Consistent with Section 111.01(a) of the LAMC pertaining to noise monitoring, the City of Los Angeles CEQA Thresholds Guide, and the standard methodology used by the City Planning Department for noise impact analyses in EIRs, the Project Draft EIR appropriately analyzed construction related noise impacts based on the L_{eq} designation. As illustrated in Tables IV.H-7 and H-8 of the Draft EIR, the construction noise analysis utilized the worst-case noise ranges in terms of L_{eq}, per the City of Los Angeles CEQA Thresholds Guide. These worst-case L_{eq} reference noise levels were utilized to model construction impacts on adjacent uses based on the closest possible distance from the adjacent use to the Project Site's property lines. Thus, as construction equipment would infrequently operate on the Project Site property line, the estimated

construction noise levels disclosed in Table IV.H-9 of the Draft EIR are very conservative, and in some cases, likely overstate the actual peak noise level increases at the identified locations.

Comment No. 09-15

Second, the aforementioned distinction between L_{eq} and dBA is about more than technical legal compliance with the CEQA threshold; the loudest noises that may occur at any given time matter. Particularly loud construction episodes, for example, would undoubtedly interrupt courses, recitals, and other AMDA activities to a greater extent than the already high average noise levels. All feasible mitigation must be imposed for these high noise incidents.

Response to Comment No. 09-15

As illustrated in Tables IV.H-7 and H-8 of the Draft EIR, the construction noise analysis utilized the worst-case noise ranges in terms of L_{eq}, per the City of Los Angeles CEQA Thresholds Guide. These worst-case L_{eq} reference noise levels were utilized to model construction impacts on adjacent uses based on the closest possible distance from the adjacent use to the Project Site's property lines. Thus, as construction equipment would infrequently, if ever, operate on the Project Site property line, the estimated construction noise levels disclosed in Table IV.H-9 of the Draft EIR are very conservative, and in some cases, likely overstate the actual peak noise level increases at the identified locations. As such, the Draft EIR adequately disclosed all potential construction noise and vibration impacts upon adjacent land uses and provided a thorough and comprehensive mitigation strategy to reduce these impacts to the maximum extent feasible.

Comment No. 09-16

Finally, the L_{eq} reported in the DEIR could be masking the true noise impacts of the Project because the DEIR fails to disclose the period of time over which construction noise is being averaged (e.g., the L_{eq} period may be including nighttime noise when no construction is taking place, break times, or other similar non-representative time periods).

Response to Comment No. 09-16

As discussed in detail in the Draft EIR, the short-term construction noise impacts are based on worst-case assumptions to disclose the peak noise level impacts on adjacent land uses. Mitigation Measure H-2 states that construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday or national holidays. No construction activities shall occur on any Sunday. Thus, the noise estimates provided in terms of L_{eq} were not discounted for non-construction periods or nighttime hours and represent construction noise during regular construction hours, and thus, the estimates adequately represent the worst-case construction related noise impacts.

Comment No. 09-17

4. The DEIR's Noise Section is Rendered Meaningless by Failure to Report Post-Mitigation Noise impacts and Failure to Definite Mitigation Measures with any Precision or Certainty.

Despite reporting Project noise impacts that are clearly unacceptable, the DEIR fails to indicate what the Project's noise impacts will be *after* mitigation. This approach is not only contrary to the approach taken in the DEIR's Air Quality and Traffic sections, it is contrary to the City's practice for other environmental impact reports. (See Exhibit G.) Disclosure of impact levels after mitigation is required, and the Applicant must be required to abide by the post-mitigation noise levels that are set forth in the DEIR. Indeed, without post-mitigation noise projections, community members and stakeholders affected by the Project have no way of knowing with any certainty if the mitigation measures in the DEIR are, in fact, effective in reducing noise levels, and if they are, by how much noise levels will be reduced. The DEIR must disclose the resulting (i.e., post-mitigation) noise levels at the relevant property lines so that AMDA and the public can determine if the mitigation measures truly reduce noise to the maximum extent feasible.

Response to Comment No. 09-17

The comment states that the Draft EIR fails to indicate what the Project's noise impacts will be after mitigation. However, the Draft EIR does in fact indicate the Project's noise impacts after mitigation after each impact discussion. Please see Pages IV.H-2; IV.H-29; IV.H-31 in the Draft EIR for example. It should be noted that Exhibit G referenced in this comment does not provide evidence or citation regarding the expected benefit or noise reductions of the referenced mitigation. In addition, it should be noted that the Draft EIR was developed according to standard City of Los Angeles protocols and inlcudes applicable thresholds of significance and environmental impact conculusions.

Regarding mitigation, Mitigation Measures H-1 through H-16 of the Draft EIR meet and exceed the City of Los Angeles standard noise mitigation measures for development projects in urbanized settings. Furthermore, where appropriate, the Draft EIR noted that although these mitigation measures would serve to reduce short-term construction noise impacts to the maximum extent feasible, impacts upon adjacent uses would remain significant and unavoidable. For other project impacts, where the impacts were deemed to be less than significant, it was noted that no mitigation measures were required (e.g., Page IV.H-37; IV.H-39). The main difference between Exhibit G and the Draft EIR is in the style in which the information on these levels of significance after mitigation is presented: under one subheading in the Exhibit and under each impact category in the Draft EIR. Also, please see Appendix J, Feasibility Assessment, for a detailed discussion regarding noise mitigation measures.

Comment No. 09-18

Part of the reason for the DEIR's failure to provide any information about post-mitigation noise levels may be that many of the noise mitigation measures in the DEIR are illusory. For example, many of the

mitigation measures are tempered with phrases like "as far as feasibly possible" or other language that actually has the effect of creating an inordinate amount of flexibility for the Applicant and/or depriving the measure of any certainty. Examples of deficient noise mitigation measures in the DEIR are set forth below, followed by a discussion of how each mitigation measure is legally deficient:

- *Noise and groundborne vibration construction activities whose specific location on the Project may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as **far as feasibly possible** from the nearest noise- and vibration-sensitive land uses.* (Mitigation Measure H-3) (Emphasis added.)

- *Construction activities shall be scheduled so as to avoid **as feasible** operating several pieces of equipment simultaneously, which causes high noise levels.* (Mitigation Measure H-4) (Emphasis added.)

- *The Project contractor shall use power construction equipment with state-of- the-art noise shielding and muffling devices **as available**.* (Mitigation Measure H-6) (Emphasis added.)

- *Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the surrounding noise-sensitive receptors **to the maximum extent** feasible during construction.* (Mitigation Measure H-7) (Emphasis added.)

- *All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors **to the extent feasible**.* (Mitigation Measure H-8) (Emphasis added.)

All the bolded language above serves to remove any assurances or standards from the mitigation. For example, relative to Mitigation Measure H-3, there is no reason that the DEIR should not disclose exactly where flexible noise-generating equipment will be located to reduce impacts to AMDA and other sensitive uses (and the resulting post-mitigation noise levels at the property line). A mere representation that the activities will be conducted "as far as feasibly possible" deprives the public of the ability to comment on whether the Applicant truly is mitigating "as far as feasibly possible."

In fact, when the Applicant's current tenant, EMI, was previously concerned about impacts to Capitol Records from a nearby construction project at 6941 Yucca (the "Yucca Condominium Project"), it secured mitigation measures such as the following:

- No stationary equipment will be operated ***within 40 feet*** of the west project site property line with EMI/Capital [sic] Records. Tower cranes and personnel lifts shall be positioned ***near Argyle on the eastern edge of the project site.*** (Mitigation Measure Supp 18) (Emphasis added.)

- Construction materials shall be stock-piled at distant portions of the site, ***at least 40 feet*** from the western project site property line with EMI/Capitol Records. The equipment warm-up areas,

water tanks and equipment storage areas described in Mitigation Measure 1-5 above shall also be located ***at least 40feet*** from the western project site property line with EMI/Capitol Records. (Mitigation Measure Supp 19) (Emphasis added.)

- ***Within 40 feet*** of the western project site property line with EMI/Capital [sic] Records, demolition, excavation and construction activities at or below the street level of the project site (including loading of demolition refuse), grading equipment and activities, augured pile driving, vibratory rollers, jumping jack compactors, and other excavation and construction equipment and activities ***shall be prohibited after 10:00 a.m. Mondays through Saturdays,*** unless one of the following exceptions apply ... (Mitigation Measure Supp 12) (Emphasis added.)

A complete list of mitigation measures for the Yucca Condominium Project is attached as Exhibit H for reference.

Response to Comment No. 09-18

The comment refers to the Draft EIR's potential noise impacts and corresponding mitigation measures. As explained above in Response to Comment No. 09-17, the Draft EIR does in fact indicate the Project's noise impacts after mitigation after each impact discussion. To provide a good-faith reasoned response to the comment, Parker Environmental Consultants prepared a technical assessment of all the noise mitigation measures reference by the comment. Please see Appendix J, Feasibility Assessment, Noise and Vibration Mitigation Monitoring Measures for the Millennium Hollywood Project.

Comment No. 09-19

The precision that EMI/Capitol Records previously received to protect itself from noise and vibration impacts needs to be reflected in the other mitigation measures for this Project too-not just Measure H-3. For example, Mitigation Measure H-4 must disclose which construction equipment will not be operated simultaneously.[7] The same goes for Mitigation Measure H-6. If state-of-the-art noise shielding and muffling devices are too expensive, or being used at another construction site, does this mean that the noise levels need not be mitigated? With respect to Mitigation Measure H-7, how will an eight-foot noise barrier be enough to mitigate noise impacts to the maximum extent feasible, and why not disclose the full gamut of noise attenuation barriers available given that one can do better than plywood structures? Most importantly, why did the Yucca Condominium Project (112,917 square feet of construction) next door to the Capitol Records Tower require noise barriers of 16 feet in height, whereas this 1,052,667 net square foot project only requires eight-foot barriers? (See Exhibit I.) (The DEIR also needs to consider special mitigation for the Project's high-rise towers, such as sound wall barriers as construction proceeds to the upper floors.) Finally, with respect to Mitigation Measure H-8, aside from it being impermissible deferred

[7] *The scheduling of different construction activities and their resulting noise levels needs to be disclosed as part of the public review process. Otherwise, how would a decision to stop operating multiple pieces of equipment be made on the construction site after the Project has already been approved, especially if the DEIR has no standards (just vague "as feasible" language)?*

mitigation, how can the DEIR state that construction truck traffic will avoid sensitive receptors to the maximum extent feasible, and then in another section state that construction truck staging will be right outside AMDA?

Ultimately, the DEIR needs to establish specific mitigation measures and post-mitigation noise standards that can be measured and adhered to. As drafted, the DEIR says nothing about how loud Project noise will be after the imposition of mitigation measures, renders the little mitigation there is meaningless with vague, imprecise language, and does not commit the Applicant to any specific noise standard.

Response to Comment No. 09-19

Similar to Comment No. 09-18 above, this comment questions the noise mitigation measures proposed in the Draft EIR and compares the Project to the Yucca Condominium Project. See Response to Comment No. 09-18 (AMDA) above. Also, please see Appendix J, Feasibility Assessment, which provides a detailed discussion regarding the Project's noise mitigation measures.

Comment No. 09-20

5. The DEIR's CNEL Baseline Is Not Supported by Substantial Evidence.

The DEIR states that noise measurements were recorded by Parker Environmental Consultants staff on April 19, 2011, at six locations in the vicinity of the Project Site *for a period of 15 minutes per location,* between the hours of 2:50 PM and 4:30PM. (DEIR, p. IV.H-5.) Somehow, despite only taking measurements for 15 minutes, the DEIR established dBA CNEL baselines for the five studied roadways. CNEL, the Community Noise Equivalent Level, "is a 24-hour average L_{eq}." (DEIR, p. IV.H-3.) The DEIR needs to disclose how a 24-hour average was derived for the baseline from a mere 15 minute measurement. Given the role that the CNEL baseline plays in establishing the Project's operational impacts, coupled with the large scope of this Project, anything less than a true understanding of the Project area's CNEL renders the DEIR's noise analysis meaningless.

Response to Comment No. 09-20

The comment claims that the Draft EIR established dBA CNEL baselines for the five studied roadways from the field noise measurements. However, the field noise measurements gathered in terms of L_{eq} were not converted to CNEL. With respect to the CNEL analyses contained in the Draft EIR, page IV.H-6 of the Draft EIR states that the calculation of the existing roadway noise levels was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Traffic Impact Study for the Project.

Comment No. 09-21

6. The DEIR Fails to Study those Roadways that May Be Most Impacted by Traffic-Related Noise and Masks True Roadway Noise Impacts.

The DEIR's analysis of roadway traffic impacts is highly deficient. As a threshold matter, the DEIR fails to consider whether there are residential streets that may be most impacted by traffic noise, even if those streets will not receive the most Project traffic. The DEIR states that "[t]he roadway segments selected for analysis are considered to be those that are expected to be most directly impacted by project-related traffic, which for the purpose of this analysis, includes the roadways that are nearest to the Project site." (DEIR, p. IV.H-14.) This selection of streets for roadway noise impacts, while appealing at first blush, has the effect of potentially masking significant impacts along nearby residential roadways that may receive lower project-related traffic, but have a lower significance threshold (3 dBA CNEL rather than the 5 dB A CNEL streets studied in the DEIR's noise analysis). As such, further analysis of streets more sensitive to noise is required.

Response to Comment No. 09-21

The Draft EIR analyzed an appropriate range of roadway segments in proximity to the Project Site. Aside from the 3.7 dBA CNEL increase during the Existing Traffic Plus Project Traffic Scenario (with No Vine Street Access) for the roadway segment of Ivar Avenue between Yucca Street and Hollywood Boulevard, no other roadway segment analyzed in the Draft EIR would come close to approaching either the 3 dBA or 5 dBA CNEL thresholds of significance. Thus, it is logical to infer that roadway segments located farther from the Project Site carrying less project-related trips than those segments analyzed in the Draft EIR would experience even smaller project-related roadway noise level increases.

Comment No. 09-22

Moreover, the traffic noise analysis suffers from other methodological problems. In addition the previously discussed concerns about the CNEL baseline, which appears to be based on a 15-minute measurement, the DEIR's traffic analysis grossly underreports the Project's true traffic impacts. Accordingly, it is very likely that the higher traffic impacts will lead to higher, and significant, roadway noise impacts. The DEIR therefore needs to be re-circulated with the disclosure of actual noise impacts from Project traffic.

Response to Comment No. 09-22

This comment suggests that the potential roadway noise impacts may be understated because the Project's traffic generation is grossly underreported. However, this comment does not specifically challenge how or why the traffic is underreported nor does this comment offer a suggestion as to what the traffic generation should have been reported as for the Project. The comment does not provide evidence to support its claim that traffic, and therefore noise, is underreported This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 09-23

7. The DEIR Must Analyze and Mitigate Vibration Impacts on AMDA's Building.

The DEIR must be re-circulated with information about the magnitude of the Project's construction and operational vibration impacts to AMDA, as well as all feasible mitigation measures that would reduce those impacts to a level less than significant. The DEIR completely ignores vibration impacts on AMDA's classroom building despite making clear elsewhere that vibration impacts from construction on buildings further away would be significant. Based Table IV.H-11 and Table IV.H-12, impacts to the Pantages Theater, the Avalon Theater, and the Capitol Records Tower (all of which have similar distances to the Project as AMDA), it appears that construction-related vibration impacts at AMDA's 1777 Vine Street Building would range from approximately 119.9 VdB to 162 VdB and 3.9 PPV to 491.66 PPV-impacts that wildly exceed the significance thresholds of 65 VdB and 0.12 PPV. There is little question that AMDA's 1777 Vine Street Building would suffer significant damage from such high vibration levels. (The DEIR states that 100 V dB is the general threshold where minor damage can occur in a fragile building yet Project-related VdB on AMDA's building is expected to be approximately 120 VdB to 162 VdB.) (DEIR, p. IV.H-4). Likewise, given the types of activities that occur in AMDA's building (e.g., breathing exercises, music classes, ballet), AMDA would be considered a Category 1 Building (65 VdB threshold) more akin with university research operations than a typical school building (75 VdB threshold) with respect to operational vibration annoyance impacts. Irrespective of what threshold is applied, however, the vibration impacts on AMDA's building are significant and must be mitigated.

Response to Comment No. 09-23

AMDA's 1777 Vine Street Building referenced in this comment is a contemporary commercial office building. Thus, this type of construction does not meet the definition of a structurally sensitive or historic building susceptible to building damages from construction-related vibration. Structures such as the Pantages Theater, Avalon Theater, Art Deco Storefronts, and the Capitol Records Complex were specifically identified in the Draft EIR because these structures, based on their historic nature and construction type, are more susceptible to potential building damage than a typical contemporary commercial office structure. Nevertheless, Mitigation Measure H-11 in the Draft EIR identifies specific performance standards for all adjacent structures, including AMDA, which would ensure impacts related to building damage from construction vibration would be less than significant.

With respect to human annoyance and disruption impacts upon AMDA from construction-related vibration, AMDA operations currently occur in commercial office buildings that are not designed to accommodate nor shield noise and vibration sensitive operations. Furthermore, the AMDA facility is located in a heavily urbanized area within the Hollywood Redevelopment Project area that has had, and will continue to experience, a high level of redevelopment, infill development, and general development construction activities.

While the Draft EIR did not identify AMDA as a vibration sensitive receptor, this designation would not change the impact determinations disclosed in the Draft EIR. Regardless of the land use designations, the Draft EIR provides a robust analysis of construction related vibration increases occurring within an approximate 500-foot radius of the Project Site. The Draft EIR concludes that short-term construction

vibration impacts upon adjacent land uses would be considered significant and unavoidable after mitigation.

Specifically identifying AMDA as one singular land use that could be impacted would not change the level of construction impacts in the Project area. Furthermore, the Draft EIR includes mitigation measures that would ensure vibration impacts upon adjacent land uses would be reduced to the maximum extent feasible, regardless of the land use designation or sensitive receptor identification. As such, the Draft EIR adequately disclosed all potential construction vibration impacts upon adjacent land uses and provided a thorough and comprehensive mitigation strategy to reduce these impacts to the maximum extent feasible. Also see Response to Comment No. 09-11 (AMDA) above for additional information.

Comment No. 09-24

8. The DEIR Avoids Required Analysis of the Project's Impacts on the Capitol Records Echo Chambers and Recording Studios.

CEQA does not allow an impact on the environment to be ignored if only the Applicant's property would be directly affected. This is obvious, yet that appears to be the position taken by the DEIR with respect to the Project's noise and vibration impacts on the Capitol Records recording studios and historic echo chambers- a City-designated Historic Cultural Monument ("HCM"). The DEIR states that the Capitol Records underground echo chambers are located approximately 20 feet north of the proposed limits of excavation for the Project and that Capitol Records Recording Studios A, B, and C are approximately 0.08 feet away from the Project. (DEIR, pp. IV.H-16 and IV.H-29.) Despite the proximity of these uses, and the fact that the DEIR identifies vibration impacts as significant, the DEIR brushes off any meaningful impact analysis or mitigation on the ground that these sensitive receptors are owned by the Applicant. (DEIR, p. IV.H-29.) The DEIR goes on to state that "[v]ibration-related impacts upon these uses will be addressed through agreements between the owner and the tenant, with the intent of minimizing noise-related impacts on the uses." *(Id.)*

The DEIR's analysis is akin to a statement that no historic resource analysis for the demolition of an HCM is necessary if it is the owner that wishes to demolish the building. Interestingly, the Applicant's tenant has previously stated in connection with other adjacent construction (the aforementioned Yucca Condominium Project) that significant impacts to the echo chambers would "basically render unusable the Echo Chambers at the Capitol Records property." (Exhibit J.) Simply put, the same level of analysis and mitigation that the City has previously required for other projects needs to be imposed here- especially because the Applicant may now have an economic interest in not protecting these historic monuments.

Response to Comment No. 09-24

The Draft EIR accurately discloses the potential construction noise and vibration levels that could be experienced by the Capital Records Building's echo chambers and studios. Specifically, page IV.H-30 of the Draft EIR states that construction impacts would produce potentially significant impacts with respect

to human annoyance and disrupting existing studio recording operations. However, the Capitol Records Building's underground recording studios are located on the Project Site, which is owned and operated by the Project Applicant. As such, any land use conflicts would be resolved through tenant-landlord agreements and further coordination between each entity with respect to on-site activities.

For the purposes of CEQA analysis, however, the Project's physical vibration-related annoyance impacts on the existing environment (i.e., the Capitol Records Building's underground echo chambers) would be considered significant and unavoidable. With respect to the comment's comparison of this impact to the theoretical demolition of a historic resource, the comment makes an unfounded leap from a temporary operational conflict, during construction only, to an unsubstantiated theoretical loss of the physical resource. The Project will not physically disturb (let alone demolish) the Capitol Records Building's echo chambers. Thus, the commenter's analogy on this issue is unfounded.

Under the analysis for the Project's impact on the Capitol Records Building's echo chambers and studios, the only significant impact would be an operational use conflict, not the physical loss of, or damage to, a historic resource. The impact associated with operational land use conflicts would be resolved to the extent feasible through coordination of the Project's construction schedule with the tenant's use of the facility.

Comment No. 09-25

9. The DEIR's Mitigation for Groundbourne Vibration Damage to Adjacent Buildings is Not Supported by Substantial Evidence.

Even though estimated vibration levels from construction of the Project are expected to range from 3.9 PPV to 491.66 PPV and the threshold of significance is 0.12 PPV, the DEIR provides that groundbome vibration damage to adjacent buildings will be reduced to insignificance because Mitigation Measure H-11 "requires the Project Applicant to perform all construction work without damaging or causing the loss of support for on-site and adjacent structures." (DEIR, p. IV.H-31). But is that even possible? Can an impact of 491.66 PPV be reduced to a level below 0.12 PPV? Exactly how will adjacent buildings not be damaged? One would not know from the DEIR because the one proffered mitigation measure to address this impact is completely conclusory.

Response to Comment No. 09-25

With respect to potential building damage impacts from construction vibration, Mitigation Measure H-11 provides a thorough and effective performance based standard to ensure potential building damage impacts would be mitigated to less than significant levels. Please also see Response to Comment No. 59-20 (Jordon, David), which is summarized in relevant part below.

Mitigation Measure H-11 specifically sets performance standards for the adjacent structures monitoring plan. Mitigation measures may specify performance standards that would mitigate a significant impact and that might be achieved in various ways. 14 Cal Code Regs §15126.4(a)(1)(B). If it is not practical to

define the specifics of a mitigation measure when the EIR is prepared, the agency may defer formulation of the specifics pending further study if the mitigation measure describes the options that will be considered and identifies performance standards. See *San Joaquin Raptor Rescue Ctr.,* 149 CA4th at 671; *Endangered Habitats League,* 131 CA4th at 794; *Defend the Bay v City of Irvine* (2004) 119 CA4th 1261, 1275, 15 CR3d 176.

While the performance standards in Mitigation Measure H-11 are not quantitative, since it does not rely on a specific prevention of some specific amount of noise or vibration, it is stated as an absolute qualitative commitment "not to adversely impact or cause loss of support to neighboring/bordering structures." Substantial evidence for the effectiveness of this commitment is provided by the monitoring program, described in detail within Mitigation Measure H-11. These programs will, at a minimum, use licensed qualified experts and scientific methods to detect all vibration as well as vertical and horizontal movement at elevation and lateral monitoring points on adjacent buildings and structures. As part of this commitment, "work will stop in the area of the affected building" if vibration or structural crack or movement thresholds are exceeded, and not resume until "measures have been taken to stabilize the affected building." In addition, the structures monitoring program must include "vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation to protect adjacent buildings from construction-related damage. In other words, Project construction activities must conform to the performance standards set in Mitigation Measure H-11 or else work would stop to avoid damage to structures. Thus, the Draft EIR has properly identified mitigation that reduces the potential impacts of the Project.

Comment No. 09-26

10. The DEIR Mentions a Rooftop Observation Deck But Provides No Analysis of its Potential Noise Impacts.

The Project's application and the DEIR mention a rooftop observation deck, but the DEIR does not analyze its noise impacts on the surrounding neighborhood. Oddly enough, even though the application states the rooftop deck will be outdoors, will have alcohol service, and that special events with live entertainment could conceivably occur, the DEIR is completely silent on the noise impacts of that deck. The DEIR does not even disclose that the deck will be outdoors. Likewise, the Project's application makes clear that other outdoor decks may be incorporated into the Project. These decks must be analyzed and their impacts mitigated to the maximum extent feasible in a re-circulated DEIR.

Response to Comment No. 09-26

The Draft EIR adequately disclosed the potential noise impacts associated with people and activities and events within the common outdoor spaces, podium levels, and observation decks. Specifically, page IV.H-40 states the Project is anticipated to include outdoor eating and gathering places at the pedestrian level at-grade, above the ground floor on the podium levels, and observation deck levels of the proposed towers. The podium levels would be developed with common open space areas, swimming pools and

poolside seating, and outdoor dining. It is anticipated that outdoor noise would be generated by people talking, swimming pool activity, and occasional amplified music, television, and related announcements during special events.

As shown in Table IV.H-3 of the Draft EIR, ambient noise levels in the Project vicinity have the potential to exceed 70 dBA CNEL. Given the existing relatively high ambient noise levels at the Project Site, the distance provided between the podium levels and any noise sensitive receptors, and attenuation of sound created by existing and/or proposed structures that may block the line of sight between receptors and noise sources, it is not expected that Project-related outdoor noise levels would substantially increase the ambient noise at surrounding off-site uses. In addition, the Project would be required to comply with Section 112.01 of the LAMC, which would ensure outdoor eating and gathering areas would not substantially alter the ambient outdoor noise levels at surrounding off-site uses and these impacts would be less than significant.

Comment No. 09-27

11. The DEIR Must Fully Analyze Potential Impacts From Above-Ground Parking Structures.

Nothing in the DEIR prevents the construction of an above-ground parking structure adjacent to AMDA's 1777 Vine Street Building or other sensitive receptors. Should this occur, the Project would be raising vehicles from a street-level parking lot to be directly adjacent to AMDA's 1777 Vine Street Building's windows on multiple levels. (The DEIR "envisions" three levels of above-grade parking, but the equivalency program would not prevent above-grade parking structures from being significantly taller.) The DEIR must analyze noise from car alarms, tire squealing, honking, and other loud parking structure noises that might impact AMDA.

Response to Comment No. 09-27

The Draft EIR adequately analyzed and disclosed that the Project would not have significant operational noise impacts associated with subterranean and above-grade parking structures. Specifically, page IV.H-39 of the Draft EIR states that, based on the code required parking standards and the implementation of a shared parking program, it is envisioned that the Project would include one level of parking at-grade, three levels of above-grade parking within the podium structures, up to six levels of below-grade parking on the East Site, and up to six levels of below-grade parking on the West Site. The above-grade parking levels would be open-air, but would include screening to improve the visual qualities of the structures. Various noise events would occur periodically from the parking facilities.

Such periodic events would generally include activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events generate sound levels as high as 75 dBA at a reference distance of 25 feet; however these noise sources would be sporadic and primarily limited to the daytime. It should be noted

that the existing Project Site currently generates noise levels largely associated with surface parking lot noise and the vehicle activities described above. Although the Project would increase the number of vehicles parking on-site, the types of noise would be similar to those currently occurring on the Project Site.

As shown in Table IV.H-3 of the Draft EIR, Noise Monitoring Location 6 was conducted on Vine Street, between the existing surface parking lots for the West Site and East Sites. The measured noise level for this location was 69.8 dBA Leq, consistent with the range of 65-75 dBA noted above. While periodic noise levels from car alarms, horns, slamming of doors, etc., would increase as a result of the Project, these events would not occur consistently over a 24-hour period and thus would not have the potential to increase ambient noise levels by 5 dBA CNEL. As such, noise impacts from parking structures would be considered less than significant and no mitigation measures are required.

Comment No. 09-28

12. The Project Would Expose AMDA to Interior Noise Levels Beyond Regulatory Standards.

The DEIR states that "the Project would result in generally unacceptable exterior noise levels for any proposed residential or open space uses fronting Vine Street .... Therefore, future interior noise levels associated with roadway traffic along Vine Street could still exceed the City standard 45.0 dBA for interior residential uses." (DEIR, p. IV.H-37.) To mitigate this impact to a level less than significant, the DEIR requires Project buildings to include sound-proof windows and noise insulation. Therefore, because AMDA' s 1 777 Vine Street Building is a sensitive receptor fronting Vine Street, the DEIR must provide similar upgrades to AMDA's 1777 Vine Street Building. In addition, because this impact was not disclosed as significant in the DEIR, this is yet another reason the DEIR must be re-circulated.

Response to Comment No. 09-28

The proposed residential or open space uses being discussed in the above quoted passage refer to the residential or open spaces proposed by the Project. The Project would place residential uses in an existing environment that exceeds the desired exterior ambient noise levels for residential land uses. Thus, the Project would be required to ensure the residential units achieve acceptable interior regulatory noise levels for multi-family residences. Please see Response to Comment No. 09-11 (AMDA) above regarding sensitive receptors.

Furthermore, this comment does not substantiate the request for noise attenuation upgrades to AMDA's 1777 Vine Street Building. The 45 dBA CNEL interior standard is for multi-family residential uses and is not applicable for commercial office buildings. Furthermore, the Project would not generate significant long-term operational noise impacts upon AMDA's 1777 Vine Street Building, thus no mitigation measures are warranted.

Comment No. 09-29

C. The DEIR's Traffic Analysis Has Multiple Material Flaws and is Not Supported by Substantial Evidence.

1. The DEIR's Equivalency Program Makes It Impossible to Understand the Full Range of Possible Uses and Configurations, All of Which Would Affect Traffic in Different Ways.

The DEIR provides the impression that CEQA traffic analysis begins and ends at total trips, and that no further analysis is required so long as total trips are maintained below a certain number. This is not the case; the imprecise nature of the DEIR's equivalency program means that the DEIR fails to provide a true understanding of the Project's impacts. Because the DEIR does not disclose precise driveway points and what specific uses those driveways would be serving, the public is not afforded an understanding of the peak hour usage of those driveways, how pedestrian activity at specific project access points may create hazards or create internal parking structure queuing, or how driveways at specific access points may backup traffic behind vehicles making a left-hand turn into the Project.[8] (Granted, the DEIR does not even discuss if left-hand turns into the Project will be allowed because of the multiple scenarios that could conceivably result from the equivalency program.) At one point, the DEIR's traffic study provides a glimmer of hope on specificity when it states that "[a] preliminary analysis concludes that the driveways as shown on the conceptual plans (Figure 3) will not introduce any unusual adverse hazards." (Traffic Study, p. 9.) But only a glimmer; a review of the aforementioned Figure 3 does not show a single driveway or Project access lane. (See Exhibit K.) Without an understanding of traffic circulation immediately around the Project, it is impossible to know if turns, queuing, and other vehicular conflicts will create trickle-down impacts to multiple intersections.

Response to Comment No. 09-29

Detailed driveway descriptions are provided on Pages 38 and 39 in Appendix IV.K.1 of the Draft EIR. The locations and uses served by the driveways are disclosed on those pages and thus the public is afforded an understanding of the peak hour usage of the driveways. Also, page IV.K.1-35 of the Draft EIR, identifies the locations of driveways and ingress/egress points. Please see Response to Comment No. 09-7 (AMDA) for additional driveway access discussion.

Further, although the Traffic Study and the Draft EIR discuss that the driveways will not introduce any unusual adverse hazards (see page IV.K.2-25 of the Draft EIR), additional analysis was completed to clarify and further demonstrate that impacts to pedestrian safety conditions due to Project Site access are less than significant. As discussed in , Appendix G, Site Access Impact and Pedestrian/Bicycle Safety Analyses, attached hereto, the Project would reduce the number of driveways serving the Project Site on

[8] *Although the Traffic Study does provide a general discussion of driveway locations, these driveway locations are hypothetical in nature only. (See Traffic Study, p. 38.) As the Project's Development Regulations provide, "parking, open space, and related development requirements for any component of the Project may be developed in any location within the Project Site." (See Development Regulations, p. 10.)*

Vine Street, Ivar Avenue and Argyle Avenue from the existing conditions, no potential sightline conflict with other vehicles, including bicycles, has been identified at these driveways, pedestrians would have adequate sidewalk space, and there is no data to indicate that the proposed driveways for the Project would cause pedestrian safety impacts.

Comment No. 09-30

In a similar vein, the traffic analysis takes credits via "internal capture" for Project uses that may never be built. For example, the DEIR claims a separate 15% internal capture reduction in trips for the fitness/sports center, for the retail, and for the restaurants (presumably because of the onsite office and residential uses). But what if the office and residential space that is actually built is significantly less than that analyzed in the DEIR or disappears altogether? What if the Applicant uses the DEIR to pursue a 100% retail project? In this case, the Applicant would obtain a 15% trip reduction for nothing.

Response to Comment No. 09-30

This comment challenges the use of trip credits for "internal capture" with respect to the Project's trip generation estimates. As shown on page 29 in Appendix IV.K.1 of the Draft EIR, internal capture credit is 5% for hotel, 15% for fitness/sports club, 15% for retail and 15% for restaurant. The Commercial Scenario, the Concept Plan, and the Residential Scenario were analyzed with a range of sizes for Non-Office Commercial (support) uses. For residential and office components, the internal capture credit is based on the support use, which is adjusted to equal the internal capture trips either inbound or outbound to the support components. Corresponding to the potential change in Project components, appropriate internal capture credit was applied to reflect that Project scenario. The purpose of the calculation is to ensure that any internal capture credit represents the land-uses. See Response to Comment No. 59-27 (Jordon, David) for additional information regarding the internal capture rates.

The concern in the comment that the use of the internal capture credit would understate the trip generation of an all retail development is unfounded because an all retail development scenario is not reflective of the Project. As stated on pages II-44 through II-48, in Section II, Project Description of the Draft EIR, the Project Objectives call for the development of a mixed-use Project. Furthermore, irrespective of the land uses proposed, the Project's Equivalency Program establishes a trip cap as one measure to control the level of development for the Project. There are a number of other controlling factors that ensure the Draft EIR has properly analyzed and disclosed the full range of environmental impacts that could occur as a result of the Project. As stated on pages II-22 and II-23 of the Draft EIR: "[t]he Equivalency Program shall be implemented pursuant to the administrative procedures set forth in the Development Agreement. The process to initiate an exchange under the Equivalency Program would begin with the Applicant filing a request with the Department of City Planning. This request shall include detailed information identifying the land use transfer/exchange that is being proposed and supplemental information documenting how the proposed land uses are consistent with the overall a.m. and p.m. peak hour trip cap identified in Table II-3, Project Trip Cap. The supporting documentation shall also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum

environmental impacts identified in the Draft EIR." Thus, the development procedures described above will ensure that the Trip Cap is not exceeded, that the method of calculating trips is consistent with the method used on the Project Traffic Study as approved by LADOT, and that the development would not exceed the maximum environmental impacts identified in the EIR.

Comment No. 09-31

Simply put, the DEIR's traffic analysis is not supported by substantial evidence. As stated earlier, the DEIR's traffic analysis is more consistent with that of a program-level EIR. It cannot legally comport with CEQA's disclosure requirements until greater Project specificity is provided.

Response to Comment No. 09-31

The comment states that the traffic analysis is not supported by substantial evidence and cannot comport with CEQA's disclosure requirements until greater Project specificity is provided. First, the traffic analysis is supported by substantial evidence. The Traffic Study, Appendix K.1 to the Draft EIR, adequately analyzes Project traffic impacts and is substantial evidence. Further, additional analyses were prepared regarding construction impacts, the Concept Plan and the Residential Scenario impacts, pedestrian conflicts, and additional intersections to the north of the study area for further clarification. See Appendices D (Updated Construction Traffic Impacts Including Individual Intersection Impact Analyses), E (Final EIR Added Intersection Analysis), F (Concept Plan and Residential Scenario Traffic Impact Analysis), and G (Site Access Impact and Pedestrian/Bicycle Safety Analysis), attached hereto. These additional analyses are also considered substantial evidence.

Please see Response to Comment Nos. 03-1 (California Department of Transportation (Caltrans)) through 03-15 (California Department of Transportation (Caltrans)) and Response to Comment Nos. 09-29 through 09-52 (AMDA) for additional information.

Comment No. 09-32

2. The Traffic Study's Trip Distribution Needs to Account for the Separate Project Uses.

As stated previously, the DEIR's equivalency program has the effect of making much of the Project's impact analysis irrelevant. While CEQA does not prohibit equivalency program environmental analysis, the analysis can become highly problematic in connection with complex projects that have several potential uses, all of which can be located in various different locations throughout a large project site. In this case, the equivalency program's broad-strokes description of potential project uses and their location on the Project site makes it impossible to capture and understand the Project's ultimate trip distribution.

Response to Comment No. 09-32

As shown in Figures 5(a) to 5(c) of the Traffic Study, Appendix K.1 of the Draft EIR, separate trip distributions were used for the Residential, Office and Non-Office Commercial components. Additional

analysis of traffic impacts due to the Residential Scenario and the Concept Plan has been conducted to clarify and amplify the traffic impact analysis in the Draft EIR. The analysis utilized the separate by component trip distributions developed for, and used in, the Traffic Study and demonstrate that significant impacts would not occur other than at those intersections identified in the Draft EIR. See Appendix E (Final EIR Added Intersection Analysis) attached hereto. Also, please see Response to Comment No. 09-29 (AMDA) for additional information.

Comment No. 09-33

The DEIR's traffic analysis assigns a trip distribution based on one specific project iteration (the Concept Plan) and this trip distribution remains constant irrespective of what uses may ultimately be incorporated into the Project and where on the site they are located. This leads to a highly simplistic and flawed trip distribution. Hotels, for example, have a very different trip distribution than a fitness center or condominiums, yet the DEIR makes no attempt to account for the fact that the project that may ultimately be built will have no resemblance whatsoever to the Concept Plan (e.g., the Project could be almost entirely residential). Likewise, we know that vehicles will choose one route over another based on their points of ingress and egress. The DEIR's trip distributions, which are guided by a completely random allocation for one project iteration that does not have to be built, are therefore highly flawed.

Response to Comment No. 09-33

The comment states that the analysis in the Traffic Study and the Draft EIR is based on the Concept Plan. However, the Commercial Scenario was determined to have the highest trip generation and as such, the Commercial Scenario was analyzed in the Traffic Study and the Draft EIR. Further, additional analysis of traffic impacts due to the Residential Scenario and the Concept Plan has been conducted to clarify and amplify the traffic impact analysis in the Draft EIR. The analysis utilized the separate by component trip distributions developed for, and used in, the Traffic Study and demonstrate that significant impacts would not occur other than at those intersections identified in the Draft EIR. See Appendix E (Final EIR Added Intersection Analysis) attached hereto.

Also, please see Response to Comment Nos. 09-29 and 09-32 (AMDA) for additional information.

Comment No. 09-34

Indeed, the Applicant's traffic consultant has previously taken the position in connection with other EIRs that a traffic study would be deficient if the trip distribution for individual uses was not specifically assigned. They said:

> ... recent traffic studies for large mixed-use projects approved by LADOT ... have used discrete trip distribution patterns and percentages for individual uses in order to more accurately assign trips to study intersections and routes. For example, office, residential, hotel and retail uses generally have different trip distributions, as their origins and destinations are different. Utilizing one generic trip distribution for dissimilar proposed and existing uses can result in project trips

and impacts being underestimated at study locations, as well as some locations not being considered for analysis because they have been assigned a low number of trips. (See Exhibit L.)

Given the fact that the DEIR's own traffic consultant has cautioned against generic trip distribution, it is difficult to understand why this DEIR does not account for all the multiple uses and configurations that could ultimately be built under the equivalency program. Without an appropriate trip distribution, the DEIR cannot be supported by substantial evidence.

Response to Comment No. 09-34

First, separate and discrete trip distributions were used for the Residential, Office and Non-Office Commercial components of the Project. See Appendix K.1 of the Draft EIR. As such, contrary to the assertion in the comment, generic trip distribution is not utilized. Additionally, an analysis of traffic impacts due to the Residential Scenario and the Concept Plan has been conducted. The detailed analysis procedures and results are documented in Appendix F (Concept Plan and Residential Scenario Traffic Impact Analysis) attached hereto. The analysis utilized the separate by component trip distributions developed for, and used in, the Traffic Study. The analysis determined that under the Residential Scenario and the Concept Plan less intersections are significantly impacted overall and that significant impacts would not occur other than at those intersections identified in the Draft EIR.

For the Residential Scenario under the Future (2020) conditions, significant Project traffic impacts would remain significant at three intersections, two of these three intersections were concluded to remain significant under the Commercial Scenario analyzed in the Traffic Study, and the third intersection was concluded to remain significant under the Maximum East Site Development Scenario (see page IV.K.1-121 of the Draft EIR). The remaining significantly impacted intersections are:

16. Cahuenga Boulevard and Hollywood Boulevard (PM Peak Hour);

18. Vine Street and Hollywood Boulevard (AM Peak Hour); and

19. Argyle Avenue and Hollywood Boulevard (PM Peak Hour).

A mitigation measure has been developed to mitigate the significant impact at Intersection No. 19, Argyle Avenue and Hollywood Boulevard, to a less than significant level under the Residential Scenario and that measure has been added to the recommended mitigation measures. The added measure would limit the allowed residential development on the East Site to 450 units and the allowed reserved residential parking on the East Site to 675 spaces (equivalent to the 450 units). This equates to approximately 50% of the total maximum of 897 units for the Residential Scenario. This measure would not affect the impact analysis of the remaining Project EIR Scenarios (the Commercial Scenario and the Concept Plan) as they have less than 450 residential units on the East Site.

Accordingly, the following mitigation measure shall be added:

"K.1-14 East Site Residential Unit and Reserved Residential Parking Cap. On the East Site, residential development shall be limited to 450 residential units and 675 reserved residential parking spaces."

With implementation of the mitigation measure, impacts at Intersection No. 19, Argyle Avenue and Hollywood Boulevard, under Future (2020) conditions under the Residential Scenario are reduced to a less than significant level. See Appendix F (Concept Plan and Residential Scenario Traffic Impact Analysis) attached hereto.

Please see Response to Comment 09-32 (AMDA) for additional information.

Comment No. 09-35

3. The DEIR Must Analyze Neighborhood Intrusion Impacts and Construction and Operational Traffic Impacts Arising From AMDA's Location

The DEIR fails to analyze the Project's neighborhood intrusion impacts. Of particular importance, the DEIR did not analyze the Project's traffic impacts on AMDA and its students and faculty. AMDA's presence adjacent to the Project site creates various specific conditions that have not been analyzed, and which may require a Neighborhood Traffic Management Program. For example, large groups of students cross Yucca Street between the Vine Tower and AMDA's 1777 Vine Street Building when classes let out throughout the day, yet the DEIR did not take pedestrian counts to understand how large groups of students might impact left-and right-hand turn lanes on Yucca, or how traffic may create hazards for AMDA students and faculty.[9]

Response to Comment No. 09-35

The AMDA facility is in a commercial neighborhood and is not a single-family residential use. The requirement for a neighborhood intrusion traffic impact analysis is typically warranted for residential neighborhoods, not commercial corridors such as Yucca Street or Vine Street. Yucca Street is a designated Secondary Highway between Cahuenga Boulevard and Vine Street. Vine Street is designated as a Major Highway Class II roadway in the vicinity of the AMDA facility. Furthermore, the southbound 101 Freeway off-ramp, located at Franklin Avenue and Vine Street, is situated only 150 feet to the north of the AMDA facility and serves as a gateway to the Hollywood area. Thus, it would be inappropriate to require a Neighborhood Traffic Management Program to address the Project's traffic impacts with respect to AMDA's bifurcated facility.

[9] *The DEIR cannot ignore multiple site-specific variables just because the City's thresholds do not address them. See Mejia v. City of Los Angeles, (2005) 130 Cal. App. 4th 322, 342. ("We conclude that the city improperly relied on a threshold of significance despite substantial evidence supporting a fair argument that the project may have significant impact on traffic on Wheatland Avenue. In light of the public comments and absent more careful consideration by city engineers and planners, the evidence supports a fair argument that the increased traffic on Wheatland Avenue as a result of the project would be substantial considering the uses of the road.").*

With respect to neighborhood intrusion impacts in residential areas surrounding the Project Site, the Project is not anticipated to add traffic volumes to any local streets bordered by single-family homes, and in turn is not anticipated to cause residential neighborhood intrusion impacts. Pedestrian counts were conducted along the north-south segment where Project driveways would be added to determine the relative number of pedestrians that would be impacted by the Project. As discussed in the Site Access Impact and Pedestrian/Bicycle Safety Analyses, Appendix G (Site Access Impact and Pedestrian/Bicycle Safety Analysis) attached hereto, the Project would reduce the number of driveways serving the Project Site on Vine Street, Ivar Avenue and Argyle Avenue from the existing conditions, no potential sightline conflict with other vehicles, including bicycles, has been identified at these driveways, pedestrians would have adequate sidewalk space, and there is no data to indicate that the proposed driveways for the Project would cause pedestrian safety impacts.

Comment No. 09-36

Likewise, the DEIR neglected to analyze the Project's traffic impacts on various residential street segments. Ivar Avenue between Yucca Street and Franklin Avenue (a great portion of which is lined with AMDA student housing), for example, will no doubt experience significant traffic impacts because northbound travel on Yucca will be one of the most efficient ways of accessing the northbound Hollywood Freeway from the Project's Ivar Avenue access point (Ivar to Franklin and then Franklin to Argyle/the Hollywood Freeway). Several other likely cut-through routes have not been identified and necessitate further study.

In short, the DEIR needs to critically address cut-through traffic and its impact on residential street segments, analyze AMDA-specific traffic issues, and provide appropriate mitigation for both construction and operational traffic.

Response to Comment No. 09-36

The route described in the comment does not involve neighborhood traffic intrusion (defined as travel on local streets through single family residential areas). In addition, Project trips exiting to Ivar Avenue are anticipated to use the more direct travel path along Yucca Street for southbound US-101 freeway access, rather than using the more circuitous route described in the comment. Likewise, Project trips from the Ivar Avenue driveway would need to "back-track" to use the described route to access the northbound US-101 freeway. As such, no further study is necessitated.

Comment No. 09-37

4. The DEIR Must Analyze Traffic Impacts During the Hollywood Bowl Summer Season and Performances at the Pantages Theater, As Well As Ascertain Whether the P.M. Peak Hours Are Truly 3:00 P.M.-6:00 P.M.

The DEIR has dramatically underreported traffic impacts by not including manual counts taken on high traffic-volume days. Specifically, the DEIR states that "[t]raffic volumes for existing conditions at the 37

study intersections were obtained from manual traffic counts conducted in March, April, May, September, and October 2011." (DEIR, p. IV.K-1-12.) The three-month break over the months of June, July, and August is highly suspect because it coincides precisely with the Hollywood Bowl summer concert season, which elevates traffic throughout Hollywood quite significantly.[10] (Why else would counts have stopped for three months?) With an occupancy of approximately 18,000, the Hollywood Bowl is the largest natural amphitheater in the United States, and summer concert nights (at the tail-end of June and almost every night in July and August) often create traffic havoc throughout the area of Hollywood near the Project site. In fact, the Highland exit from the southbound Hollywood Freeway is often so congested during Hollywood Bowl summer events that traffic is directed to the Cahuenga off-ramp, with ensuing trickle-down impacts in the immediate vicinity of the Project site. The DEIR cannot pick and choose convenient days for manual traffic counts. It is crucial that the Project's traffic baseline include Hollywood Bowl traffic so that Project traffic impacts are understood and mitigated to the maximum extent feasible.

Response to Comment No. 09-37

Per LADOT Traffic Study Policies and Procedures, May 2012, "all traffic counts should generally be taken when local schools or colleges are in session, on days of good weather, on Tuesdays through Thursdays during non-summer months, and should avoid being taken on weeks with a holiday." As such, counts stopped in the summer months based on the above, because schools are not in session, not to attempt to avoid the Hollywood Bowl summer events.

The Traffic Study used the ITE Trip Generation Manual time periods of 7-9 AM and 4-6 PM as the Project's peak generation hours. LADOT has expanded the ITE time periods to 7-10 AM and 3-6 PM for traffic count purposes because those are the peak Los Angeles commute hours. During weekdays, Hollywood Bowl and Pantages Theater events generally start at 8:00 PM, after the roadway peak period. Of the 55 weekday events on the Hollywood Bowl 2012 calendar, 41 were scheduled to start at 8:00 PM. Of the 45 shows on the Pantages Theater calendar for the period of January through April of 2013, 38 were scheduled to start at 8:00 PM. In addition, Project traffic is expected to have a peak during the normal street commuter peak traffic period. A study for a different period would consider less than the peak Project traffic volumes.

Comment No. 09-38

Likewise, the Project directly abuts the Pantages Theater, which has a seating capacity of almost 3,000. The DEIR needs to analyze the Project's traffic in conjunction with Pantages theater vehicular traffic, the latter of which would be circling the vicinity looking for parking at approximately the same time (i.e., the one hour period before the performance start time).

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[10] *Further elevating our suspicions about the date selection for manual traffic counts is that when manual counts were reinstated in September, a month when there were still a few Hollywood Bowl concerts remaining on calendar, the DEIR's traffic consultant only took manual traffic counts in the morning, not afternoon. (See DEIR, Appendix IV.K.l, Appendix B.)*

Response to Comment No. 09-38

Please see Response to Comment No. 09-37 (AMDA).

Comment No. 09-39

Finally, given the scale of the proposed Project, the DEIR should analyze traffic impacts up to 7 p.m., and include this hour as part of the peak hour if conditions warrant. Security guards stationed at the entrance to AMDA's parking lot on Yucca Street have related to us that traffic in this particular area is at its worst from 5 p.m. to 7 p.m. (not necessarily 3 p.m. to 6 p.m.). If this is the case, then the DEIR has failed to analyze the correct peak hour that applies to this particular neighborhood. Los Angeles Department of Transportation ("LADOT") peak hour reporting requirements alone are not substantial evidence unless they are supported by facts specific to the Project's location.

Response to Comment No. 09-39

The Project traffic is anticipated to peak during the standard Los Angeles commute hours of 3-6 PM because the primary uses are the residential and offices use, which have their heaviest generation levels during the commute (roadway) peak hours. Project generation and the corresponding impacts, would be less outside the 3-6 PM hours since the generation from the major components would be at a lower level. Therefore, the 3-6 PM hours were selected as the appropriate evening analysis period. As such, traffic generated by the Project would be at its worst during the standard Los Angeles commute hours of 3-6 PM and the correct peak hours were analyzed.

Comment No. 09-40

5. The DEIR Must Analyze Operational Traffic Impacts In Conjunction with Partial Construction Traffic.

The DEIR significantly underreports the Project's construction traffic impacts by ignoring the development phasing allowed by the proposed Development Agreement. The DEIR's construction traffic section assumes that the entire Project will all be built at once purportedly in order to provide a conservative analysis of construction impacts. However, ignoring the much more likely scenario that the Project will be built in phases[11] has the result of severely undercounting total traffic impacts and problems that would be posed by construction traffic *in conjunction* with operational traffic from a half-complete Project. The traffic impacts of a partially built Project, together with construction elsewhere on the site, would create a significant impact that has not been analyzed. CEQA requires that the Project's combined traffic impacts be analyzed.

[11] *"The Project includes a Development Agreement that would allow the long-term phased buildout of the Project." (DEIR, p. II-34.)*

Response to Comment No. 09-40

Appendix M of the Traffic Study in Appendix IV.K.1 of the Draft EIR considers both construction and occupied Project trip generation. The Project trip generation during construction activities is anticipated to be less than the Project traffic analyzed for the occupancy period. Further, the total site Trip Cap generation calculation procedures consider construction activity. The Trip Cap procedures, Table 2 in Appendix M of the Traffic Study and the associated text on pages 4 and 5, require that the Project include in the trip generation calculation the number of construction workers and truck trips per weekday. Also included in the trip generation calculation are factors for the Project operating uses on the Project Site. Further, page IV.K.1-32 through 35 of the Draft EIR, describe the Trip Cap calculation procedures to include construction traffic. Therefore, the trip generation calculations to be compared to the Trip Cap do take both the construction and operating activities into account.

Comment No. 09-41

6. The DEIR's Trip Cap Erroneously Combines A.M. Trips and P.M. Trips.

As the DEIR's Traffic section demonstrates, the City differentiates between a.m. and p.m. peak hour impacts (e.g., an intersection can be significantly impacted in the a.m. peak hour, but not the p.m. peak hour). Despite the City's requirement of a separate impact analysis for the a.m. and p.m. peak hours, the equivalency program's trip cap of 1,498 *combines* a.m. and p.m. peak hour trips. CEQA requires that one trip cap be created for the a.m. peak hour and that another trip cap be created for the p.m. peak hour to keep impacts consistent with the DEIR's impact envelope. If this is not done, the Applicant will be afforded the ability to create a greater impact than that which the DEIR has disclosed for one of the peak hours. For example, ITE rate 931 (Quality Restaurant) generates virtually no trips in the a.m. peak hour, but has particularly high traffic generation rates in the p.m. peak hour. If the Applicant were to provide a significant amount of restaurant space in the Project, but only measured the resulting restaurant trips against a combined peak hour trip cap, the restaurants' inordinate p.m. peak hour impacts would be masked, and p.m. peak hour impacts on nearby intersections could not be analyzed. As a result, the DEIR may fail to disclose the specific a.m. or p.m. peak hour trip impacts that could result from the Project.

Response to Comment No. 09-41

The Project trip generation was calculated separately for both AM and PM peak hours for the various scenarios (i.e., Concept Plan, Commercial Scenario, and the Residential Scenario). The Commercial Scenario analyzed in the Traffic Study had the highest AM Peak Hour and PM Peak Hour trip generation individually, as well as the two peak hours combined. The precise scenario ultimately developed is restricted to be within the envelope of Project trip generation in the Appendix IV.K.1 - Traffic Study and as described and analyzed in Section IV.K.1-Transportation-Traffic of the Draft EIR. For example, the Project could not provide a significant amount of restaurant space if the traffic generated by such a development would exceed the Trip Cap. Furthermore, irrespective of the land uses proposed, the Project's Equivalency Program establishes the Trip Cap as one measure to control the level of

development for the Project. As stated on pages II-22 and II-23 of the Draft EIR: "[t]he Equivalency Program shall be implemented pursuant to the administrative procedures set forth in the Development Agreement. The process to initiate an exchange under the Equivalency Program would begin with the Applicant filing a request with the Department of City Planning. This request shall include detailed information identifying the land use transfer/exchange that is being proposed and supplemental information documenting how the proposed land uses are consistent with the overall a.m. and p.m. peak hour trip cap identified in Table II-3, Project Trip Cap. The supporting documentation shall also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR." Thus, the development procedures described above will ensure that the Trip Cap is not exceeded, that the method of calculating trips is consistent with the method used in the Traffic Study as approved by LADOT, and that the development would not exceed the maximum environmental impacts identified in the EIR. Further, the traffic impacts were assessed separately for AM and PM peak hours. Please see Table IV.K.1-14 for the Project traffic impacts under Existing (2011) conditions on pages IV.K.1-48-50 and Table IV.K.1-18 for the Project traffic impacts under Future (2020) conditions on page IV.K.1-75 t-77 of Section IV.K 1, Traffic-Transportation, of the Draft EIR. These tables show that each intersection was analyzed for both the AM and PM peak period separately for Existing (2011) Plus Project and Future (2020) Plus Project conditions. For further clarity, the Residential Scenario and the Concept Plan were analyzed in detail for both the AM and PM peak hour. The additional analysis verified that the Project would have no new AM or PM impacts at locations other than those identified in the Draft EIR. See Appendix F (Concept Plan and Residential Scenario Traffic Impact Analysis) attached hereto.

To address the concerns raised in the comment and to further ensure that the development remains within the range of the impacts analyzed, the Trip Cap has been split into separate AM and PM components. The resulting "Trip Cap" is 574 AM peak hour trips and 924 PM peak hour trips (see the revised Trip Cap language and tables in Appendix H, Trip Cap, for detailed calculations of the separate AM and PM Trip Cap). As such, development cannot exceed 574 AM peak hour trips or 924 PM peak hour trips. To calculate the separate AM and PM peak hour Trip Cap, the values in the Traffic Study trip generation table (Table 5) were used and the same procedures used in the Draft EIR for the combined cap were utilized (except for the adding together of the AM and PM values). As demonstrated in the revised Trip Cap language and tables, the maximum generation values for both the AM and PM peak hours individually will occur with the Commercial Scenario, which was analyzed in the Traffic Study and the Draft EIR. Thus, the Traffic Study and the Draft EIR analyzed the peak impact during each hour.

Comment No. 09-42

7. The DEIR Provides No Substantial Evidence in Support of Its Approximately 30% Vehicle Trip Reduction for Public Transit use.

The DEIR's traffic study assumes an approximately 30% reduction in vehicle trips due to public transit use. First it adjusts the trip generation rates by 15% (Table IV.K.l-4) and then, in what is arguably double-dipping, takes another 15% reduction on the back-end for public transit usage in connection with

the Transportation Demand Management ("TDM") program.[12] (DEIR, p. IV.K.1-55.) While TDM programs may be effective in reducing total vehicle trips, the DEIR does not support the high 30% total trip reduction related to public transit with substantial evidence. For a Project that does not include any affordable units (in fact, the views from the proposed 55-story towers will command multi-million dollar prices) and whose office and hotel uses will likely be tied in great part to the entertainment industry, it is not clear how 30% of Project trips will be bus and Metro Red Line trips (the Metro Red Line, while very convenient to the Project, still only covers a very small portion of the sprawling Greater Los Angeles area). The DEIR needs to provide evidence in the form of similar transit-adjacent Los Angeles projects to support the assumptions regarding trip reductions. Likewise, much of the TDM program currently lacks any enforcement mechanisms or objective performance standards by which the success of the TDM program can be measured. As drafted, the TDM program is impermissible deferred mitigation.

Response to Comment No. 09-42

The adjustments for alternative modes and implementation of a TDM program reflect an increase of transit use as well as an increase in the use of other alternative modes. Given the proximity to the Hollywood/Vine Metro Red Line Transit Station, high transit usage is expected. The Red Line Transit Station provides connections to the Metro rail system and many bus lines. Further, the high cost of parking will encourage use of transit and other modes, such as bicycling, carpooling and walk-in. Additionally, the mixed-use nature of the Project and surrounding area will reduce vehicle trip generation. The TDM program will further encourage the use of alternative modes. The promoted alternatives to driving alone include ride-sharing, bicycling, work-at-home and telecommunication, as well as transit. The LADOT approved the transit assumptions with consideration of the LADOT Traffic Study Policies and Procedures, May 2012. That document is based on the conditions within the City of Los Angeles, and the transit assumptions are within the requirements of that document.

Comment No. 09-43

8. The DEIR's Significance Determination for Construction Traffic Impacts is Not Supported By Substantial Evidence.

The DEIR's significance determination for construction traffic impacts is not supported by substantial evidence. For example, none of the Project's construction trips were assigned to the street system to determine whether construction traffic would exceed LADOT impact thresholds. With respect to the DEIR's trip cap, it cannot be relied upon because construction traffic patterns will bear no resemblance to

[12] *Some of the 15% reduction from the TDM program would presumably come from bicycle usage and other vehicle trip reduction measures. However, the DEIR has not shown that this particular project could deliver a total 30% reduction either way.*

the Project's operational uses. (And if the trip cap could be used, the DEIR fails to show how construction traffic trips fall under the total trip cap.[13]

Response to Comment No. 09-43

The comment states that the construction trips do not fall under the Trip Cap. However, the maximum allowed Project trip generation recommended in Appendix IV.K.1 - Traffic Study and discussed in Section IV.K.1 Transportation-Traffic of the Draft EIR explicitly includes the combination of operational and construction traffic. If the Project is built in phases, the maximum trips, including construction trips and operational trips, would have to be less than the Trip Cap. Peak hour construction traffic is mainly due to construction worker commute trips, and will be similar to the occupied Project peak hour trips, which are also mainly commute trips.

The comment questions whether the construction impacts will exceed the operational impacts despite the lower generation. First, Table IV.K.1-13, Trip Generation During Construction By Month Within the Construction Period, in the Draft EIR shows that the Project's construction trips range from 20 trips in month 1 to a maximum of 1,269 trips during months 22-25, when the construction activity is expected to peak. To further illustrate that the construction trip impacts will be within the envelope of the build-out/operational impacts, an analysis of the maximum construction period trip generation impacts, intersection by intersection, was conducted. The results from that analysis are provided in Appendix F (Concept Plan and Residential Scenario Traffic Impact Analysis) attached hereto. The analysis in Appendix F (Concept Plan and Residential Scenario Traffic Impact Analysis) attached hereto shows that the Project will not create any traffic impacts during the construction period, which were not disclosed in the Draft EIR.

Comment No. 09-44

In addition, the construction traffic mitigation measures do not demonstrate how impacts will be reduced to a level less than significant. If anything, Mitigation Measures K.1-1 and K.1- 3 impermissibly defer mitigation by leaving determinations on sidewalk closures, haul routes, traffic detours, etc. to a future point in time and by providing that the haul route "shall avoid residential areas and other sensitive receptors *to the extent feasible."* (Emphasis added.) As the Project's haul route requires discretionary approval from the City, the DEIR must analyze now- not later- whether a haul route can be created that will not impact sensitive receptors. If the Project proposes to use a haul route that passes AMDA, then the DEIR must first demonstrate that other routes are infeasible rather than leave that determination to a future point in time. Of course, should the haul route pass AMDA, this would be yet another new significant impact requiring recirculation of the DEIR.

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[13] *The DEIR points to Table IV.K.l-12 for the proposition that "the level of trip-making activity from the Project Site during the combined peak hours will be 1,068 trips, which is more than one-quarter below the Trip Cap of 1,498 trips." (DEIR, p. IV.K.l-43.) While the DEIR may be correct that total peak hour construction trips would be 1,068. Table IV.K.l-12 does not demonstrate this.*

Response to Comment No. 09-44

A detailed haul route for all construction phases cannot be prepared at this time as the end destination for export material will change over time as capacity at the receiving locations changes. Nevertheless, the Draft EIR included an analysis of potential impacts that could arise from haul trips and proposed mitigation measures to reduce impacts to the maximum extent feasible, as shown in Section IV.K.1 and starting on page IV.K.1-45. The Draft EIR concluded that with mitigation, the Project's construction-related traffic impacts would be less than significant. Please refer to Mitigation Measures K.1-1 through K.1-3 in the Draft EIR for further details with respect to restrictions on the haul route activities. While the comment asserts that haul trips adjacent to the AMDA facility would constitute a significant impact, no evidence is provided to support that conclusion. Due to the level of redevelopment activity in the Hollywood area over the past few years, and AMDA's proximity to the 101 Freeway off ramp on Franklin Avenue, the site is currently subject to haul truck activities from other development projects on a regular basis. Thus, there is no evidence to suggest that the presence of haul trucks alone would create a significant adverse impact to the operations on the AMDA facility.

Comment No. 09-45

9. The DEIR Fails to Analyze Cumulative Construction Traffic Impacts.

The DEIR fails to consider that several projects are being built, or will be built, in the immediate vicinity of the Project (e.g., the BLVD 6200 Project, the Yucca Condominium Project). In addition to the combined traffic trips, many of these other development projects require, or will require, the same construction staging areas and haul routes. The DEIR needs to consider contingency plans in the likelihood of concurrent development and analyze total construction impacts accordingly.

Response to Comment No. 09-45

As shown in Appendix M of the Traffic Study in Appendix IV.K.1 of the Draft EIR, traffic generation is anticipated to be less during the construction phase than following build-out and occupancy for the Project. The same is to be expected for the Related Projects. Specifically, temporary traffic congestion impacts to the surrounding neighborhood could be anticipated during the hauling phases as a result of truck staging, idling and traveling on area roadways. While the construction schedules and overall duration of construction of the Related Projects in the area is speculative, similar to the construction activities under the Related Projects, the Project's construction activities, including hauling, would be subject to the City's standard conditions to mitigate adverse impacts. Due to the temporary and intermittent basis of any lane closures, staging areas, and haul routes, if the Project and the Related Projects were to be built concurrently, impacts would be less than significant, given that these activities would be subject to construction traffic mitigation measures and the City's standard conditions during the daytime hours.

Comment No. 09-46

10. The Traffic Study's Use of ITE Code 492 Is Not Supported by Substantial Evidence.

If there ever was an ITE traffic generation rate that should be used with great caution, it is Land Use Code 492 (Health/Fitness Club). This ITE rate, unlike most ITE rates which are based on multiple observations throughout the country and rigorous peer review, was developed based on *one* observation. It is also unclear where this *one* observation was conducted, when it was conducted, and why it would bear any meaningful relationship to the traffic generation rate for a gym in an urban area of the country that has consistently generated higher trip rates for gyms. For Code 492, ITE' s *Trip Generation* itself states that "[u]sers are cautioned to use data with care because of the small sample size." (See Exhibit M). Furthermore, each data plot and equation in the traffic manual notes, in bold: **"Caution- Use Carefully- Small Sample Size."** (Exhibit N). Given this language, it is incumbent on the DEIR's traffic consultant to provide evidence substantiating how the ITE data has been used appropriately and cautiously. If such evidence is unavailing, in order to have a legally defensible document the DEIR must provide a generation rate that is based on traffic counts from existing fitness clubs within the City, or that is otherwise appropriate.

Response to Comment No. 09-46

ITE Trip Generation is nationally recognized as a standard in trip generation literature and has been widely referenced regarding trip generation. ITE Trip Generation data for Land Use 492 – Health/Fitness Club includes sites from California, Connecticut, New Jersey and Pennsylvania. Weekday AM and PM peak hour trip generation rates (those salient for the Traffic Study) are based on 5 to 6 sample sites. It should also be noted that the Health Club has been calculated to generate approximately 15% of the total gross Project trips at area intersections under the Commercial Scenario as described in the Traffic Study and the Draft EIR. As such, this rate is appropriate.

Comment No. 09-47

11. The DEIR Fails to Evaluate the Traffic Impacts of the Rooftop Viewing Platform.

One would not know anything about this from the DEIR, but the Applicant intends to create a major tourist destination at the Project site that has been completely omitted from environmental study. (See Exhibit 0.) ("The 8,300 square foot rooftop observation deck [accessed by a dedicated public-accessible elevator] on the East Site will create an open, publicly-accessible attraction that will serve as a new landmark Hollywood experience for area residents and visitors. The observation deck will feature a full service cafe, outdoor seating, attractive hardscapes and landscaping that will set the feature apart from other observation decks across the country.") If, as the Project's entitlement application notes, this observation deck will be a major draw for tourists and residents alike, how have its impacts been evaluated? The DEIR fails to discuss traffic impacts from this deck, which will include tour bus traffic and parking impacts that must be analyzed.

Response to Comment No. 09-47

As is standard practice, ITE definitions were used to create parameters measuring the Project size. Those parameters provide an acceptable estimate of the Project's trip generation. A rooftop observation deck, if developed, would be anchored by a café or restaurant use. Such use is accounted for in the Project's range of allowable land uses, and was appropriately factored into the traffic analysis in the Traffic Study and the Draft EIR. The restaurant or café use with the observation deck would be appropriately factored into the Project's trip cap and Land Use Equivalency Program. The portion of the observation deck not used as a restaurant would serve as an ancillary feature of the Project's outdoor common open space, similar to the passes and pedestrian linkages described for the Project's ground floor site plan. Open space is considered an ancillary use within a commercial project and is not assigned trip generation for purposes of a traffic analysis. Rather the generation is considered in terms of the square footage of the commercial use-in this case, a restaurant use. The portion of the observation deck not being utilized as a restaurant is considered open space, and would not be considered a trip generator for purposes on the traffic analysis. Accordingly, the portion of the observation deck that is allocated a restaurant use is assigned the appropriate estimate of the Project's trip generation.

Further, as discussed in Response to Comment 09-41 above, a separate AM peak hour and PM peak hour Trip Cap has been established. As such, development, no matter what combination of uses, cannot exceed 574 AM peak hour trips or 924 PM peak hour trips.

Comment No. 09-48

12. The DEIR Fails to Evaluate the Project's Traffic Impacts on Weekend Nights.

It is unclear why only weekday a.m. and p.m. peak hours were studied for this Project. Many projects of the scale proposed by the Applicant include weekend impact analysis. In this case, given the high amount of night club, restaurant, retail, hotel, and observation deck uses that may be active in the Project during weekend nights, the DEIR must analyze Friday and Saturday night traffic impacts. This area of Hollywood is literally the center of Los Angeles nightlife on weekends, with vehicles creating gridlock from approximately 9 p.m. to 3:00 a.m. (often at levels that by far exceed weekday a.m. and p.m. peak hours). The traffic study cannot be complete until weekend impacts are studied and all feasible mitigation reduces those impacts to a level less than significant.

Response to Comment No. 09-48

The Project will mainly contain office and residential uses, which are most heavily peak commute hour traffic generators, with the other uses as supporting facilities. Therefore, peak commute hours were chosen for analysis of Project traffic impacts. As a comparison, the Saturday peak hour trip generation was calculated using the same procedures as for the peak commute hour trip generation calculations. The peak hours of all Project uses were assumed to coincide (e.g., Saturday trips to the Health Club, Offices and Restaurants all peak at the same time). The calculation shows that, even with conservative

assumptions and using the Commercial Scenario, the net Project trips at area intersections would be 19% lower at the peak on Saturdays than PM peak commute hour during weekdays. See Appendix C (Saturday Project Trip Generation) attached hereto.

Comment No. 09-49

13. The DEIR Fails to Evaluate Queuing Impacts on the Hollywood Freeway.

Despite a request from the California Department of Transportation, in response to the DEIR's Notice of Preparation, that the DEIR study the queuing of vehicles using off-ramps that will back into the mainline through lanes of the Hollywood Freeway, the DEIR is completely silent on the Project's potential significant impacts due to queuing. Especially on weekend nights, the exits off the Hollywood Freeway into Hollywood become extremely backed up, creating impacts on mainline segments as well. The DEIR cannot ignore this significant impact.

Response to Comment No. 09-49

Please see the Response to Comment No. 03-5.

Comment No. 09-50

14. The DEIR Fails to Impose All Feasible Mitigation for the Project's Significant Traffic Impacts.

Given the major deficiencies identified in practically every component of the DEIR's traffic study, the traffic analysis needs to be redone. The DEIR identified *restriping* at *one* intersection as the only roadway improvement mitigation measure for this massive Project. This cannot possibly be the only feasible road improvement; thus, AMDA may suggest additional feasible mitigation measures once the Project's plans for ingress and egress are disclosed and the traffic study is redone so as to reasonably identify the Project's traffic impacts. One thing is clear at this point, however. Given the Project's significant impacts at multiple intersections, the DEIR needs to identify the mitigation measures that were supposedly discarded and deemed infeasible for the DEIR's conclusions about infeasibility to be supported by substantial evidence.

Response to Comment No. 09-50

A variety of mitigation measures were considered during the Traffic Study process. The measures considered included modifications to the lane configurations at individual intersections. Those measures were not considered feasible due to secondary impacts on the sidewalk width or on-street parking supply, with one exception. After the potential measures were evaluated, due to secondary impacts, most of the significantly impacted intersections were determined to have no feasible mitigation measures. However, the Traffic Study recommends that the Project implements the identified feasible measures, including TDM program, transit enhancements, funding of a Transportation Management Organization, funding of an alternative mode lane trust fund, signal system upgrades and physical improvement at 1 study

intersection. Please see Mitigation Measures K.1-4 through K.1-12 on pages IV.K.1-45 through IV.K.1-59 and Mitigation Measure K.1-13 identified in Response No. 09-43 above and in the Additions and Corrections section of the Final EIR.

Comment No. 09-51

D. The DEIR Fails to Completely Analyze the Project's Parking Impacts on the Surrounding Community.

The DEIR concludes that the Project will not have significant operational impacts on parking because the Project will presumably have enough parking for its own internal uses. Assuming this is true, the DEIR still fails to account for the Project's displacement of public parking lots used by Pantages Theater patrons and other area visitors. Furthermore, from a cumulative impacts standpoint, the other parking lots in the area used for Pantages Theater parking have been entitled for other projects, one of which is already under construction. The DEIR needs to analyze the displacement of public parking spaces used for the Pantages (and other nearby uses) and mitigate parking impacts accordingly. The trickle-down impacts from the Pantages lacking parking for approximately 3,000 patrons for any given performance is also likely to create significant traffic congestion on area streets. Other projects in the vicinity, like he Hollywood Tower Terrace project at Franklin and Gower, have provided significant public parking components to mitigate such impacts. The proposed Project needs to do the same.

Response to Comment No. 09-51

As noted by the comment, the Project will provide sufficient parking supply for all uses within the Project Site, including the existing uses to remain. The Project Site does not contain any parking that is legally designated as the supply for any non-Project use (e.g., a public parking district structure, or a lot designated on a building permit for an off-site use). However, fee parking on the Project Site is allowed to be used by individuals. On weekends, when parking demand is less than on weekdays for all scenarios (see Appendix E of the Traffic Study in Appendix IV.K.1 of the Draft EIR), the on-site Project parking will be made available to patrons of currently under-parked off-site uses.

Comment No. 09-52

Likewise, street parking in the area is used by AMDA students and visitors. AMDA is concerned about the street parking displacement that will occur as a result of the Project during construction and operations. The DEIR also needs to disclose whether or not the Project's commercial parking will be free of charge. If parking will not be free of charge, the DEIR needs to analyze parking validation options and off-site parking spillage that will occur as a result of Project visitors who are unable or unwilling to pay for parking.

Response to Comment No. 09-52

On weekends, when parking demand is less than on weekdays for all scenarios (see Appendix E of the Traffic Study in Appendix IV.K.1 of the Draft EIR), the on-site Project parking will be made available to patrons of currently under-parked off-site uses. Further, as analyzed in Section IV.K.1-2 Transportation-Parking, parking on the Project Site will be provided to meet the demand for all uses within the Project Site, including the existing uses to remain. The Draft EIR is not required to analyze parking validation options or other issues related to parking for a fee.

Comment No. 09-53

E. The DEIR's Analysis of Aesthetics Conceals and Inappropriately Minimizes the Impacts of the Proposed Project.

1. The DEIR Fails to Identify AMDA as a Sensitive Receptor and Fails to Identify Significant Shade-Shadow Impacts to AMDA.

Once again, the DEIR fails to identify AMDA as a sensitive receptor, in the process concealing the Project's significant shade-shadow impacts on AMDA. (See DEIR, Table IV.A.2-l.) Not only would the Project's shade-shadow impacts surpass the threshold for AMDA's buildings, they would create significant shadows in the key outdoor areas of the AMDA campus, such as the AMDA piazza and outdoor stage. (See Figures IV.A.2-1 through IV.A.2-7, demonstrating that AMDA's campus would be shaded by both Project's towers from 9:00a.m. to 3:00p.m. during the winter solstice). This is a significant impact not disclosed in the DEIR. Should the Project be constructed as proposed, AMDA students will essentially no longer have any sunlight on their campus. The DEIR needs to identify these impacts and mitigate them to a level less than significant in a re-circulated DEIR.

Response to Comment No. 09-53

This comment first asserts that the Draft EIR did not properly identify AMDA as a sensitive receptor. The L.A. CEQA Thresholds Guide contains screening criteria to help locate and evaluate shadow-sensitive uses. It provides that shadow-sensitive uses may include, but not be limited to residential, commercial, or institutional land uses *where sunlight is important* to function, physical comfort, or commerce. (*Emphasis added*). During preparation of the Draft EIR, the AMDA building was evaluated by a records search and site visit. The AMDA facilities are primarily two commercial buildings, zoned as a commercial use, with minimal outdoor areas. Furthermore, the outdoor piazza referenced in the comment is a narrow outdoor area – with existing hedges that shade the piazza – between the AMDA building and the sidewalk on Yucca Street. Thus, per the criteria of the L.A. CEQA Thresholds Guide, the piazza is not considered a shadow-sensitive use because most of the piazza is already shaded during the winter solstice under existing conditions and thus sunlight is not important to the piazza's continuing function.

Moreover, the Project does not cast a shadow on the piazza during any of the summer solstice months. AMDA's outdoor piazza and stage area are currently shaded during the winter months, which is the only time when the Project's shadow pattern crosses theses AMDA facilities. As such there is currently minimal expectation for direct sunlight in these areas during the winter months. Based a review of aerial photographs obtained from Google Earth satellite imagery from November 14, 2009, and as verified by by a site visit on December 19, 2012, the piazza and outdoor stage area of the AMDA campus are situated within an existing shadow created by AMDA's landscaped hedge along the site's southerly property line along Yucca Street. Therefore, these areas are not considered shade and shadow sensitive land uses and the Project's shade and shadow impacts upon these AMDA facilities would be considered less that significant.

With respect to the Draft EIR, the AMDA building with the piazza are listed in Table IV.A.2-1, Summary of Winter Solstice Shadow Impacts. The Project's summer and winter shade and shadow impacts upon AMDA are illustrated in Figures IV.A.2-1 through IV.A.2-16. As shown in these figures, the Project would not cast any shadows upon any portion of the AMDA facilities located north of Yucca Street during the summer months. During the winter months, the outer envelope of the Project's shadow pattern is projected over the AMDA outdoor facilities for more than 3 consecutive hours. However, as discussed in the Draft EIR, the Project's Tower Massing Standards would create a shadow gap resulting from the 80 feet of separation between the two towers on the West Site (see Standards 7.5.2 on page IV.A.2-10 of the Draft EIR). This shadow gap is illustrated in Figures IV.A.2-1 through IV.A.2-7 in Section IV.A.2, Aesthetics - Shade/Shadow. As a result, compliance with the Project's development regulations would further reduce shadow impacts on AMDA, and indicates that the Project would not fully shade AMDA's outdoor facilities continuously for more than 3 hours during the winter months. As such, the Draft EIR is correct and the Project's shade and shadow impact upon AMDA would be less than significant with mitigation, whether or not the outdoor space is considered a sensitive land use.

Comment No. 09-54

2. The DEIR Does Nothing to Mitigate Significant Impacts to Focal Views.

The DEIR states that the impacts to focal view obstruction of the Capitol Records Tower would be significant and unavoidable, but fails to provide any mitigation for this impact. CEQA requires all feasible mitigation to be imposed. A simple solution would be to reduce the floor plate of a 220-foot building adjacent to the Capitol Records Tower and create an absolute minimum setback requirement (there is no reason a 220-foot building must have a floor plate that blocks views of the Capitol Records Tower).[14] A determination that mitigation of impacts to the Capitol Records Tower is infeasible cannot be supported by substantial evidence.

[14] *It should be noted that this mitigation is not to be viewed as an expression of support for a taller tower. The taller towers create their own type of significant impact that must be mitigated.*

Response to Comment No. 09-54

The commenter asserts that the Draft EIR does nothing to mitigate impacts to focal views, and cites the Draft EIR's conclusion that the Project's impacts to focal view obstruction of the Capitol Records Tower would be significant and unavoidable. This comment appears to reference the Draft EIR conclusion that focal views obstruction would be significant and unavoidable for View 6, under the 220-foot tower-massing model for buildings on the East Site. However, this comment fails to acknowledge the numerous project design controls and mitigation measures that have been proposed to mitigate visual impacts from the street level.

First, the Development Regulations incorporate ground-floor open space and building setback requirements to moderate the overall massing of new development in a manner that preserves important views to the Capitol Records Building and recognized portions of the Hollywood Boulevard Commercial and Entertainment District. These requirements do set an absolute minimum setback requirement that preserves views of the Capitol Records Building. The ground-floor open space and building setback requirements would also be effective in reducing the massing at the street level and limiting the visual obstruction of adjacent historic resources. (See sections 6.1, 6.9, 7.1, 7.5, 8.1 and 8.2 of the Development Regulations.) Based on these standards, there are no development scenarios that would fully block views of the Capitol Records Building from street level perspectives.

Second, a development objective of the Project is to preserve public views from certain key vantages points to the Capitol Records Building by creating grade level open space and civic plazas on the East Site adjacent to the Jazz Mural and the Capitol Records Building and on the West Site across from the Capitol Records Building. (See section 1.2.2.b of the Development Regulations.) This objective is carried forward into the Development Regulation and is an innate project design feature that reduces focal view obstruction on the Capitol Records Building, even under the 220-foot massing scenario reference by the comment.

Third, it should be noted that CEQA does not require an analysis of every imaginable mitigation measure. In this case, the design of the Project assessed the sample mitigation measures contained in the Obstruction of Views section of the L.A. CEQA Thresholds Guide when crafting the Development Regulations and aesthetics mitigation measures. For example, and as noted above, the Development Regulations use open space areas to minimize view obstruction and enhance existing views, which is a sample mitigation measure in the L.A. CEQA Thresholds Guide. (See section 8 and Figures 8.1.1-8.1.4 for the Development Regulations.) Similarly, the Development Regulations locate new structures on portions of the Project Site that reduce interference with existing views, which is another sample mitigation measure in the L.A. CEQA Thresholds Guide. Compare Figure 2.1: Site Plan, which shows the total developable area of the Project Site, with Figure 6.1.2.a of the Development Regulations, which shows how the building footprints on the East Site (under the 220-foot massing scenario) are set back from Vine Street and angled to allow views of the Capitol Records Building from the intersection of Hollywood Boulevard and Vine Street. In addition, the Project is requesting floor area averaging across both sites, which is another sample mitigation measure and allows development flexibility to incorporate

setbacks and open space on the East site that might not otherwise be available. Likewise, the Development Regulations allow 550 and 585-foot-high tower development scenarios on the East Site (See Development Regulations Figures 6.1.2.c.1 and 6.1.2.d.1). These project design features were specifically added to the Development Regulations to slenderize the towers on the East Site and thereby open up views of the Capitol Records Building. The resulting aesthetic mitigation of these project design features is illustrated in Figure IV.A.1-16, Views 6(c) and (d), which show the majority of the Capitol Records Building remains visible from the intersection of Hollywood Boulevard and Vine Street after development of the Project. The Draft EIR also includes a mitigation measure (Mitigation Measure A.1-2) that ensures these project design features are implemented in the development. In sum, the Project has mitigated view impacts to the extent feasible by incorporating project design features that reduce view impacts on the Capitol Records Building. The Development Regulations, which were included in the Draft EIR, are substantial evidence that the Project incorporates design features that mitigate visual impacts under the 220-foot massing scenario.

As demonstrated above, the Project incorporates all feasible design features and mitigation measures to reduce aesthetic impacts on the Capitol Records Building. To present the most conservative assessment of view impact, and based on the illustration presented in Figure IV.A.1-16 (Conceptual Visual Simulation Renderings View 6), the Draft EIR found that a partial view obstruction at this vantage point (View 6) would result in a significant visual impact.

Comment No. 09-55

3. New Visual Simulation Renderings of the Proposed Project and View Impacts on the Capitol Records Tower are Required.

The DEIR's visual simulations improperly obscure views of the Capitol Records Tower and minimize the iconic role that it currently plays in the Hollywood skyline. (See Exhibit P.) For some reason, the DEIR's view simulations are by and large extremely small and the photographs are taken from very great distances that would make it appear that the Capitol Records Tower is not seen from various vantage points. In particular, the view simulations of the Project from the Hollywood Freeway, which currently has one of the most iconic views of the Capitol Records Tower and signal the entrance to Hollywood, appear designed to hide and minimize the building. (The photographs are also taken from the opposite side of the freeway from which views would be experienced.)

Response to Comment No. 09-55

The commenter asserts that the Draft EIR's selection of perspectives for view simulations are purposefully taken from locations to obscure views of the Capitol Records Building and minimize its iconic role as part of the Hollywood Skyline. The referenced Exhibit P contains copies of Figures IV.A.1-11 through IV.A.1-14, Views 1 through 4, respectively, which are images from the Draft EIR. These graphics appear on pages IV.A-37 to IV.A-43, in Section IV.A, Aesthetics – Views/Light and Glare of the Draft EIR. The views from which the illustrative view simulations were taken were selected

based on a survey of the area and observations of notable and prominent views of the Capitol Records Building within the immediate project vicinity and broader Hollywood community. Views were selected to present a broad range of vantages that could be impacted by the Project. The Draft EIR clearly acknowledges the importance of the Capitol Records Building as an iconic architectural landmark within the Hollywood community. In fact, the first paragraph under the project Objectives subheading states:

> *"The underlying purpose of the Project is to revitalize the Project Site from its existing use to a vibrant and modern mixed-use development that retains the iconic Capitol Records Complex while maximizing the opportunity for creative development consistent with the priorities of the City's urban land use policies for Hollywood and those expressed by various stakeholders."* (See Section II, Project Description, page II-44)

Additional emphasis on the importance of the historic Capitol Records Building and the importance it plays with respect to the architectural character of Hollywood community is presented in Section IV.C, Cultural Resources. As stated on page IV.C-30: "*The Capitol Records Building is significant as an outstanding example of Modern high-rise architecture from the mid-20th century. The building's architectural significance makes it essential that certain important views showcasing its circular shape be maintained so that the iconic architecture of the building continues to be visible and understood."*

Further, with respect to the commenter's objection to the selection of views depicted in the Draft EIR, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. (See CEQA Guidelines Section 15204).

Here, the Draft EIR contains several panoramic and focal view simulations that include the Capitol Records Building. As shown in Figure IV.A.1-9, Photograph Location Map, the Draft EIR presents numerous perspectives that include views immediately adjacent to the Project Site, from the 101 Freeway, more distant views of the Project Site from Sunset Boulevard, and several perspectives from the Hollywood Hills looking towards the Project Site. Accordingly, the Draft EIR has provided an adequate range of view simulations that properly inform the decision makers about the potential aesthetic impacts of the Project. Additional view simulations are not required as suggested by the comment.

Comment No. 09-56

One only need to look at the view simulations in the April 2007 Draft EIR for the Yucca Street Condominium Project (the last Draft EIR where views of the Capitol Records Tower were at issue) to see that the Capitol Records Tower views are very substantial. (See Exhibit Q.) This Draft EIR for a much smaller project included multiple photographs that actually showed meaningful views of the Capitol Records Tower in full-size photographs, juxtaposed with visual simulations of the proposed project, and subsequent analysis of each photograph. Given how previous environmental impact reports have treated

the Capitol Records Tower, this DEIR's exclusion of meaningful and prominent Capital Records Tower views raises serious questions about potential DEIR bias and renders the analysis insufficient to support the DEIR's finding of insignificance.

Response to Comment No. 09-56

The commenter asserts that the Draft EIR excludes meaningful prominent views of the Capitol Records Building. On the contrary, the Draft EIR highlights the importance of views of the Capitol Records Building. Specifically, Figure IV.A.1-10, Capitol Records Building View Corridors identifies valued viewsheds of the Capitol Records Building. In addition, the Draft EIR then includes several view simulations that relate to the identified view corridors and are considered prominent view locations. See Draft EIR Figures IV.A.1-11 through IV.A.1-14.

Next, the commenter references the view simulations contained in the April 2007 Draft EIR for the Yucca Street Condominium Project (shown in the commenter's Exhibit Q) as an example of how such views were addressed in prior EIRs. The views depicted in the commenter's Exhibit Q are taken from the same general vantage point as Views 3 and 4 depicted in Figures IV.A.1-13 and IV.A.1-14, respectively of the Draft EIR. Similar to the views depicted in the commenter's Exhibit Q these views in the Draft EIR depict the viewshed of the Project Site from the Hollywood 101 Freeway. These viewpoints allow the entire site (East and West Sites) to be captured in the view simulations whereas the close up views suggested in the comment would not provide the appropriate scale to see how the Project towers on both sites would potentially impact views.

It should further be noted that these views are from the north and southbound lanes of the Hollywood Freeway are presented to represent the views available to passing motorists. As such these are transitory views experienced for seconds as one travels through the Hollywood area on the 101 Freeway. These are not stationary scenic views from a specific vantage or lookout. As such, the views in the Draft EIR are highly representative photographs from this vantage point.

Lastly, even if the views suggested by the commenter where used for view simulations, the conclusions in the Draft EIR would not change. The entire Project would appear behind the Capitol Records Building when viewed from the 101 Freeway. Thus, the Project would not obscure focal views of the Capitol Records Buildings from the vantage points suggested by the commenter, and the related aesthetic impacts from this perspective would still be considered less than significant.

Comment No. 09-57

4. The DEIR's Equivalency Program Renders Meaningful Aesthetics Analysis Impossible.

For a Project being built directly adjacent to one of the City's most important monuments, near one of the most famous intersections in the world, the vagueness and uncertainty created by the DEIR's equivalency program is completely inappropriate for environmental analysis of aesthetics. The Project's Development Regulations state that "parking, open space and related development requirements for *any* component of

the Project may be developed in *any* location within the Project site." (Development Regulations, p. 10.) (Emphasis added.) Thus, the public really has no idea what the ultimate project will look like.

Response to Comment No. 09-57

See Response to Comment No. 81-2 (Reznik, Benjamin (#2)) for a discussion of the adequacy of the Project Description as well as how the Project Objectives and Development Regulations aims to ensure compatibility with historic resources by establishing required standards and recommended guidelines for new design elements. While the Equivalency Program is designed to provide flexibility of uses, there are a number of controlling factors, such as the vehicle trip cap and the guidelines and regulations within the Development Regulations. The aesthetics analysis in the Draft EIR is based on an outer envelope of design scenarios, which presents a worst-case and conservative assumption of what the ultimate project could look like. In addition, the view simulations illustrate the Project at a variety of height scenarios (i.e., 220, 400, 550, and 585-feet high) to accurately disclose the potential development scenarios associated with implementation of the Development Regulations within the context of the Equivalency Program. Also, the Development Regulations establish definitive standards for setbacks from adjacent historic and aesthetic resources and street frontages, as well as providing standards for grade-level open space. These components of the Project, as embodied in the Development Regulations, establish key characteristics of the Project's potential aesthetic character regardless of the flexibility provided in the Equivalency Program. In doing so, the Draft EIR, discloses and analyzes multiple variations of the aesthetic character that could be associated with the Project. Therefore, the Draft EIR does in fact adequately inform the public and decision makers regarding the aesthetic character and the related impacts of the Project.

Comment No. 09-58

Likewise, many Project elements do not bear any resemblance to what is described in the DEIR and in many cases the Project could be much more impactful on aesthetics than what was analyzed in the DEIR. For example, the DEIR states that "the Project would include up to three levels of above-grade parking within the podium structures." (DEIR, p. II-31.) But the Project's Development Agreement would not commit the Applicant to this. In fact, the Project applications filed with the City state that the Project will have "around seven stories of above-grade parking." (See Exhibit A.) And more importantly, if the Applicant wanted to do all aboveground parking in 15-stories, the Development Regulations would do nothing to prevent this either.

Response to Comment No. 09-58

The commenter points to a discrepancy between the Project Description presented in Section II, of the Draft EIR and a dated entitlement application that was filed in 2008. For example, the commenter is concerned that the Draft EIR states that the Project will contain three levels of above grade podium parking, but this detail is not specified within the Development Regulations. For clarification, the Project Description in the Draft EIR accurately defines the Project as it is currently being proposed. The Draft

Millennium Hollywood Project Scope of Development: Design Guidelines and Standards submitted to the Department of City Planning in 2008, as referenced by the commenter and provided in the commenter's "Exhibit A," have since been revised and are contained in Appendix II, of the Draft EIR.

The commenter is concerned that the Development Agreement or Development Regulations would not prevent the Applicant from developing 15-stories of above ground parking. However, as stated in Section IV.K.2, Transportation and Parking of the Draft EIR, the Project would include up to three levels of above-grade parking within the podium structures, up to six levels of below grade parking on the East Site, and up to six levels of below grade parking on the West Site, which is the scope of development analyzed in the Draft EIR. In other words, the Draft EIR is not proposing a project with 15-stories of above-ground parking. So, to understand the limitations on ultimate development, the fluidity of the Development Regulations must be considered (and in certain instances constrained) by the scope of environmental impact analysis presented in the Dratf EIR.

Moreover, the Development Agreement does not allow for the Project to exceed the maximum impacts studied in the Draft EIR. As stated on pages II-22 and II-23 of the Draft EIR, the Equivalency Program shall be implemented pursuant to the administrative procedures set forth in the Development Agreement. The process to initiate an exchange under the Equivalency Program would begin with the Applicant filing a request with the Department of City Planning. The supporting documentation shall also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR. Thus, the development procedures described in the Draft EIR, Development Regulations, and the Development Agreement do in fact ensure that the development would not exceed the maximum environmental impacts identified in the Draft EIR.

Contrary to the commenter assertion about resemblance of the Project, the Draft EIR presents numerous visual simulations of the Project. As is typical of Draft EIRs, view simulations anticipate likely project elements and design without the benefit of final engineering plans. The Draft EIR view simulations accurately depict the potential heights and massing of the Project element, including podiums where potential parking areas would be constructed. In addition, the Section 10 of the Development Regulations contains several provisions regarding the design of parking facilities, including Section 10.3, which provides screening standards for above grade parking. Therefore, the Draft EIR does in fact adequately disclose and analyze the potential environmental and aesthetic impacts associated with Project design and parking facilities.

Comment No. 09-59

5. The DEIR's Analysis of Temporary Construction Impacts is Inadequate.

The DEIR's analysis of temporary construction impacts is very cursory. For example, no reference is made whatsoever to truck staging areas, which the DEIR notes elsewhere would be on Yucca Street, in what is essentially the middle of AMDA's campus. The DEIR must analyze the aesthetic impact of construction on student life at AMDA over the course of three years if the Project is built in one phase

(longer if it is multi-phased) and mitigate those impacts to a level less than significant. The one mitigation measure that has been provided (a fence) is far from sufficient.

Response to Comment No. 09-59

This comment asserts that the Draft EIR's analysis of the Project's construction related impacts are cursory and inadequate. The commenter is concerned with the placement of truck staging impacts and the potential aesthetic impact upon AMDA's campus during an expended construction period. The commenter further asserts that the proposed truck staging areas on Yucca Street will be essentially in the middle of the AMDA campus and cites only one mitigation measure (Mitigation Measure A.1-1) has been proposed to address construction impacts. Mitigation Measure A.1-1 requires the Applicant to visually screen and maintain the Project Site during construction. As provided in Section IV.K.1, Transportation/Traffic and Section IV.K-2, Parking, the Draft EIR identifies three additional mitigation measures that address the Project's construction related impacts associated with vehicle staging and parking. Specifically, these mitigation measures are restated below:

K.1-1 To mitigate potential temporary traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Applicant shall, prior to construction, develop a Construction Traffic Control/Management Plan (the "Plan") to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan shall include temporary roadway striping and signage for traffic flow as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project.

K.2-1 No sidewalk in the pedestrian route along a public right-of-way shall be closed for construction unless an alternative pedestrian route is provided that is no more than 500' greater in length than the closed route.

K.2-2 Construction Related Parking. Off-street parking shall be provided for all construction-related employees generated by the Project. No employees or subcontractors shall be allowed to park on surrounding residential streets for the duration of all construction activities. There shall be no staging or parking of heavy construction vehicles on the surrounding street for the duration of all construction activities. There shall be no staging or parking of construction vehicles, including vehicles that transport workers, on any residential street in the immediate area. All construction vehicles shall be stored on-site unless returned to the base of operations.

Implementation of these measures, in conjunction with Mitigation Measures IV.A-1, would further serve to mitigate the Project's temporary and intermittent construction related impacts upon the AMDA campus and adjacent areas, specifically with respect to pedestrian circulation and vehicle storage staging areas. Combined with mitigation measure A.1-1, the Draft EIR properly concludes that the Project's temporary visual and aesthetic impact during the construction period would be less than significant with mitigation.

Comment No. 09-60

F. The DEIR's Air Quality Analysis is Inadequate.

1. Since the Traffic Study Artificially Minimizes Project Trips, the Air Quality Analysis is Similarly Flawed.

Given all the flaws in the traffic study discussed above, when the traffic study is redone, the air quality impacts must be recalculated with the correct traffic inputs. As presently drafted, by severely underestimating the Project's traffic impacts, the DEIR fails to measure the Project's true air quality impacts.

Response to Comment No. 09-60

This comment asserts that the traffic study artificially minimized project trips. As the Project Traffic Study accurately disclosed the Project's trips, the air quality analysis presented in the Draft EIR is adequate and accurately reflects the Project's regional air quality impacts.

Comment No. 09-61

2. The DEIR Must Analyze the Project's Specific Air Quality Impacts on AMDA, Including Localized CO and Toxic Air Contaminant Impacts.

As stated previously, AMDA is a sensitive receptor adjacent to the Project that has not been identified as such. Furthermore, AMDA's "piazza," an outdoor courtyard that is the central gathering place for AMDA students and a component of AMDA's cafeteria, is at the comer of Yucca Street and Vine Avenue (and closer than 25 feet from the road), yet the DEIR fails to analyze CO hotspot impacts on students at this location. As a sensitive receptor, AMDA must be studied for CO hotspots, toxic air contaminants, and other localized emissions impacts. This analysis must include construction impacts, as well as the potential operational impacts of an above-ground parking structure at the property line with AMDA.

Response to Comment No. 09-61

The Draft EIR adequately disclosed all potential regional and localized construction and operational air quality impacts. As stated earlier in Response to Comment No. 09-11 above, AMDA was not identified as a sensitive receptor based on use permits on file with the City of Los Angeles. With respect to CO Hotspots, SCAQMD suggests conducting a CO hotspots analysis for any intersection where a proposed project would worsen the LOS to any level below C, and for any intersection rated D or worse where the proposed project would increase the V/C ratio by two percent or more. The Project would meet these criteria at 13 of the 37 intersections analyzed. The intersection of Yucca Street and Vine Street would not meet these analysis criteria and thus was correctly not analyzed in detail in the Draft EIR. Intersections that do not meet the analysis criteria would not have the potential to exceed their respective national or state ambient air quality standards.

Comment No. 09-62

3. The DEIR Fails to Impose All Feasible Mitigation Measures for ROG, NOx, and PM2.5.

Despite regional significant and unavoidable reactive organic gas ("ROG") and nitrogen oxide ("NOx") impacts, the DEIR fails to impose all feasible mitigation for these particulates. For example, the DEIR does not consider best practices to reduce construction worker trips, further reductions in construction vehicle idling times, Tier 4 off-road emissions standards, electric powered compressor engines in lieu of fuel combustion sources, alternative fuels, minimization of traffic conflicts during construction, electricity usage from power poles in lieu of diesel or gasoline generators, low-VOC coatings, etc. Simply put, the DEIR has not established that other mitigation measures that would further reduce the significant impacts are infeasible. Finally, with respect to localized on-site daily construction emissions, the DEIR fails to impose all feasible mitigation to further reduce $PM_{2.5}$ levels to a level less than significant.

Response to Comment No. 09-62

This comment suggests additional air quality mitigation measures, beyond the mitigation measures identified in the Draft EIR, It should be noted that the mitigation measures contained in the Draft EIR meet and exceed the standard air quality mitigation measures for development projects in the City of Los Angeles. In addition, the South Coast Air Quality Management District also submitted comments regarding air quality mitigation measures. Additional air quality mitigation measures have been added to the Draft EIR. Please see the response to Comment No. 08-3 for additional information about mitigation measures. Generally, see all the responses to the Comment Letter 08 for additional discussion of air quality issues and revised mitigation measures.

Comment No. 09-63

G. The DEIR's Climate Change Threshold Is Completely Counter to the Instructions of the California Natural Resources Agency and Violates CEQA.

The DEIR's impact determination is based on a comparison of the Project to "business as usual." (DEIR, p. IV.B.2-16). Such an approach is legally incorrect and goes directly counter to , the instructions of the Natural Resources Agency, the State agency that was responsible for amending the CEQA Guidelines to address climate change. As stated in the Natural Resources Agency's Final Statement of Reasons accompanying the amended CEQA Guidelines:

> This section's reference to the "existing environmental setting" reflects existing law requiring that impacts be compared to the environment as it currently exists. (State CEQA Guidelines,§ 15125.) This clarification is necessary to avoid a comparison of the project against a "business as usual" scenario as defined by ARB in the Scoping Plan. Such an approach would confuse "business as usual" projections used in ARB's Scoping Plan with CEQA's separate requirement of analyzing project effects in comparison to the environmental baseline. (*Compare* Scoping Plan, at p. 9 ("The foundation of the Proposed Scoping Plan's strategy is a set of measures that will cut

> greenhouse gas emissions by nearly 30 percent by the year 2020 as compared to business as usual") with *Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278 (existing environmental conditions normally constitute the baseline for environmental analysis); see also *Center for Bio. Diversity v. City of Desert Hot Springs,* Riverside Sup. Ct. Case No. RIC464585 (August 6, 2008) (rejecting argument that a large subdivision project would have a "beneficial impact on C02 emissions" because the homes would be more energy efficient and located near relatively uncongested freeways).) Business as usual may be relevant, however, in the discussion of the "no project alternative" in an EIR. (State CEQA Guidelines,§ 15126.6(e)(2) (no project alternative should describe what would reasonably be expected to occur in the future in the absence of the project).) (Exhibit R.)

By comparing the Project's greenhouse gas ("GHG") emissions to "business as usual," the DEIR completely undercounts GHGs and utilizes the wrong baseline, which is the issuance of the Notice of Preparation. Admittedly, no single development project will create significant climate change impacts on its own.[15] However, the DEIR must analyze Project emissions in accordance with legal requirements, since individual development projects may have a cumulatively significant impact that needs to be seriously analyzed.

Response to Comment No. 09-63

This comment seems to confuse the terminology of thresholds of significance, impact determination, accepted methodologies (i.e., "business as usual" (BAU) calculations) for analyzing GHG emission reductions, and environmental baseline. The case law cited in the comment points out that there is a difference in the BAU methodology provided in the ARB Scoping Plan and CEQA's separate requirement for analyzing impacts against the proper baseline. The Draft EIR properly employed the BAU methodology to analyze GHG impacts. The GHG analysis contained in the Draft EIR correctly establishes the current GHG emissions associated with the existing land uses on the Project Site (environmental baseline – see Table IV.B.2-3, Existing Project Site Greenhouse Gas Emissions). Table IV.B.2-6, Project Operational Greenhouse Gas Emissions, of the Draft EIR then illustrates the Project's net increase of GHG emissions over existing Project Site emissions for two separate build-out scenarios; a build-out scenario with GHG-reducing measures (Project Scenario) and a build-out scenario without GHG-reducing measures (defined therein as a Business As Usual Scenario). By providing these two potential build-out scenarios, the Draft EIR properly discloses the Project's increase in GHG emissions compared to the existing conditions. The Draft EIR does not, as the comment states, "completely undercount[] GHGs" These two potential build-out scenarios also illustrate the effectiveness of the Project's GHG-reducing measures and allows the decision-maker to determine whether those measures

[15] *The DEIR also does not disclose where the erroneous threshold originated. Under CEQA, "[t]hresholds of significance to be adopted for general use as part of the lead agency's environmental review must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence" (CEQA Guidelines Section 15064.7)(Emphasis added). To our knowledge, the City has not adopted this erroneous threshold through any public review process, nor is the threshold supported by substantial evidence. The DEIR therefore must be revised to include a discussion of how GHG emission thresholds comply with CEQA Guidelines Section 15064.7.*

represent a fair share contribution to reducing GHG impacts to the target level established under AB 32 and thus are no longer cumulatively considerable.

As discussed in the Draft EIR, the Project's GHG-reducing measures include compliance with the LA Green Building Code, the Project's location near transit, and the mixed-use nature of the Project. Specifically, as detailed in the Project Traffic Study, the Project's location and mixed-use characteristics would result in approximately 8,242 fewer daily motor vehicle trips compared to a project in a location without transit access and a project without mixed-use characteristics. In addition, as detailed in the Project Traffic Study, the Project includes a mitigation measure resulting in a 15% reduction in daily motor vehicle trips through the implementation of a project-specific Transportation Demand Management (TDM) Program.

As concluded on page IV.B.2-19 of the Draft EIR, although the Project is expected to result in a net increase in GHG emissions, the Project's GHG-reducing measures would ensure the Project's GHG emissions are reduced in manner that meets the objectives of AB 32 by reducing GHG levels by 42.6% below the Project's BAU emission levels. This reduction exceeds the 16% reduction goal below BAU in the 2011 Scoping Plan and constitutes the Project's fair share contribution to reduce its cumulative GHG impacts to below a level of significance.

The comment also seems to assume that the Natural Resources Agency's Final Statement of Reasons is the legal authority for interpreting the CEQA Guidelines. The U.S. and California Constitution established a system of checks and balances and division of powers among the judicial, executive, and legislative branches, and among the federal, state, and local governments. Normally, as is the case here, state legislative agencies do not have the authority to make final interpretations of their own regulations. This is the role of the judicial branch. Among the founding principles of our judicial system is the doctrine of *stare decisis*, in which once a judicial interpretation of a law or regulation has been made and published, it is entitled to a level of deference in order to promote stability and allow those subject to the law or regulation to rely on the decisions. In California, a court has already held in a published decision that projects that demonstrate they have reduced their GHG emissions by at least the Scoping Plan's percentage as compared to Business As Usual levels do not make a cumulatively considerable contribution to GHG impacts. (*Citizens For Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327.) The City, in part, relied on this holding to guide its assessment of GHG impacts of this project because the courts are a higher legal authority than the Natural Resources Agency. Therefore, the cumulative impacts associated with the Project's GHG emissions would not rise to the level of significance (i.e., would not be cumulatively considerable) under the quantitative threshold.

Even if the quantitative threshold were exceeded, the Project would not have a cumulatively considerable impact because the project meets the qualitative threshold. The Draft EIR provides a thorough discussion and qualitative analysis concluding that the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As such, the Draft EIR

adequately analyzed and disclosed the Project's potential GHG impacts and no further response is required.

Comment No. 09-64

H. The DEIR's Analysis of Impacts to Cultural Resources Is Not Supported by Substantial Evidence.

1. The DEIR First Needs to Analyze and Disclose the Significance of the Capitol Records Tower Before Any Meaningful Analysis of Project Impacts Can Be Made.

One would not know from the DEIR that the Capitol Records Tower was the first round office tower in the world, the first skyscraper built in Hollywood after World War II, that many view the building as "the symbol of recorded music on the West Coast," and perhaps most importantly, that the City of Los Angeles Historic-Cultural Monument ("HCM") application for the building identified the Capitol Records Tower as "literally the beacon of Hollywood." (See Exhibit S.) Whereas the City's HCM file makes clear that the Capitol Records Tower is an iconic and integral facet of the Hollywood (and Los Angeles) skyline- not just any historic building- the DEIR fails to discuss and analyze the cultural resource impacts on the Hollywood and City skyline should over one million square feet of development envelop the Capitol Records Tower and forever change its historic role as the beacon of Hollywood.

One of the key inquiries relative to Cultural Resources is whether a project will reduce the integrity or significance of important resources on the site or in the vicinity. (See CEQA Guidelines Section 15064.5(b)(l)) ("A substantial adverse change in the significance of a historic resource means ... alteration of the resource *or its immediate surroundings* such that the significance of an historical resource would be materially impaired.") (Emphasis added.) The DEIR must provide an analysis of how the Project can affect the historic nature of a City monument that is literally a "beacon" and symbolizes an entire region and/or idea. Specifically, the DEIR must include a good-faith discussion of when an adjacent development can be so massive in scale relative to a monument of worldwide importance that such a monument is materially impaired. The DEIR appears to take the position that mere visibility is the only thing that matters, such that a ten-foot setback renders impacts less than significant. The CEQA Guidelines indicate otherwise.

Response to Comment No. 09-64

The commenter is correct that the Capitol Records Building is reputed to be the first cylindrical office tower building in the world and was the first tall office building (built to the height limit of its day) constructed in Hollywood after World War II. As detailed in the Draft EIR, the Capitol Records Building is historically significant as an example of Corporate Modernist architecture from the 1950s in Los Angeles, and high-rise office buildings in Hollywood. It is also significant for its association with the Music Industry in Los Angeles. Capitol Records has been formally determined eligible for the National Register, is listed in the California Register, and has been designated as a Historic-Cultural Monument

(#857) by the City of Los Angeles. All of this information, as well as a detailed history of the Capitol Records Building and the surrounding historic resources, is included in the Historic Resources Report that is an appendix to the Draft EIR.

The commenter is also correct that the Capitol Records Building occupies a prominent place in the Hollywood skyline due to its striking cylindrical shape and rooftop pylon, and the fact that no additional high-rise buildings were built in the vicinity until recently. The Draft EIR and the Historic Resource Report clearly acknowledge the significance of the Capitol Records Building. The commenter claims that the Draft EIR fails to analyze the cultural significance of the Capitol Records Building. However, Section IV.C, Cultural Resources, of the Draft EIR specifically acknowledges that the Project has the potential to add considerable height and density, and that the immediate surroundings of the Capitol Records Building will be altered. As demonstrated in the Draft EIR, the Capitol Records Building will retain its eligibility for listing in national, state, and local registers despite alteration of its surroundings by the Project. The Capitol Records Building will remain intact and retain its important character-defining features. Setback and open-space requirements specified in the Development Guidelines will also ensure that important views will be retained. The Draft EIR also contains mitigation measure C-3 to ensure that any future alterations to the Capitol Records Buildings comply with the Secretary of the Interior's Standard of Rehabilitation.

Importantly, all of the historic impact analysis contained in the Draft EIR is supported by the Historic Resources Report, which is clearly substantial evidence. Therefore, the commenter is incorrect in its statement that the Draft EIR analysis of cultural resources is not supported by substantial evidence. Please see: (1) Topical Response 4, Cultural Rresources; (2) Responses to Comments for Letter No. 19 from the Los Angeles Conservancy; and (3) Responses to Comment for Letter No. 14 from the Hollywood Heritage for addition information regarding the adequacy of the Draft EIR's analysis of historic resources.

Comment No. 09-65

2. The Lack of a Defined Project Renders Analysis of Impacts to the Capitol Records Tower Impossible.

The lack of a specific design (including basic configuration or massing details) for the Project makes it impossible to analyze the Project's consistency with the Secretary of the Interior's Standards and Cultural Resources under CEQA, generally. The DEIR must be revised to include designs that would be used in connection with the proposed equivalency program, which is much too vague to allow for any meaningful environmental review. For example, one of the Secretary of the Interior's Standards requires that for related new construction "new work shall be differentiated from the old .... " However, it is impossible to understand the Project's consistency with the Standard given the lack of a Project design and the very broad language in the Development Regulations, which allow innumerable Project permutations that conflict with the Secretary of the Interior's Standards (See Development Regulation 7.1.5.) ("Generally, buildings over 150 feet tall ... shall not be historicized. They are contemporary forms in the skyline and

shall appear as such."). The vagueness (use of the word "generally") and exemption for development lower than 150 feet in height in this instance shows how the Development Regulations fail to provide meaningful historic resource protections.

Response to Comment No. 09-65

The Historic Resources Report provides a detailed analysis of the Project's impacts on historic resources according to the Secretary of the Interior's Standards. See Section 6.3: Use of the Secretary of the Interior's Standards to Determine Impacts in the Historic Resources Report for a details analysis of this issue.

In addition, see Response to Comment No. 81-2 (Reznik, Benjamin (#2)) for a discussion of the adequacy of the project description as well as how the Project Objectives and Development Regulations aims to ensure compatibility with historic resources by establishing required standards and recommended guidelines for new design elements. Also, the Historic Resources Report used the setbacks and open space requirements contained in the Development Regulation to form its conclusions regarding the Project's potential impacts on historic resources. Thus, contrary to the commenter's assertion, there is in fact sufficient Project details for a historic resources expert to reach a definitive conclusion regarding potential historic resources impacts.

Please see: (1) Topical Response 4, Cultural Resources; (2) Responses to Comments for Letter No. 19 from the Los Angeles Conservancy; and (3) Responses to Comment for Letter No. 14 from the Hollywood Heritage for addition information regarding the adequacy of the Draft EIR's analysis of historic resources.

Comment No. 09-66

The Development Regulations also fail to provide sufficient protections for the Capitol Records Tower from a massing standpoint. For example, the DEIR finds impacts to historic resources less than significant because the Development Regulations "help reduce potential adverse effects of mass and scale by reducing the bulk of buildings as height increases and pushing tower elements toward the center of the block, and away from historic resources .... In this way, important views from Vine Street and the Hollywood Freeway are protected." (DEIR, p. IV.C-39.) However, this language from the DEIR assumes a configuration for the Project that does not necessarily have to be built. For example, the DEIR does not disclose that if a building less than 150-feet high is built along the east side of Vine street, then no open space need be provided along Vine. (See Development Regulation 6.1.1). Likewise, the Development Regulations allow parking to be built anywhere on the Project site, without consideration for historic resource impacts. (Development Regulation 4.1.) Several other potential configurations for the Project would be completely insensitive to the Capitol Records Tower, the DEIR representations notwithstanding.

Response to Comment No. 09-66

See Response to Comment No. 81-2 (Reznik, Benjamin (#2)) for a discussion of the adequacy of the project description as well as how the Project Objectives and Development Regulations aims to provide sufficient views and clearance of the Capitol Records Building. The Capitol Records Building will retain its eligibility for listing in national, state, and local registers despite alteration of its surroundings by large-scale new development. The Capitol Records Building will remain intact and retain its important character-defining features. Setback and open-space requirements specified in the Development Guidelines will also ensure that important views will be retained.

The commenter purports development scenarios that are not proposed in the Draft EIR. The Draft EIR does not propose development scenarios wherein all structures are lower than 150-high as the commenter purports. Similarly, the commenter does not provide any evidence to prove that if a hypothetical 150-tall building on the east side of Vine street would preclude open space. In contrast, the Development Regulations contain open space standards (see Section 8) and related building designs (see Figures 8.1.1 through 8.1.4) for the development scenarios considered in the Draft EIR. The impacts related to these development scenarios are analyzed throughout the Draft EIR and were reviewed as part of the Historic Resources Report. Therefore, the Development Regulations do in fact provide sufficient protections for the Capitol Records Buildings according to the development scenarios proposed and analyzed in the Draft EIR.

Please see: (1) Topical Response 4 (Cultural Resources), (2) Responses to Comments for Letter No. 19 from the Los Angeles Conservancy; and (3) Responses to Comment for Letter No. 14 from the Hollywood Heritage for addition information regarding the adequacy of the Draft EIR's analysis of historic resources.

Comment No. 09-67

I. The DEIR's Land Use Section Does Not Accurately or Fully Analyze the Project's Impacts.

1. The DEIR Fails to Accurately Identify the Project Site's Applicable Planning and Land Use Regulations.

Starting with the DEIR's Project Description, and carrying through its Land Use Planning environmental impact analysis, there are numerous errors and inconsistencies pertaining to the current planning and land use regulations that apply to the Project site. For example, the DEIR states that all square footage numbers for the Project are calculated using the definition of "net square feet" as defined in LAMC Section 14.5.3. (DEIR, p. II-23, fn. 4.) No such definition appears in the LAMC, and the referenced section of the LAMC pertains to transfers of floor area in Downtown Los Angeles. The DEIR also refers to "net developed floor area," which is also allegedly defined by the LAMC (DEIR, p. II-24, Table II-4, note b), but again, no such defined term exists. The DEIR' s erroneous references to purportedly defined terms render it impossible for the public to assess the true scale and impacts of the proposed Project.

Response to Comment No. 09-67

The comment is correct that net square feet and net developed floor area are not defined in the LAMC. Although these terms are not defined in the LAMC, the square footages that are analyzed in the Draft EIR for the Concept Plan, Commercial Scenario, and Residential Scenario are based on the definition of floor area provided in Section 12.03 of the LAMC. This has been corrected in Section IV, Corrections and Additions, of this Final EIR. As such, although the terms used were incorrect, the Draft EIR adequately analyzed the impacts of the Project.

Comment No. 09-68

2. The DEIR Does Not Demonstrate the Project's Conformance with Critical Community Plan Goals and Policies.

(a) *The Project Does Not Provide a Range of Housing Opportunities.*

The Community Plan includes several policies regarding the importance of providing housing opportunities within Hollywood, including the importance of providing housing opportunities for households of all income levels and needs. (Community Plan Policy LU .2.17.) The DEIR asserts that the Project will comply with this policy by including one-, two-, and three bedroom residential units, which "range of units" will provide housing opportunities for a "variety of family sizes and income levels." (DEIR, p. IV.G-39.) This claim is not based in reality- while a one-bedroom unit in a new high-rise development will almost certainly command a lower price than a three-bedroom unit in that same project, there is no rational reason to assume that a lower-income individual or family could afford the rent or purchase price for that one-bedroom unit. Therefore, the Applicant must provide an accurate representation of the Project's consistency in a re-circulated DEIR.

Response to Comment No. 09-68

The comment claims that the housing opportunities that would be provided by the Project are not based in reality. The comment is speculative as to who would or would not buy or rent a residential unit of the Project. In Section IV.G. Land Use Planning, of the Draft EIR, the Project's consistency with applicable goals and policies of the Hollywood Community Plan is analyzed in Table IV.G-4, Hollywood Community Plan Update Consistency Analysis, on pages IV.G-37-48. Table IV.G-4 includes the Project's consistency with Policy LU.2.17, explaining that the Project will provide a range of residential units from one to three bedrooms and thus would provide housing opportunities for a variety of family sizes and incomes. This adequately demonstrates the Project's consistency with Policy LU.2.17.

Comment No. 09-69

(b) *The Project Does Not Specify How Pedestrian and Vehicular Traffic Will be Separated.*

Community Plan Policies LU.3.4, LU.3.5, and LU.3.6 are intended to ensure that conflicts between pedestrians and vehicles are minimized, in recognition of one of the Community Plan's overall goals of promoting a safe and navigable urban streetscape for pedestrians. These policies require that sidewalks be designed to make pedestrians feel safe, discourage curb cuts near high pedestrian traffic areas, and discourage the siting of parking areas next to busy sidewalks. However, the DEIR only addresses the first of these three policies, and states that by providing straight (or, alternately, "relatively straight") sidewalks, pedestrian safety would be ensured. (DEIR, p. IV.G-40.) The DEIR does not cite or discuss Policies LU.3.5 and LU.3.6 regarding curb cuts and the parking areas, and, as discussed elsewhere in this letter, the DEIR does not disclose *any* precise driveway points for the Project. This lack of information not only precludes an understanding of how pedestrian activity at specific project access points may create hazards, but it also prevents the City from finding that the Project complies with these Community Plan Policies regarding pedestrian safety. An accurate representation of this Community Plan inconsistency must be provided in a re-circulated DEIR.

Response to Comment No. 09-69

Table IV.G-4, Hollywood Community Plan Update Consistency Analysis, on pages IV.G-37-48 of Section IV.G. Land Use Planning, of the Draft EIR, includes the analysis of the Project's consistency with Goal LU.3: Make Streets Walkable, as well as multiple policies to implement that goal including Policies LU. 3.3, 3.4, 3.8, 3.9-12, 3.15, 3.17, 3.21-24, and 3.27. With regard to Policies LU 3.5 (Discourage curb-cuts next to sidewalks on streets with a high level of pedestrian traffic, when alternative access exists) and 3.6 (Discourage the siting of parking lots next to sidewalks, which carry high volumes of pedestrian traffic), the Project would be overall consistent with these goals and policies. Specifically, with regard to LU 3.5, the Project is designed to minimize curb cuts to the maximum extent possible by providing alternative access points to the Project Site from both sidewalks and interior entrances. Access points are provided where necessary to allow vehicles to enter and exit the Project Site and no curb cuts are proposed to strictly allow pedestrians to access the Project Site. Curb cuts are minimized along Hollywood Blvd., where most of the sidewalk activity exists. With regard to LU 3.6, the Project is proposing to remove the existing parking lots and provide on-site parking within parking garages. In turn, this minimizes pedestrian traffic though parking lots and minimizes vehicular traffic through walking areas.

Further, although the Traffic Study and the Draft EIR discuss that the driveways will not introduce any unusual adverse hazards (see page IV.K.2-25 of the Draft EIR), additional analysis was completed to clarify and further demonstrate that impacts to pedestrian safety conditions due to Project Site access are less than significant. As discussed in the Site Access Impact and Pedestrian/Bicycle Safety Analyses, Appendix G (Site Access Impact and Pedestrian/Bicycle Safety Analysis) attached hereto, the Project would reduce the number of driveways serving the Project Site on Vine Street, Ivar Avenue and Argyle Avenue from the existing conditions, no potential sightline conflict with other vehicles, including bicycles, has been identified at these driveways, pedestrians would have adequate sidewalk space, and there is no data to indicate that the proposed driveways for the Project would cause pedestrian safety impacts.

Please also see Response to Comment No. 09-7 (AMDA) above.

Comment No. 09-70

(c) *The DEIR Misrepresents the Project's Proposed Open Space and Passageway Development Regulations.*

Community Plan Policy LU.3.23 encourages large commercial projects to be designed with pedestrian connections, plazas, greenspace, and other related design features so as to avoid "superblocks." Community Plan Policy LU.4.19 similarly encourages the construction of public plazas, in addition to greenspace. The DEIR, in affirming the Project's compliance with Community Plan Policy LU.3.23, cites the Project's proposed Development Regulations, and states that "open space will enable important pedestrian linkages and through-block connections for the Project." (DEIR, p. IV .G-42.) The DEIR further states that: "Grade level open space will be designed to showcase the Capitol Records Building and Jazz Mural and will include design features and outdoor furniture to activate the ground floor amenities." (Id) This response appears to demonstrate the Project's compliance with these two Community Plan Policies. However, an examination of the proposed Development Regulations indicates that if the Project is developed so as not to exceed 150 feet in height (i.e., without any "towers" as defined by the Development Regulations), there is no required amount of grade-level open space (Development Regulation 6.1.1) and there is no minimum amount of "publicly accessible passageway area" (Development Regulation 8.3.4 a(i)). This serves to emphasize the difficulty of assessing the environmental impacts of a project with no fixed design- if the Project is built at a height above 150 feet, the DEIR' s claims about open space and passageways may be correct, but if a shorter project is built, these claims are no longer accurate. Given the Community Plan's clear recommendation to design projects that provide open space, pedestrian access, and greenspace, the DEIR must provide a more detailed analysis of how the Project will comply with these policies, regardless of the ultimate height that is proposed for the Project.

Response to Comment No. 09-70

The commenter contends that the Project no longer complies with the Hollywood Community Plan Update if the height of the Project is less than 150 feet. The commenter points to specific parts of the Development Regulations and asserts that if the Project was built at 150 feet or less, no grade level open space or publicly accessible passageway area would be required**.** However, the Draft EIR does not propose development scenarios lower than 220 feet. Further, as studied in the Draft EIR, the Project could range in height from 220 to 585 feet. This height range was fully and adequately analyzed throughout the Draft EIR.

Comment No. 09-71

J. The DEIR's Public Services Analysis is Legally Inadequate.

1. The DEIR Improperly Categorizes the Project's Fire Code Land Use for Maximum Response Distance and Fire Flow Requirements.

The City's Fire Code specifies maximum response distances that are allowed between project locations and fire stations, based upon land use and fire-flow requirements. (LAMC Section 57.09.06, Table 9-C.) When response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices and systems deemed necessary by the City. For the Project's proposed high-rise construction, these additional required fire protection devices and systems could include standpipe systems, fire alarm systems with emergency communication system, standby power systems, and an emergency command center.[16]

The DEIR correctly notes that Table 9-C of the Fire Code identifies four types of land uses with corresponding maximum response distances from the nearest fire station -Low Density Residential, High Density Residential/Neighborhood Commercial, Industrial/Commercial, and High Density Industrial/Commercial (Principal Business Districts or Centers). However, despite the Project's proposed location in the center of the Hollywood business center within a Regional Center land use designation, and despite the fact that the Project would contain more than one million square feet of high-rise residential and commercial floor area, the DEIR asserts that the proper land use category for purposes of Table 9-C is High Density *Residential/Neighborhood* Commercial. As a result of this categorization, the DEIR claims that the applicable maximum response distance from the nearest fire station is 1.5 miles, and that two City fire stations are located within this maximum distance (Station No. 27 at 0.7 miles from the Project, and Station No. 82 at 0.8 miles from the Project).

While the Project, in several of its many configurations, would contain high density residential land uses, there is no configuration that could appropriately be classified as "neighborhood" commercial. The equivalency program would also allow a completely commercial scenario. Given the location and immense size of the Project, the appropriate Table 9-C land use category should unquestionably be High Density Industrial/Commercial (Principal Business Districts or Centers), which has a corresponding maximum response distance of 0.75 miles from the nearest engine company, and 1 mile from the nearest truck company. Only Station No. 27 is within 0.75 miles, and by only 0.05 miles. Moreover, Station No. 27 is a "light force" truck and engine company, with a single aerial ladder truck and a single engine.[17] These details pertaining to response distances must be clarified in the DEIR to properly classify the Project's proposed land uses, and to describe the impacts resulting from the relatively limited availability of fire protection services in the immediate vicinity of the Project.

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[16] *National Fire Protection Association, "High Rise Building Fires," December 2011, p. 17.*

[17] *DEIR p. IV.J.l-3, City of Los Angeles Fire Department website (http://lafd.org/apparatuslll-fire-a-rescueresources/ 294-lafd-truck-company), accessed December 5, 2012.*

Response to Comment No. 09-71

This comment contends that the Proposed Project should be classified as High Density Industrial/Commercial with regard to corresponding maximum fire response distance from the nearest fire station. The commenter provides this conclusion by asserting that an all commercial development could be developed based on the Equivalency Program. Based on the "worst-case impact envelope" studied In the Draft EIR, including the trip cap, however, the Project is correctly identified as High Density Residential/Neighborhood Commercial. Specifically, the Community Plan and Update designates the Project Site as Regional Center Commercial and refers to the LAMC for specific land uses permitted within this designation. The Regional Center Commercial land use designation allows for the construction of commercial, parking, and high-density multi-family residential uses, no industrial uses are allowed. Development of the Project would include some combination of multi-family residential, retail, restaurant and commercial land uses, in addition to the Capitol Records Complex, which would be retained as part of the Project. This type of development would be consistent with the Regional Center Commercial land use designation and the High Density Residential/Neighborhood Commercial land use category identified in Table 9-C of the Fire Code, also presented in Table IV.J.1-2 of the Draft EIR.

The strictest standards apply to High Density Industrial and Commercial as identified in Table 9-C of the Fire Code and in Table IV.J.1-2 of the Draft EIR, which requires a response distance of 0.75 miles for an engine and 1 mile for a truck company. The Project Site is 0.7 miles from LAFD Station No. 27, which has both a truck and engine company and is 0.8 miles from Station No. 82, which has an engine company. Thus, the Project Site is within the response distance of the most conservative land use designation with the strictest standards as the Project Site is 0.7 miles from Station No. 27, which has an engine and a truck company.

Comment No. 09-72

In addition to maximum response distances, Table 9-C also sets forth minimum required fire flows for the same four land use categories discussed above. Confusingly, while the DEIR claims that the Project is appropriately categorized as High Density Residential/Neighborhood Commercial for purposes of determining maximum response distances, elsewhere the DEIR claims that the Project only requires a fire flow of 6,000 to 9,000 gallons per minute from four to six hydrants flowing simultaneously, which corresponds to the Industrial/Commercial land use designation. (DEIR p. IV.J.l-11.) Again, given the location and proposed size of the Project, the appropriate Table 9-C land use category should be High Density Industrial/Commercial (Principal Business Districts or Centers). This land use category requires a minimum fire flow of 12,000 gallons per minute, available to any block. This fire flow requirement could be even higher, for Table 9-C requires that, where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 g.p.m. will be required. Given the densely developed nature of the properties surrounding the Project site, the possibility of simultaneous fires seems reasonable. The DEIR must provide more analysis of how the Project is being analyzed for potential impacts to fire protection services, and must not arbitrarily assign the Project to two inappropriate Table 9-C land use categories.

Response to Comment No. 09-72

According to a written correspondence with the LAFD that is citied on page IV.J.1-11 and attached as Appendix J.1 of the Draft EIR, the required fire flow for the Project would be 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously. As such, the Project is properly analyzed based on information directly from the Fire Department and was not arbitrarily assigned to an inappropriate land use category. Further, if the Project were to be categorized as Industrial/Commercial per Table 9-C, a response distance of 1 mile for an engine and 1.5 miles for a truck company would be required. The Project would also satisfy those requirements as the Project Site is 0.7 miles from LAFD Station No. 27, which has both a truck and engine company and is 0.8 miles from Station No. 82, which has an engine company.

Further, as discussed in Section IV.J.1, Public Services-Fire Protection, of the Draft EIR, the Project would replace the existing on-site water system (which now currently serves above grade parking and storage kiosk areas) with new water lines configured in a system that would be maintained and supplied by the LADWP via connection points to an existing LADWP water main. The Water Operations Division of the LADWP would perform a detailed fire flow study at the time of permit review in order to ascertain whether further on-site water system or other site-specific improvements would be necessary. Hydrants, water lines, and water tanks would be installed per Fire Code requirements for the Project. In addition, the Project Applicant would be required to submit the proposed plot plan for the Project to the LAFD for review for compliance with applicable Fire Code, California Fire Code, City Building Code, and National Fire Protection Association standards, thereby further ensuring that the Project would not create any undue fire hazard.

Comment No. 09-73

2. The DEIR Completely Fails to Properly Analyze Fire Department Response Times.

The DEIR contains a cursory, and inaccurate, analysis of average Fire Department response times. The DEIR states that the Fire Department "prefers" to arrive on the scene of *all* types of emergencies (fire and/or medical) within 5 minutes in 90 percent of cases, and to have an advanced life support unit arrive to all high risk medical incidents within 8 minutes in 90 percent of cases. (DEIR, p. IV.J.l-4.) The DEIR then reports that average response times for Station Nos. 27 and 82 are 4:43 and 4:18, respectively, while the average response time for the slightly more distant Station No. 41 is 5:09. (DEIR, Table IV.J.1-3, p. IV.J.l-7.) Given the fact that two of the three discussed fire stations appear to meet the Fire Department's response time goal of 5 minutes, the DEIR concludes that the impact of the Project upon emergency response times would be less than significant.

However, the DEIR's stated response times, which were reported by the Fire Department to the Applicant's CEQA consultant, cover responses to *structure fires only,* and do not include response times to medical emergencies. This presents an inaccurate picture of what the true Fire Department response times are today, and what they might be in the future if the Project is constructed. In addition, the DEIR

itself contains a reference to a broader problem with its analysis of Fire Department response times- in May 2012, the City Controller issued an audit of the Fire Department's claimed response times, and found that the Department had produced inaccurate response time data for a number of years, making it impossible to determine proper emergency response times, as measured against national standards. (City Controller, *Analysis of the Los Angeles Fire Department's Response Times,* May 18, 2012, p. 3.) Furthermore, this audit stated that, to the extent that the Department's data could be properly analyzed, it showed that medical response times had been increasing. *(Id)*

The DEIR itself refers to the Controller's audit of Fire Department response times- in a footnote, the audit's finding that medical response times had increased is acknowledged. But the footnote goes on to state: "Nevertheless, this audit is presented for informational purposes only, and the written response from the LAFD (dated December 14, 2011) regarding response times is used in the analysis presented in this DEIR." (DEIR, p. IV.J.l-4, fn. 7.) This is completely inadequate analysis- the Controller's audit noted that the Fire Department had been keeping inaccurate response time data for years, which means that any "written response" issued by the Department *prior* to the audit is extremely suspect. Furthermore, even if the response time data provided by the Fire Department could be treated as accurate, it would only be accurate for responses to *structure fires only,* and not for medical responses. And, as the audit demonstrates, recent medical response times have been increasing. The DEIR completely fails to provide any context or analysis of this issue, and this cannot be allowed to occur- any proposal to add over one million square feet of residential and commercial uses in the heart of Hollywood will have a dramatic impact on the demand for fire and medical services. If the DEIR cannot provide an accurate analysis of the Fire Department's ability to meet current demand, there is no substantial evidence for its assertion that the Project will not result in any new significant impacts. This analysis must be completely redone to reflect the current state of affairs regarding the City's Fire Department.

Response to Comment No. 09-73

The LAFD provided a written response on December 14, 2011, for the Draft EIR for the Millennium Hollywood Project. That response, by Captain Mark Woolf, included information about medical emergency services, stated, in part: “The response times to the proposed site would be within 5 minutes from Fire Station 27. These response times meet the desired response distance standards of the LAFD.” This response time is not limited to structure fires and as such medical response times are adequate as well. As noted in the letter, Fire Station 27 also houses a Paramedic Ambulance and a Basic Life Support Ambulance. See Appendix J.1 of the Draft EIR.

The current challenges facing the City in light of recent budget cuts are complex and continue to evolve. City officials are committed to developing interim solutions to ensure that the LAFD is able to meet mandated performance standards set forth in the Los Angeles Fire Code. CEQA does not shift financial responsibility for the provision of adequate fire and emergency response services to the Project Applicant. The City has a constitutional obligation to provide adequate fire protection services. As such, the City must continue to perform its obligations. However, it should also be noted, as discussed in greater detail in Section IV.J.1 Public Services-Fire Protection of the Draft EIR, that the Project would generate a

significant amount of General Fund revenues to the City in the form of sales and property taxes. The City could use these added revenues to help offset the LAFD budget cuts, although the ultimate use of these revenues cannot be predicted with certainty at this time.

As discussed in Section IV.J.1 Public Services-Fire Protection of the Draft EIR, response times are not the only factor involved in evaluating impacts to fire protection services. For example, the Project is consistent with Fire Code Section 57.09.06, regarding distance to fire stations. As shown in Table IV.J.1-1, Existing Fire Stations Serving the Project Site, the Project Site is 0.7 miles from LAFD Fire Station 27, which houses a truck company and an engine company. The Project Site is 0.8 miles from LAFD Fire Station 82, which houses an engine company. That is within a 1.5-mile radius and is thereby consistent with Fire Code Section 57.09.06.

The Project also incorporates a number of mitigation measures designed to ensure that impacts related to fire protection services would be less than significant. These measures include submittal of the proposed plot plan for the Project to the LAFD for review for compliance with applicable Fire Code, California Fire Code, City Building Code, and National Fire Protection Association standards and submittal of an emergency response plan for approval by the LAFD that would include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. The mitigation measures would apply to medical emergencies as well. (See Mitigation Measures J.1-1 through J.1-7 on page IV.J.1-18 of the Draft EIR for a complete list of fire protection services mitigation measures). As such, the Draft EIR adequately analyses the Project's impacts to fire protection services.

Comment No. 09-74

3. The DEIR's Analysis of Police Services Impacts Fails to Acknowledge the Project's Alcohol-Serving and Entertainment Uses.

The DEIR briefly discusses the Project's potential impacts on existing police protection services, proposes minimal mitigation measures to be implemented during the construction and operation of the Project, and concludes that the Project would not create any significant environmental impacts. However, this analysis fails to accurately portray the uses proposed for the Project, some of which will produce additional impacts which must be analyzed in the DEIR. Specifically, the DEIR's Project Description notes that the Applicant will be seeking conditional use approvals for on-site consumption of alcohol *and* live entertainment at the Project, including a night-club. However, despite being included in the Project Description, these proposed uses are not discussed anywhere else in the DEIR. Moreover, given the Project's proposed equivalency program, there is no way of knowing if one bar/restaurant will be developed, or if ten will be proposed. The proposed live entertainment use could include a small jazz club, or a sprawling nightclub with events seven nights a week. Regardless of the specific mix of uses that the Applicant eventually decides upon, alcohol and entertainment uses will have a direct impact on police services in the community, and without providing more information and analysis regarding these

uses, the DEIR's conclusion that no significant impacts will exist is conclusory and not supported by substantial evidence.

Response to Comment No. 09-74

See Response to Comment Nos. 81-7 and 81-10 (Reznik, Benjamin (#2)) for a discussion of the request for a master conditional use permit to permit the onsite sales and consumption and sale for offsite consumption of a full line of alcoholic beverages.

Section IV.J.2, Public Services – Police includes several mitigation measures that are designed to make police response efficient during operation, including reviewing plans at the plan check stage with reasonable recommendations incorporated, and providing the LAPD with access information.

While the Equivalency Program is designed to provide flexibility of uses, there are firm constraints on how the Project is developed, including the vehicle trip cap and the Development Regulations.

The Draft EIR provides a reasonable worst-case impact analysis for each category of impact. In the Draft EIR, the Residential Scenario has been identified as the development plan that could have the maximum potential impacts to police protection services, for a 24 hour period (including both daytime and nighttime hours); however, as the Commercial Scenario would have the greatest potential increase in total population (residents and employees) at the Project Site, the Commercial Scenario would have the maximum potential impacts to police protection services for the daytime period. Due to the Project's direct population and employee increase and associated demand for police protection services from the Commercial Scenario, there would be a potential impact on police protection services. Thus, to reduce the Project's potential impacts to police protection services to less than significant levels, mitigation measures are provided in Section IV.J.2, Public Services – Police.

Comment No. 09-75

K. The DEIR's Utilities and Service Systems Analysis Does Not Correctly Account for the Equivalency Program and Cumulative Impacts.

The DEIR's Utilities and Service Systems section analyzes the DEIR's Concept Plan, Commercial Scenario, and/or Residential Scenario to determine the Project's total potential impacts on utilities and service systems. In doing so, the DEIR neglects to analyze the true intensity of uses that could conceivably be developed at the Project site. For example, although the DEIR's Residential Scenario has more residential units than either the Concept Plan and Commercial Scenario, nothing prevents the Applicant from building even more residential units than the amount set forth in the Residential Scenario because of the Project's equivalency program. If the Applicant were to build more residential units than that in the Residential Scenario, then total Project impacts to those areas where residential uses are more impactful (like solid waste generation) have not been disclosed. This applies to every use, across every impact area (restaurants have greater water usage, for example, yet nothing in the DEIR or proposed

Development Agreement creates a cap on restaurant space). Accordingly, all of the· numbers in the DEIR's Utilities and Service Systems section are misleadingly low.

Response to Comment No. 09-75

The Draft EIR fully discloses all impacts and does not neglect to analyze the maximum intensity of uses that could conceivably be developed at the Project Site. For each category, the Draft EIR analyzes the scenario that would produce the greatest impact. Thus, the Project Description is designed to allow the Draft EIR to analyze the outer boundaries of the impacts that could be produced across the range of Project build-out combinations. For a given environmental category, the Draft EIR analyzes the scenario most likely to cause the greatest impact for that category. This "worst-case impact" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the Draft EIR, so long as all of the impacts are disclosed. Sierra Club v. City of Orange, 163 Cal. App. 4Th 523, 533, 78 Cal. Rptr. 3d 1, 3 (4th Dist. 2008).

The comment then states that anything could be built at the Project Site, such as all restaurant uses or all residential uses. The Project could not be built as an all restaurant or all residential development as an all restaurant or all residential development is not reflective of the Project. As stated on pages II-44 through II-48, in Section II, Project Description of the Draft EIR, the Project Objectives call for the development of a mixed-use Project. Furthermore, irrespective of the land uses proposed, the Project's Equivalency Program establishes the Trip Cap as one measure to control the level of development for the Project. There are a number of other controlling factors that ensure the Draft EIR has properly analyzed and disclosed the full range of environmental impacts that could occur as a result of the Project. As stated on pages II-22 and II-23 of the Draft EIR: "[t]he Equivalency Program shall be implemented pursuant to the administrative procedures set forth in the Development Agreement. The process to initiate an exchange under the Equivalency Program would begin with the Applicant filing a request with the Department of City Planning. This request shall include detailed information identifying the land use transfer/exchange that is being proposed and supplemental information documenting how the proposed land uses are consistent with the overall a.m. and p.m. peak hour trip cap identified in Table II-3, Project Trip Cap. The supporting documentation shall also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR." Thus, the development procedures described above will ensure that the Trip Cap is not exceeded, that the method of calculating trips is consistent with the method used on the Project Traffic Study, and that the development would not exceed the maximum environmental impacts identified in the EIR.

Comment No. 09-76

The DEIR also states that "the potential need for the related projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, relationship between the development of the Project and the related projects in relation to this issue as none of the related projects within the LADWP service area are located in proximity to the Project Site." (DEIR, p. IV.L.-1-20.) This is false. Immediately *adjacent* to the Project are the BLVD 6200 Project and the Yucca Condominium

Project, for example. The DEIR must analyze the immediate impacts of these projects and other related projects in close proximity.

Response to Comment No. 09-76

The Project analyzes the immediate impacts of projects and related projects in close proximity to the Project Site. Contrary to the commenter's statement that the DEIR did not analyze the BLVD 6200 Project and Yucca Condominiums Project, these two projects are listed on the Draft EIR's related project list, as identified in Section III, Environmental Setting, Table III-1, Related Projects List. The comment also cites that the Project is "immediately adjacent" to the BLVD 6200 Project. However, the BLVD 6200 Project is located over a block away and across Hollywood Boulevard to the South and across Argyle Boulevard to the East. While the Yucca Condominiums Project is located near the Project Site, the conclusion reached in the Draft EIR, that the potential need for the upgraded water service at each of the related projects will depend on the specific circumstances and activities at each site, remains the same.

Comment No. 09-77

L. The DEIR's Alternatives Analysis Fails to Comply with CEQA.

1. The DEIR Does Not Provide a Reasonable and Legally Sufficient Range of Alternatives.

The DEIR's Alternatives section provides several alternative projects, but all of them (with the obvious exception of the required "No Project" alternative) appear to have been provided as part of a pro forma attempt to *appear* compliant with CEQA rather than to *actually* comply with CEQ A. In practice, the DEIR does not provide a reasonable range of alternatives to comply with CEQA's minimum requirements for alternatives analysis. *Four out of the five* development alternatives provide for 875,228 net square feet of development (reduced from the proposed Project's 1,166,970 net square feet). In other words, four out of the five development alternatives provide *exactly* the same development square footage, with almost *exactly* the same, if not worse, impacts to aesthetics, air quality (construction), cultural resources (had it been ' correctly identified as significant), and noise (construction) -key significant impacts of the Project.[18] With respects to AMDA's concerns about noise and vibration, for example, the DEIR has provided four alternatives that would not alleviate impacts on AMDA in the slightest. This is not a reasonable range of alternatives in legal compliance with CEQ A.

[18] *Although the DEIR does not identity the impacts as worse, the impacts are in actuality worse in some cases because the DEIR purposefully removed public benefits from the Alternatives to make them appear unattractive. The removal of public benefits from the alternatives in and of itself makes them completely unrealistic. The Applicant would be hard-put to find another 583,485 square foot-plus project with a 20-plus year development agreement that has previously been approved by the City and has not been required to provide public benefits similar to those that magically disappear from the various alternatives.*

Response to Comment No. 09-77

The Draft EIR does provide a reasonable range of alternatives as well as justification as to why alternative sites and other development scenarios were considered but rejected. It should be noted that while an EIR must describe a range of reasonable alternatives to the Project, it is not required to discuss every alternative to the Project. Instead, an EIR should present a "reasonable range of potentially feasible alternatives." 14 Cal Code Regs §15126.6(a). The CEQA Guidelines do not establish ironclad rules relating to the range of alternatives to be discussed in an EIR. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576. Rather, the nature and scope of the alternatives studied in an EIR is governed by the rule of reason. 14 Cal Code Regs §15126.6(a). Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice. 14 Cal Code Regs §15126.6(f). See *California Native Plant Soc'y v City of Santa Cruz* (2009) 177 CA4th 957. Here, the Draft EIR analyzed five alternatives not including the No Project Alternative. The alternatives included two reduced density alternatives (4.5:1 and 3:1 FAR), a reduced height alternative, and two land use alternatives. The Draft EIR provides over 150 pages of analysis for these alternatives. In doing so, the Draft EIR has provided the decision makers with a diverse set of alternatives that allow for a reasoned choice between densities, heights, and land uses. The Draft EIR's range of alternatives is reasonable.

In addition, as stated in Section VI, Alternatives to the Project, of the Draft EIR, the development of the Project Site at an FAR below 3:1 would also be considered economically infeasible and was rejected from further environmental review because it is incapable of accomplishing the Applicant's development intentions and objectives for viable reuse of the Project Site. Also, such a development would result in environmental impacts similar to those identified for the Project and thus, would not substantially reduce or avoid the significant impacts that would occur under the Project.

The reduced density mixed-use development at 3:1 FAR would include 583,485 square feet. While certain impacts would be reduced due to the comparably smaller development than the Project, the Alternative 3 was selected as the Environmentally Superior Alternative. Due to a reduction in overall square footage when compared to the Project, Alternative 3 would not meet the full extent of the Project Objective to generate the maximum community benefits by maximizing land use opportunities and providing a vibrant urban environment with state-of-the-art improvements. Specifically, with a reduced version of the Project, the objective to ensure that this iconic intersection of Hollywood would remain a thriving commercial corridor for the community would not be fully realized, given the reduction in land uses proposed, because this alternative would not generate the density of residents and employees needed to sustain the existing and proposed business, resident, visitor, transit and cultural activities in the area. This Alternative, with its reduced density when measured against the Project, would not maximize land use opportunities available. Alternative 3 would not create as great of a long-term increase in tax revenue to the City, or create as many additional jobs, or attract as much business activity to the Hollywood Area when compared to the Project as proposed.

Regarding the level of impacts associated with the alternatives, the Draft EIR contains Table IV-70, which provides a summary analysis of how the Alternatives reduce impacts. Lead agencies are not

precluded from presenting alternatives that would substantially reduce some impacts, but increase others. When these alternatives are included in an EIR, however, the EIR must discuss the alternative's significant impacts, although in less detail than is required for an analysis of the project's impacts. A matrix displaying the significant effects of each alternative may be used to summarize the comparison. See 14 Cal Code Regs §15126.6(d). The Draft EIR complies exactly with these CEQA requirements.

Last, the alternatives selected for analysis in the Draft EIR were selected to comply with CEQA, as discussed above. The alternatives were not selected simply to alleviate impacts that could occur on AMDA. This methodology complies with CEQA as explain above and further discussed in response to Comment No. 09-78 below.

Comment No. 09-78

Likewise, all five of the development alternatives fail to either significantly reduce or eliminate the Project's significant impacts to areas such as aesthetics, transportation, and air quality. In fact, none of the alternatives completely eliminate a single significant impact. (As Table VI-70 of the DEIR demonstrates, despite the DEIR's identification of multiple significant and unavoidable impacts, not one impact was reduced to insignificance by a single alternative.) The DEIR's failure to eliminate a single significant impact makes little sense. For example, in connection with the reduced FAR alternative of 3:1, the DEIR provides that "impacts related to focal view obstruction under Alternative 3 would be significant and unavoidable, similar to the impact identified under the Project." (DEIR, p. VI-44.) However, this alternative, which has 583,485 less square feet than the Project, and is on the same approximately 4.5 acres, should have no difficulty reducing the focal view impact to a level less than significant. The DEIR could not conceivably provide substantial evidence in support of the proposition that there is no other place on the site to build, but on Vine Street, so as to block the view of the Capitol Records Tower from the intersection of Hollywood and Vine. Obviously, it is feasible to push a building back a bit after the total development envelope has shrunk by 583,485 square feet. AMDA can (and will, if necessary) provide several 583,485 square foot concept plans that would satisfy all the Project objectives and avoid significant impacts to focal views.

Response to Comment No. 09-78

The Project Objectives aims to preserve public views from certain key vantage points to the Capitol Records Building and preserve existing view corridors from certain key vantage points to the Hollywood Hills. While Alternative 3 would have less density, it would still create a development that could potentially create a focal view obstruction of the Capitol Records Building, but to a lesser degree than the Project under the Development Regulations. This conclusion is based on the conservative approach that any substantial development on the Site has the potential to partially block views of the Capitol Records Building, depending on the vantage point.

The Lead Agency can select alternatives that can avoid or *substantially lessen* one or more effects. (*Emphasis added*). See 14 Cal Code Regs §15126.6(c), which indicates that the Project alternatives do

not have to eliminate all significant impacts, but must instead be capable of reducing significant impacts. The court in *Sierra Club v City of Orange,* 163 CA4th at 546 noted that for complex projects, "it is practically impossible to imagine an alternative that would provide substantial environmental advantages in all respects." As demonstrated in Table IV-70: Comparison of Impacts Under the Project to Impacts Under the Project Alternatives, the Draft EIR analyzes several alternatives that substantially lessen one or more environmental effects of the Project. In doing so, the Draft EIR's alternatives analysis complies with CEQA.

Last, the commenter offers to provide plans that satisfy the objectives of the Project and avoids significant impacts. This portion of the comment provides an opinion with no supporting evidence. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 09-79

2. The DEIR Has Not, And Cannot, Show that A Further Reduced FAR Alternative is Infeasible.

The DEIR states that development of the Project site at a density lower than a 3:1 FAR was rejected for further review as an alternative to the Project because it would be economically infeasible and would not satisfy the project objectives. Given that the lowest FAR alternative evaluated in the DEIR is a large 583,485 square foot project, yet City discretionary review would be triggered by Los Angeles Municipal Code Section 16.05 at a mere 50,000 square feet of nonresidential floor area (or 50 residential units), the DEIR's range of alternatives is far from reasonable. The DEIR has to evaluate a significantly reduced Project. This is especially so because, as stated above, the DEIR's alternatives fail to eliminate or significantly reduce the Project's significant impacts. With respect to a 3:1 FAR project being infeasible in this area of Hollywood, this finding cannot be supported by substantial evidence. Several other projects in the area have been built at less than 3:1 FAR (e.g., the Jefferson at Hollywood Project on Highland and Yucca, the Hollywood Tower Terrace Project at Franklin and Gower).

Given the presence of multiple buildings in the area built at less than a 3:1 FAR, some of them quite recent, the DEIR must provide financial data to support its finding of infeasibility. Financial data is critical to evaluate whether an alternative is truly infeasible or merely less profitable, since CEQA does not permit an alternative to be rejected on profitability grounds. See *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1181 ("The fact that an alternative may be ... less profitable is not sufficient to show that the alternative is financially infeasible."). The DEIR must provide specific evidence to support its finding of infeasibility. For example, in vacating an inadequate EIR and requiring the University of California to re-start the CEQA process, the Court stated that the University must "explain in meaningful detail in a new EIR a range of alternatives to the project and, if [found] to be infeasible, the reasons and facts that...support its conclusion." *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 406. In short, the DEIR's statement that anything less than 3:1 would be infeasible is completely conclusory, and must be supported with specific evidence and financial information.

Response to Comment No. 09-79

Generally, the comment states that the Draft EIR has not shown that a further reduced FAR alternative is infeasible, and claims that the Draft EIR improperly rejected an alternative that was lower density than the 3:1 FAR alternative analyzed in the Draft EIR. CEQA allows the Lead Agency to consider and reject certain alternatives. Section 15126.6(a) of the CEQA Guidelines clearly states "an EIR need not consider every conceivable alternative to the project." In addition, Section 15126.6(d) provides that an EIR can "identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination." Here, the Draft EIR complied exactly with these CEQA requirements. The Alternatives section (page VI-7) of the Draft EIR explains that a less-than-3:1 FAR alternative was rejected from detailed review in the Draft EIR because such an alternative fails to meet the project objectives, is not considered economically feasible, and would not result in viable reuse of the Project Site.

The comment also asserts that the Draft EIR range of alternatives is far from reasonable, and then demands that the Draft EIR evaluate a significantly reduced Project. While an EIR must describe a range of reasonable alternatives to the Project, it is not required to discuss every alternative to the Project. Instead, an EIR should present a "reasonable range of potentially feasible alternatives." 14 Cal Code Regs §15126.6(a). The CEQA Guidelines do not establish ironclad rules relating to the range of alternatives to be discussed in an EIR. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576. Rather, the nature and scope of the alternatives studied in an EIR is governed by the rule of reason. 14 Cal Code Regs §15126.6(a). Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice. 14 Cal Code Regs §15126.6(f). See *California Native Plant Soc'y v City of Santa Cruz* (2009) 177 CA4th 957. Here, the Draft EIR analyzed five alternatives not including the No Project Alternative. The alternatives included two reduced density alternatives (4.5:1 and 3:1 FAR), a reduced height alternative, and two land use alternatives. The Draft EIR provides over 150 pages of analysis for these alternatives. In doing so, the Draft EIR has provided the decision makers with a diverse set of alternatives that allow for a reasoned choice between densities, heights, and land uses. The Draft EIR's range of alternatives is reasonable.

Next, the comment states that the Draft EIR's analysis of alternatives is not supported by substantial evidence. Specifically, the comment asserts that the Draft EIR must provide financial data to support a finding of economic infeasibility. The comment cites to the *Laurel Heights Improvement Association v. Regents of the University of California* to support this claim. This claim, however, is misplaced and not supported by case law. In fact, in 2012 the Court of Appeal of California held that there is no requirement that the economic feasibility analysis be included in a Final EIR – much less a Draft EIR – so long as it was included in the administrative record. See *The Flanders Foundation v. City of Carmel-By-The-Sea et al.* (2012) 202 Cal.App. 4th 603, 619. In the *Flanders* case, the plaintiff asserted that the City was required to place the economic feasibility analysis in the Draft EIR rather than elsewhere in the administrative record. This is the same position taken by the comment. The court in *Flanders*, however, explained that the plaintiff's reliance on *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376 was misplaced because financial feasibility evidence was

ultimately available for review before final consideration of the project. Therefore, it is clear that economic feasibility evidence is not required to be in the Draft EIR, as asserted in the comment. Here, the administrative record for the Project will contain adequate financial feasibility evidence regarding Project Alternatives prior to final consideration of the Project by the decision makers.

Finally, the comment claims that the Draft EIR's statement that anything less than a 3:1- reduced-density alternative is infeasible is completely conclusory and unsupported by evidence. As explained above, the Draft EIR explains why a further-reduced-density alternative was rejected. In addition, the Draft EIR fully evaluates six alternatives to the Project that include varying uses, densities, and sizes of buildings to determine whether those alternatives satisfy the objectives of the Project, reduce environmental impacts, and are feasible. Therefore, the alternatives rejected from further consideration in the Draft EIR, as well as the range of alternatives analyzed in the Draft EIR, comply with applicable CEQA requirements.

Comment No. 09-80

3. The DEIR Must Include Footprint-Based Alternatives.

Given the significant noise, air quality, and shade-shadow impacts on AMDA due in great part to the Project's footprint, which places the Project's most intensive construction directly adjacent to AMDA, the DEIR must consider footprint alternatives that would have the ability to significantly reduce, if not eliminate, many of the Project's significant impacts. None of the alternatives consider a setback from AMDA or less intense development around AMDA. There is little question that the Project site is large enough to permit flexibility for buffer areas and/or the relocation of the most intense development to other sections of the Project site. As none of the DEIR's alternatives mitigate noise, air quality, and shade-shadow impacts to AMDA, revised Project footprints that would significantly mitigate those impacts must be incorporated into the DEIR.

Response to Comment No. 09-80

As stated above in Response to Comments Nos. 09-12, 09-15, and 09-53, the commenter is offering their opinion that the Project would create significant impacts without any justifications for their claim. Please refer to Response to Comments Nos. 09-12, 09-15, and 09-53 (AMDA) above for additional information. With regard to the comment that the Project must incorporate an additional alternative that looks at a revised footprint area, the Project adequately proposes and studies a reasonable range of alternatives, as discussed above. While an EIR must describe a range of reasonable alternatives to the Project, it is not required to discuss every alternative to the Project. Please refer to Response to Comment No. 09-77, 09-78, and 09-79 (AMDA) above for more information.

Comment No. 09-81

4. The Analysis of Each of the Alternatives is Highly Flawed.

The critique of the DEIR's Project analysis is hereby applied by reference to all of the alternatives, which suffer from the same analytical problems. Since the alternative *scenarios* need to be redone in their entirety, there is no need to individually discuss the analysis for each of them.

Response to Comment No. 09-81

Please see Response to Comment Nos. 09-77, 09-78, and 09-79 (AMDA) above for more information on the analysis of Project Alternatives. The commenter provides an opinion on the Alternatives and does not discuss the adequacy of specific Alternatives. These comments will be forwarded the decision makers for their consideration and no further response is required.

Comment No. 09-82

III. CONCLUSION.

We hope you agree that a project of this magnitude requires a thorough vetting of the issues with accurate information, thoughtful responses, and compliance with basic CEQA requirements. For the reasons set forth above, the numerous inadequacies in the DEIR require significant revisions and re-circulation of the DEIR.

Once again, we appreciate the opportunity to comment on the DEIR.

Response to Comment No. 09-82

This comment is a conclusion statement to their letter. The Draft EIR does not need to be revised and recirculated. The comment is noted for the records and will be forwarded to the decision-making bodies.

LETTER NO. 10 - BEACHWOOD CANYON NEIGHBORHOOD ASSOCIATION

Fran Reichenbach
President, Beachwood Canyon Neighborhood Association

November 1, 2012

Comment No. 10-1

We respectfully request an extension of public comments regarding the Millennium DEIR. This report took a long time to construct with various professionals involved. It's not realistic to ask the average citizens to study and present meaningful comments on this huge proposal within a matter of weeks. Also, before and during the holidays, people have many family events and needs that compete for their attention.

Neighborhood Councils are breaking in new boards. Many neighborhood organizations, including ours, don't even have meetings during the holiday season. With NCs and neighborhood organizations dark or unprepared to do the kind of work necessary to appropriately respond to this EIR, it's only reasonable to grant our request for an extension of time within which to respond to this huge and dense EIR.

We are formally requesting the fullest extension possible under article 15105 of CEQA guidelines, to December 25. Since that falls on Christmas, we suggest that you extend the deadline until the **second week of the New Year**, when all parties are likely to be able to more completely address this project.

While developers of this project are requesting all kinds of entitlements, it would be a demonstration of profound public courtesy for you to grant an extension up to and through the second week of the New Year 2013.

Response to Comment No. 10-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 11 - GREATER GRIFFITH PARK NEIGHBORHOOD COUNCIL

Linda Demmers
President, Greater Griffith Park Neighborhood Council

November 21, 2012

Comment No. 11-1

The Greater Griffith Park Neighborhood Council respectfully requests an extension of the period for public comment regarding the Millennium DEIR. The report is voluminous and took a long time to construct with professionals. It is unrealistic to ask average citizens to study and present constructive comments in such a short amount of time.

It is before and during Holiday Season, and with a newly seated board and executive committee, we are unprepared to respond in a responsible manner. We are therefore requesting the longest time possible, until after the Holidays to January 16, 2013. Under article 15105 of CEQA guidelines, the latest deadline would be December 25, 2012 obviously an unrealistic time.

This project has so many entitlements that your Department should extend the courtesy to the public so they can do their due diligence to help make this project a welcome addition to the city.

Response to Comment No. 11-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration

Comment No. 11-2

The GGPNC requests that the Millennium Project and DEIR applicant apply all applicable provisions from the Hollywood Community Plan and Final Environmental Impact Report (FEIR), adopted June 19, 2012 by the Los Angeles City Council, to this project and DEIR. Those provisions are expressed in the goals, policies and programs, standards, and guidelines found in Chapters 1 through 7 of the Hollywood Community Plan and the Final Environmental Impact Report, including mitigation measures.

Response to Comment No. 11-2

The Project's consistency with the applicable goals and policies of the Hollywood Community Plan Update is shown in Table IV.F-4, of the Draft EIR. Not every goal, policy, program, standard or guideline is applicable to a private development, such as the Project. Some of these are instead applicable

and directed to overall City and government-controlled planning and policy-making. The comment does not point to a specific goal or policy that the Project has left out or would be inconsistent.

In addition, the mitigation measures identified in the Final EIR for the Hollywood Community Plan Update are applicable to overall City and government-controlled planning and policy-making. Project-specific mitigation measures designed to minimize, reduce, or avoid Project-related impacts are included in the Project's Draft EIR.

Comment No. 11-3

We also recommend the development fees to be part of the Nexus Study provided for in the implementation program of the Hollywood Community Plan.

Response to Comment No. 11-3

The Project includes a number of mitigation measures related to traffic, including Mitigation Measure K.1-13 (which has been revised to Mitigation Measure K.1-13 due to the addition of new mitigation measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR), in which the Project Applicant shall be responsible for the cost and improvements of any necessary signal improvements and mitigation measures.

The commenter is likely referring to the plan to fund a nexus study to establish trip fees on new development to finance regional mobility improvements. The Community Plan Update became effective on August 6, 2012. Any proposed nexus study fees would apply to future projects. Any fees that would apply to this Project would depend on the provisions of the Los Angeles Municipal Code and the nexus study, as well as determinations by the Los Angeles Department of Transportation.

Comment No. 11-4

Once again, we respectfully request an extension for public comment to January 16, 2013.

Response to Comment No. 11-4

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 12 - HOLLYWOOD DELL CIVIC ASSOCIATION (#1)

Whitley Heights
Hollywood Dell Civic Association

December 6, 2012

Comment No. 12-1

Title: From The Hollywood Dell

Details: Please spread the word to your communities.
Thank you!

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Hollywood Dell Civic Association
Neighborhood News & Upcoming Events

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Dear neighbors, as most of you know there is a very large proposed project called the Millennium Project right at the base of our neighborhood surrounding the Capitol Records building.

I believe this project will effect our Dell neighborhood more than any other neighborhood since it is right at our two main entrances. There is a special meeting at HUNC (Hollywood United Neighborhood Council) this Thursday. It would be great if we could attend in full force! Please attend if you can!

Special Board Meeting for review of Millennium Project
Special Board Meeting and PLUM Committee Presentation

Thursday December 6th, 2012; 7:00pm
Seventh-day Adventist Church of Hollywood, 1711 N Van Ness Ave, Hollywood, CA 90028

(On site parking available within the Church compound)

(Whitley Heights NC (Hollywood Hills West NC) and HHWNC Plum Committee rejected The Millennium Skyscraper Projects.)

Response to Comment No. 12-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 13 - HOLLYWOOD DELL CIVIC ASSOCIATION (#2)

Patti Negri
President, Hollywood Dell Civic Association

December 6, 2012

Comment No. 13-1

We are writing to request an extension of the Public Review/Comment Period for the Millennium Draft Environmental Impact Report ("DEIR") until January 31, 2013.

The Hollywood Dell Community Association, representing approximately 1,500 residents in the Hollywood Dell neighborhood, and in concert with other Community Associations and Councils in the Hollywood area, is in the process of reviewing the recently released DEIR. This two-volume report, the work product of paid professional architects, draftsmen, consultants, attorneys, investors, and city staff that took over 2- years to research and develop, is dense, technical, filled with complex calculations and numerous acronyms and references that require multi-page appendices and cross referencing on the slow responding City Planning and Zoning web site.

We are not professional planners, but are concerned residents and business owners located within 500' of the proposed development who need additional time to properly review the DEIR. Many residents are away for the Holidays, others have escalated work schedules, and some neighborhood councils do not have scheduled meetings until after the first of the year while others are trying to get up to speed after recent officer elections.

No project in Hollywood is more ambitious, larger or likely to create indelible change to our Community than the Millennium development. We want that change to be positive. We want and need sound development in Hollywood which demands adequate time to review a DEIR of this magnitude.

We trust that the City will grant an extension of the public comment period to the DEIR as requested to January 31, 2013. It will allow us to comment proactively and help us guide the Millennium Project to be one we can all support, use and point to with pride.

Response to Comment No. 13-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 14 - HOLLYWOOD HERITAGE

Bryan Cooper
President, Hollywood Heritage, Inc.
P.O. Box 2586, Hollywood, CA 90078

December 10, 2012

Comment No. 14-1

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members, thank you for the opportunity to review and comment on the Millennium Hollywood Project, and the accompanying Draft Environmental Impact Report (DEIR).

For three decades Hollywood Heritage has been an advocate of the preservation and protection of Hollywood's historic resources. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development. Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in public policy discussions through the formulation of the Community Redevelopment Plan of 1986 and subsequent urban design plans, specific plans and in property entitlement discussion involving historic resources. These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood.

Response to Comment No. 14-1

The comment is an introduction and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 14-2

Our expertise in this area has led us to the conclusion that the Millennium Hollywood project has significant and adverse impacts on a number of Hollywood's historic resources.

CEQA guidelines define a project as having a significant environmental impact when the project causes a substantial adverse change in the significance of a historical resource as defined by the California Environmental Quality Act (CEQA), Section 15064. The City of Los Angeles CEQA Thresholds Guide (2006, p. D.3-3) maintains that a project would have a significant impact on historic resources if the project results in a substantial adverse change in the significance of a historic resource by construction that reduces the integrity or significance of important resources on the site or in the vicinity via alteration of the resource's immediate surroundings.

Response to Comment No. 14-2

The commenter references the City of Los Angeles CEQA Thresholds Guide and provisions of CEQA. It should be noted that these same legal provisions and requirements, among others, were used to prepare the Historic Resources Report and Section IV.C, Cultural Resources, of the Draft EIR. Based on the detailed analysis in those documents, the Project does not have a significant impact on any on-site or off-site historic resources. Please see Response to Comment No. 19-3 (Los Angeles Conservancy), which explains why the historic resources on and around the Project Site are not materially impaired.

Comment No. 14-3

We appreciate some of the mitigation measures designed to preserve the historic Capitol Records and Gogerty Building, however we believe that the proposed project would substantively alter the context in which these buildings gained their significance by compromising the immediate surroundings. Portions of the project are grossly out of proportion with the identified resources, thereby minimizing them and irretrievably altering their setting. Additionally, while we applaud the inclusion of open space, the current design significantly challenges the pedestrian environment of Hollywood. Like many previous developments, it draws pedestrians away from the street and irrevocably alters the historic street wall along Vine and Argyle.

Response to Comment No. 14-3

It is noted that the commenter appreciates the mitigations measures that will preserve the Capitol Record Building and the Gogerty Building. The commenter is correct that the Project allows for a scale of new development that is significantly larger than existing buildings in the immediately surrounding area. See Responses to Comments No. 19-3 and 19-4 (Los Angeles Conservancy), which explain why the difference in scale between the Project and existing historic resources does not trigger a significant impact.

To summarize, the Draft EIR acknowledges that the Project has the potential to add considerable height and density, and that the surroundings will be altered. Alteration of the surroundings, however, will not reduce the integrity of historic resources such that their eligibility for listing in national, state, or local registers will be impaired. In addition, Section 6.2: Impact Analysis Using Los Angeles CEQA thresholds in the Historic Resources Report, specifically analyzes the Project's potential impacts on the surrounding historic resources and specifically assesses the height differences between existing resources and the Project structures. It concludes that impacts are less than significant and that the Project will not materially impair the historic significance of any resource on the Project Site or in the area.

Next, the commenter applauds the Project's grade level open space, but then criticizes its design as challenging the pedestrian environment. As explained in the project description contained in the Draft EIR, the Project will transform existing parking lots into a mixed-use development that incorporates grade-level public plazas, pedestrian passage ways, amenities, and commercial uses (where none

currently exist) that enliven the street scene and pedestrian environment at the Project Site. The Project is designed to provide uses and activity that will attract pedestrians into the area, especially along Hollywood Boulevard and Vine Street. Similarly, the Project Site is located very close to the Metro Red Line Hollywood/Vine Station, which will also encourage a vibrant pedestrian environment compared to the existing conditions. The Project seeks to be pedestrian friendly, not challenge the pedestrian environment. Lastly, it should be noted that the street walls along Vine Street and Argyle Avenue that are nearest to Hollywood Boulevard are not part of the Project Site.

Comment No. 14-4

We also find the current version of the Millennium Hollywood Draft EIR to be deficient in its assessment that the project would not cause an adverse change in significance for the Hollywood Boulevard Commercial and Entertainment Historic District.

The heart of Hollywood is listed in the National Register of Historic Places and functions as one of the City of Los Angeles' major tourist destinations and economic engines. The Hollywood Boulevard Commercial and Entertainment Historic District is a 12 block area of the commercial core. The district contains 103 of the most important buildings in Hollywood, listed at the national level of significance in the National Register of Historic Places. The development pattern of the 1920s and 1930s was characterized by the construction of buildings of generally 12 stories at major intersections, flanked by one and two story retail structures.

The District was formally designated by the National Park Service on behalf of the Secretary of the Interior in 1985. At the time, there were over 60 contributors and approximately 40 non-contributors which all dated from the 1905-1935 period of significance. Since its listing, the District has seen significant and positive restorations, now having the largest collection of restored historic theaters in use in the nation. The District can count the beneficial reuse of the Broadway and Equitable Buildings, the Hollywood Professional Building, and the Nash Building, and many restorations, spurring the renaissance of Hollywood. But the District has suffered the loss of several contributors, and has seen the addition of overly-large developments such as Hollywood and Highland, the W Hotel and Madame Tussaud's.

Response to Comment No. 14-4

The commenter claims that the Draft EIR is deficient regarding the Project's impact on the Hollywood Boulevard Commercial and Entertainment District. To be adequate, the Draft EIR must support its significance conclusions with substantial evidence. In this case, the Cultural Resources section of the Draft EIR is supported by the Historic Resources Report, which is considered substantial evidence.

The remainder of the comment describes the history and contributors to the Hollywood Boulevard Commercial and Entertainment District. It should be noted that the Historic Resources Report and the Draft EIR provide a detailed analysis of the Project's potential impacts on the Hollywood Boulevard Commercial and Entertainment District.

The last sentence of the commenter is related to other projects in the area and is not a comment on the adequacy or analysis contained in the Draft EIR and thus does not require a response. For additional information on potential impacts on historic resources, please see the Cultural Resources Topical Response (Topical Response No. 4).

Comment No. 14-5

The current Millennium Hollywood project fails to significantly address the negative impact created by the mass and height of the proposed development in regards to the existing structures in the vicinity. This will be the largest tower in the area and will be visible throughout the Hollywood Boulevard Commercial and Entertainment District, irrevocably altering the character of this national landmark. In addition, while creating opportunities to see landmarks such as the Hollywood Sign from areas within the development, the project fails to address the fact that these new view lines will alter views that have, to date been publicly available.

Response to Comment No. 14-5

The commenter is incorrect. The Draft EIR for the Project adequately analyzes the potentially adverse impacts related to the Project, including impacts related to mass and height of the Project compared to existing conditions. The Draft EIR specifically acknowledges that the Project has the potential to add considerable height and density, and that the immediate surroundings of the on-site and adjacent historic resources will be altered. Alteration of the surrounding area however will not critically reduce the integrity of surrounding historic resources such that their eligibility for listing in national, state, or local registers will be impaired.

The commenter is correct in asserting that the Project could be the largest tower in the area and would be highly visible in the surrounding area. As noted above, however, and in the responses to Comment Letter No. 19, the Draft EIR analyzed the potential visual impacts and cultural impacts (among many others) of the Project. Those sections of the Draft EIR are supported by technical studies. Based on the evidence in the administrative record, it is clear that the Project will not have a significant unavoidable impact on historic resources on the Project Site or in the adjacent Hollywood Boulevard Commercial and Entertainment District.

The commenter is incorrect in claiming that the Draft EIR fails to address the new view lines that could potentially alter views of the Hollywood Sign or other value viewsheds in the area. The Draft EIR provides an extensive analysis of focal and panoramic viewshed impacts. It also contains numerous photo-simulations that illustrate exactly how views could change after development of the Project. The Draft EIR is also supported by an Aesthetics Impact Report, which further assesses viewshed impacts. Please see those sections of the Draft EIR, the referenced technical studies, and the Cultural Resource and Aesthetics Topical Responses for additional information.

Comment No. 14-6

In the "Related Projects" section of the DEIR, which compares this project with other projects nearby, unapproved, proposed developments are used alongside existing structures, allowing the square footage increase that this project suggests to be seen as more reasonable. However, the structures included on the comparative chart are all less than one-third the size of the proposed Millennium tower. The only project that is as large is the proposed redevelopment of the Paramount Studios Lot. At 1,385,700 sq. ft., the Paramount Lot is a much larger property and does not have any single building of a comparative height as proposed by Millennium. We believe that the addition of the proposed tower(s) will overwhelm contributing properties in the district and the proposed "separation" of new and old construction is simply not an adequate mitigation measure.

Response to Comment No. 14-6

It should be noted that the Related Projects List contained in the Draft EIR was included to analyze potential cumulative impacts. Accordingly, the list should include all past, present, and reasonably foreseeable projects that could have cumulative impacts when considered together with the Project. As required by CEQA, the intent of this analysis is to include unapproved, proposed and existing projects (that are not overly speculative) to provide a conservative cumulative analysis. The commenter is suggesting that the Draft EIR uses this approach to make the Project seem more reasonable, when it fact the approach is mandated by CEQA and actually is more conservative than limiting the Related Projects List as the commenter seems to propose.

The Related Projects List is included in Table III-1, Related Projects List, of the Draft EIR. The list was based on consultation with the LADOT database of projects in the area, traffic reports for individual projects, and other sources, as listed in the Notes to Table III-1. The list was based on known and foreseeable projects at the time the Notice of Preparation for the Project was prepared. The Related Projects List included related projects as far west as La Brea Avenue, as far east as Western Avenue, as far south as Melrose Avenue, as well as many related projects along Hollywood Boulevard in the vicinity of the Project Site.

The portion of the comment regarding the characteristics of the Paramount Studios project does not challenge the adequacy of the analysis or conclusions of the Draft EIR, and thus does not require a response here. Regarding the scale and massing of the Project, please see Response to Comment No. 14-5 (Hollywood Heritage) above, Response to Comment Nos. 19-2, 19-3 (Los Angeles Conservancy), and the Topical Response 4, Cultural Resources.

Comment No. 14-7

Hollywood Heritage appreciates the efforts of the project's developers and will work diligently with them to ensure the preservation and protection of all of Hollywood's historic resources. Please feel free to contact us at (323) 874-4005 should you have any questions.

Response to Comment No. 14-7

The comment is a conclusion statement and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 15 - HOLLYWOOD UNITED NEIGHBORHOOD COUNCIL (#1)

Susan Swan
President, Hollywood United Neighborhood Council
Certified Council #52
P.O. Box 3272, Los Angeles, CA 90078

November 30, 2012

Comment No. 15-1

The Board of the Hollywood United Neighborhood Council (HUNC) voted 10-0 at its regularly scheduled meeting on Monday, November 19, 2012 to formally request an extension on the review period for the Millennium project in our area. While we have been tracking this development for years, the timing of the release of the DEIR right before the start of the holiday season has not allowed us as much time as we feel is needed to properly analyze and comment on a project of this size and impact. We join with numerous other community organizations to ask that the December 10, 2012 deadline be extended by an additional 30 or 45 days.

HUNC only just received the DEIR, which is sizable in length and heavy on details, in early November. While we were able to convene one meeting of our Planning & Land Use Committee to hear a presentation from the developer on the proposal, many questions remain among our committee members and the public.

Response to Comment No. 15-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration

Comment No. 15-2

Also, as noted by the Hollywood Dell Civic Association and others, it is very difficult to respond to a project that does not include a specific proposal, but instead a matrix of options that range between FARs of 4.5 to 6. HUNC has gone on record opposing any kind of skyscraper, and would prefer lower heights generally.

Response to Comment No. 15-2

The comment states that it is difficult to respond to an EIR that does not include a specific proposal. It should be noted that the Draft EIR analyzes the Project according to the uses and design permitted in the

Development Regulations. The Development Regulations, in conjunction with the components of the Project explained in the Project Description section of the Draft EIR, provide an adequate level of detail to perform an analysis of the Project's potential environmental impacts. Moreover, the comment does not challenge the adequacy of the Draft EIR, thus the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment then goes on to oppose the Project as a whole, which is also noted for the record.

Comment No. 15-3

Reference was made at our Board meeting by a Millennium representative to certain undetermined community benefits, but these are to be negotiated between the developer and the City, which makes it difficult for our Board to see what the final package might be for the project. We are underwhelmed by what we have heard so far, showers for bike riders for example, and curious whether the City will ask for tangible improvements that will help mitigate not just the impact that the project will have on the intersections deemed by a traffic consultant to be impacted, but more generally across Hollywood to help improve overall vehicle mobility.

Response to Comment No. 15-3

As noted in the Draft EIR, the community benefits associated with the Project will be included in a Development Agreement and the project design features. In addition, the Draft EIR contains a comprehensive traffic analysis in Section IV.K..2 Transportation and Parking that discloses the Project potential impacts related to traffic, circulation, and vehicle mobility. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather suggests mitigation measures that could be considered for the Project. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 15-4

Our Board is holding a special meeting, in conjunction with our PLUM Committee, on December 6 to further discuss the issues around this project and prepare a list of issues we would like to see the Planning Department address before Millennium goes before the City Council. Given how long we have waited to engage in this conversation and how incomplete and at the same time overwhelming the information about this project is, we ask for an extended Public Comment period until mid- to late January so that we and other interested community groups can fully consider the potential impacts to local small businesses and residents.

Response to Comment No. 15-4

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 16 - HOLLYWOOD UNITED NEIGHBORHOOD COUNCIL (#2)

Susan Swan
President, Hollywood United Neighborhood Council
Certified Council #52
P.O. Box 3272, Los Angeles, CA 90078

December 10, 2012

Comment No. 16-1

On December 6, 2012, at a special joint meeting of its PLUM Committee and Board, HUNC voted 9-0-2, with input from a number of different community groups and dozens of individual stakeholders, to request that the following suggestions be considered as part of the consideration of the DEIR for the Hollywood Millennium Project, which is located within our area:

Response to Comment No. 16-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 16-2

1) Consider a new expanded traffic study, to be paid for by HUNC and the community, which will cover all of the different neighborhoods impacted by the project, from the Hollywood Dell and the rest of the Hollywood Hills east to Western Avenue.

Response to Comment No. 16-2

With regard to conducting an independent traffic study, the Project's Traffic Study was conducted pursuant to the standards and procedures required by and approved by the Los Angeles Department of Transportation (LADOT), as defined in the Memorandum of Understanding, included as Appendix A to the Traffic Study. The Traffic Study concluded that there would be significant and unavoidable operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections. The Traffic Study and subsequent letter from the LADOT dated August 16, 2012, and included as Appendix IV.K.2 to the Draft EIR, included Project requirements as mitigation measures to fully or partially reduce impacts. The study area of the Traffic Study and the Draft EIR is adequate.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information

requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. (See CEQA Guidelines Section 15204).

Comment No. 16-3

2) Reject the variance to increase the FAR for the project from 4.5 to 6. HUNC has long been opposed to allowing high rises in the greater Hollywood area. The new Hollywood Community Plan has height limits along the Vine corridor, among other area. There also has been a recent proposal before City Council for general heights limits across Hollywood (see motion Garcetti-LaBonge).

Response to Comment No. 16-3

Please refer to Response to Comment 59-14 (Jordon, David) with regard to the requested increase in FAR from 4.5 to 6. In addition, please refer to Topical Response 2, Aesthetics, for additional information regarding views corridors. With respect to heights, in should be noted that the Project Site does not have a height limitation pursuant to the existing zoning. As discussed in the Draft EIR, the Project would implement a mixed-use development consisting of modern, yet architecturally varied, urban structures that are consistent in use and character to the surrounding urban aesthetics environment.

Comment No. 16-4

3) Support expenditure of roughly $5 Million in Quimby fees for parks all around the vicinity of the project, including the lot in development at Ivar and Franklin, the Gateway to Hollywood monument on Cahuenga and the Hollywood Freeway Cap Park.

Response to Comment No. 16-4

This comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather suggests where Quimby monies should be distributed. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Additionally, according to Section IV.J.4, Public Services - Parks and Recreation, of the Draft EIR, the City imposes Quimby fees and Park and Recreation fees pursuant to LAMC Section 17.12 and LAMC Section 21.10.3, respectively, based on the number of units proposed within a project to help offset potential project and cumulative environmental impacts. Please refer to Response to Comment No. 59-24 (Jordon, David) for additional information.

Comment No. 16-5

4) Require that infrastructure improvements (sidewalks, lighting, etc.) be done around the various intersections near the project, including Franklin and Vine, Ivar and Yucca, and Yucca and Argyle. This should also include new pedestrian improvements, including the north side of Franklin and at intersection with Argyle.

Response to Comment No. 16-5

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. However, the Draft EIR does include some mitigation measures that address infrastructure improvements, e.g. Mitigation Measure K.1-7 Transit Enhancements (which has been revised to Mitigation Measure K.1-8 due to the addition of new mitigation measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR).

Comment No. 16-6

5) Support for a right turn lane at the intersection of Cahuenga and Franklin (northbound traffic), as proposed by developer.

Response to Comment No. 16-6

This comment expresses support for a right turn lane at the intersection of Cahuenga and Franklin (northbound traffic). However, the northbound right turn lane proposed by the Project was rejected by City of Los Angeles Department of Transportation due to the potential loss of on-street parking spaces. Instead, other mitigation measures were proposed and accepted by LADOT and other City agencies to mitigate the significant traffic impact at this intersection. For example, Mitigation Measures K.1-5 through K.1-11 (which have been revised, due to the addition of new mitigation measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR) include a Transportation Demand Management program, transit enhancements, a contribution to the Bike Plan Trust Fund, and Traffic Signal System Upgrades, all of which will help to reduce Project traffic impacts.

Comment No. 16-7

6) Oppose variance for reducing parking for health club from 10 spaces for every 1,000 ft^2 to 2 spaces for every 1,000 ft^2. The nearby Gold's Gym has severe parking problems and usage would likely be at a level greater than 2 spaces for every 1,000 ft^2.

Response to Comment No. 16-7

This comment expresses opposition to a variance for reduced parking for the proposed health club. Section IV.K.2, Transportation – Parking, of the Draft EIR, discusses and analyzes the variance for fitness center/sports club use. For example, see pages IV.K.2-23 through IV.K.2-24 of the Draft EIR.

Comment No. 16-8

7) Support fixes proposed for Argyle/Franklin at 101/DOT connection. Have Hollywood Dell and HUNC representatives included in all future discussions about specifics as we are stakeholders of both local and State governments and can serve as a bridge.

Response to Comment No. 16-8

This comment supports fixes proposed for the Argyle/Franklin at 101/DOT connection and recommends Hollywood Dell and HUNC representatives be included in all future discussions with local and State governments. The proposed enhancements for the Argyle/Franklin at 101/DOT connection are identified in Mitigation Measure K.1-10 on pages I-94 and IV.K.1-58 of the Draft EIR (and revised to Mitigation Measure K.1-11 to accommodate a new Mitigation Measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR). This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 16-9

8) Limit the number and size of concerts to be held outdoors at facility and coordinate all proposed events through CD13 Hollywood Boulevard Street Closure Committee to ensure proper notification and minimal disruption to local traffic patterns.

Response to Comment No. 16-9

This comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather suggests the overall size of concerts to be held at the Project Site. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 16-10

9) Require that developers pay for left turn signals for all directions of the intersection of Hollywood and Vine that do not have them now as a general traffic mitigation. This intersection has been listed as one of two that will be impacted within the first five years.

Response to Comment No. 16-10

This comment suggests that developers be required to pay for left turn signals for all directions of the intersection of Hollywood and Vine. However, the mitigation measure recommended by the commenter would not address Project traffic impacts. The left-turn phases would require signal time and thereby decrease the phase length and capacity for other movements. Signal System Upgrades, the funding or implementation of which is recommended as Mitigation Measure K.1-9 on page IV.K.1-58 of the Draft EIR (and revised to Mitigation Measure K.1-10 to accommodate a new Mitigation Measure K.1-4, as

described in Section IV, Corrections and Additions to the Draft EIR) will increase the capacity for all intersection users.

Comment No. 16-11

10) Return a portion of the nearly $6 Million in additional General Fund revenue expected to be generated by the project to the Hollywood Community to pay for additional police and fire services that will be needed by the new residents of the project.

Response to Comment No. 16-11

It should be noted that the Draft EIR analyzes the potential impacts on police and fire services in Section IV.J.1, Public Services. The Draft EIR concludes that the Project's potential impacts on such services will be less than significant. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR, but rather suggests where General Fund revenue should be distributed. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 16-12

11) Oppose the waiver of D limitation status for the parcels proposed for development to ensure that, even though the CRA is defunct, there will still be a review of how the project would impact the Hollywood redevelopment zone area. Section V 506.2.1 of the CRA Hollywood Community Redevelopment Plan, under the title of "Hollywood Boulevard District," states that:

"The objectives of the District are to: ..... 2} Assure that new development is sympathetic to and complements the existing scale of development."

Response to Comment No. 16-12

The comment opposes the waiver of the existing "D" development limitation on the Project Site. As discussed in the Draft EIR, the Regional Center Commercial land use designation allows for the construction of commercial, parking, and high-density multi-family residential uses. Development of the Project would include multi-family residential, retail, restaurant and commercial land uses, in addition to the Capitol Records Complex, which would be retained as part of the Project. Please refer to Response to Comment No. 81-9 (Reznik, Benjamin (#2)) for additional information.

In response to the commenter's statement that the Draft EIR should analyze how the Project would impact the now defunct Hollywood Redevelopment Plan, please refer to Page IV.G-48 of Section IV.G, Land Use, of the Draft EIR for a full discussion of the Project's consistency with the Hollywood Redevelopment Plan and its consistency with the existing scale of surrounding development.

Comment No. 16-13

12) The height of the new towers could be nearly as high comparatively as the downtown skyline and more than twice as tall as any existing structure in Hollywood. This would largely obscure the view of the Hollywood sign, a historic resource, which needs to be addressed. Section V 506.2.2 of the CRA Hollywood Community Redevelopment Plan, under the title of "Hollywood Core Transition District," states that properties along Hollywood Boulevard, which is deemed to be a hillside/flats transition area:

"shall be given special consideration due to the low density of the adjacent residential areas. The objective of this District is to provide for a transition in the scale and intensity of development between Regional Center Commercial uses and residential neighborhoods. The Agency shall review all building permits in this District to ensure that circulation patterns, landscaping, parking and scale of new construction is not detrimental to the adjacent residential neighborhoods. Development guidelines shall be prepared for this District to ensure that new development is compatible with adjacent residential areas."

Response to Comment No. 16-13

Please refer to Topical Response 2, Aesthetics, for information regarding views, including views of the Hollywood Sign.

LETTER NO. 17 - HOLLYWOODLAND HOMEOWNERS ASSOCIATION (#1)

Sarajane Schwartz
President, Hollywoodland Homeowners Association
2700 N Beachwood Drive, Los Angeles, CA. 90068

December 8, 2012

Comment No. 17-1

I am president of the Hollywoodland Homeowners Association, and we are writing to strongly urge you to extend the Public Review/Comment Period for the Millennium Draft Environmental Impact Report (DEIR) until January 31st 2013. We join the many other HOAs, neighborhood councils, and other organizations in asking for this extension.

This two tower major project, unprecedented in its size and scope in the history of Hollywood, will forever change the very character and nature of Hollywood in irreparable ways. It is therefore a very reasonable request to give our community adequate time to study this very large and complicated two volume report that has taken years to put together.

Hollywoodland , consisting of almost 600 homes, sits at the foot of the Hollywood Sign for which it was built. It was the first canyon development in Los Angeles, and we'll be celebrating our 90th anniversary in 2013. We have witnessed a lot of history in Hollywood, and have waited for decades for its proper revitalization. Surely the parties involved in this development can wait a few additional weeks to make sure things are done properly.

Response to Comment No. 17-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 17-2

We have many concerns regarding this project—the major one being the most important consideration for any development – safety. For example, Millennium borders and greatly impacts the "very high fire hazard zone" in which Hollywoodland is located. Apart from the acute problem of slow response times of emergency vehicles caused by already gridlocked streets in Hollywood that will become even more congested with these skyscrapers, is the nightmare scenario of trying to evacuate our neighborhood or any other area in the Hollywood Hills because of a fire on to these paralyzed streets. The results would be catastrophic.

Response to Comment No. 17-2

As discussed in Section IV.J.1 Public Services-Fire Protection of the Draft EIR, response times are not the only factor involved in evaluating impacts to fire protection services. For example, the Project is consistent with Fire Code Section 57.09.06, regarding distance to fire stations. As shown in Table IV.J.1-1, Existing Fire Stations Serving the Project Site, the Project Site is 0.7 miles from LAFD Fire Station 27, which houses a truck company. The Project Site is 0.8 miles from LAFD Fire Station 82, which houses an engine company. That is within a 1.5-mile radius and is thereby consistent with Fire Code Section 57.09.06.

The Project also incorporates a number of mitigation measures designed to ensure that impacts related to fire protection services would be less than significant. These measures include submittal of the proposed plot plan for the Project to the LAFD for review for compliance with applicable Fire Code, California Fire Code, City Building Code, and National Fire Protection Association standards and submittal of an emergency response plan for approval by the LAFD that would include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. (See Mitigation Measures J.1-1 through J.1-7 on page IV.J.1-18 of the Draft EIR for a complete list of fire protection services mitigation measures).

In regard to the potential for increased traffic impacting response times, increases in traffic attributable to the Project would not greatly affect the ability of emergency vehicles being able to maneuver through crowded intersections, as the LAFD has experience responding to emergencies in congested areas throughout the City, through the use of lights/sirens, ability to direct traffic to the side of the road, and to drive on the wrong side of the road, if necessary. Further, although there are significant traffic impacts, the significant impacts are at limited locations and there is availability of alternative routes within the street system in the area surrounding the Project Site. As such, impacts would be less than significant.

CEQA does not shift financial responsibility for the provision of adequate fire and emergency response services to the Project Applicant. The City of Los Angeles has a constitutional obligation to provide adequate fire protection services. Assuming the City continues to perform its obligations, there is no basis to conclude that the Project will cause a substantial adverse effect on human beings.

Comment No. 17-3

In the end, one would hope that we all want the same thing—the successful redevelopment of Hollywood. This is best achieved when all of the parties are able to work together. In order to facilitate this process we need an extension of the public review/comment period on the DEIR. It is an extremely reasonable request considering the scope of the project, the limited amount of time for us to study it and the unfortunate holiday time of year. We hope that you will wisely and responsibly grant our request.

Response to Comment No. 17-3

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 18 - HOLLYWOODLAND HOMEOWNERS ASSOCIATION (#2)

Sarajane Schwartz
President, Hollywoodland Homeowners Association
2700 N Beachwood Drive, Los Angeles, CA. 90068

December 9, 2012

Comment No. 18-1

The Hollywoodland Homeowners Association has already sent you a letter stating that the best course of action for the Millennium Project would be to extend the DEIR public comment period to January 31, 2013. If that responsible decision is not made, and the deadline for review remains December 10, 2012, we want to add our comments. This is a preliminary reaction as we have not had adequate time to carefully study this very large document.

Response to Comment No. 18-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 18-2

Hollywood is a world famous location with aging and very limited infrastructure. It is an inappropriate location for this unprecedented massive development that will permanently and negatively change the very special character and nature of Hollywood.

Response to Comment No. 18-2

It should be noted that the Draft EIR analyzes potential land use planning impacts, and infrastructure capacity issues, associated with the location of the Project Site. Please see Sections IV.G, Land Use Planning, and IV.L, Utilities and Service Systems for a detailed discussion of these topics. Otherwise, the comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 18-3

The most important consideration for any project is safety, and because of this project's location, traffic cannot be separated from safety. Hollywood sits at the base of the Hollywood Hills that cuts off north and south traffic. Franklin is the last artery to the north that runs east and west. This is just a block from this project. Many of the canyon streets are cut off at the south by the Hollywood Freeway and dead end at

Franklin Ave. Franklin is already gridlocked for miles several hours a day. To the south many of the intersections and streets in Hollywood are already gridlocked with over capacity traffic. In addition the vast majority of streets in Hollywood are quite narrow and extremely limited particularly when compared to other areas that host skyscrapers. To approach the Millennium project from the northeast one has to make two left turns. One is at Franklin and the other at Argyle.

Response to Comment No. 18-3

It should be noted that the Draft EIR contains a comprehensive discussion of potential traffic and public safety impacts in Sections IV.K, Transportation and IV.J, Public Services. These section assess the Project potential impacts given the existing conditions (including street and intersection capacities) surrounding the Project Site. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 18-4

Hollywoodland sits in a vulnerable bottleneck surrounded by Griffith Park on three sides. Millennium borders and greatly impacts this "very high fire hazard zone" of the Hollywood Hills in which Hollywoodland is located. Apart from the acute problem of slow response times of emergency vehicles caused by already gridlocked streets in Hollywood that will become even more congested with these skyscrapers, is the nightmare scenario of trying to evacuate our neighborhood or any other area in the Hollywood Hills because of a fire on to these paralyzed streets. The results would be catastrophic. This is not a totally hypothetical situation with us. In Hollywoodland we have had dozens of homes destroyed and damaged by fire. Several years ago, a resident died in a fire in his home because traffic impeded the response time of LAFD. In recent years within a period of several months there was a fire behind the Hollywood Sign and a major fire slightly to the east of us in Griffith Park. Just this year we had a fire in our area on a fortunately no wind day. We do not want a worst case scenario of residents being burned in their trapped cars while trying to escape. In addition, we have not even focused on the not unimportant issue of how all of this traffic impacts quality of life.

We see no evidence that the traffic specifics mentioned in the DEIR adequately address these problems.

Response to Comment No. 18-4

As discussed in Section IV.J.1 Public Services-Fire Protection of the Draft EIR, response times are not the only factor involved in evaluating impacts to fire protection services. For example, the Project is consistent with Fire Code Section 57.09.06, regarding distance to fire stations. As shown in Table IV.J.1-1, Existing Fire Stations Serving the Project Site, the Project Site is 0.7 miles from LAFD Fire Station 27, which houses a truck company. The Project Site is 0.8 miles from LAFD Fire Station 82, which houses

an engine company. That is within a 1.5-mile radius and is thereby consistent with Fire Code Section 57.09.06.

The Project also incorporates a number of mitigation measures designed to ensure that impacts related to fire protection services would be less than significant. These measures include submittal of the proposed plot plan for the Project to the LAFD for review for compliance with applicable Fire Code, California Fire Code, City Building Code, and National Fire Protection Association standards and submittal of an emergency response plan for approval by the LAFD that would include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. (See Mitigation Measures J.1-1 through J.1-7 on page IV.J.1-18 of the Draft EIR for a complete list of fire protection services mitigation measures).

In regard to the potential for increased traffic impacting response times, increases in traffic attributable to the Project would not greatly affect the ability of emergency vehicles being able to maneuver through crowded intersections, as the LAFD has experience responding to emergencies in congested areas throughout the City, through the use of lights/sirens, ability to direct traffic to the side of the road, and to drive on the wrong side of the road, if necessary. Further, although there are significant traffic impacts, the significant impacts are at limited locations and there is availability of alternative routes within the street system in the area surrounding the Project Site. As such, impacts would be less than significant.

CEQA does not shift financial responsibility for the provision of adequate fire and emergency response services to the Project Applicant. The City of Los Angeles has a constitutional obligation to provide adequate fire protection services. Assuming the City continues to perform its obligations, there is no basis to conclude that the Project will cause a substantial adverse effect on human beings.

The Draft EIR also includes mitigation measures with respect to traffic impacts. Despite mitigation measures, the Draft EIR acknowledges that there will remain operational impacts at two intersections due to the Project and at five intersections due to the Project with Cumulative impacts.

Comment No. 18-5

Utilities

We are concerned about the massive additional population this project will bring to Hollywood. The utilities are aging and currently inadequate for the present levels of population. We are still rationing water. Also with this added proposed load would our system be adequate to fight a large fire? We currently lose power several times a year because of our antiquated power lines. Shouldn't the current infrastructure be updated to adequately deal with its current users before more are added?

We see nothing in the DEIR that mitigates these issues.

Response to Comment No. 18-5

The comment expresses concern with aging utility infrastructure. With regard to water, the Project would replace the existing on-site water system with new water lines configured in a looped system that would be maintained and supplied by the LADWP via two connection points to the existing 12-inch LADWP water main near Vine Street and Hollywood Boulevard. Additionally, according to Section IV.L.I, Water, of the Draft EIR, the LADWP confirmed that the Project Site can be supplied with water from the municipal system, as identified in Appendix IV.L.1, Water Supply Assessment. The Draft EIR then confirms that all infrastructure improvements would be built to the LADWP and Los Angeles City Plumbing Code standards.

With regard to Fire, please refer to Response to Comment No. 18-4 (Hollywoodland Homeowners Association (#2)), above. The commenter also states that the existing power lines are aged. Although this does not speak to the adequacy of the Draft EIR, according to Section IV.L.4, Energy Conservation, of the Draft EIR, the Project projected annual electricity consumption would represent only approximately 0.03 percent of the forecasted electricity consumption in 2020. As stated in the Draft EIR, this is based on Los Angeles Department of Water and Power forecast that the annual electricity demand will be 26,408 gigawatt-hours in 2020, compared to the Project energy demand that requires approximately 8.024 gigawatt-hours in 2020.

Comment No. 18-6

Parking

Adequate parking is already an issue in Hollywood. This project adds to the problem. It will bring in huge numbers of people. The vast majority of them will be using cars. Also, the project's proximity to mass transit will actually add to the capacity needed. If in the 'fortunate' case many of the project's residents decide to use mass transit – which by the way has not been the case so far with the buildings already built by the metro—more parking spaces are needed—not less. Spaces are needed for the residents' cars that they're leaving behind—they still will own cars—in addition to spaces needed for the cars of those coming to visit, work, or shop in the area.

We see nothing in the details of the DEIR concerning parking that will adequately deal with the proper capacity that will be needed.

Response to Comment No. 18-6

This comment expresses concern with respect to parking and asserts that the Draft EIR does not adequately address parking capacity, specifically with respect to residential land uses within close proximity to a Metro Station. A detailed parking analysis is provided in Section IV.K.2 Transportation – Parking, of the Draft EIR. Also note that reserved spaces for residents are included in the shared parking demand calculations.

Comment No. 18-7

Hollywood's Identity

Hollywood is one of the world's most famous and unique cities and acts as a magnate for tourists while being a home for its residents. Tourists come to view such sites as the Capitol Records Building that will be overpowered by this project. They want to see Los Angeles' most iconic symbol, The Hollywood Sign. Its view will also be blocked by this project. They want to see this historic area of Los Angles that sits surrounded by the fabled Hollywood Hills. Its view will also be blocked by this project. They do not come to see skyscrapers. They want to see Hollywood's unique identity. This project is not only not part of that but works to destroy it. In addition, there are frequent street closures in Hollywood to accommodate the many premieres and entertainment related events. These closures can go on for days particularly in the case, for example, of the Academy Awards. Residents accommodate these frequent occurrences because it's part of Hollywood's identity and life's blood. These events are on borrowed time if this massive project comes. How can streets be blocked off with all of this additional traffic? Also, Hollywood, an area developed in the 20's is home to many residents. It's our Bedford Falls—the mythical location of Frank Capra's "It's A Wonderful Life." It is ironic that here it is Christmas time, and this project can turn Hollywood into Pottersville.

We see nothing in the details of the current DEIR that can mitigate these issues.

Response to Comment No. 18-7

Please refer to Topical Response 2, Aesthetics, for information regarding views, including views of the Hollywood Sign, and overall visual character of the Project in Hollywood.

Comment No. 18-8

These are just some of the very important issues that we feel the current DEIR does not properly address. We urge that more planning and review be done before the Millennium Project progresses.

Thank you for your consideration.

Response to Comment No. 18-8

The comment is a conclusion statement. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment states that the Draft EIR does not adequately address certain issues. The previous comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR. Each of these has a Response to Comment, above.

LETTER NO. 19 - LOS ANGELES CONSERVANCY

Adrian Scott Fine
Director of Advocacy
Los Angeles Conservancy
523 West Sixth Street, Suite 826, Los Angeles, CA 90014

December 10, 2012

Comment No. 19-1

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Millennium Hollywood Project which, through its inclusion, directly impacts the iconic 1956 Capitol Records building.

The Conservancy, along with Hollywood Heritage, has long been active in protecting and advocating for the historic resources in Hollywood, particularly in and around the National Register-listed Hollywood Boulevard Commercial and Entertainment District immediately south of the project site. In 2006, the Conservancy's Modern Committee successfully nominated Capitol Records for designation as a City of Los Angeles Historic-Cultural Monument (HCM). The Conservancy commends the project applicant, Millennium Partners and Argent Ventures, for placing and sensitively considering the preservation of Capitol Records and the Gogerty Building at the core of the proposed development. We are encouraged by the direction of this project to date, however we do have some questions and think additional safeguards are necessary to address the larger preservation goals.

Response to Comment No. 19-1

The comment is primarily an introduction of the Conservancy's role in Hollywood and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. It is noted that the Conservancy is encouraged by the Project and commends the Applicant for preserving the Capitol Records Building and Gogerty Building. Responses to the substantive comments on the Draft EIR raised in this letter are provided below. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 19-2

I. **Scale new construction appropriately to ensure compatibility with historic resources**

The Conservancy appreciates the efforts of the project team to incorporate new construction carefully and respectfully around Capitol Records. Areas for new buildings are located to the west and south to avoid impacts to several character-defining features of Capitol Records called out in its Historic-Cultural Monument (HCM) nomination. Specifically, proposed new construction would generally avoid

obstructing significant views of Capitol Records from the 101 Freeway and be sited away from Capitol Records' famed underground recording studios and reverberation chambers.

Response to Comment No. 19-2

It is noted that the Conservancy appreciates the efforts of the project team to design the Project around the Capitol Records Building and preserve certain viewsheds and the historic integrity of the structure.

Comment No. 19-3

While these efforts are commendable, we remain concerned the allowable scale and massing threatens to overwhelm Capitol Records and the surrounding historic buildings, immediately adjacent and nearby along Hollywood Boulevard. Two of the four proposed height zones in the Development Regulations allow for towers up to 585 feet, significantly taller than the adjacent 165-foot Capitol Records on the East Site as well as the two-story theatre built in 1926 (Hollywood Playhouse) just south of the West Site. The buildings along Hollywood Boulevard are also generally below 150 feet, including the low-scaled 1930 Pantages Theater, built in 1930 and directly abutting the southern edge of the East Site.

Response to Comment No. 19-3

The Draft EIR provides a detailed analysis of the Project's potential impacts to historic resources. The analysis in the Draft EIR is supported by a Historic Resources Report prepared by the Historic Resources Group. Ultimately, the Draft EIR concludes that the Project's impacts to historic resources on the Project Site, and adjacent to it, are less than significant. The Historic Resources Report specifically analyzed the Project's potential impacts on the Capitol Records Building, the Hollywood Playhouse, and the Pantages Theater, which are the structures referenced in this comment.

Specifically, the Historic Resources Report concludes that new construction on the East Site will be adequately separated from the Pantages Theater. Similarly, the Development Regulations provide for open space requirements and setbacks from Vine Street on the West Site to buffer new development from the Hollywood Playhouse. Accordingly, the Historic Resources Report concludes that there is an adequate visual separation between the Project and the Hollywood Playhouse. Likewise, the Historic Resources Report provides a detailed analysis of the Project's potential impacts on the Capitol Records Building using both the CEQA thresholds of significance and the Secretary of the Interior's conformance standards. It concludes that the Project will not significantly impact the Capitol Records Building.

Granted, the commenter is correct that the Project allows for a scale of new development that is significantly taller than the existing buildings in the immediately surrounding area. The Draft EIR specifically acknowledges that the Project has the potential to add considerable height and density, and that the immediate surroundings of the on-site and adjacent historic resources will be altered. However, merely altering the surroundings does not automatically trigger a significant adverse impact.

As noted in the Draft EIR, the CEQA Guidelines state that a substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[19] The Guidelines go on to state that "[t]he significance of an historic resource is materially impaired when a project… [d]emolishes or materially alters in an adverse manner *those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources… local register of historic resources… or its identification in a historic resources survey*."[20] (Emphasis added).

The commenter seems to imply that the alteration of the immediate surroundings of on-site and adjacent historic resources caused by the scale of the Project will adversely alter the characteristics that convey the historic significance of on-site and adjacent historic resources. As demonstrated in the Draft EIR, however, all of the on-site and adjacent historic resources will retain their eligibility for listing in national, state, and local registers despite alteration of their surroundings by the Project. The Historic Resources Report and the Draft EIR both demonstrate that the Capitol Records Building and the contributing structures in the Hollywood Boulevard Commercial and Entertainment District will all remain intact and would not be materially impaired (based on the applicable technical and legal standards) by the Project.

Comment No. 19-4

Historic buildings can often coexist with taller buildings, but the project's maximum allowable height would dwarf its immediate neighbors and compete for status with the already iconic circular tower of Capitol Records. We urge the applicant to consider lower height maximums or allocating available square footage more evenly across the project site to be more compatible with the lower scaled historic properties and the National Register-listed historic district in this area of Hollywood. This may be addressed to some degree already yet the preferred project and Development Regulations, as currently outlined in the Draft EIR, do not necessarily provide this level of detail and clarity.

Response to Comment No. 19-4

The commenter is correct that historic buildings often coexist with taller buildings in urban areas. There are several examples of this coexistence in major urban cities across the United States, including in Los Angeles. For example, the historic Los Angeles Central Library in downtown Los Angeles coexist with the 1,018-foot adjacent U.S. Bank Tower (formerly the Library Tower), which was developed as part of the Central Library redevelopment effort.

The commenter urges the Applicant to consider lower height maximums or adjust square footages to be more compatible with iconic circular features of the Capitol Records Building. The Development Regulations indeed present several height datum development scenarios. It should be noted that simply lowering the maximum elevations of the Project structures does not necessarily reduce potential impacts

[19] *CEQA Guidelines, section 15064.5(b) (1).*

[20] *CEQA Guidelines, section 15064.5(b)(2).*

on the Capitol Records Building. As analyzed in the Aesthetics section of the Draft EIR, and confirmed by the Aesthetics Impacts Report prepared by Van Cleve Architects, lower height designs create more visual obstruction of the circular features of the Capitol Records Building.

The comment claims that there is insufficient detail in the Development Regulations or Draft EIR to provide a sufficient level of impact analysis. The Development Regulations do in fact present a detailed description of the development scenarios, complemented with numerous height and massing figures, which illustrate the potential impacts on adjacent and on-site historic resources. Several variations of structure height are presented in the Development Regulations and are correspondingly analyzed in the Draft EIR and the supporting technical reports. The Historic Resources Report utilized the development limitations established in the Development Regulations to analyze potential impacts on historic resources. As stated above, the Historic Resources Report and the Draft EIR used the detail provided in the Development Regulations to conclude that impacts to the on-site and adjacent historic resources will be less than significant

Comment No. 19-5

II. Incorporate precise preservation-oriented standards and guidelines in the Development Regulations

Despite the placement and siting of new construction on the West and East Sites, significant impacts to Capitol Records may still occur. The draft Development Regulations, which will be attached to and enforceable through a Development Agreement, aims to ensure compatibility with historic resources by establishing required standards and recommended guidelines for new design elements. However, the existing draft document lacks sufficient detail to mitigate impacts and provide surety in a reliable and predicable manner.

Response to Comment No. 19-5

The commenter states that the draft Development Regulations lack sufficient detail to mitigate impacts. The Development Regulations provide 55 pages of precise development regulations that control the extent of development on the Project Site and do not lack sufficient detail to mitigate impacts to historic on-site and adjacent historic resources. In addition, the Development Regulations contain Section 3: Historic Resources and Setting, which specifically recognizes the historic resources on the Project Site and surrounding vicinity. That section sets forth key Project objectives regarding historic resources that include, but are not limited to: (1) preservation of the Capitol Records Building and Gogerty Building; (2) preservation of certain valued views to the Capitol Records Building and the Hollywood Boulevard Commercial and Entertainment District; (3) incorporation of open space and setback requirements to reduce the massing at the street level and limit the visual crowding of adjacent historic resources; and (4) the design of new buildings in a manner that is differentiated from but compatible with adjacent historic resources.

The Historic Resources Report was prepared in conjunction with the Development Regulations. Consequently, the Historic Resources Report, and the related historic resources section of the Draft EIR, specifically analyzed the potential impacts on historic resources pursuant to the precise limitations set forth in the Development Regulations, including the height limitations, open space areas, separation and setbacks from existing historic resources. The ultimate conclusion was that the Project does not have a significant impact on historic resources. This conclusion is based on substantial evidence (i.e., the Historic Resources Report) and the precise requirements of the Development Regulations.

Comment No. 19-6

For instance, the figures in section 6.1.2 appear to require 10-foot setbacks at the south and east edges of Capitol Records' base and an additional 50-foot setback east of the tower curve. However, these standards are not articulated in the text of the Development Regulations. If these setbacks are to protect the underground recording studios and reverb chambers, the location of these features should be referenced and clearly labeled in the Development Regulations and the required setbacks established. Additional open space or other appropriate uses may also be encouraged to increase the buffer between these areas and any new structures.

Response to Comment No. 19-6

The commenter differentiates the figures from the text of the Development Regulations. However, the Development Regulations (text and figures) are to be taken holistically. The limitations in the text and the figures are enforceable and will become binding on the parameters of development. The setbacks referenced in the comment (as well as other features in the Development Regulations) were designed to address all historic resources on the Project Site and adjacent to it, not merely the recording facilities at the Capitol Records Building.

The comment refers to underground recording studios and reverb chambers. It should be clarified that only the echo/reverberation chamber is located underground and that the recording studios are located at-grade. In addition, the Noise section of the Draft EIR identifies the Capitol Records Building's underground echo/reverberation chambers, as well as the at-grade recording studios, as sensitive noise receptors. See Figure IV.H.1: Noise Monitoring and Sensitive Receptor Location Map, in the Draft EIR. The Draft EIR is also supported by a noise technical appendix. The Draft EIR concludes that the Project would have a temporary significant noise and vibration impact on the Capitol Records Building's recording facilities, but only during construction. The construction activities could cause noise and vibration impacts, but construction will not physically disturb the Capitol Records Building's recording facilities. The Noise section of the Draft EIR contains numerous mitigation measures to reduce potential noise impacts on nearby sensitive receptors, including the underground echo/reverberation chambers and the at-grade recording studios. Moreover, potential noise impacts on these uses will be minimized to the extent possible through agreements between the Capitol Records Building tenant and the Applicant, who owns the building. The Draft EIR accurately discloses the potential construction noise and vibration levels that could be experienced by the Capital Records Building's echo chambers and studios. The

Project will not have a long-term operational impact on the Capitol Records Building's recording studios. Therefore, the Development Regulations as drafted, in conjunction with the noise and vibration mitigation measures in the Draft EIR, ensure that all feasible steps have been taken to minimize impacts on the Capitol Records Building's recording facilities.

Comment No. 19-7

Similarly, another significant view of Capitol Records, the one from the corner of Hollywood and Vine, may be impacted by the location and design of new construction on the project site. The Draft EIR identifies significant adverse impacts to this view for building envelops built to the maximum heights of 220 and 400 feet. In theory, the Development Regulations would narrow the floor plates as towers extend higher to avoid obstructing this view. However, the regulations fail to provide standards or guidelines that direct siting of any portion of new construction away from this view corridor.

Response to Comment No. 19-7

The commenter is correct that the Draft EIR discloses a significant impact related to View 6(a) and View 6(b), which are the 220 and 400-foot development scenario view simulations looking at the Capitol Records Building from the corner of Hollywood Boulevard and Vine Street. In this respect, the Draft EIR complies with CEQA by disclosing this potential impact and properly informing the decision makers about the Project's potential impacts. It should be noted, however, that portions of the Capitol Records Building and the Jazz Mural remain visible from this vantage point under all development scenarios. And, the Draft EIR concludes that the visual impacts from the Hollywood Boulevard and Vine Street vantage point are considered less than significant under the 550 and 585-foot development scenarios. In other words, from this perspective, the visibility of the Capitol Records Building is preserved to varying degrees based on the implementation of the Development Regulations.

The commenter states that "the regulations fail to provide standards or guidelines that direct siting of any portion of new construction away from this view corridor". However, the Development Regulations contain provisions that setback development from Vine Street on both the East Site and West Site. More specifically, and as detailed in the Draft EIR, the Development Regulations requirements for open space and massing direct new development away from the Vine Street view corridor. Grade-level open space requirements are discussed in section 8.2 of the Development Regulations. The Development Regulations state that the open space is designed to showcase the Capitol Records Building and Jazz Mural. The Development Regulations mandate a minimum 4% of total lot area be used for grade-level open space for buildings up to 220 feet high. This percentage increases as building heights increases. The grade-level open space requirements have the effect of setting new development back from Vine Street immediately south of the Capitol Records Building on the East Site, and directly across from the Capitol Records Building on the West Site. Similarly, massing standards for tower elements are discussed in section 6.1 of the Development Regulations. The massing standards help reduce potential adverse visual effects to the Capitol Records Building and its surroundings in the following manner:

1. Creating physical and visual separations around the Capitol Records Building.

2. Setting a minimum setback for tower elements.

3. Reducing the percentage of allowable lot coverage of towers as height increases.

4. Reducing the total square footage of tower floor plates as height increases.

These elements reduce the bulk of buildings as height increases and push tower elements toward the center of the block, away from the Capitol Records Building. In this way, important views from Vine Street, as well as other vantage points are protected. As related to the comment here, the Development Regulations are not required to site any or all new construction away from the Hollywood Boulevard and Vine Street view corridor as the commenter proclaims. Instead, the Draft EIR must disclose the impacts associated with implementation of the Project according to the parameters of the Development Regulations. As explained above, the Draft EIR satisfies these disclosure and analytical requirements.

See Topical Response 2, Aesthetics, for a further discussion of the potential aesthetic impacts associated with the Project.

Comment No. 19-8

Additionally, the required 10-foot setback from Vine Street for any portion of the building up to 150 feet, and an additional 10-foot setback for towers above 150 feet are insufficient to maintain even partial views of the 165-foot tall Capitol Records. More specific and detailed setbacks, massing, angles or other elements of the Development Regulations should be established to protect the integrity of Capitol Records and the nearby historic resources.

Response to Comment No. 19-8

The commenter asserts that the Project fails to maintain even partial views of the Capitol Records Building. However, as discussed above, the requirements for setbacks and open space stipulated in the Development Regulations are sufficient to maintain views of the Capitol Records Building from Vine Street under all development scenarios. For more information, please see the Response to Comment No. 19-7 above and see Figure IV.A.1-16 in the Draft EIR, which clearly demonstrates that views of the Capitol Records Building remain visible to varying degrees under all development scenarios.

With respect to the commenter's request that the Development Regulations be further modified, this comment does not challenge the adequacy of the analysis or conclusions of the Draft EIR, but rather it suggests revisions to the Development Regulations. There are no changes anticipated to the Development Regulations as a result of historic concerns at this time. This comment is noted for the record and will be forwarded to the decision makers for their consideration. Furthermore, it should be noted that the Historic Resources Report and Cultural Resources section of the Draft EIR specifically analyzed the historic "integrity" of the Capitol Records Building and nearby historic resources in a pre-Project and post-Project

condition. The conclusion was that the Project will not result in a significant impact on either on-site or off-site historic resources. Thus, further setbacks, massing scenarios, or other design components need not be established as suggested by the commenter.

Comment No. 19-9

III. Modify the Development Agreement and mitigation measures with additional safeguards

a. Design review and approval by the Cultural Heritage Commission

While the buildable area overlaps only a portion of the HCM-designated Capitol Records parcel, it seems appropriate that the city's Cultural Heritage Commission review and comment on the ultimate design of new elements at the project site given the importance of Capitol Records and the likelihood of adverse impacts of new construction. This review should occur prior to any issuance of building permits for all phases of development to ensure final details of design, siting, cladding materials, and other elements of compatibility are adequately considered.

Response to Comment No. 19-9

This comment does not challenge the adequacy of the analysis or conclusions of the Draft EIR, but rather it recommends review of the Project by the City of Los Angeles Cultural Heritage Commission. This comment is noted for the record and will be forwarded to the decision makers for their consideration. In addition, it should be noted that the City of Los Angeles Office of Historic Resources reviewed the Historic Resources Report for the Project, and concurred with its findings, before publication of the Draft EIR.

Comment No. 19-10

b. Post-construction noise and vibration monitoring

We appreciate the proposed monitoring of vibration and differential settlement impacts on sensitive historic resources during construction. Such monitoring can identify potential impacts during construction and mitigate issues before major damage can occur. In the event that substantial damage results due to the project construction, we urge the applicant to commit to repairing any damage, conforming to the Secretary of the Interior's Standards. All work shall be overseen by a qualified architectural historian or preservation professional.

Response to Comment No. 19-10

It is noted that the Conservancy appreciates the vibration monitoring mitigation measures in the Draft EIR. The commenter urges the Applicant to conform to the Secretary of Interior's Standards for repairs on historic structures. The Draft EIR already contains such measures. For example, Mitigation Measure H-11 in the Noise section of the Draft EIR requires an adjacent structure monitoring plan, with

performance standards developed by a registered civil engineer or certified engineering geologist, that ensure that construction of the Project will not adversely impact adjacent structures. That measure requires all work to be halted if the thresholds of the structure monitoring plan are exceeded, until measures are taken to stabilize affected buildings. In addition, Mitigation Measures C-2 in the Cultural Resources section of the Draft EIR contains similar requirements. Also, Mitigation Measures C-3 and C-4 in the Cultural Resources section require any structural improvements to the Capitol Records Building and the Gogerty Building to comply with the Secretary of the Interior's Standards. As noted in these mitigation measures, all such work shall be performed to the satisfaction of the Department of City Planning and the Office of Historic Resources. Therefore, at this time, there is no need to incorporate additional adherence to the Secretary of the Interiors Standards or oversight by an architectural historian as suggested by the commenter.

Comment No. 19-11

In addition, we urge the project applicant to commit to ongoing noise and vibration monitoring of the Capitol Records recording studios and reverb chambers following construction and during the initial operation of new uses surrounding the historic building. While the applicant currently owns all of the parcels and has a vested interest in protecting the operation of Capitol Records, ownership may change in the future necessitating the need for a process to address operational impacts.

Response to Comment No. 19-11

Please see the Response to Comment No. 19-6 (Los Angeles Conservancy) above, which addresses construction and operational noise impacts on the Capitol Records Building's recording studios. To summarize, the Draft EIR concludes that the Project would have a temporary significant noise and vibration impact on the Capitol Records Recording studio, but only during construction. As noted above, construction activities will not physically disturb the recording facilities. These impacts will be minimized to the extent possible through agreements between the Capitol Records Building tenant and the Applicant, who owns the building. The Draft EIR accurately discloses the potential construction noise and vibration levels that could be experienced by the Capital Records Building's echo chambers and studios. As analyzed in the Draft EIR, and supporting technical noise study, the Project will not have a long-term operational impact on the Capitol Records Building's recording studios. No further analysis of this issue is required in the Final EIR.

Comment No. 19-12

c. Revise the exceeding long development period

The Conservancy remains concerned about long-term implications of the twenty-five year development term requested by the project application. Projects of a similar scope and scale have been approved in the City with development terms ranging from ten to fifteen years. Approval of the proposed development term would severely limit consideration of other opportunities that may arise in the future, including new

development that may be more appropriate for the site in the future. The ownership, economic and social circumstances, as well as the design and land use priorities will change greatly during the twenty-five year period currently requested by the project applicant.

The proposed project does not appear to warrant this exceptionally long development term, therefore we urge a time period more in line with similar projects approved by the City.

Response to Comment No. 19-12

This comment does not challenge the adequacy of the analysis or conclusions of the Draft EIR, but rather it questions the term of the Development Agreement and urges the City of Los Angeles to consider a shorter term. The term of the Development Agreement is subject to the discretionary approval of the Los Angeles City Council. Accordingly, this comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 19-13

Interests of the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education. Since 1984, the Conservancy's all-volunteer Modem Committee has worked to raise awareness about Los Angeles' unique collection of mid-twentieth century modernist structures that shaped the tastes and architectural trends of the entire nation.

Thank you for the opportunity to comment on the Draft EIR for the Millennium Hollywood Project. Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Response to Comment No. 19-13

The comment is a conclusion statement and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 20 - MONTALBÁN FOUNDATION

Gilbert Smith
Chair, Ricardo Montalbán Foundation
1615 North Vine Street, Hollywood, CA 90028

December 4, 2012

Comment No. 20-1

As stakeholders in the heart of the Hollywood Entertainment District, we are voicing our support of the Millennium Hollywood project. This project will anchor our historic neighborhood with a 21st Century mixed-use addition that embodies architectural beauty, urban infill dynamics, and public tourist, shopping, and entertainment business opportunities

We believe that the developers have a vision that will compliment Capitol Records, and our important music industry and are including cultural expressions that capture our rich history and leadership in the entertainment community. With the construction phase Hollywood will see nearly 3,000 construction-related jobs. The completed project will provide nearly 1,300 permanent jobs. As a transit-oriented development project, it will also encourage the use of our Metro and other public transportation services.

We have seen an ocean of positive change with the opening of the W Hotel and the Legacy Mixed Use projects. The Millennium Hollywood project will bring together business, residents, and our entertainment venues and serve as a beacon to the entire Los Angeles community.

Response to Comment No. 20-1

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 21 - OAKS HOMEOWNERS ASSOCIATION

Caroline Schweich
President, Oaks Homeowners Association
PO Box 29155, Los Angeles, CA 90029-0155

December 10, 2012

Comment No. 21-1

The Oaks Homeowners Association asks that the comment period for the above mention DEIR be extended by 60 days for these reasons:

1. The DEIR is so long that one could not be expected to read it all and formulate comments within the short period.

2. Awareness of the DEIR has not adequately been made to the community

3. A comprehensive parking plan for Hollywood must be developed and proposed prior to the comment period for the DEIR. The goal should be to minimize the number of new car trips to the Hollywood area, and maximize the efficiency, frequency and diversity of transit options.

4. Various homeowners associations and NCs can not be expected to agendize for both the respective committee meeting and the full Board meeting, and officially act in such a short time frame.

5. The community should be given the opportunity and time to conduct an independent traffic study.

Oaks Homeowners Association would like to comment on the DEIR. However, at this date can simply not do so in complete and official manner.

Response to Comment No. 21-1

The comment notes that the review time for the Draft EIR was too short and requests an extension. For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The Draft EIR Notice of Availability was mailed out to an area 500 foot radius from the Project Site, as well as to a list of owners and occupants and agencies provided by the City Planning Department. In addition, the Notice was advertised in the Los Angeles Times on the first day of public review, October 25, 2012. The Draft EIR was made available for review on the City's website and in person at City Hall, as well as digital copies at local area libraries.

The comment requests a parking plan for Hollywood in general. It should be noted that CEQA does not require a project-specific Draft EIR to analyze impacts on an entire City area, portions of which will not

be impacted whatsoever by the Project. The Draft EIR adequately analyzed parking issues related to the Project and included a shared parking analysis as Appendix E to the Traffic Impact Study, included as Appendix IV.K.1 to the Draft EIR. A Hollywood-wide plan for parking is beyond the scope of this Draft EIR.

The comment requests time to conduct an independent traffic study. This is not a comment on the adequacy of the Draft EIR, and as noted above the public was provided proper notice of the Project and its statutory review periods. While nothing in the Draft EIR or is environmental review process preclude the public from preparing an independent traffic study, it should be noted that the Project's Traffic Study was conducted within the parameters and approved by the Los Angeles Department of Transportation (LADOT), as defined in the Memorandum of Understanding, included as Appendix A to the Traffic Study. The Study adequately disclosed the Project's potential traffic impacts. The Study and subsequent letter from the LADOT dated August 16, 2012, included as Appendix IV.K.2 to the Draft EIR, included Project requirements as mitigation measures to fully or partially reduce impacts. The public was provided an opportunity to review the Study pursuant to CEQA review times.

LETTER NO. 22 - SUNSET HILLS HOMEOWNERS ASSOCIATION

Beth Fogarty
Sunset Hills Homeowners Association
PO Box 15201, Beverly Hills CA 90209

December 11, 2012

Comment No. 22-1

Please make note of our comments as per below

Response to Comment No. 22-1

The comment is an introductory note. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 22-2

Please do not allow the following to be approved:

1. Increasing the present zoning from a 4.5:1 ratio to a 6:1 ratio would allow the developer to increase the project size from 825,000 SF to 1.1 Million SF.

2. Allowing a reduction in the City's parking requirement for the proposed 35,000SF health club from 10-spaces/1000 to 2-spaces/1000. The reduction in parking spaces would have 280 health club users looking for parking on Hollywood's streets.

3. The Community Redevelopment Agency's development requirements were put in place to maintain Hollywood's historic core and Unallow for redevelopment to enhance and compliment existing development and the livability of the surrounding residential communities. Allowing Millennium/Argent to eliminate their development's adherence to the CRA guidelines creates a massive project totally out of scale with the Hollywood area.

Response to Comment No. 22-2

This comment asks the City to not approve certain requests associated with the Project's entitlements. The comment is noted and will be forwarded to the decision makers for consideration. With respect to the substantive issues related to the requests, please see the discussion below.

The commenter is generally correct that the Project could develop approximately 1,166,970 square feet of net new floor area as stated in the Project Description of the Draft EIR. The impacts associated with this size development are fully analyzed in the Draft EIR.

The commenter implies that the alteration of the immediate surroundings of on-site and adjacent historic resources caused by the scale of potential new development associated with the Project will adversely alter the characteristics that convey the historic significance of on-site and adjacent historic resources. As demonstrated in the Draft EIR, however, all of the on-site and adjacent historic resources will retain their eligibility for listing in national, state, and local registers despite alteration of their surroundings by large-scale new development. The Capitol Records Building, the Gogerty Building, the retail storefronts located at 6316-6324 Yucca Street, and the Hollywood Boulevard Commercial and Entertainment District will all remain intact and retain their important character-defining features. Setback and open-space requirements specified in the Development Guidelines will ensure that important views to historic resources and their street-level prominence will be retained.

With regard to parking, the Project's parking was analyzed using a shared parking which may be applied to the Base Demand when the uses have different parking requirements and different demand patterns in a 24-hour cycle or between weekends and weekdays pursuant to the Development Agreement and the Development Regulations. This is consistent with Community Plan Update policies and Section 106.61 of the Green Building Code. The intent is to maximize efficient use of the Project Site by matching parking demand with complementary uses. As the actual number of spaces will be dependent upon the land uses constructed in accordance with the Equivalency Program, the calculation of the parking requirements shall be based on a detailed assessment prior to Project construction based on the procedures set forth below and in the Development Agreement. As discussed above, parking will be provided to meet demand.

LETTER NO. 23 - ABRAHAMS, GEORGE

George Abrahams
3150 Durand Drive, Los Angeles, CA 90068

December 4, 2012

Comment No. 23-1

The December 10, 2012 close of public comment period for the draft EIR for project ENV-2011-675-EIR is too short to prepare a traffic analysis of the project. I have asked several traffic consultants and they all have replied that they have other work scheduled currently and that the time to prepare an analysis is greater than the comment period. The comment period should be extended at least 120 days so that we can hire a traffic planner to do the necessary study. Please add this comment to the ENV-2011-675-EIR case file.

Response to Comment No. 23-1

The Draft EIR included a traffic analysis of the Project, which is included in Appendix IV.K.1.

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 24 - ANDERSON, ROBERT

Robert Anderson

December 10, 2012

Comment No. 24-1

I have lived and worked in the Hollywood area off and on for forty-five years.

I believe more time is needed to make this decision.

Response to Comment No. 24-1

The comment is an introduction and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 24-2

Currently there is insufficient infrastructure to support this proposal. The traffic in this area is already chronically heavily congested.

Response to Comment No. 24-2

The Draft EIR acknowledges that the Project would generate additional trips and that significant project-related impacts would occur at two study intersections and significant cumulative-related impacts at five study intersections.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 24-3

The land mark Capitol Records Building is a historic building. The proposal is not practical. It would be a disastrous environmental eyesore.

Response to Comment No. 24-3

The Project would retain the Capitol Records Building and any future maintenance of it would be performed pursuant the Secretary of the Interior's Standards. Please see Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent historic Capitol Records building. The commenter states that the Project would be an eyesore. Please refer to Topical Response 2, Aesthetics, for information regarding project aesthetics, including views.

Comment No. 24-4

These buildings would not be appropriate for this earthquake prone neighborhood. The Sunset and Vine Tower was unsafe, unoccupied and boarded up with a fence around it for years after the 1994 earthquake. This has exactly the same potential.

Response to Comment No. 24-4

The commenter suggests that adjacent vacant properties are the result from past earthquakes in the area, and that the same will happen to the Project. As stated in the Draft EIR, the Project Site is not located in an area delineated on the Alquist-Priolo Earthquake Fault Zoning Map. Likewise, as discussed in the Draft EIR, the Project Site is not located within a fault rupture zone. Also, the California Geological Survey (CGS) and the City of Los Angeles ZIMAS system (http://zimas.lacity.org/map.asp) show the closest fault to the Project Site with the potential for fault rupture as the Santa Monica/Hollywood Fault, which is located approximately 0.4 miles from the Project Site. The geotechnical reports that support the Draft EIR conclude that geotechnical conditions on the Project Site are suitable for development of the Project. The commenter provides an opinion as to why certain buildings in the area are now boarded up, which does not contest the adequacy of the Draft EIR.

Comment No. 24-5

Those who forget the mistakes of the past are doomed to repeat them.

As presented, The Millennium Project appears to be an ill conceived, just plain bad idea.

Response to Comment No. 24-5

This comment expresses an opinion about the project, but does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

LETTER NO. 25 - BAUMGART, TED

Ted Baumgart
2425 Mountain Ave, La Crescenta, CA 91214

December 10, 2012

Comment No.25-1

I grew up in Laurel Canyon, attended Wonderland Avenue School and Bancroft Junior High, this is my backyard. My friends attended Hollywood High, and so did many of their parents. My uncle's house was up Beachwood with a prominent view of the city. By looking at the renderings of this ghastly project idea I notice at least one of the two is a bold faced lie! I'm an architectural/film set designer and illustrator, and I know how to cheat the eye.

Response to Comment No. 25-1

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 25-2

It shows the Hollywood Hills miles in the distance, when in fact they are very close to this site and these monstrosities will be looking right into the windows of the homes in the hills.

Response to Comment No. 25-2

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. Nevertheless, refer to Topical Response 2, Aesthetics, for additional information regarding views. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 25-3

Not only that, but built these two ugly behemoths would be precedents that give legality to more tall buildings to be built, and soon there won't be a view but tall buildings looking into Hollywood Hills homes windows and homes looking into building windows.

Response to Comment No. 25-3

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. Nevertheless, refer to Topical Response 2, Aesthetics, for additional information regarding views. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 25-4

There will be no ridgeline of 'The Hills' looking over Hollywood seen through palm trees, the very icon known around the world.

Response to Comment No. 25-4

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. Nevertheless, refer to Topical Response 2, Aesthetics, for additional information regarding views. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 25-5

The problem exists already west above the Strip. We were next door to a famous and well respected artist's home looking out of big floor-to-ceiling glass windows across a swimming pool at dusk to the jeweled city below, working on a new show concept, and low and behold some skyscrapers in front of us were looking right back into our windows. Not the cozy hills anymore. Not the jeweled city below. You get walls in Manhattan or any dense big city, but no one has the Hollywood Hills as the predominantly horizontal jewel with city below, and visa versa. This proposal would unleash a wall of buildings that dwarf the hills. Be very aware of the essence, soul, and character of Hollywood known around the world. It is worth more per square foot developed intelligently than these monuments to shorter term profit and quick tax base increase. LA is not any other city and Hollywood defines LA, so let's keep it, use it, and develop it intelligently. This is not just any "Run-of-the-Mill-ennium Project", this proposal is insane.

Response to Comment No. 25-5

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. Nevertheless, refer to Topical Response 2, Aesthetics, for additional information regarding views. These comments will be forwarded to the decision makers for their consideration and no further response is required.

LETTER NO. 26 - BECKLUND, LAURIE

Laurie Becklund

October 29, 2012

Comment No. 26-1

Thank you for remembering to send me the CD of the DEIR for Millennium. Really appreciate the attempt to visualize this project with photos and graphics. An enormous amount of work.

Response to Comment No. 26-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project.

Comment No. 26-2

I'm puzzled by one thing: i thought the MOU signed by LADOT with the developer required a change in the intersection at Argyle and Franklin, the one I talked to you about briefly when i was in your office. the traffic study had all southbound access on Argyle being closed from franklin, which would have landlocked our whole neighborhood. the DEIR seems to suggest otherwise. did this change?

Response to Comment No. 26-2

The Memorandum of Understanding (MOU) is included as Appendix A to the Traffic Impact Report, which is Appendix IV.K.1 to the Draft EIR. Section IV.K.1, Transportation – Traffic, of the Draft EIR, make reference to intersection specific improvements at the intersection mentioned in the comment. See the mitigation measure from the Draft EIR for additional information:

K.1-11 Intersection Specific Improvements - Argyle Avenue/Franklin Avenue – US 101 Freeway Northbound On-Ramp – To mitigate the significant traffic impact at this intersection under both existing (2011) and future (2020) conditions, the Project Applicant shall restripe this intersection to provide a left-turn lane, two through lanes, and a right-turn lane for the southbound approach and two left-turn lanes and a shared through/right lane for the northbound approach. The final design of this improvement would require the joint approval of Caltrans and LADOT.

The conceptual image (in Appendix H of the Traffic Study) shows left-turn lanes allowing access from westbound Franklin Avenue to southbound Argyle Avenue and a right-turn lane allowing access from eastbound Franklin Avenue to southbound Argyle Avenue. Thus, there would continue to be southbound access on Argyle Avenue from Franklin Avenue.

LETTER NO. 27 - BRACKETT, ALAN

Alan Brackett
Safety Committee member of Hollywood Homeowners Association

December 10, 2012

Comment No. 27-1

I am a homeowner resident in Hollywoodland directly above where this project is intended. I am concerned about infrastructure that I do not see being addressed. Are the city's sewer lines being upgraded along with other utilities?

Response to Comment No. 27-1

Please refer to Response to Comment 18-5 for a discussion on existing and proposed infrastructure.

The Draft EIR analyzed the impacts to water and electricity in Section IV.L, Utilities and Service Systems. The Project's Water Supply Assessment (Appendix IV.L.1 to the Draft EIR) found that the Los Angeles Department of Water and Power (LADWP) would be able to meet the water demand of the Project, in addition to existing and planned future uses of the LADWP's system. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.

Based on the estimated flow, the sewer system will accommodate the total flow for the Project, which was confirmed by the City's Bureau of Sanitation (BOS) in two letters dated September 27, 2011 and January 8, 2013. As described in the City's BOS letters, further detailed gauging and evaluation may be needed as part of the permit process to identify the most suitable sewer connection point(s). As discussed in the Draft EIR, if, for any reason, the local sewer lines have insufficient capacity, then the Project Applicant will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. The BOS identified the connection to be made as either to the 8-inch line on Vine Street and/or the 12-inch line on Yucca Street. The construction of a secondary line, if necessary, would not result in significant impacts as the construction would be of short duration and with the implementation of best practices would not significantly impact traffic or emergency access. A final approval for sewer capacity and connection permit will be made at the time of final building design.

Comment No. 27-2

I don't see how there is enough parking being provided in the new proposed sites to handle the amount of traffic and cars and the streets already are lacking parking.

Response to Comment No. 27-2

With regard to parking, the Project's parking was analyzed using a shared parking analysis because different uses have different parking demands during a 24-hour cycle and between weekday and

weekends. This is consistent with Community Plan Update policies, and Section 106.61 of the Green Building Code. The intent is to maximize efficient use of the Project Site by matching parking demand with complementary uses. As the actual number of spaces will be dependent upon the land uses constructed in accordance with the Equivalency Program, the calculation of the parking requirements shall be based on a detailed assessment prior to Project construction based on the procedures set forth in the Development Agreement. Accordingly, parking will be provided to meet demand based on the shared parking analysis.

Comment No. 27-3

Why are such tall sky-scrapers being allowed and if they are why are they not required to provide tourist viewing sites at their tops for viewing the Hollywood Sign, etc.?

Response to Comment No. 27-3

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height. It should be noted that pursuant to current zoning the Project Site does not have a height limitation. The Project Description does mention a possible rooftop observation deck. Please refer to Topical Response 2, Aesthetics, for additional information regarding views, including of the Hollywood Sign.

Comment No. 27-4

This project will cause much more traffic to my area with people wanting to get to a "green" place with their dogs and families and none is being provided for this onslaught. What happened to the idea that new development needs to also provide "green" space (parks) for the new population they attract?

Response to Comment No. 27-4

According to Section IV.J.4, Public Services - Parks and Recreation, of the Draft EIR, the City imposes Quimby fees and Park and Recreation fees pursuant to LAMC Section 17.12 and LAMC Section 21.10.3, respectively, based on the number of units proposed within a project to help offset potential project and cumulative environmental impacts. Please refer to Response to Comment No. 59-24 (Jordon, David) for additional information.

Comment No. 27-5

I bank at what is now the Chase bank on the corner of Sunset and Vine and when the big "W" hotel was built I noticed that the nice view of the Hollywood Sign was blocked from view from the bank parking lot where it had been visible for ~90 years. These new highrises will block the view of the sign for tourists as well as residents from anywhere south of their location for quite a distance. This I am afraid will cause more disturbance to my neighborhood with people wanting to see or touch the sign. Our neighborhood cannot handle and was not built to handle this kind of onslaught of traffic. Also, looking south from the

hills theses buildings will block the view from many homes that have paid a premium for this view. There are rules - written and unwritten - in the hills about blocking your neighbor's view with new houses or with trees and now I cannot understand why these highrises can get away with this when we have always had the understanding that this is an understood right of ownership in the hills that you respect your neighbor and try to get along and not block their views. Obviously, this respect is not there with this project.

Response to Comment No. 27-5

The Draft EIR analyzes a variety of public views and view corridors, which are discussed in Section IV.A.1, Views / Light and Glare. Please refer to Topical Response 2, Aesthetics, for additional information regarding views, including of the Hollywood Sign.

Comment No. 27-6

I am against this project continuing until big changes come to fruition. There needs to be a huge height restriction, more consideration for the surrounding area and respect for the people living and working for years in the area. Utilities and sewer and parking and traffic and lack of a "green" area need to be addressed. This is not downtown Los Angeles or New York or any other of the large cities and should not become one. This is Hollywood, where people from all over the world come to see something unique - not another big city filled with highrises and traffic and pollution. My neighborhood which is right up the street is the nearest "green" area and where do you think all the residents in these new buildings are going to go? They won't want to drive the extra mile to get to Griffith Park - they will head straight up the hill and past my house with their noise, congestion and danger of burning down our neighborhood with their cigarettes.

Response to Comment No. 27-6

The Draft EIR adequately analyzes utilities in Section IV.L, parking and traffic in Section IV.K, land use issues in Section IV.G, and aesthetics in Section IV.A. Please refer to those sections for a discussion of potential impacts the Project could have on those environmental issue areas. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 27-7

Stop this project and put more thought into what it means to the area - have some respect! Big money should not be allowed to get away with whatever it wants in America! There is already too much of this happening and this is one place where the line should be drawn in the sand. Postpone and take a deep breath and let's talk and try and work things out!

I will be glad to help in any way that I can - Please don't hesitate to call on me to represent our area.

Response to Comment No. 27-7

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 28 - BROSSEAU, DEBORAH

Deborah Brosseau

November 12, 2012

Comment No. 28-1

Thank you for sending the report and detailed information about this project. I am vehemently opposed to the Millennium Project and disgusted by the impacts delineated in the report.

Response to Comment No. 28-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 28-2

Please keep me posted on any opportunities to publicly and privately express this opposition.

Response to Comment No. 28-2

The EIR process provides an opportunity to provide comments after the Draft EIR is released, which this commenter did. When the Project goes into various public hearings such as at City Planning Commission and City Council, the public will have another opportunity to provide written and oral comments. The dates of future hearings are not known at this time.

LETTER NO. 29 - CAPLAN, RANDI

Randi Caplan
Beachwood Canyon Property Owner

December 9, 2012

Comment No. 29-1

The public comment period for the Millennium Hollywood Project did not allow sufficient time for a traffic study to be prepared by an independent consultant. To protect the people who live in the community from runaway development that severely impacts our infrastructure and services, the comment period should be extended [at a minimum] to allow for a traffic study (and any other needed studies) to be included.

Response to Comment No. 29-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The commenter seeks the extension to protect, in the commenter's words, the community from runaway development that could impact infrastructure and services. The Draft EIR and Appendices included many studies, including air quality, historic resources, noise, traffic, parking, public services, utilities including infrastructure and water supply. The CEQA process is designed to "provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project." (CEQA Statute § 21061). According to CEQA Guidelines 15002, the basic purposes of CEQA are to: (1) inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. The Draft EIR complied with these CEQA requirements.

LETTER NO. 30 - CAREY, SABINE

Carey Sabine
2442 Cheremoya Ave., Los Angeles, CA 90068

December 10, 2012

Comment No. 30-1

I am herewith informing you of my concerns for 40+ story tall high risers in the Hollywood area. They would be out of proportion, absolute eye-sores (from all directions), and most of all, causing a complete traffic chaos, way beyond what is already becoming a very congested area. In my past 18 years in Hollywood I have seen the traffic going from easy to an absolute nightmare. I can't imagine any more traffic being added to this area.

Response to Comment No. 30-1

Please refer to Topical Response 2, Aesthetics, for a discussion of visual impacts. Also note that the Draft EIR contains an extensive and adequate analysis of traffic impacts in Section IV.K. Otherwise, the comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 30-2

I am not opposed to adding several high structures in Hollywood but they should stay within proximity of the current high risers in Hollywood.

Please do not allow a "Manhattanfication of Hollywood"!!!!

Response to Comment No. 30-2

The commenter is opposed to new development that is significantly larger than anything in the immediately surrounding area. The Draft EIR specifically acknowledges that the Project has the potential to add considerable height and density as compared with the immediate surroundings.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height, and it should be noted that the Project Site does not have a height limitation pursuant to current zoning.

LETTER NO. 31 - CLARK, GEORGE

George Clark

December 9, 2012

Comment No. 31-1

This continues to be something that boggles the mind. The city council is in cahoots with developers with no regard for public support, quality of life or safety. It now takes up to 45 minutes at rush hour to drive from Vermont to the 101 along Franklin. We are already jammed in here. Now they want to seriously increase the amount of traffic?

Response to Comment No. 31-1

The Project's Traffic Study was conducted pursuant to the guidelines set forth by and was approved by the Los Angeles Department of Transportation (LADOT). The Traffic Study concluded that there would be significant and unavoidable operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections. The Traffic Study and subsequent letter from the LADOT dated August 16, 2012, which is included as Appendix IV.K.2 to the Draft EIR, included Project requirements as mitigation measures to fully or partially reduce impacts. All of the traffic mitigation measures are set forth in the EIR. Please see Section IV.K.1 Transportation-Traffic of the Draft EIR for additional information regarding the Project's traffic impacts.

Comment No. 31-2

Can't wait until a fire in thew hills breaks out at rush hour. Scores will die and the the hills left in ashes.

Response to Comment No. 31-2

In regard to the potential for increased traffic impacting response times, increases in traffic attributable to the Project would not greatly affect the ability of emergency vehicles being able to maneuver through crowded intersections, as the LAFD has experience responding to emergencies in congested areas throughout the City, through the use of lights/sirens, ability to direct traffic to the side of the road, and to drive on the wrong side of the road, if necessary. Further, although there are significant traffic impacts, the significant impacts are at limited locations and there is availability of alternative routes within the street system in the area surrounding the Project Site. .

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 31-3

On it's face it cannot work and will become a living nightmare. Can't this be stopped by lawsuits including enviro impact? No one will be able to see the Hollywood Hills except those living in the high rises which will topple in the strong earthquake that is coming at some point.

Response to Comment No. 31-3

Please refer to Topical Response 2, Aesthetics, for information regarding views, including views of the Hollywood Sign.

Comment No. 31-4

The city planners are obviously in the pocket of developers and on it's face is immoral. If dug into deeply enough no doubt illegality is going on as well. The Rico act is probably being violated as well.

Shame on the city council. It is disgusting. We must mount a petition and throw all of them out of office is this proceeds. Of course they'll end up on developers boards but at least they will be out of offcie and we'll have politicians who care about the city and the people not just their own financial gain.

Response to Comment No. 31-4

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 32 - CLARK, JOSEPHINE AND BRYAN

Josephine and Bryan Clark
Holly Hill Terrace, Hollywood, CA 90068

December 8, 2012

Comment No. 32-1

This so-called "Plan" is totally inadequate.....a monstrosity of a building.....and creates traffic problems that will choke this area of Hollywood to death.....

Response to Comment No. 32-1

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The Draft EIR contains extensive analysis of traffic impacts and is supported by a traffic technical appendix. The traffic section of the Draft EIR discloses the Project's potential traffic impacts. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 33 - CLEMENTS, CHIP

Chip Clements
6284 Mulholland Highway, Los Angeles, CA 90068

December 10, 2012

Comment No. 33-1

I'm a resident of the Hollywood Hills above Vine Street and have just, at this late date, become aware of plans to build two 500-foot-tall skyscrapers on Vine St. near Hollywood Blvd. To me the prospect of adding these gigantic structures to our neighborhood sounds insanely inappropriate.

I'm writing to express my displeasure at the prospect of your permitting these giant structures to tower over our community. I'm not against development. I love that Hollywood is evolving as a destination for entertainment and tourism. But why two 50-story buildings? It's more appropriate for Manhattan than for Hollywood.

Please send these developers back to the drawing board and have them plan structures more appropriate for this part of town. With the W hotel complex and the Hollywood/Highland complex and a score of other projects, you guys hit just the right note in terms of planning an expansion of our community. These mega-skyscrapers don't fit in.

Response to Comment No. 33-1

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height, and it should be noted that the Project Site does not have a height limit pursuant to existing zoning.

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 34 - CONRAD, JACK #1

Jack Conrad

December 8, 2012

Comment No. 34-1

Are you kidding me?

The traffic in Hollywood is already a joke. How much infrastructure are these totally out of scale monstrosities going to add to our already overburdened city?

Response to Comment No. 34-1

The comment refers to traffic and infrastructure, but does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. Traffic, public services, and utility systems are all analyzed in the Draft EIR. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 34-2

Have your artist draw in a reasonable representation of the traffic!

Response to Comment No. 34-2

Traffic generation and intersection impacts are shown in maps in Section IV.K.1, Transportation – Traffic, of the Draft EIR.

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 35 - CONRAD, JACK #2

Jack Conrad

December 11, 2012

Comment No. 35-1

Thank you for your very kind reply.

From what I've been reading it looks like Garcetti has already sold us out.

Disgraceful!!

Response to Comment No. 35-1

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 36 - CONTI, FABIO

Fabio Conti

December 4, 2012

Comment No. 36-1

As a longtime resident of the Hollywood Hills and a small business owner near the intersection of Sunset and Vine, I have seen the Hollywood community change for the better over the years.

The most positive change has come through the construction of more residential developments as it has brought a stable population to the area. The Sunset and Vine project by the CIM Group, for example, has interjected a new level of activity that has benefited many local businesses like my restaurant Fabiolus.

I support the Millennium Hollywood project because I am confident it will have the same beneficial impact on the community as a whole. The fears that this project will create gridlock on area streets are completely unfounded because people who will move here will be doing so to live an urban lifestyle that involves a lot of walking and taking the subway to get around, not sitting in their cars.

It's time that Hollywood grew up. The parking lots around Capitol Records are the perfect place for density because the site is close to the subway, the Hollywood Freeway and all kinds of excitement that people want to be a part of, meaning this development can be absorbed without placing too big of a burden on the community.

Moreover, by proposing taller buildings, this project would open up the streetscape for more open space. As one of the densest neighborhoods in Los Angeles, Hollywood desperately needs more open space for young people like my two sons.

Millennium Hollywood is an exciting project that will be positive for the Hollywood community, and I am excited to support it.

Response to Comment No. 36-1

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 37 - COVIELLO, GAIL

Gail Coviello

December 8, 2012

Comment No. 37-1

The public comment period did not allow sufficient time for a traffic study to be prepared by an independent consultant. Please extend the public comment period to allow for this traffic study to be included. I think it is crucial to this project. Thank you!

Response to Comment No. 37-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

With regard to conducting an independent traffic study, the Project's Traffic Study was conducted within the parameters and approved by the Los Angeles Department of Transportation (LADOT), as defined in the Memorandum of Understanding, included as Appendix A to the Traffic Study. The Study concluded that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections. The Study and subsequent letter from the LADOT dated August 16, 2012, which is included as Appendix IV.K.2 to the Draft EIR, included Project requirements as mitigation measures to fully or partially reduce impacts.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. (See CEQA Guidelines Section 15204). The Traffic Impact Study for the Draft EIR concluded that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections.

LETTER NO. 38 - D'ANTONIO, JOANNE

Joanne D'Antonio
Safety Chair, Hollywoodland Homeowners Association

December 9, 2012

Comment No. 38-1

The Millennium Hollywood Project is the most irresponsible disaster to ever hit Hollywood. These super high-rises are unsafe (no mitigation for fire, roads and emergency services)

Response to Comment No. 38-1

The commenter expresses concerns that the Project is unsafe and does not mitigate fire and emergency services. According to Section IV.J, Public Services, of the Draft EIR, the Project suggests numerous mitigation measures to help offset potential impacts from Fire and Police, including emergency access. The commenter's statement that the Draft EIR does not address mitigation for these services is false.

Comment No. 38-2

and unsightly because they dwarfs the historical City of Hollywood and the iconic Capitol Records Building.

Response to Comment No. 38-2

Please refer to Response to Comment No. 16-3 for a discussion on the Project's overall height.

Please see Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent historic Capitol Records building.

Comment No. 38-3

The public comment period did not allow time for an independent traffic study. This must be done.

Response to Comment No. 38-3

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

With regard to conducting an independent traffic study, the Project's Traffic Study was conducted within the parameters and approved by the Los Angeles Department of Transportation (LADOT), as defined in the Memorandum of Understanding, included as Appendix A to the Traffic Study. The Study concluded

that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections. The Study and subsequent letter from the LADOT dated August 16, 2012, (included as Appendix IV.K.2 to the Draft EIR), included Project requirements as mitigation measures to fully or partially reduce impacts.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or requested by commenters. The Traffic Impact Study for the Draft EIR concluded that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections.

Comment No. 38-4

And where are the plans to upgrade the very old infrastructure for these buildings? The utilities cannot take this additional burden. Imagine how much more sewage must go through these old pipes?

Response to Comment No. 38-4

Please refer to Response to Comment No. 18-5 for a discussion on existing and proposed infrastructure.

Comment No. 38-5

I will not vote for a single politician that is currently in office if this goes through. And I will campaign aggressively against all of them. It is unconscionable to sell out historic Hollywood to developers from another state. They will make our community look grotesque. And it will be prone to safety hazards.

Up until now the subway helped our area, but now it is attracting greedy outsiders who do not care about destroying the community. You must have an independent study before City officials make am irreparable mistake by allowing these buildings to be built and set a precedent for more of the same.

Response to Comment No. 38-5

It should be noted that the Draft EIR analyzes potential impacts on historic resources, safety, and aesthetics in Sections IV.C, Cultural Resources, IV.J, Public Services, and IV.A, Aesthetics respectively. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 38-6

Height limits really need to be set for the entire community, not just certain streets, to retain a pleasing look in a safe, responsible environment.

Response to Comment No. 38-6

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height. These comments will be forwarded to the decision makers for their consideration and no further response is required.

LETTER NO. 39 - DE VARENNES, MONIQUE

Monique de Varennes

December 9, 2012

Comment No. 39 -1

As futile as this message no doubt is, I feel compelled to write it. I've lived within walking distance of the Capitol Records building, in apartments and houses, for 37 years; I look out at it from my kitchen window (and, no, the proposed project will not block my view). I've raised my kids in this neighborhood; it's my home. I'm not an enemy of change -- in fact, I welcome it -- but I have reservations about the Millennium Project on two counts.

Response to Comment No. 39 -1

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 39 -2

The first is practical. There are so many large developments springing up in Hollywood at the moment -- it seems wrong-headed to greenlight something this gargantuan before measuring the impact of the new buildings on traffic, antiquated systems, and services.

Response to Comment No. 39 -2

It should be noted that the Draft EIR analyzes potential impacts related to traffic, infrastructure and public services in Sections IV.K, Transportation, IV.L, Utilities and Service Systems, and IV.J, Public Services respectively. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 39 -3

The second objection is aesthetic. The proposed buildings look handsome (though I've been fooled by renderings before), but they are far too tall, making the iconic Capitol Records building look Lilliputian and absurd. Something closer to the scale of existing buildings would be far less objectionable.

Response to Comment No. 39 -3

Please refer to Topical Response 2, Aesthetics, for information regarding views.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

LETTER NO. 40 – DILLARD, JOYCE

Joyce Dillard
P.O. Box 31377, Los Angeles, CA 90031

December 10, 2012

Comment No. 40-1

You may cover part of the Watershed issues, but have not adapted this document to the requirements of the MS4 permitting, the Greater Los Angeles County Integrated Regional Water Management Plan, the LA County Sediment Plan and the 200-year floodplain planning by the State Department of Water Resources.

Response to Comment No. 40-1

This comment expresses a general concern that the Project does not address the County of Los Angeles Integrated Regional Water Management Plan, the LA County Sediment Plan, and the 200-year floodplain planning by the State Department of Water Resources. As stated in the Draft EIR, the State's National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Proposed Project would be subject to the requirements set forth in the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of BMPs to help manage runoff water quality. The City has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494, therefore, the Proposed Project is consistent with the State Department of Water Resources and the commenter's concerns are unfounded.

Comment No. 40-2

We need to know the pollutant loads created for the project and the expected traffic congestion into the project area.

Response to Comment No. 40-2

The Project's air quality impacts are discussed in Section IV.B.1, Air Quality, of the Draft EIR. The Project's traffic generation and intersection impacts are discussed in Section IV.K.1, Transportation – Traffic, of the Draft EIR.

Comment No. 40-3

How is the capacity of the sewers being address on maintenance as well as a capital basis. Other than scenarios, what are the estimated usages and loads.

Response to Comment No. 40-3

The commenter would like information on sewer capacity and is referred to Section IV.L.2, Wastewater, of the Draft EIR for information on projected wastewater. According to the Draft EIR, Wastewater from the Project Site would be subsequently conveyed to the Hyperion Treatment Plant (HTP), which has a remaining treatment capacity of approximately 88 million gpd. The 158,940 gpd net increase in wastewater over the existing Project Site uses represents approximately 0.2 percent of the remaining capacity at the HTP. As shown in the Draft EIR, the HTP has enough remaining capacity to accommodate the Project under the Commercial Scenario as well (which is the worst case scenario), a fact also confirmed by the City's BOS. Regarding the commenter's statement about what loads are estimated other than the scenarios presented, the Draft EIR presents the worst case scenario for wastewater usage.

Comment No. 40-4

Will the Tillman Plant diminished capacity affect this project. The diminished capacity is not approved in the LA Integrated Water Resources Plan.

Response to Comment No. 40-4

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required. For information purposes, wastewater from the Project Site would be subsequently conveyed to the HTP, which has a remaining treatment capacity of approximately 88 million gpd. The 158,940 gpd net increase in wastewater over the existing Project Site uses represents approximately 0.2 percent of the remaining capacity at the HTP.

Comment No. 40-5

We are attached the Final MS4 permit. How will this project be in compliance?

Response to Comment No. 40-5

With regard to the commenter's question about MS4 compliance, please see Response to Comment No. 40-1 (Dillard, Joyce) above.

Comment No. 40-6

What is the continued mitigation measures for trash and bacteria issues.

Response to Comment No. 40-6

The Project's solid waste mitigation measures are listed below:

L.3-1 All waste shall be disposed of properly and in accordance with the City's Bureau of Sanitation standards. Appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation shall be used. The bulk recyclable material such as broken asphalt and concrete, bricks, metal and wood shall be hauled by truck to an appropriate facility. Non recyclable materials/wastes shall be hauled by truck to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

L.3-2 Recycling bins shall be provided at all trash locations, to promote recycling of paper, metal, glass, and other recyclable materials during operation of the Project. These bins shall be emptied and recycled accordingly and consistent with AB 939 as a part of the Project's regular solid waste disposal program.

LETTER NO. 41 - DRABECK, KATRINA

Katrina Drabeck
6238 De Longpre Avenue
Hollywood, CA 90028

December 10, 2012

Comment No. 41-1

I want to submit my extreme disapproval of the Millennium Hollywood Project, specifically the height of the towers. This plan is obscene. Growth in Hollywood should be in line with the aesthetic of the city. The Hollywood skyline is beautiful and iconic. These towers will dwarf all other buildings and absolutely ruin the skyline. As a long time Angelino, I love driving the stretch of the 101 and seeing the Capitol Records building, which would look ridiculous in between these highrises. As a Hollywood resident, I take great joy in driving down Vine, past all of the beautiful historical buildings - this is about so much more than just Capitol Records - that make Hollywood so special

Every city needs to grow and change over time to thrive. But that growth needs to make sense. It needs to have respect and thought to the world around it. (For example, the Hollywood W Hotel was a perfect fit for the community, aesthetically.) This plan simply does not fit in Hollywood and it would absolutely break my heart to see it realized. Perhaps the future of Hollywood involves a change in the skyline, but one this drastic, one that you can not even see past from the hills, one that would impede the view of the Hollywood sign from the city, is not what Hollywood is to the people who live here. A generic city just like any other we are not. Please support growth that maintains Hollywood's character. Diminishing the feel of community that we all enjoy here will reduce the quality of life for current residents and even impact local businesses.

Response to Comment No. 41-1

Please refer to Topical Response 2, Aesthetics, for information regarding views.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Please refer to Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent historic Capitol Records building.

Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 41-2

In addition, it is hard to understand a need for a residential tower when countless apartment and condo buildings built in the past few years still sit partially empty. Anyone who could afford to live in a new building like this would not get out of their nice cars to utilize the subway nearby. Traffic flow in Hollywood is already bad enough. This would make it a nightmare.

Response to Comment No. 41-2

It should be noted that the Draft EIR analyzes potential impacts related to population and housing in Section IV.I, Population, Housing, and Employment. It also analyzes potential traffic impacts associated with the Project in Section IV.K, Transportation. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 41-3

I much more strongly support the 220 ft high version of the project.

Response to Comment No. 41-3

It should be noted that the Draft EIR analyzes height issues related to aesthetics, land use, and project alternatives in Section IV.A, Aesthetics, IV.G, Land Use Planning, VI, Alternative to the Propose Project. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 42 - DUKE, OLIVIA #1

Olivia Duke

December 10, 2012

Comment No. 42-1

I am OUTRAGED that these ugly two towers are being allowed to be built in Hollywood. We are already suffering so much from the building that has been allowed to continue. What is it going to take! Nobody but the contractors want these buildings built. Homeowners are moving out of Hollywood and the state because of all of the obvious under the table money that is being received by the city from the contractors building these totally unnecessary Gothic structures that take away from the unique history of the Hollywood city structure's. Is everyone on drugs? It must be either this or the money that is being handed over to the city. If you think that someone will not call in an investigation on this I can hardly believe the lack of thought. It is so obvious to everyone in the Hollywood Hills what is going on. We are just disgusted. I am thinking of moving after 25 years in the Hollywood Hills. The traffic due to all the building that has been allowed is destroying our Hollywood Hills area. Thank you.

Response to Comment No. 42-1

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 43 - DUKE, OLIVIA #2

Olivia Duke

December 11, 2012

Comment No. 43-1

Thank you, Srimal, I am sorry to be so curt but please understand the deep frustration that we feel in our neiborhood. We are totally being disregarded by the city that we pay high taxes to. Our wonderful city and Hollywood is being destroyed by all of the building that is being allowed. I live up in Beachwood Drive at Glen Holly. I have to park four blocks away, during the summer people come to blows with the tourists, the noise level is out of control (there is no longer any quiet enjoyment time) and the traffic out front on a street that used to be safe to cross is unbelievable. It takes triple the time to get anywhere, even to the store. There is no parking anywhere. We have gotten no help from the city after repeated requests and we are all just burnt out and jaded on the lack of care that we feel for our circumstances. We have gotten no help from Councilman La Bonge's office -- he is up to his ear lobes trying to put out the other fires that the city has caused. I don't know of one person who supports the building of those two towers -- we are very concerned about the increased environmental impact (on an environment that can hardly take more) and the biggest thing is the W as well as the surrounding condo's can not be rented out so there is no need for more. Why then have these awful, un-blending buildings been green lit? It truly makes me physically ill. I used to love to come home. Now I can't wait to get out. I am thinking of moving after 25 years -- I have multiple neighbors who already have left the state because of what is happening.

Response to Comment No. 43-1

It should be noted that the Draft EIR analyzes potential noise, traffic and parking, and population and housing impacts in Sections IV.H, Noise, IV.K, Transportation, and IV.I, Population, Housing and Employment respectively. Otherwise, the comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 44 - DYER, BRIAN

Brian Dyer
1835 Grace Avenue, Los Angeles, CA 90028

December 10, 2012

Comment No. 44-1

Below is the text of the attached word document. If you have any questions, please feel free to contact me at (323) 469-5681.

Response to Comment No. 44-1

This comment is an introduction and does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 44-2

After reviewing the DEIR, I find some troubling aspects to it, particularly in the design and in the geological and soils section

Response to Comment No. 44-2

It should be noted that the Draft EIR analysis impacts associated with geology and soils in Section IV.D, Geology and Soils. The Draft EIR also contains geotechnical mitigation measures that ensure development on the Project Site is adequately supported and does not significant impact adjacent existing structures. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 44-3

Design: Even though East of Vine is not considered by the Hollywood Community Plan as the Hollywood Core, as the area west of Vine is, the design elements should be the same. The Pantages Theatre, which the Millennium Project (MP) will abut, finished construction in the 1930s. This alone should have extended the core to Argyle and up to the Henry Fonda theatre as the Eastern reaches of the core. As such, this "theatre district" as the city is already wanting to extol, should follow the design standards regarding height restrictions that the core has already been adjusted to through the Hollywood Community Plan.

Response to Comment No. 44-3

Please see Response to Comment No 14-5 (Hollywood Heritage), Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent structures.

Comment No. 44-4

Geology: The MP DEIR uses the Modified Mercalli scale, which uses people's impressions about the intensity they feel during the earthquake. That is fine. However, the DEIR should go beyond and use the Richter scale as well so the public, in this questioning period, could better understand the DEIR. Also, the DEIR does not use any report more recent than 2002. Nowhere in the DEIR is the recent activity in Beverly Hills, on the Inglewood Fault and Beverly Hills Fault mentioned. These faults have, in effect, cut in two the Santa Monica Fault and the Hollywood Fault, both of which can be triggered by the above mentioned faults and trigger each other. Cal Tech currently states on their website that the Santa Monica Fault can reach a 7.0 or higher, in conjunction with another fault. The Hollywood fault, which runs north of the Santa Monica fault may reach 6.5 or higher.

Response to Comment No. 44-4

The Project's geotechnical engineering report was completed in May 2012, and is included as Appendix D to the Draft EIR. The Project will be built with the recommendations of the geotechnical report, which are listed as Mitigation Measures D-1 to D-10, as well as the latest building codes.

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required. For additional information regarding fault rupture, please refer to Response to Comment 24-4 (Anderson, Robert).

Comment No. 44-5

Regarding the liquefaction of soils mentioned in the DEIR, one only has to look at the building of the Metro Redline, which created a hole in Hollywood Boulevard, when underground erosion due to an underground stream created a collapse in the tunnel. The water table under the Runyon Canyon park was also reduced. Nowhere in the study are these incidences mentioned. If the soils and water table on either end of the project were not discoverable by the METRO DEIR, what is yet to be found with the huge MP?

Response to Comment No. 44-5

This comment states that the Draft EIR did not mention certain conditions that other projects in and around Hollywood have found during construction activities. The conditions of the soil beneath the Metro Redline building and Runyon Canyon Park do not relate to the Project or the Project Site and as

such CEQA does not require that the EIR for the Project study such conditions. Please see Section IV.D Geology and Soils of the Draft EIR for information regarding the conditions of the soil at the Project Site.

Comment No. 44-6

Traffic: As already stated in the DEIR, traffic will be impacted. As witnessed by the Project Plan for Trizec Hahn's "Hollywood & Highland" the traffic mitigation processes listed on that projects section IV, , page 13 & 14 (attached document) for neighborhoods has not continued to be implemented. Traffic in the neighborhoods are already overflowing and causing cut-throughs. Since the project's Western boundary includes Argyle, this project will have a heavy impact on the communities into the core, South of Franklin and North of Hollywood where traffic is already beyond capacity due to clubs, theatres, The Ford Theatre and the Hollywood Bowl. In the above mentioned Trizec Hahn plan, one of the mitigations was that Trizec Hahn would provide traffic control officers where necessary. Lack of one is a continuing problem at Franklin and Highland intersection. Because Yucca, north of the project, from Gower, traveling West to Highland, is a two lane street, with Historic buildings on either side prohibiting street expansion, traffic mitigation, without city oversight, will not be handled correctly. As the City does not have the personnel according to budget and cutting back, this is a bad policy at this time.

Response to Comment No. 44-6

The Project's Traffic Study was conducted within the parameters and approved by the Los Angeles Department of Transportation (LADOT), as defined in the Memorandum of Understanding, included as Appendix A to the Traffic Study. The Study concluded that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections. The Study and subsequent letter from the LADOT dated August 16, 2012, and included as Appendix IV.K.2 to the Draft EIR, included Project requirements as mitigation measures to fully or partially reduce impacts.

The Final EIR includes a Mitigation Monitoring and Reporting Program, which is used to implement and monitor the mitigation measures, as well as assigning which City department has enforcement and monitoring oversight. City budgets and personnel to ensure enforcement is beyond the scope of this EIR.

Comment No. 44-7

Already four North South bound streets, Vine, Cahuenga, Highland and La Brea, push traffic through the Cahuenga corridor. This traffic pattern should be kept as "friction less" as possible to facilitate transportation and emergency services. The rail system (Metro Redline) has not alleviated much of this problem to date. Donald Appleyard's San Francisco study subsequently put forth in his 1981 book "Livable Streets" shows how traffic erodes and destroys community which self admittedly the Millennium Project exacerbate. Traffic levels are a problem. But community and emergency routes need to be conserved by the city for the greater good of the people, rather than exploited for a short term solution of a company.

Response to Comment No. 44-7

See Response to Comment No. 44-6 (Dyer, Brian), above. It should also be noted that the Draft EIR contains a detailed analysis of potential traffic impacts in Section IV.K, Transportation, which is supported by numerous technical studies contained as appendices. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 44-8

For these reasons, I would not want the MP to move forward in its current form. It does nothing for the community. In fact, it builds its own community where another already exists. It does not encourage community but divides it. It does not provide solutions to traffic, emergency services and community, but compounds the problems already there.

Response to Comment No. 44-8

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

LETTER NO. 45 - ENGLAND, SUZANNE

Suzanne England
6330 Franklin Avenue, Hollywood, CA 90028

November 30, 2012

Comment No. 45-1

I'm writing to contest the EIR you have approved for the Millennium Hollywood Project. My reasons are as follows:

Response to Comment No. 45-1

The commenter states she is contesting the EIR for reasons which follow and which have been responded to individually. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 45-2

The EIR has not completed a thorough study of the environmental impacts for our area. The infrastructure will be seriously impacted with all of the additional population created with this project. The air quality, noise, police and fire response, sewer usage, road wear and increased traffic locally as well as on the 101 Freeway and Vine Street off ramp, will all be impacted by this project. These things need further study.

Response to Comment No. 45-2

With regard to the commenter's concern with the existing infrastructure surrounding the Project Site, please refer to Response to Comment No. 18-5 (Hollywoodland Homeowners Association (#2)) above.

Air quality, noise, fire response, sewer infrastructure, and increased traffic are all discussed and analyzed in the Draft EIR in Sections IV.B, IV.H, IV.J.1, IV.L.2-1, and IV.K.

Comment No. 45-3

The access for people leaving the hills in their cars will be seriously affected as well, as traffic will become even more dense.

Response to Comment No. 45-3

The Draft EIR acknowledges that the Project would generate additional trips and that significant project-related impacts would occur at two study intersections and significant cumulative-related impacts at five

study intersections. This comment does not challenge the adequacy of the impact analysis of the Draft EIR.

Comment No. 45-4

Air quality is of major concern to me. I already get black soot throughout my apartment that overlooks the city. With the increased traffic, this will also increase.

Response to Comment No. 45-4

The Draft EIR includes a comprehensive discussion regarding the Project's potential air quality impacts related to construction and operation of the Project. Please see Section IV.B.1, Air Quality for an analysis of air quality impacts. To summarize, the Draft EIR analyzes consistency with the applicable air quality management plan and the Air Quality Element of the General Plan of the City of Los Angeles. It also analyzes construction related impacts associated with demolition, site preparation/grading/excavation, and building construction. In addition, it analyzes air quality impacts related to placement of the Project Site in relation to existing sources of air contaminants (including black soot from freeways) and impacts related to long-term operational aspects (including increased traffic related emissions) of the Project. For traffic related air quality impacts in particular, see page IV.B.1-25 of the Draft EIR, which explains how the CalEEMod Version 2011.1 and the traffic study assumptions were used to calculate potential air quality impacts. Also, please note that the Draft EIR and MMRP contain numerous mitigation measures to reduce construction and operational air quality impacts to the extent feasible.

Comment No. 45-5

The noise also concerns me; the increased traffic on the 101 Freeway and the Vine Street off ramp will bring increased traffic noise and the increased population, night clubs, shops, etc., will bring increased noise to the area. Peace of mind and quality of life for local residents must be considered in any community plan.

Response to Comment No. 45-5

The Draft EIR analyzed a logical range of roadway segments in proximity to the Project Site. Aside from the 3.7 dBA CNEL increase during the Existing Traffic Plus Project Traffic Scenario (with No Vine Street Access) for the roadway segment of Ivar Avenue between Yucca Street and Hollywood Boulevard, no other roadway segment analyzed in the Draft EIR would come close to approaching either the 3 dBA or 5 dBA CNEL thresholds of significance. Thus, it is logical to infer that roadway segments located farther from the Project Site (i.e. 101 Freeway) carrying less project-related trips than those segments analyzed in the Draft EIR would experience even smaller project-related roadway noise level increases.

Comment No. 45-6

-The population growth needs to be correctly addressed. The need for more rapid transit and density needs to be studied, based on true population growth, not biased figures.

Response to Comment No. 45-6

The comment addresses population growth and that the Draft EIR needs to accurately address it in its analysis. The Draft EIR accurately addresses population growth and consistency with regional and local plans. The Draft EIR states that the Residential Scenario would contribute toward, but not exceed, the population growth forecast for the City of Los Angeles, and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. Overall, the Project would increase the density of residential uses as identified in the Draft EIR, bringing more housing units closer to major employment centers. This additional density would be located in an area currently served by public transit (Metro Red Line, Hollywood DASH, and LADOT Commuter Express 422 & 423), and would be located near existing transportation corridors. Therefore, the commenter's statement is incorrect, as the Draft EIR accurately addresses this issue.

Comment No. 45-7

-The proposed project removes height limits that were put in place previously. They were put in place for a very good reason-to prevent over development such as this project and to retain the integrity of the area. The heights of the buildings proposed are contrary to the elements of the area. Yucca Ave is mainly a street with low slung buildings, and should remain that way. The skyscrapers and high rises proposed are so out of place that it is ridiculous! It will ruin the whole feel of the area and the quality of life for local residents.

-Preserving the quality of life in the area should be of great importance to the City of Los Angeles. In this case, the residents of the area have been left out of the equation. Yucca Ave, between Argyle and Cahuenga is a very neighborhood friendly place, with small shops and low buildings, creating a relaxed place for local residents to walk their dogs, go for a walk, or enjoy the locality. Placing high rises and skyscrapers here will ruin this whole atmosphere, taking away the friendly neighborhood feel we have, replacing it with an anonymous "any big city" feeling. It will take our neighborhood away. Creating so much density in this part of the city, in Hollywood, is detrimental to the quality of life here.

Response to Comment No. 45-7

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height. Also, it should be noted that the current zoning does not impose a height limit on the Project Site.

Please refer to Topical Response 2, Aesthetics, for information regarding views.

Please see Response to Comment No. 14-5 (Hollywood Heritage), Response to Comment Nos. 19-2, 19-3, 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion in response to the comment that the Project's overall height is out of place with other buildings in Hollywood.

Comment No. 45-8

-Hollywood is special, and should be kept that way. The Capitol Records building is one of a kind, and surrounding it with skyscrapers is incongruent and tasteless. It also reduces the iconic feel of the Capitol Records building and the area, and diminishes its importance. People come to Hollywood to experience a unique place; they can go to any city in the world to see glass and steel skyscrapers and high rises. The views, historic buildings and one-of-a-kind shops in Hollywood are what draw people here; not skyscrapers, chain stores and restaurants that can be found anywhere.

Response to Comment No. 45-8

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Additionally, please refer to Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent historic Capitol Records building.

Comment No. 45-9

-Since there is a major earthquake fault at Yucca and Vine Street, it is a danger to build these skyscrapers in that vicinity. I believe further study should be done on this. In the event of a major earthquake, those skyscrapers would create a huge problem. Large numbers of people would rush out of the buildings into the street, creating even more of a challenge for fire and police vehicles to get through.

Response to Comment No. 45-9

For additional information regarding fault rupture and the potential for a major earthquake to occur, please refer to Response to Comment 24-4 (Anderson, Robert) above.

Comment No. 45-10

-Building with a conscience: I personally don't understand why the planned development of this community does not flow with the existing buildings. Should we not think along the lines of creating buildings that actually work with the classic structures here in Hollywood, instead of against them? If you must fill in every space with dense construction, can they not at least have similar heights to the surrounding area, and similar architectural styles? Just think how wonderful that would look! The future doesn't have to be a Hollywood filled with crappy looking "affordable housing" apartments, cheap-looking hotels (The W), disparate high rises and skyscrapers stuck in between classic buildings.

Response to Comment No. 45-10

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 45-11

-Lastly, and apparently not a serious issue for the City of Los Angeles, is the further blocking of the view of the Hollywood Hills with extremely tall buildings. Part of the charm and attraction of this area is the Hollywood Hills and the Hollywood sign.

Response to Comment No. 45-11

Please refer to Topical Response 2, Aesthetics, for information regarding views.

Please refer to Response to Comment No. 16-3 f Hollywood United Neighborhood Council (#2)) or a discussion on the Project's overall height.

Comment No. 45-12

I care about Hollywood and OPPOSE the current version of the Hollywood Community Plan and Millenium Hollywood Project. It must be modified to take into consideration correct census data, height limits, infrastructure, emergency services, public transportation; and to alleviate density and congestion. I would like to see another EIR performed, but one that takes into account the real figures and problems. The Los Angeles City Council has rushed this through without considering many things. This is a dangerous way to go, creating serious problems for the future in Hollywood. We should not rush into such projects, and should take a long hard look at the affects of projects of this nature on the future.

Response to Comment No. 45-12

The comment is a conclusion statement. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment states that the Draft EIR does not adequately analyze the potential environmental impacts of the Project. The previous comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR. Each of these has a Response to Comment, above.

LETTER NO. 46 - FERRY, EMILY

Emily Ferry
1958 Vista del Mar, Los Angeles, CA 90068

October 27, 2012

Comment No. 46-1

I perused the CD mailed to me by The City of Los Angeles Planning Department with great sorrow and fear.

This project will spell disaster for the Hollywood area.

Response to Comment No. 46-1

The comment expresses an opinion about the project but does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 46-2

Traffic in this neighborhood has already grown to epic proportions and there are many hours of the day when it is just best not to leave the house. The introduction of hundreds (if not thousands) of additional cars will make living in this area impossible.

Response to Comment No. 46-2

The Draft EIR includes a comprehensive analysis on traffic impacts and a traffic appendix. Please see those documents for a discussion on the Project's traffic impacts. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 46-3

The Cahuenga pass cannot be widened- that is just a fact. The confluence of Hollywood and Vine is inexorably bordered on the north, and, in essence, on the east, by the freeway which traverses this narrow throat. What will happen with all those vehicles? The noise! The pollution! The traffic jams!

Response to Comment No. 46-3

Traffic generation, noise impacts due to traffic, and air quality pollutants are all discussed and quantified in the Draft EIR. The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 46-4

What on earth are the developers thinking? Who will benefit from these proposed edifices? Yes, some jobs for construction contractors/workers will be created, but they will be short-term jobs, existing only for the duration of building. Then those of us who reside in the area will be left, trapped.

Response to Comment No. 46-4

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. Nonetheless, it should be noted that the Project will create short-term construction jobs and long-term jobs associated with anticipated land uses and operation of the Project. Please see Section IV.I, Population, Housing, and Employment in the Draft EIR for additional employment information. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 46-5

And where are the tenants for the housing spaces? There are already many empty condos and apartments in this neighborhood.

Response to Comment No. 46-5

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. However, it should be noted that the Draft EIR analyzes population and housing issues in section IV.I, Population, Housing, and Employment. The analysis assesses the Project in comparison to local and regional growth forecast and related housing needs. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration

Comment No. 46-6

Services? What services will be provided by this development? A gym? We already have one nearby. More bars? We do not need more of those- our streets are already filled nightly with screaming revelers, urinating in the street and leaving trash behind.

Response to Comment No. 46-6

It should be noted that the Draft EIR includes a discussion of the Development Agreement associated with the Project, which will contain certain public benefits. In addition, the Project includes mixed land uses could provide new restaurants, enhanced open spaces, and commercial uses that represent an increase in services available at the Project Site. The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 46-7

The historic, iconic Hollywood sign and Capitol Records building have already been eclipsed and pushed aside by new construction. Those are the proud symbols of our neighborhood, the reason that tourists come to Hollywood.

Response to Comment No. 46-7

Please refer to Topical Response 2, Aesthetics, for additional information regarding views and views of the Hollywood Sign.

The Project would retain the Capitol Records Building. Please see Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent historic Capitol Records building.

Comment No. 46-8

I understand that Mayor Villaraigosa and Councilman Garcetti are determined to develop areas around the Metro stops and I do see validity in these desires, but fifty story buildings? And north of Sunset, near the hills, mired beneath the freeway?

Response to Comment No. 46-8

It should be noted that the Draft EIR analyzes project location within the context of land use planning in Section IV.G, Land Use Planning. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 46-9

If this project were to become half the height, half the size, and go near Fountain and Vine (Now that's an ugly intersection!) I would consider supporting it, but under the current description ..... No way, no how, under no circumstances, never, ever, ever!

Response to Comment No. 46-9

It should be noted that the Project Site does not currently contain a height limitation based on existing zoning. Also, the Draft EIR analyzes height issues in Sections IV.A, Aesthetics, IV.C, Cultural Resources, and IV.G, Land Use Planning. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 46-10

This is just the first of many letters and the beginning of my protest. Hollywood has been my home for many years and I will not relinquish her magnificence without a fight.

Response to Comment No. 46-10

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 47 - FOLB, BRIAN

Brian Folb
Authorized Representative, Paramount Contractors & Developers, Inc
6464 Sunset Boulevard, Suite 700, Hollywood, CA 90028

December 6, 2012

Comment No. 47-1

I am writing in support of the Millennium Hollywood Project.

Our company developed several mid-range height (6-12 stories) office buildings in the late 1960's and early 1970's during what was considered a. development boom period for Hollywood. Weak economic conditions slowed things down in the 90's and early 2000's. However, we are seeing a growth trend starting again now with the resurgence of a significant amount of multi-family housing occurring in Hollywood and I don't see this trend slowing down in the near future.

Response to Comment No. 47-1

The comment is an introduction and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 47-2

Further, the Hollywood Community Plan calls for higher density development around the mass transit portals and this project is a perfect fit in accommodating this mandate. We also feel the proposed taller buildings would be appropriate and an asset providing street-level opportunities .for much needed public open space, green space and linkages to existing and planned green space adjacent to the site. The taller buildings will also provide the opportunity for a roof-top public observation deck offering visitors panoramic views of the entire city and the famous Hollywood Sign.

Response to Comment No. 47-2

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 47-3

On the Economic benefits side, 5900 jobs will be created by this project, of which 2900 jobs would be involved directly in the construction of the Project. The anticipated $540 million investment would result in a total economic output of approximately $925 million in L.A. County. At full development, the business activities generated, including household spending has the potential to provide recurring economic output of approximately $230 million and $4.3 million in net recurring revenue to the City of L.A. upon completion. Quimby Fees are an additional benefit.

Response to Comment No. 47-3

This comment describes the economic benefits including revenue and job creation that are projected to occur with construction and development of the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 47-4

The project also intends to preserve and showcase the iconic Capitol Records Building, by creating open public spaces around the area of the building, activating the neighborhood and giving people an opportunity to interact with the famous landmark. The result will create a more public feel to what up to now has been an isolated, private site, bringing in a new population to energize the area, and fostering an active streetscape where none has existed in the past.

Please feel free to contact me personally should you have any questions or require any additional information.

Response to Comment No. 47-4

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 48 - GEOGHAN, JIM #1

Jim Geoghan
HHWNC Traffic Chair

December 4, 2012

Comment No. 48-1

As the newly elected HHWNC Traffic Chair and as a 27 year resident of Hollywood I protest this move totally.

The DEIR report is hundreds of pages and most people have yet to read ANY of it.

This must be delayed so people have a chance to READ this enormous document.

Response to Comment No. 48-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 49 - GEOGHAN, JIM #2

Jim Geoghan
6603 Whitley Terrace
Los Angeles, CA 90068

December 8, 2012

Comment No. 49-1

The Mellennium Project at the proposed 54 stories is a MONSTROSITY - I have lived in Whitley Heights for 27 years - the city should not and cannot approve a building over 540 feet, more than half the height of the Empire State Building.

This plan taxes our services of water and electricity, the response time for the fire and police department and will make traffic worse than it is already.

This project MUST be downsized to keep the community livable.

Response to Comment No. 49-1

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

The Draft EIR analyzed the impacts to water and electricity in Section IV.L, Utilities and Service Systems. The Project's Water Supply Assessment (Appendix IV.J.1 of the DEIR) found that the Los Angeles Department of Water and Power (LADWP) would be able to meet the water demand of the Project, in addition to existing and planned future uses of the LADWP's system. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.

The Los Angeles Fire Department (LAFD) provided a written response on December 14, 2011, for Project. That response, by Captain Mark Woolf stated, in part: "The response times to the proposed site would be within 5 minutes from Fire Station 27. These response times meet the desired response distance standards of the LAFD."

The Los Angeles Police Department (LAPD) provided a written response on August 16, 2012, for the Project. That response, by Commander Andrew J. Smith, stated that average response times for emergency calls for service in the Hollywood Area during 2011 was 4.9 minutes as compared to a citywide average of 5.8 minutes, and a set standard of seven minutes.

The Draft EIR acknowledges that the Project would generate additional trips and that significant project-related impacts would occur at two study intersections and significant cumulative-related impacts at five study intersections.

This comment provides an opinion but does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

LETTER NO. 50 _GERGER, TERRI

Terri Gerger

December 11, 2012

Comment No. 50-1

(*E-mail Subject: How do I see the link online to the Millennium Hollywood Project*)

Under consideration and the letters filed to date in response to the DEIR

For

CASE No: ENV-2011-675-EIR

Response to Comment No. 50-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The commenter was informed, by return e-mail, that the Millennium Hollywood Project DEIR is on the Planning Department's website and was provided with the link and access instructions.

Comment No. 50-2

Thank you.

How do I see the comment letters that have been filed to date?

Response to Comment No. 50-2

The comment letters will be kept on file in the Planning Department, Room 750, City Hall.

Comment No. 50-3

Aren't you going to post them online like you normally do?

Thank you for the information.

Response to Comment No. 50-3

The comment letters will be included in the Final EIR and will be posted online when the Final EIR is released.

LETTER NO. 51 - GOLDSTEIN, JEFFREY

Dr. Jeffrey Goldstein
UCLA School of Dentistry

December 10, 2012

Comment No. 51-1

It is clearly outrageous that projects like this can be rammed though without appropriate studies impacting traffic, fire safety, water a sewer preparations and public safety, overall. Where is Tom LaBonge and Eric Garcetti when it comes to this.

Response to Comment No. 51-1

The Draft EIR analyzed traffic in a comprehensive traffic study according to the guidelines and parameters of the Los Angeles Department of Transportation.

The Draft EIR included a Water Supply Assessment as Appendix L.1 to the Draft EIR, approved by the Los Angeles Department of Water and Power to determine that water supplies were sufficient to serve the Project.

The Los Angeles Fire Department and Los Angeles Police Department were contacted for information as to response times and demands. Mitigation measures are included to reduce, avoid, and eliminate any potential impacts to fire and police service.

The Los Angeles Bureau of Sanitation (BOS) was contacted to analyze sewer impacts. Based on the estimated flow, the sewer system will accommodate the total flow for the Project. As is typical with a large-scale Project, further detailed gauging and evaluation may be needed as part of the permit process to identify the most suitable sewer connection point(s). If, for any reason, the local sewer lines have insufficient capacity, then the Project Applicant will be required to build a secondary line to the nearest larger sewer line with sufficient capacity.

LETTER NO. 52 - GOODWIN, JOHN

John Goodwin
President, Galaxy Press

December 9, 2012

Comment No. 52-1

I am writing to signify my support of the Millennium Hollywood Project. My specific reasons more closely align with the desire to see the continued achievement of Hollywood's renaissance. One of my side projects is the annual Hollywood Christmas Parade, for which I am one of the key organizers and my office is the green room (Hollywood and Sycamore). The intention of this parade is to portray the benefits of and to drive business and activity to Hollywood (the original purpose of the parade over 80 years ago.) I am thus very supportive of activities which seek to validate Hollywood as a regional center.

Having the Metro Red Line at Hollywood and Vine, makes public transportation a very viable option to get in and out of Hollywood at this site if visitors choose not to drive.

As a member of the Board of the Hollywood Chamber, there are additional attendant benefits to this project: namely the estimated 5,900 total jobs created (2,900 jobs in the construction alone) and at full development, the business activities generated, including household spending has the potential to provide recurring economic output of approximately $230 million and $4.3 million in net recurring revenue to the City of Los Angeles upon completion.

Response to Comment No. 52-1

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 53 - GREEN, WENDY

Wendy Green

December 6, 2012

Comment No. 53-1

As a member of the public who will be very much affected by this project, I want to say that it has been next to impossible to find out about where it is in the approval process. I just spent half an hour on the official city website, and called and emailed appropriate parties (as best I could determine) to find out about that very thing, to no avail whatsoever. The public is not informed. It certainly should be with a project of this magnitude. I am begging those involved with deciding the future of my neighborhood and quality of life for more time. Please extend the deadline.

Response to Comment No. 53-1

As defined by Section 15050 of the CEQA Guidelines, the City of Los Angeles Planning Department is the Lead Agency for the Project. A Notice of Preparation (NOP) was prepared and circulated on April 28, 2011 through May 31, 2011 for the required 30-day review period.

The Draft EIR Notice of Availability was mailed out to an area 500 foot radius from the Project Site, as well as to a list of owners and occupants and agencies provided by the City Planning Department. In addition, the Notice was advertised in the Los Angeles Times on the first day of public review, October 25, 2012. The Draft EIR was made available for review on the City's website and in person at City Hall, as well as digital copies at local area libraries.

The preparation of the Final EIR (including responding to comments received on the Draft EIR) will be finished before the entitlement, hearing and approval process. A Notice of Public Hearing by the Advisory Agency/Hearing Officer is scheduled for February 19, 2013. The notice was mailed out to owners, occupants, and others, within a 500-foot radius of the Project.

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 54 - GREGORIAN, LUCY

Lucy Gregorian

December 10, 2012

Comment No. 54-1

My dog and I will actually fall for it.

Response to Comment No. 54-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 55 - HALLINAN, EDA

Eda Hallinan

December 9, 2012

Comment No. 55-1

It is really hard for me to believe that City Council will approve these two ridiculous buildings in our small Hollywood community. Change is natural, but there is no one who actually cares about our community of Hollywood who could approve these two monstrosities.

Response to Comment No. 55-1

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 55-2

How is it possible that city council has not yet protected us in Hollywood by passing building height restrictions in the Vine corridor?

Response to Comment No. 55-2

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 55-3

How is it possible that there could be a vote on this proposal when there is has not yet been a traffic study.

Response to Comment No. 55-3

A traffic study was prepared and discussed in Section IV.K.1, Transportation - Traffic, of the Draft EIR.

Comment No. 55-4

I urge you to extend the public comment period -- to give time to the community to really see what the plans are. There was not enough of a public comment period for people who actually live here to make voice their opinions. Now that these drawings exist let us truly air them and let people know their opinions count.

Response to Comment No. 55-4

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 56 - HODOUS, BARBARA

Barbara Hodous
Berkes Crane Robinson & Seal LLP

December 10, 2012

Comment No. 56-1

I am writing to express my vehement opposition to the ugly and unnecessary high rise towers proposed to be erected near Vine. A great deal of the appeal of Hollywood (and Los Angeles in general) is that one can see the hills from many places, even when one is driving in the midst of the Hollywood commercial districts. This ability to see the land and the beautiful hills, despite the traffic and congestion, is much of what distinguishes Hollywood and Los Angeles from most other major cities. Hasn't anyone learned from the disastrous high rise at Sunset and Vine which sat hideous and unused for years?

Response to Comment No. 56-1

Please refer to Topical Response 2, Aesthetics, for additional information regarding views.

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 56-2

There is no need for such ugly high rise buildings which will only destroy the city, destroy the panorama, add to traffic (assuming these monstrosities can be filled, which I doubt) and generally make life more difficult and unpleasant. This project should be stopped! I am a long-time Hollywood resident, extremely distressed by such bad decisions on the part of city planners, etc. I will not vote for anyone who approves such a project.

Response to Comment No. 56-2

Please refer to Topical Response 2, Aesthetics, for additional information regarding views. Also, please note that the Draft EIR contains extensive traffic analysis and supporting technical information. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

LETTER NO. 57 - HOLMES, MARY

Mary Holmes

December 6, 2012

Comment No. 57-1

As a member of the public who will be very much affected by this project, I want to say that it has been next to impossible to find out about where it is in the approval process. I just spent half an hour on the official city website, and called and emailed appropriate parties (as best I could determine) to find out about that very thing, to no avail whatsoever. The public is not informed. It certainly should be with a project of this magnitude. I am begging those involved with deciding the future of my neighborhood and quality of life for more time.

Response to Comment No. 57-1

As defined by Section 15050 of the CEQA Guidelines, the City of Los Angeles Planning Department is the Lead Agency for the Project. A Notice of Preparation (NOP) was prepared and circulated on April 28, 2011 through May 31, 2011 for the required 30-day review period.

The Draft EIR Notice of Availability was mailed out to an area 500 foot radius from the Project Site, as well as to a list of owners and occupants and agencies provided by the City Planning Department. In addition, the Notice was advertised in the Los Angeles Times on the first day of public review, October 25, 2012. The Draft EIR was made available for review on the City's website and in person at City Hall, as well as digital copies at local area libraries.

The preparation of the Final EIR (including responding to comments received on the Draft EIR) will be finished before the entitlement, hearing and approval process. A Notice of Public Hearing by the Advisory Agency/Hearing Officer is scheduled for February 19, 2013. The notice was mailed out to owners, occupants, and others, within a 500-foot radius of the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 57-2

Please extend the deadline.

Response to Comment No. 57-2

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 58 - ILES, ALEXA

Alexa Iles

December 6, 2012

Comment No. 58-1

Please note that a signed hard copy of the extension request letter attached will be mailed with a signature.

Response to Comment No. 58-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 59 - JORDON, DAVID

David Jordon
6230 Yucca LLC

December 10, 2012

Comment No. 59-1

We are the owner of the property located at 6320 Yucca Avenue which is immediately adjacent to the proposed Millennium Hollywood project and would be one the properties most impacted by this massive project. Based on our preliminary evaluation, we are concerned that the DEIR does not adequately analyze the potential environmental impacts of the project and contains a number of inaccuracies and false assumptions that does not fully disclose all impacts. Moreover, we are concerned that the proposed project sets a dangerous precedent by proposing significantly more development than allowed for the project site under the updated Hollywood Community Plan which created maximum floor area parameters for the project site that are consistent with adjacent properties. Our concerns include, but are not limited to, the following:

Response to Comment No. 59-1

The comment is an introduction and states that the Draft EIR does not adequately analyze the potential environmental impacts of the Project and contains a number of inaccuracies and false assumptions that does not fully disclose all impacts. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

With regard to the concern stated in the comment regarding more development than allowed in the Hollywood Community Plan Update, please see Section IV.G Land Use and Planning of the Draft EIR for information regarding the Project's consistency with the Hollywood Community Plan Update. See Response to Comment 59-14 (Jordon, David) below for additional information regarding FAR and the Hollywood Community Plan Update.

The subsequent comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR. Each of these has a Response to Comment, below.

Comment No. 59-2

1. General Comments

- The project description is unclear and seems intentionally nebulous. The DEIR is more akin to a programmatic EIR than a project EIR, in that it allows for an almost infinite number of use and square footage permutations, as well as different use distribution and site access schemes. It is impossible to understand the maximum build out scenario and how it impacts the community. An

accurate project description is fundamental to fulfilling the purpose of CEQA to inform the public. This project description fails in that regard. It should be redone and recirculated for public comment.

- It is unclear whether the equivalence formula really considers all impact parameters. This lack of clarity disguises potentially significant impacts and obscures full and accurate public information about the project.

Response to Comment No. 59-2

The commenter asserts that the Project is not clear and seems intentionally nebulous. The Project Description in the Draft EIR includes a range of options that could result from the Project. The proposed Project presents several scenarios with the provision that the final development may be any combination of the uses analyzed in the Draft EIR. The Project Description is stable and presents the information required by CEQA to provide a meaningful basis for environmental review. It does not intend to be nebulous.

As described in Section II, Project Description, of the Draft EIR on Page II-21, "[t]hrough the analysis of the Concept Plan and two additional scenarios, the Commercial Scenario and the Residential Scenario, further described below, this Draft EIR analyzes the greatest potential impact on each environmental issue area..." Thus, the most intense impacts from each scenario represent the greatest environmental impacts permitted for any development scenario for the Project. This "worst-case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. *Dusek v. Redevelopment Agency*, 173 Cal. App. 3d 1029, 1041 (1985); *County of Inyo v. City of Los Angeles,* 71 Cal. App. 3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved). Therefore, the Project Description in the EIR includes a range of options that could result from the Project. CEQA does not prohibit an EIR from analyzing a range of potential options for a single project.

With regard to the portion of the comment that states that it is impossible to understand the maximum buildout and impacts, CEQA and the City of Los Angeles provide essential flexibility tools to applicants so that projects can respond to the ever-changing real estate market and needs of the Hollywood area. While flexibility is contemplated in the Development Agreement with regard to particular land uses, siting, and massing characteristics, the Draft EIR analyzes and discloses all potential land uses, the maximum FAR (6:1), and all potential environmental impacts. In addition to the identified development scenarios listed in the Draft EIR, the proposed Equivalency Program would provide development flexibility so that the Project could respond to the growth of Hollywood and market conditions over the build-out duration of the development. Land uses to be developed would be allowed to be exchanged among the permitted land uses so long as the limitations of the Equivalency Program are satisfied and do not exceed the analyzed upper levels of environmental impacts that are identified in the Draft EIR or exceed the maximum FAR.

It is the intent of the Equivalency Program to allow development flexibility with respect to the buildout of the Project. Specifically, the Equivalency Program would provide development flexibility so that the Project could respond to the growth of Hollywood and market conditions over the build-out duration of the development. The City of Los Angeles has given developers a tool to allow the exchange of land uses among the permitted uses, so long as the limitations of the Equivalency Program are satisfied and do not exceed the analyzed upper levels of environmental impacts identified in the Draft EIR or exceed the maximum Floor Area Ratio (FAR).

Development proposed through the Equivalency Program allows the Applicant to construct land uses and structures that are consistent with the growth of Hollywood and local economy at the time of construction. It does not allow the Applicant to propose land uses that are not identified and studied in the Draft EIR nor does it allow any use to be proposed in excess of the studied impacts. Through the analysis of the Concept Plan and two additional scenarios, the Commercial Scenario and the Residential Scenario, the Draft EIR analyzes the greatest potential impact on each environmental issue area.

Comment No. 59-3

- The Development Agreement is key information that is excluded from the DEIR. The applicant proposes that the development standards and regulations for the project are established in the Development Agreement which would serve as the regulatory document for future development. A Development Agreement is not a tool to create special development standards that in certain instances propose more lenient standards than the City's zoning code. What the applicant really wants is a Specific Plan approved via a Development Agreement which is not typically used for such purposes. If the applicant wants special regulations, the appropriate vehicle should be a Specific Plan which must be analyzed in the DEIR and available to the public for full review and comment. Failing to include the draft Development Agreement deprives the public of a meaningful opportunity to comment on the DEIR.

Response to Comment No. 59-3

The purpose of an EIR is to disclose, analyze and propose mitigation for the significant environmental impacts of a project, and alternatives to the project. Public Resources Code Section 21002.1(a). The impacts that must be assessed are those that alter the physical environment. Public Resources Code Section 21060.5.

The CEQA Guidelines authorize an EIR to "incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public." 14 Cal. Code Regs. § 15150(a). The Guidelines provide that "incorporation by reference is most appropriate for including long, descriptive or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." 14 Cal. Code Regs. § 15150(f)

The impacts that are to be analyzed in an EIR are those that result from the actual development of buildings, structures, infrastructure and other physical changes or improvements to existing conditions in the project area. The Development Agreement does not itself direct construction or improvements, but authorizes the project over a defined period of time and provides certainty by precluding further changes to the land use controls applicable to the project site over the term of the agreement. Accordingly, the Development Agreement is an appropriate document to incorporate by reference.

The actual physical form of the Project and the dimensions of what changes will occur to the existing physical environment, are derived from the Development Regulations that the Project must comply with pursuant to the provisions of the Development Agreement. The Draft EIR clearly discloses the relationship between the Development Agreement and the Development Regulations. The text of the Draft EIR provides summaries of pertinent provisions from the Development Regulations in each section. To provide a comprehensive basis for analyzing potential Project development forms the Draft EIR includes the full text of the Development Regulations in an appendix.

The CEQA Guidelines further provide that a document incorporated by reference "shall be made available to the public for inspection at a public place or public building" and "at a minimum, the incorporated document shall be made available to the public in an office of the lead agency in the county where the project would be carried out. . . ." 14 Cal. Code Regs. § 15150(b). The Draft EIR complies with this Guideline, since the Draft EIR provides notice to the public on the first page of the Development Regulations appendix that the full text of the Development Agreement is on file with, and may be reviewed at, the offices of the Los Angeles Department of City Planning that is acting as the lead agency for the CEQA review of the Project.

The CEQA Guidelines also provide that "where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of the EIR." 14 Cal. Code. Regs Section 15150(a). The Development Agreement is therefore not omitted from the Draft EIR, but is properly included through incorporation by reference as expressly authorized by the CEQA Guidelines.

A specific plan is not an appropriate means of authorizing the project. Essential to the feasibility of the project is the certainty and stability of the land use controls applicable to the site over the lengthy term required for financing, construction and occupancy of the proposed developments. While a specific plan may provide a set of detailed height, bulk and use parameters for an area as small as the project site, it is subject to modification or amendment at any time and would not meet this basic criteria for project viability. A Development Agreement is required to specify, among other terms of development, "the permitted uses of property, the density or intensity of use, [and] the maximum height and size of proposed buildings" Government Code Section 65865.2. The proposed Development Agreement for the project contains, through the Development Regulations, controls on each of these topics.

There is also no basis for the assertion in the comment that the Project should be authorized by a specific plan because it proposes more lenient standards than the City zoning code. To the extent that proposed

development features require discretionary approvals pursuant to the Los Angeles Municipal Code the Project entitlement applications make specific requests for these approvals, and each of these is listed in the Draft EIR.

Comment No. 59-4

2. Aesthetics

- The DEIR concludes that the proposed project would not create a significant shade and shadow impact. However, the shade and shadow study clearly shows that according to the City's significance criteria the project would result in a significant shade and shadow impact on our entitled residential project at 6230 Yucca. This is an undisclosed significant impact that requires recirculating the DEIR.

Response to Comment No. 59-4

This comment asserts that the Project would result in a significant shade and shadow impact upon a future but currently non-existing building at 6230 Yucca Street. Section 15125(a) of the CEQA Guidelines requires that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

As it may relate to the commenter's assertion that an entitled project should be considered a sensitive receptor, the Supreme Court has found that "the impacts of a proposed project are ordinarily to be compared to the actual environmental conditions existing at the time of CEQA analysis, rather than to allowable conditions defined by a plan or regulatory framework." (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 320-321). This line of authority includes cases where a plan or regulation allowed for greater development or more intense activity than had so far actually occurred, as well as cases where actual development or activity had, by the time CEQA analysis was begun, already exceeded that allowed under the existing regulations. In each of these decisions, the appellate court concluded the baseline for CEQA analysis must be the existing physical conditions in the affected area, that is, the real conditions on the ground rather than the level of development or activity that could or should have been present according to a plan or regulation.

Applied here, at the time the environmental analysis for the Draft EIR commenced, the property at 6230 Yucca Street was improved with the former KFWB Studio Building. The former KFWB Studio Building was subsequently demolished by the time the NOP was published, but remained unimproved. To date, the site still remains undeveloped. A vacant lot does not meet the stated criteria as defined in the LA CEQA Thresholds Guide to be considered a sensitive receptor for purposes of assessing shade and

shadow impacts notwithstanding the fact that development is permitted on the lot whether by right or by virtue of a specific approval.

In accordance with the guidance set forth in the LA CEQA Thresholds Guide, the criteria used to determine whether a particular land use should be considered a shadow sensitive uses should be based on the type of land use, the existing conditions of the subject property, and whether there appears to be a reasonable expectation for a significant amount of direct sunlight on the property. Although it is acknowledged that the property at 6230 Yucca Street is entitled for and proposed to be developed with a multi-story residential development, the site remains vacant and does not contain any residential land uses or occupants. Thus, the adjacent property does not contain any shade and shadow sensitive land uses.

Furthermore, in the event the property at 6230 Yucca Street is developed with residential land uses in the future, the future inhabitants of this building would choose to reside in this location with the knowledge of the proposed Hollywood Millennium Project and its proposed building heights, and thus would not have a reasonable expectation for direct sunlight from the westerly and southerly facing units. The resulting shadows created by the Project would not constitute a significant environmental impact upon residential units. The resulting impact from the Project's shadow patterns would be no different than a north-facing unit in the same building that receives no direct sunlight throughout the day. Therefore, the Project's shade and shadow impacts upon this adjacent property are considered less than significant pursuant to the environmental baseline and the Project's potential impacts.

Comment No. 59-5

3. Air Quality

- The project will result in significant long term operational ROG and NO impacts, yet the AQMP consistency analysis on p. IV.B.l-31 focuses only on CO. This obscures a significant impact from meaningful public input.

Response to Comment No. 59-5

Page IV.B.1-31 of the Draft EIR regarding the AQMP consistency analysis states, "*[a]s discussed in more detail below*, the Project would result in construction and operational air quality emissions that exceed the SCAQMD thresholds of significance at the project level." (Emphasis added.) The section that follows starting on page IV.B.1-35 provides eleven pages of analysis regarding the Project's ROG and NOx impacts that exceed SCAQMD thresholds of significance and the mitigation provided. The record of comments received with ideas on further reductions to the Project's ROG and NOX emissions demonstrates that the City has received meaningful public input on the Project's air quality impacts and that there is a clear understanding of those impacts. In addition to the referenced section of the Draft EIR's ROG and NOx analysis, the AQMP consistency analysis also provides a discussion on both of the required criteria in determining a project's consistency with the AQMP. Specifically, the AQMP consistency analysis discusses the Project's regional operational air quality emissions, potential to create

CO Hotspots, the Project's population, housing and employment impacts, consistency with SCAG's Compass Growth 2% strategy, and reductions in the Project's VMTs through locating density in an area currently served by public transit (i.e., the Hollywood and Vine Metro Red Line Station, Hollywood DASH, and LADOT Commuter Express 422 & 423). In other words, the Draft EIR does not just focus on CO as claimed in the comment.

Further analysis of the Project's consistency with the AQMP is found in the cumulative impact section on Draft EIR page IV.B.1-53 to 57. While the Draft EIR has accurately concluded that Project air quality emissions would, in fact, exceed the project level thresholds, the location and type of such development projects is equally relevant in determining whether the Project will be consistent with the goals and objectives of the AQMP. The Draft EIR focuses the Project's AQMP consistency analysis on these parameters. Specifically, page IV.B.1-31 and 32 state projects that are consistent with the projections of employment, population and housing forecasts identified by SCAG are considered to be consistent with the 2007 AQMP growth projections since the forecast assumptions by SCAG form the basis of the land use and transportation control portions of the 2007 AQMP. Accordingly, due to the Draft EIR's evaluation of the Project against the two criteria for consistency with regional plans and the regional AQMP adopted by the SCAQMD, the Draft EIR appropriately analyzed the Project's consistency with the AQMP and correctly determined this impact to be less than significant.

Comment No. 59-6

- The construction assumptions are not spelled out clearly. Given the amount of excavation, the PMlO and PM2.5 emissions in Table IV. B-10 and IV.B-11 seem very low.

Response to Comment No. 59-6

The commenter states that construction assumptions are not spelled out clearly and that the emissions seem low. Pages IV.B.1-35 and IV.B.1-26 of the Draft EIR include a comprehensive discussion regarding the Project's construction assumptions utilized in the air quality impact analysis. Specifically, the analysis details the construction timeline for demolition, site preparation/grading/excavation, and building construction. In addition, the Draft EIR details the volume of demolition, soil export, and construction equipment fleet mixes that would occur for each construction phase, including the number of hours per day.

Additionally, the total PM_{10} and $PM_{2.5}$ emissions disclosed in the Draft EIR accurately reflect the Project's potential air quality emissions. It should be noted that Mitigation Measure B.1-1 ensures compliance with SCAQMD Rule 403 – Fugitive Dust, which would serve to reduce PM_{10} and $PM_{2.5}$ dust emissions by as much as 61% during the construction phases.

Comment No. 59-7

- The LST analysis on page IV.B.l-44 is based on the SCAQMD look up tables. These tables do not reflect the most current federal $N0_2$ thresholds. Thus, impacts may be understated. The

impacts should be re-run according to the federal standards and publicly disclosed in a recirculated EIR.

Response to Comment No. 59-7

As disclosed in Appendix IV.B.1, Air Quality Data Sheets, to the Draft EIR, the Project's LST mass rates were adjusted for the revised federal NO_2 ambient air quality standard (0.10 ppm).

Comment No. 59-8

- There is no LSI analysis for operations. This failure obscures potentially significant impacts. LST analysis for operations is standard and is included in most City of Los Angeles EIRs. An LST analysis should be prepared and re-circulated for public review.

Response to Comment No. 59-8

As discussed on page IV.B.1-25 of the Draft EIR, the SCAQMD has developed LSTs that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. However, because the LST methodology is applicable to projects where emission sources occupy a fixed location, LST methodology would typically not apply to the operational phase of this Project because emissions are primarily generated by mobile sources traveling on local roadways over potentially large distances or areas. As discussed on page 1-3 of the SCAQMD's guidance document for Sample Construction Scenarios for Projects Less than Five Acres in Size (February 2005), LSTs would apply to the operational phase of a project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site. For example, the LST methodology could apply to operational projects such as warehouse/transfer facilities. As the Project would include a mixed-use development and would not include long periods of motor vehicle queuing and idling at the Project Site, an operational analysis against the LST methodology is not applicable and thus was not included the Draft EIR. No further analysis is warranted or required by CEQA.

Comment No. 59-9

- The DEIR at page IV.B.l-52 claims that the project is substantially consistent with the CARB siting guidelines because most of the residential receptors would be located beyond 500 feet from the freeway. The project is either consistent or it is not. "Mostly consistent" implies that there are potentially significant impacts for some residential receptors. These impacts should be identified and the analysis recirculated.

Response to Comment No. 59-9

The Draft EIR accurately discloses the existing health risks and ambient air quality conditions at the Project Site and surrounding area due to the proximity to the 101 Freeway. Page IV.B.1-52 of the Draft

EIR states that approximately 98.6% of the Project's proposed development area would be located farther than 500 feet from the 101 Freeway. The Draft EIR does not imply that there would be potentially significant impacts to some residential receptors. Rather, the Draft EIR clearly identifies impacts on the Project from the existing air quality environment due to the 101 Freeway as significant and unavoidable. Specifically, page IV.B.1-53 of the Draft EIR states the Project Site is located in an existing ambient air quality environment that exceeds air quality standards due to heavy traffic on the 101 Freeway.

It is important to note the CEQA does not require an analysis of the environment's impacts on a project. See Response to Comment No. 08-2 (Southern California Association of Governments), which summarized the case law regarding this issue. In short, the purpose of CEQA is "not to protect proposed projects from the existing environment" (*Baird v. County of Contra Cost*a (1995) 32 Cal.App.4th 1464; Pub. Res. Code Sections 21061, 21083(b), and 21060.5.) "[C]ourts have recognized that CEQA is not a weapon to be deployed against all possible development ills." (*South Orange County Wastewater Authority v. City of Dana Point* (2011) 196 Cal. App. 4th 1604, 1614.) It has a limited role. "The Legislature did not enact CEQA to protect people from the environment." (*Id*. at 17-1618.) "We agree with [SOCWA v. County of Orange], that the Guidelines [15126.2]... is not an example of an environmental effect caused by development, but instead is an example of an effect on the project caused by the environment. Contrary to Guidelines section 15126.2, subdivision (a), we hold that an EIR need not identify or analyze such effects.... Although the Guidelines ordinarily are entitled to great weight, a Guidelines provision that is unauthorized under CEQA is invalid." (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 474.)] Still, in good-faith, and as listed in responses to Comment Letter No. 08 from SCAQMD, the Final EIR includes additional mitigation measures to address air quality impacts caused by the existing air quality environment at the Project Site.

In addition, the Draft EIR's air quality impact analysis is supported by an HRA, which has quantified and disclosed the potential air quality health risks associated with the Project Site location consistent with the recommendations of CARB and the Department of City Planning. The Project Site is located in an ambient air quality environment that would expose sensitive receptors to elevated TACs that cannot be mitigated below a level of significance by the Project. Therefore, the related impacts associated with exposure to existing TACs were appropriately disclosed as significant and unavoidable in the Draft EIR. Therefore, CEQA does not require recirculation of the air quality analysis contained in the Draft EIR.

Comment No. 59-10

- The DEIR's conclusion of no significant impacts due to project related TAC emissions at page IV.B.l-52 is unsupported by any facts. As construction could occur until 2035 and thus expose sensitive receptors to TACs over a long period, the DEIR should have included an HRA for construction emissions.

Response to Comment No. 59-10

The commenter states that the Draft EIR's conclusions regarding TAC emissions are unsupported. The Draft EIR contains an HRA in Appendix IV.B.3 that provides a detailed analysis of the health risks at the Project Site due to existing air quality conditions (see page 6 of the HRA). Regarding construction, and pursuant to the terms of the Development Agreement, construction may occur up to the year 2035, but that does not mean that construction activities would be continuous from now until 2035. Instead, the Draft EIR states (page II-44) that the Project could be developed in one phase or a number of phases; and that in the in the event the Project is developed in one phase, construction could be complete in approximately 30-36 months. Accordingly, the Project does not propose long-term and continuous construction activities at the Project Site from breaking ground until 2035, but rather these activities could occur anytime between Project commencement and 2035. Thus, while the Project is seeking flexibility as to when the construction activities could occur, construction related TAC emissions would occur over short-term and intermediate periods. These types of Project construction activities do not warrant a health risk assessment because such assessments are based on exposure durations consisting of 30 to 70 years of continuous 24-hour a day, 7 days per week of activity. Nevertheless, an HRA was prepared to disclose potential health risks associated with Project Site air quality conditions. In summary, the Draft EIR includes that appropriate evidence (the HRA) and discloses impacts related to TACs at the Project Site.

Comment No. 59-11

- The mitigation measures, commencing on page IV.B.l-60, are very limited and should be expanded to include, at a minimum:
    - All construction Tier 4 construction equipment should be used from 2015 on;
    - Non-VOC paints and finishes shall be used;
    - The project should install filters rated MERV 17 or higher;
    - The project should install cool roofs;
    - All outdoor lighting should be LED;
    - The project should maximize solar panel use;
    - The project should install DPM filters on all emergency generators;
    - The project should include EV charging stations and an alternative fuel station; and
    - The project should use only alternative fuel maintenance equipment.

Response to Comment No. 59-11

It should be noted that the commenter does not raise a specific issue or challenge regarding the adequacy of the impact analysis of the Draft EIR, but rather generally suggests mitigation measures that could be applicable to the Project or any other project. In other words, the commenter has provided no nexus between the Project and the mitigation measures suggested. Granted, an EIR should respond to comments making specific suggestions for mitigating a significant impact unless the suggested mitigation is facially infeasible. An EIR need not, however, explain why suggested mitigation measures that are described in general terms and are not specific to the project are infeasible. *Santa Clarita Org. for Planning the Env't v City of Santa Clarita* (2011) 197 CA4th 1042, 1055, 129 CR3d 183. Nonetheless, in good faith this response elaborates on additional air quality mitigation measures that have been added in the Final EIR based on specific comments regarding potential environmental impacts associated with the Project. For example, please see Response to Comment Nos. 08-2, 08-3, and 08-4 (Southern California Association of Governments), which set forth additional air quality mitigation in response to the comment letter submitted by SCAQMD.

Comment No. 59-12

4. Geology

- The amount of export appears to be severely underestimated based on the proposed number of subterranean parking levels. Therefore, construction air quality, noise and traffic impacts may also be understated. An updated soil export analysis should be required for the Final EIR, and a mitigation measure should require a final export analysis prior to issuance of building permits because the analysis will be more accurate when based on construction-level detail drawings. If the soil export increases, subsequent environmental analysis should be required.

Response to Comment No. 59-12

Site grading would include excavating the West and the East Sites up to 6 levels below grade for the construction of subterranean parking garage levels and building foundations. As stated in the Draft EIR, it is estimated that the Project will require the export of approximately 333,515 cubic yards of soil during the excavation phase. The comment provides no evidence to support its claim that this export figure is inaccurate. The Draft EIR explains that excavation would occur for approximately 14 months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations; and that in total, the Project would require approximately 333,515 cubic yards of soil to be hauled off-site.

Additionally, the Draft EIR discloses that the construction phase includes the construction of the proposed buildings, connection of utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site. This phase would also include the removal of all trees, walls, fences, parking related facilities, and asphalt and concrete. In total, approximately 240 cubic yards of site

improvements and approximately 585 cubic yards of asphalt/concrete would be removed and hauled off-site.

It should also be noted that in order to reduce potential impacts to a less than significant level, the Project proposes mitigation measures D-1 and D-2 in Section IV.D, Geology and Soils, of the Draft EIR. Specifically, these mitigation measures would require the Project Applicant to submit a final geotechnical report to the Department of Building and Safety prior to any construction work at the Project Site.

Comment No. 59-13

5. Hydrology

- The project will require dewatering, which can induce settlement. However, the impacts on nearby fragile structures (Pantages, Avalon, Capital Records echo chambers) are not addressed. There is no substantial evidence in the Draft EIR or its appendices to address the known potential impact of settlement from de-watering.

Response to Comment No. 59-13

The comment states that dewatering can induce settlement. However, the comment provides no evidence to support this technical claim. As noted in the Draft EIR, the Project would include up to six levels of below-grade parking on the East Site and the West Site. Construction of the Project would require only temporary dewatering for the deep excavations for these below-grade parking structures. No permanent dewatering would be required since the subterranean parking structures would be designed and constructed to withstand hydrostatic pressure associated with groundwater. As discussed below, the hydrology and geotechnical studies prepared for the Draft EIR did not conclude that dewatering would induce settlement to the extent that there would be a significant impact. Thus, the comment is unsubstantiated.

Additionally, the commenter states that the potential risk to neighboring structures from settlement caused by dewatering was not addressed. As discussed in Section IV.F, Hydrology and Water Quality, of the Draft EIR, it is during the construction phase, particularly during deep excavations, that construction activities may extend below the ground water level and necessitate dewatering. These activities and their potential impacts to neighboring structures are discussed on Pages IV.F-16 through IV.F.21 of the Draft EIR. Further, these activities would be addressed via obtaining a permit from the City for the temporary discharge of dewatering effluent from the Project Site.

Additionally, it should be noted that the Draft EIR contains Appendix D, Preliminary Geotechnical Engineering Study, which assessed geological and settlement conditions on the Project Site. In addition, the Geology and Soils and the Cultural Resources sections of the Draft EIR each contain a mitigation measure (C-2 and D-10, respectively) that requires an adjacent structure monitoring plan that ensures protection of adjacent historic structures. Those same sections of the Draft EIR (Section IV.C, Cultural

Resources, pages IV.C-29 to IV.C-33) analyze potential impacts to nearby historic structures. Thus, contrary to the commenter's statement, potential impacts were analyzed and supported with evidence.

Comment No. 59-14

6. Land Use

- The updated Hollywood Community Plan, adopted only a few months, placed a Q condition on the project site that limits the maximum FAR to 4.5:1 which is consistent with surrounding properties. The proposed zone change and FAR of 6:1 is not compatible with the Community Plan and surrounding properties. This reduced FAR was adopted in part to reduce aesthetic and land use impacts resulting from incompatibly large developments. No substantial evidence supports the conclusion that the project is consistent with the updated Hollywood Community Plan.

Response to Comment No. 59-14

With regards to the compatibility of the Project with the Hollywood Community Plan Update (the Update), substantial evidence exists in Section IV.G, Land Use Planning, of the Draft EIR to demonstrate the Project's consistency with the Update. For example, see Table IV.G-4, Hollywood Community Plan Update Consistency Analysis, on pages IV.G-37-48, for a detail analysis of the compatibility of the Project with the relevant goals and policies of the Update. Further, a "Q" condition was placed on the Project Site pursuant to the Update. The "Q' condition does not regulate the Floor Area Ratio (FAR), the "Q" condition places a use restriction on the Project Site to prohibit residential use only. The Project is consistent with the "Q" condition because it is a mixed use project and would not have only a residential use.

With respect to FAR, the C4-2D-SN zone corresponds with Height District No. 2. Pursuant to LAMC Section 12.21.1(A)(2), Height District No. 2 allows a maximum FAR of 6:1 and does not specify a height restriction. However, the Height District No. 2 classification for the Project Site is further regulated by a "D" Development Limitation, imposed by Ordinance No. 165,659, effective May 6, 1990. The "D" Development Limitation restricted the floor area on the Project Site to three times the buildable area of the lot, or a FAR of 3:1. The Update modified the "D" Development Limitation for the Project Site to increase the FAR from 3:1 to 4.5:1. The modified 'D" limitation in the Update also allows for a 6:1 FAR on the Project Site, provided that a project complies with a few conditions. While the Project Applicant is requesting that the City remove the "D" limitation from the Project Site', thereby resulting in a FAR of 6:1, this is not inconsistent with the Update because the Update allows for a 6:1 FAR on the Project Site. Also, the zone change is consistent with the Update because the Project Site retains the Regional Center Commercial land use designation under the Update and the C2 zone (which is the requested zoning) is an allowable zone within the Regional Center Commercial land use designation.

Comment No. 59-15

- The project proposes supergraphic signage and states they are permitted in the Hollywood Signage Supplemental Use District. The Hollywood Signage SUD was amended which prohibits supergraphic signs. This error results in a significant land use impact because the purpose of the amended sign ordinance was to avoid the aesthetic environmental impact of supergraphic signage.

Response to Comment No. 59-15

The commenter is correct that Ordinance 181,340 amended the Hollywood Signage Supplemental Use District (SUD). The amended SUD does not allow for supergraphics. Nevertheless, the Project does not propose supergraphic signs.. Please refer to Section IV, Corrections and Additions to the Draft EIR, of this Final EIR, for updated language regarding the Hollywood Signage SUD. Also, the proposed Development Regulations have been revised to reflect the amended ordinance, with which the Project will comply. The revised text of the Development Regulation is also listed in Section IV, Corrections and Additions to the Draft EIR, of this Final EIR. The revised page is also included on the following page.

11. SIGNAGE

11.1 Hollywood Signage Supplemental Use District

Signage shall be subject to Ordinance No. 181340: Hollywood Signage Supplemental Use District (Amended) pursuant to Section 13.11 of the Los Angeles Municipal Code.

11.2 Modification to Guidelines

Notwithstanding Section 11.1, high-rise signs located within 24 feet from the top of the building and meeting the requirements of the Building Code shall be permitted. See fig. 11.2.

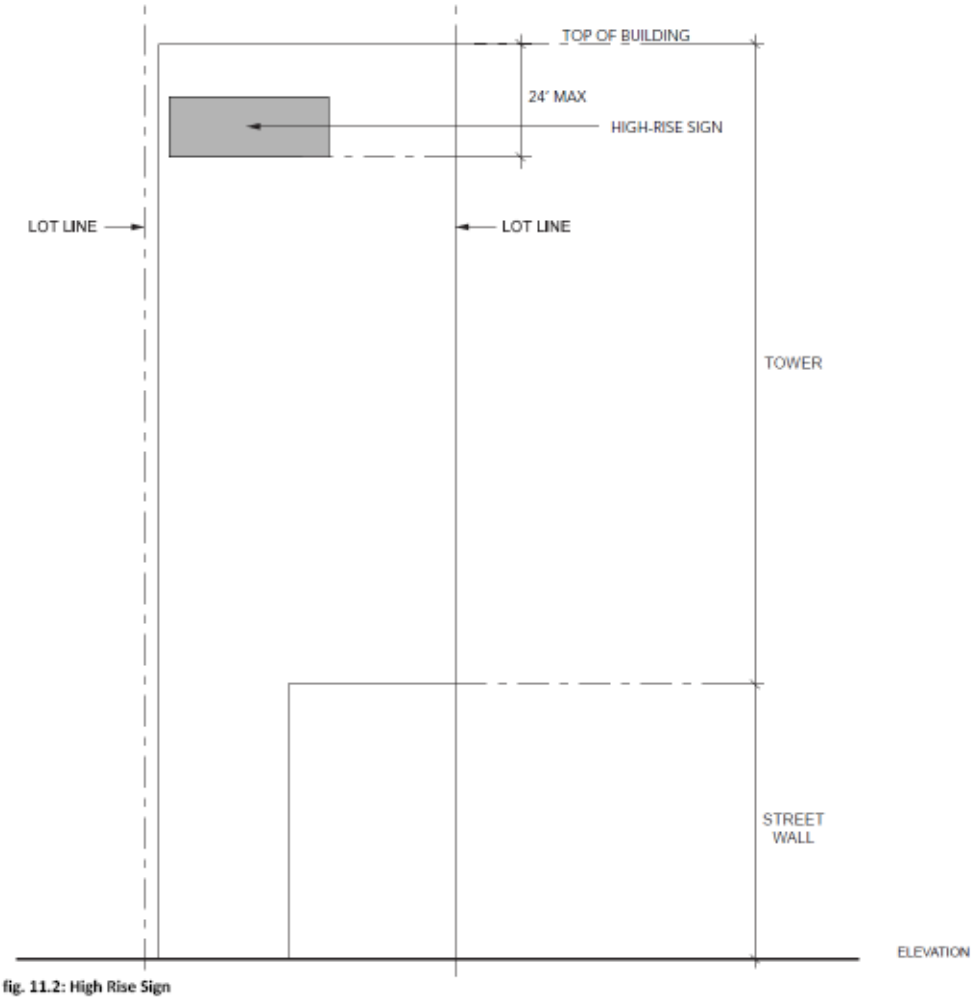

fig. 11.2: High Rise Sign

Comment No. 59-16

7. Noise

- The vibration and noise analyses do not account for pile drivers, yet there is no prohibition against the use of such equipment (see, e.g., Table IV.H-7). Pile driving generates significant groundborne vibration. Impacts to sensitive receptors such as the Capital Records recording studios, therefore, are not adequately analyzed.

Response to Comment No. 59-16

It should be noted that the Project will not use pile drivers during construction. Also, please see Appendix J, Feasibility Assessment, which discusses noise mitigation feasibility issues. In addition, Table IV.H-7 in the Draft EIR does not list the types of equipment or methods of construction proposed to be used for the Project, but provides a range of noise levels for certain types of equipment typically used in construction. To ensure the use of pile drivers is prohibited during construction, it is recommended that the following mitigation measure (MM H-12, below) be incorporated into the Additions and Correction Section of the Final EIR. This mitigation measure shall also be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) to ensure it is a binding condition of permissible construction activity.

Mitigation Measure

H-12 Driven soldier piles shall be prohibited during construction. Augered piles are permitted.

Comment No. 59-17

- The DEIR states at page IV.H.1-23 that the construction noise analysis uses the Commercial Scenario to assess noise impacts as this scenario will generate the most construction and operational noise. However, the DEIR does not explain why or include a quantitative analysis to demonstrate this. Therefore, no substantial evidence is included in the DEIR to support this conclusion. Noise is quantitative analysis and must be supported by quantitative evidence-not mere unsupported statements.

Response to Comment No. 59-17

The Draft EIR does include a quantitative analysis of construction noise impacts. See page IV.H.23 regarding construction impacts and Tables IV.H.7 through IV.H-9, which provide quantitative noise levels during construction. That analysis is supported by evidence in Appendix H, Noise Data Sheets. It follows that the short-term construction noise and vibration impacts disclosed on the Draft EIR are correctly focused on the worst-case daily impacts. The Draft EIR estimated construction noise and vibration increases at adjacent land uses based on the worst-case daily mix of equipment and the type of construction activity. The Draft EIR explains why the Commercial Scenario was used on page IV.H-23

by stating that impacts under that scenario represent the maximum peak daily construction noise and vibration level for any of the permissible development scenarios. This statement should be taken with the understanding and context that the overall size of the Project's potential buildout would not alter the daily and peak noise and vibration impacts, but could alter the duration of the construction process. As explained in the Draft EIR, the thresholds of significance for construction noise and vibration are based on peak daily increases, and not total construction timeline. Accordingly, while the Project's overall construction timeline would have flexibility depending the size or scenario of the Project ultimately developed, the Draft EIR appropriately disclosed the worst-case daily construction noise and vibration impacts on adjacent land uses.

Comment No. 59-18

- The DEIR should require the use of noise curtains and reduced hours (especially in the p.m.) as feasible mitigation to reduce noise impacts on the Pantages and Avalon Theater. Limited hours would also be effective in reducing vibration impacts on these sensitive receptors. Noise curtains are a standard and feasible measure to reduce the severity of construction noise impacts. Thus the DEIR fails to include feasible mitigation to avoid or reduce the severity of impacts.

Response to Comment No. 59-18

The noise reduction actions described in the comment are in fact incorporated into the Project. Mitigation Measures H-1 through H-11 located on pages IV.H-43 through IV.H-45 of the Draft EIR include thorough and feasible mitigation strategies aimed at reducing construction noise and vibration impacts on adjacent land uses. Specifically, Mitigation Measures H-2 and H-10 limit construction hours and require construction schedule notifications, and Mitigation Measures H-5, H-6 and H-7 require the use of sound control curtains, muffling devices, and noise barriers. Also, please see Appendix J, Feasibility Assessment, which discusses noise mitigation feasibility issues.

Comment No. 59-19

- The impact conclusion regarding the Capitol Record's echo chambers at page IV.H.l-30 is not consistent with the analysis and conclusions of the 6230 Yucca Project EIR. The analysis in the Yucca Project EIR is substantial evidence that the conclusion in this DEIR is incorrect and understates potential impacts.

Response to Comment No. 59-19

The commenter claims that the impact conclusion in the Draft EIR regarding the Capitol Record's echo chambers is not consistent with the analysis and conclusions of the 6230 Yucca Project EIR and therefore, the conclusion in the Draft EIR is incorrect and understates potential impacts. It is critical to note that the 6230 Yucca Project EIR and this Draft EIR are for different projects with different development characteristics and different environmental impact analyses. Simply stated, it is improper to assume (as

the comment has done) that two different projects would have the same CEQA analysis. Also note that the commenter does not cite any specific instances or facts that are inconsistent between the two EIRs.

Nonetheless, in good-faith reasoned response an assessment of the two EIRs is summarized here. The noise and vibration analysis presented in the Draft EIR is substantially consistent with the analysis presented in the EIR for the 6230 Yucca Project, and where it differs, presents a more detailed and conservative analysis. Both EIRs identify the Capitol Records Building's echo chamber as being a sensitive land use with respect to noise and vibration impacts impacting the operations at the studios. Both EIR's conclude that the construction activities would exceed the noise and vibration thresholds during construction and found that impact to be significant and unavoidable, even after mitigation.

Where the analyses differ, is a result of the specific distances cited as it pertains to the active construction sites in relation to the Capitol Records Building's echo chambers. The 6230 Yucca Project EIR cited the location of the off-site Capitol Records echo chambers at distance of 75 feet to the southwest of that project site (see page IV.1-11 of the 6230 Yucca Project EIR). The Draft EIR cites a distance of 0.08 feet between the proposed construction area and the underground echo chambers, which are actually located on-site (see Tables IV.H-9 and IV.H-10 in the Draft EIR). The 6230 Yucca Project EIR found that the proposed construction activities would exceed the noise and vibration thresholds identified in the EIR, and concluded a significant unavoidable impact would occur. The 6230 Yucca Project EIR does not contain a specific calculation of the anticipated vibration levels at the Capitol Records Building's echo chambers. Rather, the vibration levels cited in the 6230 Yucca Project EIR were generic in nature (based on distances of 25, 50, 60, 75, and 100 feet) and are identified in Table IV-7, Vibration Source Levels for Construction Equipment.

Similar information is presented in Table IV.H-10 on page IV.H-28 of the Draft EIR, though the metrics provided in Table IV.H-10 were reported in PPV (in/sec.) and RMS VdB. These metrics are further defined in the Draft EIR on page IV.H-21. Although not included in 6230 Yucca Project EIR, subsequent analysis was provided by Veneklasen Associates (April 9, 2008), and submitted into the administrative record, which noted more specifically that "[t]he expected vibration levels more than likely will be in the range of 80 to 90VdB which is 40 to 50 decibels above the existing ambient conditions." The detailed vibration analysis presented in the Draft EIR, which is based on 0.08 feet of separation as compared to 75 feet, estimated the vibration levels to be 162.0 VdB in the vicinity of the Capitol Records Building's recording studios A, B, and C (See Table IV.H-11, Construction Groundborne Vibration Levels at Sensitive Land Uses – Human Annoyance Impacts on page IV.H-29 of the Draft EIR). For these reasons, among others, the Draft EIR presents a more detailed and conservative impact conclusion than the 6230 Yucca Project EIR. For additional evidence of the difference between these projects related to noise impacts, please see Appendix J, Feasibility Assessment, which discusses the applicability of noise mitigation measures as related to the 6230 Yucca Project and the Project.

Within this context, the Draft EIR accurately discloses the potential construction noise and vibration levels that could be experienced on adjacent land uses, including the Capitol Records Building's echo chambers. Specifically, page IV.H-30 of the Draft EIR states that construction impacts would produce

potentially significant impacts with respect to human annoyance and disrupting existing studio recording operations. The Project's physical vibration-related annoyance impacts on the existing environment (i.e., the Capitol Records Building's underground echo chambers) were disclosed in the Draft EIR as significant and unavoidable. Please see Response to Comment 81-18 (Reznik, Benjamin (#2)) and 19-6 (Los Angeles Conservancy) for additional information regarding impacts on the echo chambers.

Comment No. 59-20

- Page IV .H.l-30 discloses vibration levels at the Pantages, Avalon Theater and the Art Deco storefronts of that exceed the building damage significance threshold by 3250%. The vibration levels at the echo chambers will be almost 4000 times beyond the significance threshold. The DEIR nonetheless concludes a less than significant impact with mitigation. However, Measure H-11 merely requires the applicant to perform all work in a manner that does not damage these structures, without explaining how this can be done. This vague mitigation measure is inadequate because it neither prescribes a specific measure nor sets a performance standard relative to damage. Furthermore, damage is not the only consideration. These uses are sensitive receptors because vibration can also cause disruption to their operation. The DEIR is devoid of adequate disruption analysis. The DEIR should include analysis demonstrating how such damage can be avoided, amended to adequately analyze potential disruption impacts, and then re-circulated for public review.

Response to Comment No. 59-20

The Draft EIR adequately addresses construction related vibration impacts both in terms of potential to damage buildings and in terms of human annoyance impacts (disruption to land use operations). With respect to building damage impacts from construction vibration, Mitigation Measure H-11 provides a thorough and effective performance based standard to ensure building damage impacts would be mitigated to less than significant levels.

With respect to human annoyance and potential disruption to adjacent land uses, page IV.H-29 of the Draft EIR states that because potential construction vibration levels at the identified sensitive off-site receptors would exceed the FTA's annoyance thresholds, potential construction groundborne vibration impacts at off-site receptors 3, 8, 11, 16, and 17 would be significant and unavoidable. As such, the Draft EIR discloses impacts related to use and physical disturbance of identified resources. For reference, Table IV.H-11 of the Draft EIR identifies these receptors as multi-family residences, the Pantages Theater, the Avalon Theater (formerly the Hollywood Playhouse), the Capitol Records Building underground echo chamber, and the Capitol Records Recording Studios A, B and C. The Draft EIR then proposes mitigation for vibration related impacts.

With respect to building damage impacts from construction vibration, Mitigation Measure H-11 provides a thorough and effective performance based standard to ensure building damage impacts would be mitigated to less than significant levels. Mitigation Measure H-11 specifically sets performance standards

for the adjacent structure monitoring plan. Mitigation measures may specify performance standards that would mitigate a significant impact and that might be achieved in various ways. 14 Cal Code Regs §15126.4(a)(1)(B). If it is not practical to define the specifics of a mitigation measure when the EIR is prepared, the agency may defer formulation of the specifics pending further study if the mitigation measure describes the options that will be considered and identifies performance standards. See *San Joaquin Raptor Rescue Ctr.,* 149 CA4th at 671; *Endangered Habitats League,* 131 CA4th at 794; *Defend the Bay v City of Irvine* (2004) 119 CA4th 1261, 1275, 15 CR3d 176.

While the performance standards in Mitigation Measure H-11 are not quantitative since it does not rely on a specific prevention of some specific amount of noise or vibration, it is stated as an absolute qualitative commitment "not to adversely impact or cause loss of support to neighboring/bordering structures." Substantial evidence for the effectiveness of this commitment is provided by the monitoring program, described in detail within Mitigation Measure H-11. This program will, at a minimum, use licensed qualified experts to detect all vibration as well as vertical and horizontal movement at elevation and lateral monitoring points on adjacent buildings and structures. As part of this commitment, "work will stop in the area of the affected building" if vibration or structural crack or movement thresholds are exceeded, and not resume until "measures have been taken to stabilize the affected building." In addition, the structure monitoring program must include "vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation to protect adjacent buildings from construction-related damage. In other words, Project construction activities must conform to the performance standards set in Mitigation Measure H-11 or else work would stop to avoid damage to structures. Thus, the Draft EIR has properly identified mitigation that reduces the potential impacts of the Project.

Comment No. 59-21

- Table IV.H-13 shows a cumulative noise increase along Argyle between Yucca and Hollywood of over 3 dBA CNEL under the various development and access scenarios, but concludes that the impact will not be significant. However, the Pantages is located adjacent to this roadway segment, and at over 65 dBA the noise levels would be considered to be "clearly unacceptable" for this use. Therefore, the DEIR should have applied the more restrictive 3 dBA threshold and conclude the impact to be significant. This failure disguises a significant impact under the correct significance threshold. Applying the correct threshold would result in a significant impact. Therefore the DEIR should be corrected and this significant impact disclosed and recirculated for public review.

Response to Comment No. 59-21

As shown in Table IV.H-13 of the Draft EIR, the existing estimated noise level for the roadway segment of Argyle Avenue between Yucca Street and Hollywood Boulevard is 65.5 dBA CNEL. The Pantages Theater, which fronts this roadway segment on the building's east side, is currently exposed to these exterior noise levels which are considered "clearly unacceptable" for land use operations containing auditoriums, concert halls, and amphitheaters according to the information provided in Table IV.H-6 of

the Draft EIR. In reviewing all possible development and access scenarios analyzed in Table IV.H-13 of the Draft EIR, the future year 2035 without project development scenarios could result in a noise level at this roadway segment of 68.3 dBA CNEL.

Thus, the Pantages Theater is located along a roadway segment with noise levels that are already "clearly unacceptable" under existing conditions without the Project, and would continue to be subject to elevated and potentially incompatible noise levels without the Project in the future year 2035. These noise level increases would occur as a result of related projects and ambient growth unrelated to the Project. The Project's contribution to these noise level increases would be a maximum of 0.4 dBA CNEL under the Horizon Year 2035 With Project category for the Maximum East Site Development Scenario (No Vine Street Access). This increase would not exceed the 3.0 dBA threshold of significance for project level impacts. As such, the Draft EIR adequately disclosed the Project's potential operational roadway noise impacts and no further response is required.

Comment No. 59-22

8. Public Services

- As there is no guarantee that the library fee imposed as mitigation will be used on local libraries, and no quantitative analysis showing that the amount will be sufficient to mitigate impacts even if spent locally, the DEIR should have found a significant impact. Any mitigation imposing a fee must show that the amount of the fee will reduce the impact to less-than-significant levels and further show that a mechanism is in place to use the funds for the prescribed mitigation. The mitigation in the DEIR fails to include either of these requirements.

Response to Comment No. 59-22

The commenter states that there is no guarantee that the library fee imposed as mitigation would be used by the libraries, however, as discussed to Section IV.J.5, Public Services - Libraries, of the Draft EIR, the Los Angeles Public Library (LAPL) themselves have recommended that the Project Applicant pay $200 per capita based on the projected residential population of the Project development to offset potential impacts from Project implementation. See Appendix J.5 of the Draft EIR. In accordance with Section 15130(a)(3) of the CEQA Guidelines, a project's contribution to cumulative impacts is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

Furthermore, according to the LAPL, the funds from these fees would be used for staff, books, computers, and other library materials. See Appendix J.5 of the Draft EIR. The commenter also states that the Draft EIR must show that a mechanism is in place to use the funds, however, does not provide why this is necessary per CEQA. Nevertheless, funding for specific branch projects is provided by bond measures presented to voters. Additionally and separate from any specific LAPL fees, the Project would contribute

tax revenue to the City's General Fund through development. Regular funding of the operation of the LAPL system comes from the General Fund and fluctuates with City priorities.

Comment No. 59-23

- The DEIR does not acknowledge the significant cumulative impact regarding solid waste due to limited landfill capacity. A quantitative cumulative analysis of solid waste capacity is necessary and required. The draft EIR should be amended and recirculated with this analysis.

Response to Comment No. 59-23

The commenter states that a cumulative significant impact would occur with regards to landfill capacity, however, the commenter fails to identify how or why this would occur. According to Section IV.L.3, Utilities and Service Systems - Solid Waste, of the Draft EIR, the overall quantity of construction and demolition debris generated during the construction lifetime of the related projects, combined with the construction debris from the Project, would constitute approximately 0.4 percent of the remaining capacity of 9.4 million tons at Peck Road Gravel Pit, the inert waste landfill serving the County. Of the 0.4 percent, the Project would represent 0.08 percent. Additionally, the EIR states that the Sunshine Canyon and Chiquita Canyon Landfills have a remaining available daily intake of 9,947 tons per day (tpd). The cumulative solid waste generation shown in Table IV.L.3-7 of Section IV.L.3, Utilities and Service Systems - Solid Waste, of the Draft EIR, would represent approximately 0.17 percent of the remaining combined daily intake capacity at the Sunshine Canyon and Chiquita Canyon Landfills. As shown in the Draft EIR, the Sunshine Canyon and Chiquita Canyon Landfills have adequate capacity for the related projects and the Project, and there is no need to recirculate the Draft EIR, as the commenter notes.

Comment No. 59-24

9. Recreation

- The DEIR does not acknowledge the significant cumulative impact on parks due to the shortfall in existing parkland per the City's standard. A quantitative cumulative analysis of parks and recreation impacts is necessary and required. The DEIR should be amended and recirculated with this analysis.

Response to Comment No. 59-24

The commenter states that a cumulative significant impact would occur with regards to parkland, but fails to identify how or why this would occur. As discussed in Section IV.J.4, Public Services - Parks and Recreation, of the Draft EIR, the City imposes Quimby fees and Park and Recreation fees pursuant to LAMC Section 17.12 and LAMC Section 21.10.3, respectively, based on the number of units proposed within a project to help offset potential project and cumulative environmental impacts.

In accordance with CEQA Guidelines section 15130 subdivision (a)(3), a project's contribution to cumulative impacts is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The fees are established to be proportionate to a project's demand for recreation and park facilities, as the demands for such facilities are primarily based on residential population of a given area. As discussed in Section IV.J.4, Public Services-Parks and Recreation, of the Draft EIR and pursuant to CEQA Guidelines Section 15130 subdivision (a)(3), the Project's impacts would not be considered cumulatively considerable, as these fees are mandatory and proportionate based the Project's residential density. See pages IV.J.4-16-17. Thus, the Draft EIR does not need to be amended and recirculated.

Comment No. 59-25

10. Traffic

- The project may include a significant amount of retail (the concept plan refers to 100 KSF) but there is no midday Saturday traffic analysis (retail uses tend to experience peak generation at that time). This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of weekend traffic impacts is necessary and required. The DEIR should be amended and recirculated with this analysis.

Response to Comment No. 59-25

Although traffic impacts will be greater during peak commute hours, Saturday peak hour trip generation was calculated to respond to the comment and for further clarity. The Saturday peak hour trip generation was calculated using the same procedures as for the peak commute hour trip generation calculations in the Traffic Study. The peak hours of all Project uses were assumed to coincide (e.g. Saturday trips to the Health Club, Offices and Restaurants all peak at the same time). The calculation shows that, even with conservative assumptions and using the Commercial Scenario, the net Project trips at area intersections would be 19% lower at the peak on Saturdays than PM peak commute hour during weekdays. See Appendix C, Saturday Project Trip Generation, attached hereto.

Also, please see Response to Comment 09-48 (Southern California Association of Governments) for additional information.

Comment No. 59-26

- The existing traffic conditions in Table IV.K.1-3 show only one intersection operating at LOS E and none at LOS F. Recent EIRs for other projects (e.g., NBCU and Hollywood & Gower) show the same intersections to be much more congested, in some case three levels of service worse. These other EIRs are substantial evidence of more sever impacts than are disclosed in this EIR.

Response to Comment No. 59-26

The comment states that recent EIRs for other projects show intersections to be more congested under existing conditions and thus there are more severe impacts than disclosed in the Draft EIR. The comment is not specific regarding the study intersections with which the Commenter is concerned. The traffic counts were conducted in 2011 during normal weekdays when the majority of schools were in session, as called for in the LADOT Traffic Study Policies and Procedures, May 2012. The traffic counts for the NBC Universal project, which is referred to by the Commenter, are from 2006 and the traffic counts for the Hollywood & Gower project, also referred to by the Commenter, are from 2007. Volumes can fluctuate over a 4-5 year period for a variety of reasons. Traffic counts taken in 2006 and 2007 are no longer current or accepted as accurate, and cannot be considered substantial evidence of more severe impacts than are disclosed in the Draft EIR. To reflect the most current traffic conditions, traffic counts are required by the LADOT Traffic Study Policies and Procedures, May 2012, to be collected within 2 years from when the traffic study is initiated. As such, the traffic counts from those projects no longer accurately reflect traffic volumes at a given intersection.

Comment No. 59-27

- The internal capture rates in Table IV.K.1-4 lack support. LADOT relies on ITE studies from Florida from the early 90's. These studies are out dated and were limited to 3 land uses. The DEIR must justify the internal capture rates used to avoid undercounting trips.

Response to Comment No. 59-27

The Comment claims that the internal capture rates lack support and the Draft EIR must justify the internal capture rates. Trip reductions related to the Project are expected to occur as a result of "multi-purpose" or "internal" trips within the Project Site. Internal trips are most likely to occur at mixed-use developments containing a variety of uses. For example, residents, hotel guests and/or office workers are expected to use on-site retail, sports/fitness club and restaurants, reducing trips to and from a project.

ITE studies provide the most reliable source for quantifying these trip generation adjustments. The ITE Trip Generation Manual (8th Edition, 2008) was used for the Traffic Study. The studies used for the national publication have been determined to be appropriate for use in the City of Los Angeles. Based on the observed trip generation for mixed-use areas of Los Angeles and elsewhere, LADOT has for numerous traffic studies determined that internal trip making is an appropriate factor to be considered. However, to be conservative, the rates used in the Traffic Study and Draft EIR are lower than those recommended in the Trip Generation Manual.

In order to further address the comment, data collected at Legacy Town Center (a mixed-use development) by the Texas A & M University, Texas Transportation Institute for the Federal Highway Administration (FHWA) -- Internal Trip Capture Estimator For Mixed-Use Developments, FHWA, February 2010 -- was compared to the Traffic Study assumptions. The following table compares the

FHWA study results with the Traffic Study assumptions for the support uses. (The residential and office uses internal trip calculations are based on balancing the support use trips rather than percentage assumptions.)

		FHWA Study			
	Traffic Study	AM Peak Hour		PM Peak Hour	
Use		Entering	Entering	Entering	Entering
Retail	15%	25%	37%	30%	61%
Restaurant	15%	6%	9%	32%	34%
Hotel	5%	3%	9%	36%	38%
Sports/Fitness Club[1]	15%	N/A	N/A	N/A	N/A
1 Not listed as a use for Legacy Town Center in the FHWA Study.					

The only comparison where the assumed average is above the measured average rate for a peak hour is restaurants during the AM peak hour. The AM peak hour for restaurants accounts for less than 1% of the daily Project traffic while the PM peak hour accounts for over 8% of the daily Project traffic. The PM measured percentages from the FHWA study are over twice the assumed percentage in the Traffic Study.

In summary, the FHWA study rates were measured within the last decade and the comparison table shows the assumed rates are conservative compared to the measured rates. This comparison confirms that the rates approved by LADOT and used in the Traffic Study are conservative.

Comment No. 59-28

- The table in the traffic study used to calculate the net project trips appears to use lower trip generation rates for residential and sports club uses than the ITE rates on which they were purportedly based (see also Table IV.K-5). This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of traffic impacts using the ITE rates is necessary and required. The draft EIR should be amended and recirculated with this analysis.

Response to Comment No. 59-28

The comment asserts that lower trip generation rates than the ITE rates appear to be used to calculate the net project trips related to residential and sports club uses. The Traffic Study and the Draft EIR used ITE equations, not rates, for the residential and sports club uses. The ITE Trip Generation Manual provides trip generation equations and rates for Apartment as Land Use 220 and Health/Fitness Club as Land Use 492. As shown in Appendix D of the Traffic Study in Appendix IV.K.1 of the Draft EIR, the equations (rather than the rates) from the ITE Trip Generation Manual were used for the traffic generation estimates

for the residential and health club uses. The equations, instead of the rates, were selected and agreed to by LADOT because the coefficient of determination (R^2) value for the given equations exceeds 0.77 for both AM and PM peak hours, which demonstrate that the equations are a good fit for the Project data, and the values are within the range of the data. The high R^2 value demonstrates that the equations are more reliable than rates given the Project component sizes are within the data range. See Response to Comment 81-11 (Reznik, Benjamin (#2)) for further clarification. As such the trip generation related to residential and sports club uses is considered appropriate, no potentially significant impacts are disguised, and the Draft EIR does not need to be amended and recirculated.

Comment No. 59-29

- Page IV .K.l-26 uses a single set of trip distribution assumptions, despite the fact that the mix of uses can vary dramatically under the equivalency program. It is likely that the individual land uses would have different distribution patterns, so that varying the overall mix would cause the distribution to change. Because the project description is vague and ambiguous as to the mix of uses, the DEIR is flawed by its failure to analyze traffic impacts under a similarly wide array of potential uses.

Response to Comment No. 59-29

As shown in Figures 5(a) to 5(c) of the Traffic Study, Appendix K.1 of the Draft EIR, separate trip distributions were used for the Residential, Office and Non-Office Commercial components. Additional analysis of traffic impacts due to the Residential Scenario and the Concept Plan has been conducted to clarify and amplify the traffic impact analysis in the Draft EIR. The analysis utilized the separate by component trip distributions developed for, and used in, the Traffic Study and demonstrates that significant impacts would not occur other than at those intersections identified in the Draft EIR. See Appendix E, Final EIR Added Intersection Analysis, attached hereto.

Also, to further ensure that the development remains within the range of impacts analyzed, a separate AM and PM Trip Cap has been established. As such, the development to be built cannot exceed the peak AM trips studied or the peak PM trips studied. Please see Response to Comment No. 09-41 (AMDA) for additional information on the revised Trip Cap.

Please also see Response to Comment Nos. 09-29, 09-32, and 09-34 (AMDA) for additional information.

Comment No. 59-30

Table IV.K.l-6 establishes a trip cap based on adding up a.m. and p.m. trip numbers for various uses. It is not appropriate to combine a.m. and p.m. peak hour trips, since the traffic impacts must be assessed separately for each peak hour under longstanding City methodology. This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of traffic impacts by separating am and pm peaks is necessary and required. The DEIR should be amended and recirculated with this analysis.

Response to Comment No. 59-30

The comment states that it is not appropriate to combine am and pm peak hour trips for the trip cap since traffic impacts must be assessed separately for each peak hour under longstanding City methodology. First, the Traffic Study complies with the LADOT Traffic Study Policies and Procedures, May 2012 and is thus consistent with longstanding City methodology. Further, the traffic impacts were assessed separately for AM and PM peak hours. Please see Table IV.K.1-14 for the Project traffic impacts under Existing (2011) conditions on pages IV.K.1-48-50 and Table IV.K.1-18 for the Project traffic impacts under Future (2020) conditions on page IV.K.1-75 t-77 of Section IV.K 1, Traffic-Transportation, of the Draft EIR. These tables show that each intersection was analyzed for both the AM and PM peak period separately for Existing (2011) Plus Project and Future (2020) Plus Project conditions.

However, to further ensure that the development remains within the range of impacts analyzed, a separate AM and PM Trip Cap has been established. As such, the development to be built cannot exceed the peak AM trips studied or the peak PM trips studied. Please see Response to Comment No. 09-41 (AMDA) for additional information on the revised Trip Cap.

Comment No. 59-31

- Table IV .1.-7 uses light industrial trip rates as a proxy for construction traffic. This appears to be a novel first-time approach that no other City EIR has taken. This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of construction traffic impacts by using passenger car equivalencies for each construction truck trip is necessary and required. The draft EIR should be amended and recirculated with this analysis.

Response to Comment No. 59-31

The comment states that the analysis of construction trips disguises potentially significant impacts, deviates from other City EIRs, and should analyze passenger car equivalencies for each construction truck trip. As shown in/on page IV.K.1-33 of Draft EIR passenger car equivalencies (PCE) of 2.5 were used for the construction truck trips. The ITE rate for Light Industrial use (LU 110) was used for construction employees as the commute patterns of construction workers also needs to be included in a construction analysis. Those trips would be similar to the typical industrial workers because the mode use and start/end times of the construction related work during construction periods are most similar to the Light Industrial uses. Therefore, the daily, AM and PM peak hour trip rates used for determining the Project's non delivery/haul vehicle trip generating potential per construction worker are considered to be approximately the same or less than the per employee rates developed for Light Industrial uses and thus appropriate for use in the analysis

As shown in Appendix D of the Traffic Study in Appendix IV.K.1 of the Draft EIR, the summation of the construction work trips and the PCE conversion of the truck trips is lower than the Project build-out trip

generation analyzed in the Traffic Study. As shown in the detailed intersection by intersection construction analysis, Appendix D, Updated Construction Traffic Impacts Including Individual Intersection Impact Analyses, attached hereto, the construction traffic would significantly impact fewer study intersections compared to the Project and no intersections not identified in the Draft EIR.

Comment No. 59-32

- It is not clear how the trip computation factors in Table IV .K.l-8 were derived. Moreover, it is unclear whether the analysis considers ballroom or meeting room space in the hotel. The vagueness of this analysis denies the public a meaningful opportunity to comment and disguises potentially significant impacts.

Response to Comment No. 59-32

The comment states that it is unclear how the trip computation factors in Table IV.K.1-8 were derived. The rates in Table IV.K.1-8 were developed based on Table 5, Project Trip Generation, in the Traffic Study, which is Appendix IV.K.1 of the Draft EIR. The rates take the adjustments for each individual use into account.

The comment also states that it is unclear whether ballroom or meeting room space was considered in the analysis of the hotel use. The trip generation rates used for the Project's hotel uses were based on The ITE Trip Generation Manual, 8th Edition, 2008, which includes the following definition for hotel uses on page 570:

> "Hotels are places of lodging that provide sleeping accommodation and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms or convention facilities, limited recreational facilities (pool, fitness room), and/or other retail and service shops."

The Project proposes standard ancillary facilities proportionate to the size of the hotel, which comply with the ITE Trip Generation code definition. Separate trip generation for hotel accessory uses is not considered appropriate. Thus, the analysis does not deny the public meaningful opportunity to comment and discloses potentially significant impacts.

Comment No. 59-33

- Pages IV .K.l-44 discloses long term lane closures during construction on Argyle, Vine, Ivar and Yucca, but finds a less than significant impact since the closures would not completely block all traffic lanes in any direction. The DEIR should have found the impact to be significant due to the amount and duration of the lane closures. At a minimum, the DEIR should have considered whether the rerouting of traffic due to these closures would have significant impacts at local intersections. This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of traffic impacts

resulting from reducing traffic flow to one lane is necessary and required. The DEIR should be amended and recirculated with this analysis.

Response to Comment No. 59-33

The temporary construction staging on the surrounding street segments will temporarily restrict the Project Site adjacent on-street parking, and the lay down area will not be in travel lanes. Rerouting of the current and future traffic is considered to be nominal due to the temporary nature of any restriction, the restriction mainly being limited to the on-street parking lane, and one travel lane being maintained in each direction at all times. Please refer to pages IV.K.1-38 and IV.K.1-39 of Section IV.K.1, Transportation - Traffic, of the Draft EIR for a discussion of the Project construction temporary roadway closures traffic impacts.

Comment No. 59-34

- Table IV.K.l-14 discloses significant impacts at the northern edge of the study area. The analysis should be expanded to confirm that there are no significantly impacts intersections beyond this edge. Whenever a significant impact occurs at the edge of the study area, that impact provides substantial evidence of potentially significant impacts outside the study area. The traffic study should be revised to a larger geographic area and recirculated.

Response to Comment No. 59-34

The comment asserts that the Draft EIR shows that there are significant impacts at the edge of the study area and thus the traffic study should be revised to a larger geographic area. As per standard City of Los Angeles procedures, the study area for the Traffic Study was selected in consultation with LADOT. The Traffic Study locations selected were those locations at which the Project traffic impacts may be significant and substantial. The locations at which traffic impacts may be significant are the critical capacity constraints of the area roadway system. For the Hollywood area roadway system the capacity constraints are the freeway links and the signalized intersections. The more minor (STOP controlled) intersections were determined not to constrain the system capacity. In general, the northbound US-101 Freeway ramps (or an associated intersection) form the northern boundary of the agreed-to study area. The Hollywood Freeway was selected as the northern boundary because most of the Project trips directed northward will utilize this facility, especially with limited surface routes to the north. The Project trips remaining on surface streets will be intercepted trips to and from the neighborhood areas rather than added trips.

The intersection of Franklin Avenue and Argyle Avenue/US-101 Freeway Northbound On-Ramp is one of two significantly impacted intersections located on the north edge of the study area. More than twice as many northbound Project trips will be turning left or right during the peak hours as will be traveling north from this intersection. In addition, as shown on the Figure IV.K.1-3 on page IV.K.1-17 for the AM peak hour and Figure IV.K.1-4 on page IV.K.1-19 of Section IV.K 1, Traffic-Transportation, of the Draft

EIR, the counts collected for the Project show that the traffic along Argyle Avenue north of US-101 Freeway is substantially lower than those south of the freeway – 361 versus 656 trips during AM peak hour and 276 versus 916 trips during PM peak hour. Therefore, the US-101 Freeway forms the study boundary as agreed-to with LADOT and significant impacts are not anticipated to occur beyond the boundary.

The other intersection on the north study area boundary with a significant impact before mitigation is the intersection of Franklin Avenue and Highland Avenue (north). Cahuenga Boulevard provides a more direct route to the intersection to the north of Highland Avenue and Cahuenga Boulevard. Thus, local traffic that is already on the local streets will use Highland Avenue to the north.

Further, conditions at the intersections to the north of the study area are addressed by the Project mitigation. The Signal System Upgrades and TDM measures will improve conditions throughout the area, including for the intersections to the north. Those measures will reduce the impacts at the intersection of Franklin Avenue and Highland Avenue (north) to less than significant and would have similar benefits at the intersections further north. To clarify the above and fully respond to the comment, an analysis of Project impacts at two additional intersections, Highland Avenue/Camrose Drive/Milner Road, and Argyle Avenue/Vine Street/Dix Street, was conducted. (See Appendix E, Final EIR Added Intersection Analysis, attached hereto). These intersections were selected because they are the intersections (outside the study area) to the north of intersections found to be significantly impacted by Project traffic in the Traffic Study and the Draft EIR. This analysis concluded that the Project impacts would be less than significant at these locations. As such, there would not be significant impacts beyond the study area and the Traffic Study does not need to be revised and recirculated.

Comment No. 59-35

- The analysis relies on the TDM program in Mitigation Measure K.1.4 to reduce or avoid significant intersection impacts. This reliance is misplaced, since the Mitigation Measure does not establish any objective criteria to measure the success of the program or provide for corrective action if the trip reduction goals are not met. CEQA mitigation measures must be specific, setting forth specific measures and performance standards to justify the conclusion that the mitigation will reduce impacts to less-than-significant levels.

Response to Comment No. 59-35

The comment suggests that the TDM program does not set forth specific measures or performance standards. The specific details of the TDM program are included in the Traffic Study in Appendix IV.K.1 of Draft EIR and provided on pages IV.K.1-87 of Section I, Introduction/Summary and IV.K.1-55 of Section IV.K.1 of the Draft EIR. Mitigation Measure K.1-4 states in part that "[a] preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for the Project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project." See page IV.K.1-55 of the Draft EIR. Not only is approval of

the final program required prior to the issuance of the first certificate of occupancy, but 19 specific elements (e.g. parking provided as an option only for all leases and sales) are required in the TDM Program as listed on pages IV.K.1-55 through 56 of the Draft EIR. The final TDM Program will include all elements listed in Mitigation Measure K.1-4 and additional elements may be included to ensure that impacts are reduced. As such, the TDM program is set forth with specific detail and can be properly monitored by the City and LADOT.

Comment No. 59-36

- Mitigation Measure K.1-12 allows for the granting of TCO's under certain circumstances where the mitigation measures are delayed. Since the TCO will allow the project to become operational before mitigation is in place, this could result in significant impacts that should have been disclosed. The DEIR should be revised and recirculated to include an analysis of impacts resulting from TCO's granted before relevant mitigation is in place.

Response to Comment No. 59-36

The comment states that because temporary certificates of occupancy (TCO) can be granted under certain circumstances where mitigation measures are delayed, the Draft EIR should be revised and recirculated to provide an analysis of impacts related to the granting of a TCO. The comment presents a speculative and hypothetical circumstance of an event that may or may not occur in the future and CEQA does not require that type of analysis.

Mitigation Measure K.1-12 states in part that ". . . Unless otherwise noted, all transportation improvements and associated traffic signal work within the City of Los Angeles must be guaranteed through the B-Permit process of the Bureau of Engineering, prior to the issuance of any building permits and completed prior to the issuance of any certificates of occupancy. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the Applicant, provided that, in each case, the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT." This measure reflects both LADOT and City policy of allowing, if necessary, the Project to continue to be developed, if by reasons beyond control of the Project Applicant mitigation is not feasible at the time it is to be implemented. This does not relieve the Applicant from implementing such mitigation measure. The mitigation measure is still required to be implemented when feasible. CEQA requires existing conditions plus project impacts and cumulative impacts to be analyzed and disclosed in the EIR. The Traffic Study and traffic section of the Draft EIR contain these analyses and all significant impacts on traffic and transportation created by the Project are disclosed in the Draft EIR.

Comment No. 59-37

- The transit impact analysis in Table IV.K.1-17 fails to consider increased transit usage from related projects and ambient growth. Moreover, the analysis lumps all bus and rail lines together,

rather than considering impacts on individual lines, which would allow a true analysis of peak directional demand.

Response to Comment No. 59-37

The comment suggests that the transit impact analysis failed to adequately analyze transit impacts from related projects and ambient growth. Unlike individual roadway capacity, the individual Transit Line capacity can be shifted between lines as demand shifts. Further, while the road capacity is near or exceeds the capacity in many instances, the analysis in the Draft EIR demonstrates that substantial transit capacity is available to the Project. The transit ridership growth from the related projects will not approach the capacity. Additionally, the transit impact analysis is based on the existing transit capacity without considering possible transit improvements to the area transit system. The additional capacity will help meet the growing area transit demand irrespective of the Project. Any capacity increases will further ensure that Project transit demand increases do not result in significant impacts and satisfy the area related projects transit demand.

To clarify that there is adequate transit capacity for the Project and cumulative growth, the following comparison of the 2020 demand and the existing capacity was made. The table below contains the assumption that all Related Projects, within ¼ mile of a Redline subway station, will generate transit trips at 15% of base traffic level, the same assumptions made for the Project. Even with that conservative assumption, less than half of the existing transit capacity would be used in 2020.

Category	AM Peak Hour	PM Peak Hour	Data Source/Assumption
Existing Ridership	1,162	1,422	(MTA Records)
Ambient Growth	122	149	(1% per year from 2010 to 2020)
Related Projects	1,714	2,199	(15% of Auto Passenger Trips for Related Projects within 1.5 miles)
Project	229	393	(Traffic Study)
Total	3,226	4,163	
Transit Capacity	9,381	9,571	(Traffic Study)
Percent to be Used	34%	43%	

Therefore, further analysis is not required to provide substantial evidence that the Project impacts on the transit system are less than significant.

Comment No. 59-38

- In some case the project's incremental contribution at intersections varies between Table IV .K.1-14 (20 11) and IV .K.1-18 (2020) (see, e.g., intersections 16 and 19). This error disguises potentially significant impacts and denies the public a meaningful opportunity to comment on potentially significant impacts.

Response to Comment No. 59-38

The comment states that the Project's incremental impacts at intersections vary between 2011 and 2020. This is true, but does not disguise potentially significant impacts because traffic volumes for each movement at each study intersection are expected to be different from year (2011) to year (2020) as explained below. Table IV.K.1-14 is based on existing (2011) traffic conditions and Table IV.K.1-21 are based on the future (2020) traffic conditions. As discussed on page 23 of Traffic Study in Appendix IV.K.1 of the Draft EIR, the traffic analysis was performed through the use of established traffic engineering techniques. The methodology used in the Traffic Study for the analysis and evaluation of traffic operations at each study intersection is based on procedures for transportation planning analyses outlined in Circular Number 212 from the Transportation Research Board[21]. Traffic volumes for each movement at each study intersection are expected to be different from year (2011) to year (2020), therefore, different critical movement pairs are expected for some intersections under existing and future conditions. For example, the westbound lefts and eastbound thru movements may determine the needed east-west signal phase length at an intersection in 2011. However, due to related projects' traffic, the eastbound lefts and westbound thru movements may instead be critical at that intersection in 2020. The numerical difference in the Project traffic impact reflects the CMA calculation methodology that is based on the critical movements and the degree to which the Project will add to them. Therefore, differences in Project impacts for existing and future conditions are considered reasonable and do not "disguise" potentially significant impacts.

Comment No. 59-39

- The analysis uses a 1 percent annual ambient growth factor between 2011 and 2020, but a lower factor (4.4% total) from 2020 to 2035. No justification is given for this deviation from the standard ambient growth rate of 1 percent through to the stated horizon date.

Response to Comment No. 59-39

The comment states that there is no justification for the lower annual ambient growth factor between 2020 and 2035. The 1% ambient growth rate through 2020 was used per LADOT Traffic Study Policies and Procedures, May 2012. The additional 4.4% total ambient growth rate from 2020 to 2035 was based on

[21] *Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980.*

Los Angeles County CMP guidelines, was agreed to be LADOT, and was added to reflect that the Development Agreement would extend beyond 2020. (See the West/Central Los Angeles area growth rate included in the Appendix D of the Guidelines for CMP Transportation Impact Analysis of Draft 2010 Congestion Management Program). The recommended traffic growth factor from 2010 to 2035 is 4.4%. To be conservative, 4.4% was assumed in the Traffic Study as the growth rate from 2020 to 2035 based on the CMP guidelines, but the growth rate from 2011 to 2020 was not decreased to that level. Therefore, the ambient growth rates used were conservative and justified.

Comment No. 59-40

- Table IV.K.1.21 contains a number of inaccuracies in the With Project Plus Mitigation (i.e, minuses that should be pluses-see Intersections 2, 4, 14, 15, and 18). This error deprives the public a meaningful opportunity to comment on potential impacts. They should be corrected and recirculated for public review.

Response to Comment No. 59-40

The typographical errors have been corrected in the Final EIR in Table IV.K.1-21. Please see Section IV of this Final EIR, Corrections and Additions, for revised language. The correct values were included in the Traffic Study in Appendix IV.K.1 of Draft EIR and the inaccuracies, once corrected, do not show any additional significant impacts beyond those disclosed in the Draft EIR and thus there is no need for recirculation.

Comment No. 59-41

- The access analysis at page IV.K.1-114 concludes that there is no feasible mitigation to avoid the additional significant impact under the No Vine Street Access Scenario. In fact, there is an obvious mitigation-requiring access on Vine Street. It is insufficient to merely state that access on Vine Street is infeasible; substantial evidence must be included to show that it is truly infeasible rather than merely undesirable.

Response to Comment No. 59-41

The Draft EIR does not state that requiring access on Vine Street is infeasible. Both the With Vine Street Access and Without Vine Street Access scenarios are analyzed to provide a thorough review of the potential Project significant traffic impacts under each access option. The Draft EIR does not state that requiring access on Vine Street is infeasible and neither access option has been declared "infeasible". Rather, the LADOT Manual of Policies and Procedures section on Driveway Design states that the driveways should be "located on the street with the least traffic volume, when there is a choice." (Sub-section V. Driveway Location Planning). Further, restricting Vine Street access is being considered as a general City policy. As such, the Draft EIR analyzes both access options and reflects existing policy and the ongoing policy consideration.

Comment No. 59-42

Page IV.K.l-128 provides that contributions to Signal System Upgrades should be made proportional to each phase's trip generation value. This could result in undisclosed significant impacts, since the DEIR relies upon the improvements to mitigate otherwise significant impacts, and the signal upgrades only provide the full benefit on a system-wide basis. Thus, the funding should be paid up front to avoid the impacts as assumed in the DEIR. Fair-share contributions only provide adequate mitigation when there is substantial evidence that that the mitigation measure will ultimately be fully funded and implemented. Furthermore, until the mitigation measure is fully operational, project impacts will remain significant. This impact may be temporary, but the duration of the significant impact is irrelevant. The DEIR, therefore, fails to disclose the significant impact that will occur until the Signal System Upgrades are in place.

Response to Comment No. 59-42

The comment states that the Signal System Upgrades (Upgrades) should all be paid up front; otherwise traffic impacts could temporarily remain significant. As discussed on pages IV.K.1-128 through IV.K.1-129, of the Draft EIR, the mitigation triggers are intended to implement traffic mitigations prior to the Project trips generated that would create the impacts. In regard to the Upgrades, the Project Applicant must install the Upgrades prior to any Certificate of Occupancy being granted for the Project or LADOT may instead choose for the Project Applicant to pay a fee for LADOT to implement the Upgrades. The fee would be paid proportional to each phase of the Project's trip generation or if the entire Project was constructed at once, the fee would be paid in its entirety prior to the issuance of any Certificate of Occupancy for the Project. Making the payment proportional to the trip generation per phase of the Project will ensure that there are not any significant impacts that remain significant until full implementation of the Upgrades. Further, the signal system has already been substantially upgraded by the City through ATSAC and ATCS improvements. The Upgrades mitigation represents the next generation of the upgrades to the signal system. As with the ATSAC and ATCS systems, the Upgrades will be implemented on an incremental basis, with critical corridors receiving the highest priority to maximize the benefit to the area, which would be decided by the City. Therefore, the payments and upgrade installations can be balanced with the Project traffic impacts. The impacts will increase as more of the Project is constructed and occupied. Implementation of a portion of the mitigation based on the trip generation of a particular phase of the Project, for example, the Upgrades to signal systems closest to the Project Site, will address the impacts of a portion of the Project. As such, the Draft EIR fully discloses all significant traffic impacts.

Comment No. 59-43

Based on the above, the DEIR analysis does not adequately analyze the potential impacts of the project and must be revised and recirculated for further public review and comment.

Response to Comment No. 59-43

The comment is a conclusion statement. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment states that the Draft EIR does not adequately analyze the potential environmental impacts of the Project. The previous comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR. Each of these has a Response to Comment, above.

LETTER NO. 60 - KAHANA, TAL

Tal Kahana
6000 Temple Hill Drive, 90068

December 10, 2012

Comment No. 60-1

Hello- I am a home owner and investment property owner in Beachwood Canyon. I have lived and owed in the canyon for over 20 years. In that time, I have seen the traffic drastically increase as a result of the W hotel and the resurgence of Hollywood Boulevard.

The new building proposal is troubling for several reasons.

Response to Comment No. 60-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

The comment states that the building proposal is troubling for many reasons. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment then goes on to oppose the Project as a whole. The subsequent comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR.

Comment No. 60-2

The lack of height restriction is troubling for the traffic and visual impact it will have.

Response to Comment No. 60-2

Please refer to Topical Response 2, Aesthetics, for information regarding views.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Comment No. 60-3

The lack of upgrades to our sewers and infrastructures is a problem deferred.

Response to Comment No. 60-3

The commenter expresses concerns that the Project would not upgrade existing infrastructure and that a problem would occur. According to Section IV.L, Utilities and Service Systems, of the Draft EIR, the Project suggests mitigation measures and code-compliance requirements to help offset potential impacts from water, sewer, solid waste, and energy. As stated in these sections of the Draft EIR, the Project would not create a significant impact to any utility system and not a problem deferred, as suggested by the commenter.

Comment No. 60-4

The lack of a traffic study before allowing the plans is irresponsible and creates the appearance of impropriety.

Response to Comment No. 60-4

The Project's Traffic Study was conducted within the parameters and approved by the Los Angeles Department of Transportation (LADOT), as defined in the Memorandum of Understanding, included as Appendix A to the Traffic Study. The Study concluded that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections. The Study and subsequent letter from the LADOT dated August 16, 2012, and included as Appendix IV.K.2 to the Draft EIR, included Project requirements as mitigation measures to fully or partially reduce impacts.

Comment No. 60-5

Please continue the time period so that resident fears can be addressed and the traffic study completed.

Response to Comment No. 60-5

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 61 - KATZ, DEAN

Dean Katz
6376 Quebec Drive
Los Angeles, CA 90068

December 10, 2012

Comment No. 61-1

I am expressing my serious opposition to the Millenium Projects DEIR

Response to Comment No. 61-1

The comment expresses an opinion, but does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration

Comment No. 61-2

As a key point to my objection, the City of Los Angeles has removed the "D" limitation and has given Millenium a height variance. The proposed area of improvement is directly in front of our neighborhood. The project, when complete, would obscure vast areas currently visible from our area. The sheer scale that Millenium is requesting in their project will make the balance of buildings surrounding dwarfed. These will be the tallest buildings east to downtown, and west to Century City.

Response to Comment No. 61-2

The comment opposes the waiver of the existing "D" development limitation on the Project Site. As discussed in the Draft EIR, the Regional Center Commercial land use designation allows for the construction of commercial, parking, and high-density multi-family residential uses. Development of the Project would include multi-family residential, retail, restaurant and commercial land uses, in addition to the Capitol Records Complex, which would be retained as part of the Project. Please refer to Response to Comment No. 81-9 (Reznik, Benjamin (#2)) for additional information.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Please see Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent historic Capitol Records building.

Comment No. 61-3

For our part as family residing here, was Hollywood enjoys a central location in the city and has easy access to outlying areas of Los Angeles.

Needless to say, the congestion we're suffering already in the "Dell" residential area of the Hollywood Hills is catastrophic. This project condemns the area to traffic congestion beyond any scope I could imagine.

Response to Comment No. 61-3

The comment expresses concern about traffic and congestion, but does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. Please see Response to Comment No. 60-4 (Kahana, Tal) above for more information. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 61-4

There are facets to the DEIR that I haven't been able to ascertain given the short response period.

Response to Comment No. 61-4

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 61-5

What are the codicils for residential units of the property in regards to noise and light?

Response to Comment No. 61-5

CEQA looks at impacts of the Project on the environment, not of the Project onto itself. Noise impacts as well as Light and Glare impacts to adjacent sensitive uses were analyzed in several sections of the Draft EIR, and according to the Project characteristics listed in the Development Regulations. Specifically, the Draft EIR analyzes operational noise impacts in Section IV.H, Noise. The Draft EIR also analyzes light and glare issues in Section IV.A.1, Aesthetics, Views/Light and Glare.

Comment No. 61-6

What limitations have been set for special use events that will imact our area?

Response to Comment No. 61-6

All uses of the Project would be contained on the Project Site. As discussed in Section IV.G, Land Use Planning, and in Section II, Project Description the uses on the Project Site are limited to the mixed-uses proposed in the Draft EIR and activities permitted on the Project Site if the list of discretionary actions (on Page II-49 of the Draft EIR) are approved by the City of Los Angeles.

Comment No. 61-7

And what of filming companies using the location? What kind of sound, hours of filming, and huge lighting and techno rigs have been regulated for the property? Especially, along the upper floors where the aforementioned would be the most annoying?

Response to Comment No. 61-7

The comment expresses concern about possible future uses at the project premises, but does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. It should be noted that the Draft EIR analyzes land use compatibility in Section IV.G, Land Use Planning. The Draft EIR also analyzes light and glare issues in Section IV.A.1, Aesthetics, Views/Light and Glare. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 61-8

What is the light pollution factor for entire project? This is large question. We suffered with Super Graphics on what is the largest building in Hollywood at this time. Those graphics are found on virtually every building in Hollywood now. There is a supposed billboard and graphic disallowance in this plan, but for instance, there are huge amounts of light that have been added to the Hollywood area over the last couple of years. The Pantages addes neon. The W Hotel has a very bright emanation. The electronic billboard at Franklin and Cahuenga, the electronic billboard at the Target property on the edge of West Hollywood is even an issue up here. Add to that the former Bekins Storage building for years had super graphics and intense lighting that took the entire community a very long time to finally get resolved. I don't believe the city is proactive on this front, and the City remains solely reactive to these issues only after the fact, and uproar by Hollywood residents.

Response to Comment No. 61-8

Nighttime lighting is discussed in Section IV.A.1, Aesthetics – Views / Light and Glare, of the Draft EIR.

The Project would be required to comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6, and design interior and exterior lighting such that zero direct-beam illumination leaves the Project Site. The Project would also be required to meet or exceed exterior lighting levels and uniformity ratios for lighting using the following strategies:

Shield all exterior luminaries or provide cutoff luminaires per Section 123 (b) of the California Energy Code;

Contain interior lighting within each source;

Allow no more than .01 horizontal lumen foot-candles to escape 15 feet beyond the Site boundary; and

Automatically control exterior lighting dusk to dawn to turn off or lower light levels during inactive periods.

Comment No. 61-9

Add to this, that I believe no intensive sound study can show the level of noise that will bounce reflective off the structures. Everything from motorcycles, to helicopters are a nuisance for us. I have had to make numerous calls, and complaints to the FAA regarding news helicopters that fail to adhere to aviation law. I can't imagine what the added decibels will be from this projejct. There's an area for an exterior stage. The right to some peace and happiness in our home, could easily be set aside to allow an oversized project to have concerts and events that naturally exceed standards due to the sound bouncing off these structures.

Response to Comment No. 61-9

The Project's operational noise is discussed in Section IV.H, Noise, of the Draft EIR. As discussed in the Draft EIR, the Project would include certain grade-level open space and potentially a roof-top observation deck. However, on page IV.H-40, the Draft EIR specifically concludes that the Project would not have significant operational noise impacts associated with people and activities and events within the common outdoor spaces, podium levels and observation decks. Furthermore, the Draft EIR notes that the Project must comply with the applicable noise sections of the of the LAMC, which thereby prevents noise levels from exceeding City standards for this location and ensures potential noise impacts on off-site sensitive uses would be less than significant.

Comment No. 61-10

But I remain steadfast in the opposition to allow a 6-1 ratio allowance for Millenium, and find it wholly incomprehensible that the city would set the D limitation aside, and allow this scale of project to move forward. This is the center of complaint with the project. Why can't they adhere to the 4.5 - 1 allowance? Seems that plenty of other projects have, and Millenium ought to as well.

Response to Comment No. 61-10

Regarding the removal of the "D" limitation, see Response to Comment No. 61-2 (Katz, Dean), above.

Regarding the reduced FAR (4.5:1), see Response to Comment No. 09-79 (AMDA) which discusses that a further reduced FAR alternative is infeasible.

LETTER NO. 62 - KRUSE, ZIGGY #1

Ziggy Kruse

December 4, 2012

Comment No. 62-1

Given the gravity and the scope of the Millennium Project and the for sure long period of time it took to complete the DEIR on the project it seems unreasonable that the public is only given roughly 6 weeks (10-25-2012 through 12-10-2012) to submit comments on the DEIR.

The traffic section of the main text is 131 pages long, the parking section is 26 pages long, and the alternatives section is 151 pages long. Also, those main text sections do not include the appropriate appendices that would have to be evaluated, as well.

This DEIR was compiled with input by experts and city planners, which is not the case of the the input you will receive from the public. Some might hire a "pro", but the majority of stakeholders / constituents are not equipped to rush through any document this size in the time period asserted by your office.

At this time it would be very appropriate for your office to extend the comment period at best for an additional 90 - 120 days or at a minimum until after the December 2012 / January 2013 holiday season.

Response to Comment No. 62-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 63 - KRUSE, ZIGGY #2

Ziggy Kruse

December 10, 2012

Comment No. 63-1

These objections are send to you on behalf of myself, Robert Blue, Richard MacNaughton, Patricia Macfadden, SaveHollywood.org, Hollywoodians Encouraging Logical Planning and CCLA as well as on behalf of Citizens Opposing Corrupt Development, Task Force for a Livable Hollywood.

Response to Comment No. 63-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 63-2

Time to review and respond too short

The developer had years and millions of dollars all this documentation for the city and the city is providing residence who have to work in their spare time only 45 days to review and respond. This time period is unreasonably short and shows the disregard for the citizen opinions.

A considerable portion of these documents including the special traffic report commissioned by the developer appeared to be the product of Accounting Control Fraud, but residents need much more time in order to document these problems.

Response to Comment No. 63-2

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 63-3

Traffic

We have obtained a document from the city stating that the traffic mitigation under the Hollywood Community Plan overwhelm any possible mitigation and thus the DEIR and the Traffic Study are directly contradicted by the city's own opinion on this subject.

Response to Comment No. 63-3

This comment asserts that there is an inherent conflict between the traffic findings of the Hollywood Community Plan Update EIR and the Proposed Millennium Hollywood Project Draft EIR. The proposed mitigation measures for the Project Draft EIR have been carefully coordinated with the City of Los Angeles' transportation system improvements and are consistent with the citywide improvement program. The Project mitigation would implement the types of programs identified in the General Plan (including the Hollywood Community Plan Update) as being appropriate. The City of Los Angeles Department of Transportation, in their August 16, 2012 assessment letter, has concurred with the mitigation measure proposed for the Project. This letter is included in Appendix IV.K-2 of the Draft EIR.

Comment No. 63-4

DEIR relies on matgerially false data

This project is authorized under the June 19, 2012 Hollywood Community Plan (HCP), which is based on materially false data. Therefore the data underline this DEIR are similarly defected.

Response to Comment No. 63-4

The comment suggests that the Hollywood Community Plan Update and the Project Draft EIR are based on materially false data, but gives no reason for making this assertion. The Draft EIR analyzes and discusses potential Project impacts under both the 1988 Hollywood Community Plan and the Hollywood Community Plan Update and is compatible and consistent with both. However, the data analyzed in the Draft EIR are not false or defective. Regardless, as discussed in Section IV.G, Land Use Planning, of the Draft EIR, potential land use impacts are identified as less than significant, without mitigation.

Comment No. 63-5

Earthquake danger

This project is build on the edge of an active earthquake fault and his failed to properly assess the earthquake ramifications on this project.

Response to Comment No. 63-5

The Project is not within an Alquist Priolo Earthquake Fault Zoning Map area. For additional information regarding fault rupture and the potential for a major earthquake to occur, please refer to Response to Comment No 24-4 (Anderson, Robert) above.

Comment No. 63-6

Harmful Nature of Transit Oriented Districts (TOD)

The DEIR fails to consider the harmful nature of TOD's , not withstanding the fact that TOD's are mentioned in the defective HCP. The city first pointed out the ill advised nature of TOD's and in the 1915 Traffic Study by the city of Los Angeles, a copy of which is already in the City's files. The DEIR fails to consider any of these factors, and the mathematics of transportation, the geography of the city and the interplay of density, zoning as well as modes of transportation have not changed since 1915.

Furthermore, the DEIR fails to take into account the fact that the city of los Angeles is the most densely populated city in the country with approximately 7,000 people per square mile.

Response to Comment No. 63-6

Any reference to a 1915 Traffic Study and the ill advised nature of TODs is relying on outdated data and information. The analysis of the Project and the Project's traffic impacts is not based on and does not rely on a 1915 traffic study. Instead, the growth forecast from the 2012-2035 RTP/SCS is used in the Draft EIR and is adequate and appropriate. Please see Response to Comment No. 08-3 (Southern California Association of Governments) for additional information on the growth forecast.

Comment No. 63-7

Inaccurate Data makes the entire DEIR defective

Garbage in, Garbage out. - The DEIR and its thousands of pages of accompanying document are replete with factual errors, half truth and omissions of material information making all the conclusions defective.

Response to Comment No. 63-7

The comment states that the Draft EIR is garbage and half-truths. The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 63-8

Lack of proper procedure

The defects in preparing these papers are so great that the DEIR fails to follow the proper procedures under CEQA. Furthermore, there is not substantial evidence to support the conclusions which favor the construction of this project.

Response to Comment No. 63-8

The Draft EIR was prepared, noticed, and circulated according to the proper procedural requirements in accordance with CEQA. Otherwise, the comment is an opinion on CEQA procedures and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the

environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 63-9

If the public had been provided a reasonable opportunity to review these materials, than I could have been more detailed in my comments. The burden, however, rests solely on the city to ferret out all the material data and to present it in a fair and balanced manner so that the public can understand the various pros and cons of the project. The city has an opportunity to rectify its failures when it drafts the FEIR.

Response to Comment No. 63-9

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 64 - KUHRT, STACEY

Stacey Kuhrt
5200 Franklin Avenue, Hollywood, CA 90027

November 29, 2012

Note: Since this letter appears to be a duplicate of Response to Comment No. 45 (England, Suzanne) above, many of the responses to that letter would apply to this letter, too.

Comment No. 64-1

I'm writing to contest the EIR you have approved for the Millenium Hollywood Project. My reasons are as follows:

Response to Comment No. 64-1

The comment opposes the Project, but does not otherwise state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 64-2

-The EIR has not completed a thorough study of the environmental impacts for our area. The infrastructure will be seriously impacted with all of the additional population created with this project.

Response to Comment No. 64-2

With regard to the commenter's concern with the existing infrastructure surrounding the Project Site, please refer to Response to Comment No. 18-5 (Hollywoodland Homeowners Association (#2)) above.

Comment No. 64-3

The air quality, noise, police and fire response, sewer usage, road wear and increased traffic locally as well as on the 101 Freeway and Vine Street off ramp, will all be impacted by this project. These things need further study. The access for people leaving the hills in their cars will be seriously affected as well, as traffic will become even more dense.

Response to Comment No. 64-3

Air quality, noise, police, fire response, sewer infrastructure, and increased traffic are all discussed and analyzed in the Draft EIR. in Sections IV.B, IV.H, IV.J.1, IV.L.2-1, and IV.K.

The Draft EIR acknowledges that the Project would generate additional trips and that significant and unavoidable project-related impacts would occur at two study intersections and significant and unavoidable cumulative-related impacts at five study intersections. This comment does not challenge the adequacy of the impact analysis of the Draft EIR.

Comment No. 64-4

Air quality is of major concern to me. I already get black soot throughout my apartment that overlooks the city. With the increased traffic, this will also increase.

Response to Comment No. 64-4

Pages IV.B.1-35 and IV.B.1-26 of the Draft EIR include a comprehensive discussion regarding the Project's construction air quality assumptions. Specifically, the analysis details the construction timeline for demolition, site preparation/grading/excavation, and building construction. In addition, the Draft EIR details the volume of demolition, soil export, and construction equipment fleet mixes that would occur for each construction phase, including the number of hours per day. The total PM10 and PM2.5 emissions disclosed in the Draft EIR accurately reflect the Project's potential air quality emissions. It should be noted that Mitigation Measure B.1-1 ensures compliance with SCAQMD Rule 403 – Fugitive Dust, which would serve to reduce PM10 and PM2.5 dust emissions by as much as 61% during the construction phases. In addition, it analyzes air quality impacts related to placement of the Project Site in relation to existing sources of air contaminants (including black soot from freeways) and impacts related to long-term operational aspects (including increased traffic related emissions) of the Project. For traffic related air quality impacts in particular, see page IV.B.1-25 of the Draft EIR, which explains how the CalEEMod Version 2011.1 and the traffic study assumptions were used to calculate potential air quality impacts. Also, please note that the Draft EIR and MMRP contain numerous mitigation measures to reduce construction and operational air quality impacts to the extent feasible.

Comment No. 64-5

The noise also concerns me; the increased traffic on the 101 Freeway and the Vine Street off ramp will bring increased traffic noise and the increased population, night clubs, shops, etc., will bring increased noise to the area. Peace of mind and quality of life for local residents must be considered in any community plan.

Response to Comment No. 64-5

The Draft EIR analyzed a logical range of roadway segments in proximity to the Project Site. Aside from the 3.7 dBA CNEL increase during the Existing Traffic Plus Project Traffic Scenario (with No Vine Street Access) for the roadway segment of Ivar Avenue between Yucca Street and Hollywood Boulevard, no other roadway segment analyzed in the Draft EIR would come close to approaching either the 3 dBA or 5 dBA CNEL thresholds of significance. Thus, it is logical to infer that roadway segments located farther from the Project Site (i.e. 101 Freeway) carrying less project-related trips than those segments

analyzed in the Draft EIR would experience even smaller project-related roadway noise level increases. For additional information, please see Response to Comment No. 45-5 (England, Suzanne) above.

Comment No. 64-6

-The population growth needs to be correctly addressed. The need for more rapid transit and density needs to be studied, based on true population growth, not biased figures.

Response to Comment No. 64-6

The comment addresses population growth and that the Draft EIR needs to accurately address it in its analysis. The Draft EIR accurately addresses population growth and consistency with regional and local plans. The Draft EIR uses the appropriate growth forecast from the SCAG 2012-2035 RTP/SCS. The Draft EIR states that the Residential Scenario would contribute toward, but not exceed, the population growth forecast for the City of Los Angeles, and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. Overall, the Project would increase the density of residential uses as identified in the Draft EIR, bringing more housing units closer to major employment centers. This additional density would be located in an area currently served by public transit (Metro Red Line, Hollywood DASH, and LADOT Commuter Express 422 & 423), and would be located near existing transportation corridors. Therefore, the Draft EIR accurately addresses this issue. Please see Response to Comment No. 08-3 (Southern California Association of Governments) for additional information.

Comment No. 64-7

-The proposed project removes height limits that were put in place previously. They were put in place for a very good reason—to prevent over development such as this project and to retain the integrity of the area. The heights of the buildings proposed are contrary to the elements of the area. Yucca Ave is mainly a street with low slung buildings, and should remain that way. The skyscrapers and high rises proposed are so out of place that it is ridiculous! It will ruin the whole feel of the area and the quality of life for local residents.

Response to Comment No. 64-7

The Project does not remove any height limitations. The Project Site does not have any existing zoning or other limitation on height.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Please refer to Topical Response 2, Aesthetics, for additional information regarding views.

Please see Response to Comment No 14-5 (Hollywood Heritage), Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent structures.

Comment No. 64-8

-Preserving the quality of life in the area should be of great importance to the City of Los Angeles. In this case, the residents of the area have been left out of the equation. Yucca Ave, between Argyle and Cahuenga is a very neighborhood friendly place, with small shops and low buildings, creating a relaxed place for local residents to walk their dogs, go for a walk, or enjoy the locality. Placing high rises and skyscrapers here will ruin this whole atmosphere, taking away the friendly neighborhood feel we have, replacing it with an anonymous "any big city" feeling. It will take our neighborhood away. Creating so much density in this part of the city, in Hollywood, is detrimental to the quality of life here.

Response to Comment No. 64-8

It should be noted that the Draft EIR analyzes potential impacts on air quality in Section IV.B, Air Quality. The Draft EIR also analyzes land use compatibility issues in Section IV.G, Land Use Planning. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 64-9

-Hollywood is special, and should be kept that way. The Capitol Records building is one of a kind, and surrounding it with skyscrapers is incongruent and tasteless. It also reduces the iconic feel of the Capitol Records building and the area, and diminishes its importance. People come to Hollywood to experience a unique place; they can go to any city in the world to see glass and steel skyscrapers and high rises. The views, historic buildings and one-of-a-kind shops in Hollywood are what draw people here; not skyscrapers, chain stores and restaurants that can be found anywhere.

Response to Comment No. 64-9

This comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Additionally, please refer to Topical Response 4, regarding Cultural Resources for a discussion on the compatibility of the Project with the adjacent historic Capitol Records Building.

Comment No. 64-10

-Since there is a major earthquake fault at Yucca and Vine Street, it is a danger to build these skyscrapers in that vicinity. I believe further study should be done on this. In the event of a major earthquake, those

skyscrapers would create a huge problem. Large numbers of people would rush out of the buildings into the street, creating even more of a challenge for fire and police vehicles to get through.

Response to Comment No. 64-10

For additional information regarding fault rupture and the potential for a major earthquake to occur, please refer to Response to Comment No. 24-4 (Anderson, Robert) above.

Comment No. 64-11

-Building with a conscience: I personally don't understand why the planned development of this community does not flow with the existing buildings. Should we not think along the lines of creating buildings that actually work with the classic structures here in Hollywood, instead of against them? If you must fill in every space with dense construction, can they not at least have similar heights to the surrounding area, and similar architectural styles? Just think how wonderful that would look! The future doesn't have to be a Hollywood filled with crappy looking "affordable housing" apartments, cheap-looking hotels (The W), disparate high rises and skyscrapers stuck in between classic buildings.

Response to Comment No. 64-11

It should be noted that the Draft EIR analyzes potential impacts related to onsite and adjacent historic resources in Section IV.C, Cultural Resources. The Draft EIR also analyzed height issues in relation to aesthetics, land use, and project alternatives in Sections IV.A, Aesthetics, IV.G, Land Use Planning, and VI, Alternatives to the Proposed Project. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 64-12

-Lastly, and apparently not a serious issue for the City of Los Angeles, is the further blocking of the view of the Hollywood Hills with extremely tall buildings. Part of the charm and attraction of this area is the Hollywood Hills and the Hollywood sign.

Response to Comment No. 64-12

Please refer to Topical Response 2, Aesthetics, for information regarding views.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Comment No. 64-13

I care about Hollywood and OPPOSE the current version of the Hollywood Community Plan and Millennium Hollywood Project. It must be modified to take into consideration correct census data, height

limits, infrastructure, emergency services, public transportation; and to alleviate density and congestion. I would like to see another EIR performed, but one that takes into account the real figures and problems. The Los Angeles City Council has rushed this through without considering many things. This is a dangerous way to go, creating serious problems for the future in Hollywood. We should not rush into such projects, and should take a long hard look at the affects of projects of this nature on the future.

Response to Comment No. 64-13

The comment is a conclusion statement. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment states that the Draft EIR does not adequately analyze the potential environmental impacts of the Project. The previous comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR. Each of these has a Response to Comment, above.

LETTER NO. 65 - LEDDING, MARY

Mary Ledding
6384 La Punta Drive, Los Angeles CA 90068

December 10, 2012

Comment No. 65-1

For some reason this was bounced back.

Response to Comment No. 65-1

This comment is an introductory comment and does not provide a concern or question regarding the adequacy of the Draft EIR. This comment will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 65-2

This is to register my profound objections to the proposed Millenium Project. As currently anticipated it will increase the congestion immensely. I have lived in the Hollywood Hills since 1975 and in recent years, due to the extensive increased development in Hollywood, the ability to transgress through the Hollywood area in order to get home has gone from about 10 minutes in prior years to about 4 times that.

Hollywood is NOT New York. I object strongly to the idea as some of you have proposed, that Hollywood should be developed with the type of density that New York has. We do not live on an island with limited space. We do not have useable, highly trafficked public transport systems – the buses are subject to the same sorts of traffic congestion as all cars in the area. They do not promise a quicker, more efficient mode of transportation.

Response to Comment No. 65-2

This comment opposes the Project, but does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 65-3

In addition to congestion, these projects will guarantee an increase in the level of air pollution in the area, as already congested on-off ramps to the Hollywood freeway will become even more idling lanes for cars waiting to enter/exit.

Response to Comment No. 65-3

It should be noted that the Draft EIR analyzes potential impacts related to traffic and air pollution in Sections IV.K, Transportation, and IV.B, Air Quality Analysis respectively. Otherwise, this comment does not challenge the adequacy of the impact analysis of the Draft EIR. These comments will be forwarded to the decision makers for their consideration and no further response is required.

Comment No. 65-4

I know that others in the Hollywood Dell have already sent you comments regarding this project, of which I am aware and heartily concur. These deal with the development ratio, parking spaces, and the lack of adherence to the CRA guidelines. Please consider those comments re-iterated here.

Response to Comment No. 65-4

The commenter states that the Draft EIR has a lack of adherence to the CRA guidelines. In response to the commenter's statement, please refer to Page IV.G-48 of Section IV.G, Land Use Planning, of the Draft EIR for a full discussion of the Project's consistency with the Hollywood Redevelopment Plan and its consistency with the existing scale of surrounding development. Also, please see Response to Comment No. 16-12 (Hollywood United Neighborhood Council (#2)) above for more information on overall compliance with the Redevelopment Plan.

Comment No. 65-5

This project will not only cause YEARS of congestion as it is built, but given how empty so many of the buildings in Hollywood currently are, it will take decades to turn it into really used space. Do not take the short-term view that any development is good for jobs, good for the economy, etc. This development is MAMMOUTH, OVERSIZED, and A DEVELOPER'S BOONDOGGLE. Please take every effort you can to reconsider this horror. For the first time in living here since 1975, I am considering moving to another state. That is what this project means to me and to the neighbors who live and work in the Hollywood area.

Please stop or at least severely reduce and limit the size of this ugly, massive project.

Response to Comment No. 65-5

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

The comment does speak to the size of the Project. The commenter states that the Project is mammoth and oversized. The commenter is referred to Topical Response 2, Aesthetics, for information regarding Project aesthetics and views.

LETTER NO. 66 - LOND, HARLEY #1

Harley Lond
2274 Alcyona Drive, Los Angeles, CA 90068

November 15, 2012

Comment No. 66-1

This is in response to Draft Environmental Impact Report No. ENV-2011-675-EIR State Clearinghouse No. 2011041094

I have reviewed the report regarding the Millennium Hollywood Project and have come to the conclusion that the development is not beneficial to the community:

Response to Comment No. 66-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

The comment states that the Project is not beneficial for the community. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment then goes on to oppose the Project as a whole. The subsequent comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR.

Comment No. 66-2

Hollywood does not need more shops or hotel rooms or pricey condos. There is much unused retail space on Hollywood Blvd and -- surprising given all the hoopla when The W was proposed -- retail space at The W. There appears to be other mixed use developments going up to the east of this development. Enough is enough..

Response to Comment No. 66-2

It should be note that the Draft EIR analyzes land use compatibility issues in Section IV.G, Land Use Planning. Otherwise, the comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 66-3

No. 1: The size of the proposed development will be detrimental to the Hollywood skyline: To wit, destroying or altering views from the South, West and East of the Capitol Building (despite what the developers say) and the beautiful Hollywood Hills (and perhaps views of the Hollywood sign.).

Response to Comment No. 66-3

Please refer to Topical Response 2, Aesthetics, for information regarding views, including views of the Hollywood Sign.

Comment No. 66-4

No. 2: The development would increase traffic congestion in an area already clogged with traffic; nearby freeway onramps and arteries are already at a virtual standstill during rush hour; this development would make that worse.

Response to Comment No. 66-4

The Draft EIR acknowledges that the Project would generate additional trips and that significant and unavoidable project-related impacts would occur at two study intersections and significant and unavoidable cumulative-related impacts at five study intersections. This comment does not challenge the adequacy of the impact analysis of the Draft EIR.

Comment No. 66-5

No. 3: There is already a higher level of noise and crime engendered by the clubs and restaurants that have opened in Hollywood; this will only contribute more.

Response to Comment No. 66-5

It should be noted that the comment does not provide any evidence to support its claim that the Project will contribute more noise and crime. In contrast, the Draft EIR analyzes of both of these issues in Sections IV.J.2, Public Services – Police and IV.H, Noise based on reported statistics and existing conditions. As stated in the Draft EIR, overall, the Hollywood Area experiences a lower occurrence of crime than Citywide. The Draft EIR discloses that, like any development that brings people onto an otherwise unpopulated site, the Project would increase activity at the Project Site and thus has the potential to increase crime. However, based on calculations performed for CEQA's analytical purposes, the Project as a whole would only represent a potential 1.02 percent increase in potential crimes compared to the existing conditions. This increase, if any all actually occurs, is minimal and would be expected with any project. Please see Section IV.J.2. Public Services – Police in the Draft EIR for additional information regarding crime.

Comment No. 66-6

No. 4: During construction, the noise will drift up into the hills and be unbearable (noise from construction of The W was horrible).

Response to Comment No. 66-6

As illustrated in Tables IV.H-7 and H-8 of the Draft EIR, the construction noise analysis utilized the worst-case noise ranges in terms of Leq, per the City of Los Angeles CEQA Thresholds Guide. These worst-case Leq reference noise levels were utilized to model construction impacts on adjacent uses based on the closest possible distance from the adjacent use to the Project Site's property lines. Thus, as construction equipment would infrequently, if ever, operate on the Project Site property line, the estimated construction noise levels disclosed in Table IV.H-9 of the Draft EIR are very conservative, and in some cases, likely overstate the actual peak noise level increases at the identified locations. As such, the Draft EIR adequately disclosed all potential construction noise and vibration impacts upon adjacent land uses and provided a thorough and comprehensive mitigation strategy to reduce these impacts to the maximum extent feasible.

Comment No. 66-7

No. 5: The air quality will suffer from the dust and dirt of construction.

Response to Comment No. 66-7

Pages IV.B.1-35 and IV.B.1-26 of the Draft EIR include a comprehensive discussion regarding the Project's construction assumptions utilized the air quality impact analysis. Specifically, the analysis details the construction timeline for demolition, site preparation/grading/excavation, and building construction. In addition, the Draft EIR details the volume of demolition, soil export, and construction equipment fleet mixes that would occur for each construction phase, including the number of hours per day. The total PM10 and PM2.5 emissions disclosed in the Draft EIR accurately reflect the Project's potential air quality emissions. It should be noted that Mitigation Measure B.1-1 ensures compliance with SCAQMD Rule 403 – Fugitive Dust, which would serve to reduce PM10 and PM2.5dust emissions by as much as 61% during the construction phases.

Comment No. 66-8

No. 6: Construction will clog streets with construction vehicles, adding to local congestion.

Response to Comment No. 66-8

Construction traffic impacts are discussed in Section IV.K.1, Transportation – Traffic, of the Draft EIR. Mitigation measures K.1-1 to K.1-3 would reduce any construction impacts from construction lane closures, construction vehicles, and hauling activities to less than significant.

Comment No. 66-9

No. 7: After construction, the streets in the area will be damaged with potholes, alligator ridges, etc. Many streets around the W still show signs of damage from that construction. The city just can't seem to make developers take care of the streets they damage.

Response to Comment No. 66-9

Street paving schedules are decided by the City and Bureau of Street Services. The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 66-10

Let's leave things the way they are -- instead of developing the land here into gigantic structures that strain the earth, why not put in a much-needed park?

Response to Comment No. 66-10

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 66-11

Or keep the land as parking lots -- Hollywood certainly needs more parking.

Response to Comment No. 66-11

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 66-12

If you want to redevelop Hollywood, let's get rid of some of the sleazy stores that line parts of Hollywood Blvd.?

Response to Comment No. 66-12

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 66-13

Also, I'm not sure whether or not the City is helping to fund this development -- if so, I resent using my tax money to line the pockets of developers.

Response to Comment No. 66-13

The City is not helping to fund the Project. Also, the comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 67 - LOND, HARLEY #2

Harley Lond
2274 Alcyona Drive, Los Angeles, CA 90068

December 10, 2012

Comment No. 67-1

I'm sure that -- given the power that developers hold over the current members of the city council and the mayor -- the Millennium project will go ahead -- to the detriment of Hollywood. However, I urge you to take note:

Response to Comment No. 67-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 67-2

Do not allow the following to be approved:

Increasing the present zoning from a 4.5:1 ratio to a 6:1 ratio would allow the developer to increase the project size from 825,000SF to 1.1Million SF.

Allowing a reduction in the City's parking requirement for the proposed 35,000SF health club from 10-spaces/1000 to 2-spaces/1000. The reduction in parking spaces would have 280 health club users looking for parking on Hollywood's streets.

The Community Redevelopment Agency's development requirements were put in place to maintain Hollywood's historic core and Unallow for redevelopment to enhance and compliment existing development and the livability of the surrounding residential communities. Allowing Millennium/Argent to eliminate their development's adherence to the CRA guidelines creates a massive project totally out of scale with the Hollywo

Response to Comment No. 67-2

Please see Section IV.G, Land Use Planning of the Draft EIR for information regarding the Project's consistency with the Redevelopment Plan. Otherwise, the comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 67-3

Below is a copy of my previous letter to you and the Hollywood-area council members:

This is in response to Draft Environmental Impact Report No. ENV-2011-675-EIR State Clearinghouse No. 2011041094

I have reviewed the report regarding the Millennium Hollywood Project and have come to the conclusion that the development is not beneficial to the community. Hollywood does not need more shops or hotel rooms or pricey condos. There is much unused retail space on Hollywood Blvd and -- surprising given all the hoopla when The W was proposed -- retail space at The W. There appears to be other mixed use developments going up to the east of this development. Enough is enough.

No. 1: The size of the proposed development will be detrimental to the Hollywood skyline: To wit, destroying or altering views from the South, West and East of the Capitol Building (despite what the developers say) and the beautiful Hollywood Hills (and perhaps views of the Hollywood sign.).

No. 2: The development would increase traffic congestion in an area already clogged with traffic; nearby freeway onramps and arteries are already at a virtual standstill during rush hour; this development would make that worse.

No. 3: There is already a higher level of noise and crime engendered by the clubs and restaurants that have opened in Hollywood; this will only contribute more.

No. 4: During construction, the noise will drift up into the hills and be unbearable (noise from construction of The W was horrible).

No. 5: The air quality will suffer from the dust and dirt of construction.

No. 6: Construction will clog streets with construction vehicles, adding to local congestion.

No. 7: After construction, the streets in the area will be damaged with potholes, alligator ridges, etc. Many streets around the W still show signs of damage from that construction. The city just can't seem to make developers take care of the streets they damage.

Let's leave things the way they are -- instead of developing the land here into gigantic structures that strain the earth, why not put in a much-needed park? Or keep the land as parking lots -- Hollywood certainly needs more parking.

If you want to redevelop Hollywood, let's get rid of some of the sleazy stores that line parts of Hollywood Blvd.? Also, I'm not sure whether or not the City is helping to fund this development -- if so, I resent using my tax money to line the pockets of developers.

Response to Comment No. 67-3

This comment is a repeat of Comment Letter No. 66-01 (Lond, Harley (#1)). Please refer to Response to Comment No. 66-13 (Lond, Harley (#1)) above for a complete response to concerns.

LETTER NO. 68 - MANZO, NITA

Nita Manzo

December 10, 2012

Comment No. 68-1

I am writing to comment on the proposed Millenium Project.

I am not a land use attorney or a traffic expert, so I don't suppose that I will be able to add any expertise to your consideration process.

Response to Comment No. 68-1

The comment is an introduction and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration

Comment No. 68-2

Further, it would have been nice if the Planning Department could have given us more time to review this DEIR. After all, the developer is asking you for a 20 year agreement. Why then do we receive only a few weeks to look at this mountain of documents?

Response to Comment No. 68-2

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 68-3

I question the adequacy of the traffic study supporting this DEIR.

I live near the intersection of Argyle and Franklin, and I believe that it is already in failure at many evening peak times. I routinely drive east on Franklin at about 6:30 pm (which is outside of the mistakenly-truncated peak afternoon study time of 3:00 pm to 6:00 pm), Tuesdays and Thursdays, and I observe that west-going traffic on Franklin (mostly people waiting to get on the 101 at Argyle) is backed up often as far as Wilton Place.

Again, this is at a time which was not even measured by the traffic study.

Despite this, the traffic study describes the Franklin/Argyle intersection as being currently adequate. (IV.K.1 Transportation - Traffic Draft Environmental Impact Report Page IV.K.1-22)

I recognize that whoever did this study may have complied with the applicable procedures or regulations of LA DOT. However, if LA DOT considers the Franklin/Argyle intersection to be acceptable currently, then its judgment too must be questioned.

Argyle is a Local Street, and many of us depend on it to get in and out of our homes. Not everyone can use public transit, and this is a hilly area. Please reconsider the proposed impacts on our neighborhood.

Response to Comment No. 68-3

Please see Response to Comment No. 09-36 (AMDA). In addition, the Project was determined to have a significant impact at Intersection No. 6-Argyle Avenue and Franklin Avenue/US 101 NB On-Ramp. The Traffic Study Appendix IV.K.1 of Draft EIR, has proposed a mitigation measure at this intersection to help improve the traffic conditions. The proposed enhancements for the Argyle Avenue and Franklin Avenue/US 101 NB On-Ramp are also identified in Mitigation Measure K.1-10 on pages I-94 and IV.K.1-58 of the Draft EIR (and revised to Mitigation Measure K.1-11 to accommodate a new Mitigation Measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR).

Comment No. 68-4

There is so much more I would like to say, but I am out of time.

Response to Comment No. 68-4

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 69 - MASON, JEAN CLYDE

Jean Clyde Mason
2777 Woodshire Drive, Hollywoodland, CA 90068

December 11, 2012

Comment No. 69-1

These height allowances are outrageous. I will join with my neighbors and I will fight against them.

Response to Comment No. 69-1

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 69-2

Garcetti is the leader of our now corrupt City Government. He should be impeached, dethroned, fined and first EXPOSED as a CROOKED POLITICIAN, taking bribes and favors from money hungry developers.

Response to Comment No. 69-2

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 70 - MCDONOUGH, BARBARA

Barbara McDonough

December 8, 2012

Comment No. 70-1

This is a travesty on the landscape! These buildings are completely out of scale for anywhere in LA, not to mention the historic neighborhood of Hollywood.

Response to Comment No. 70-1

Please see Response to Comment No 14-5 (Hollywood Heritage), Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent structures.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 70-2

Not only will they be an eyesore, you will ruin the one-of-a-kind underground echo chambers in the Capitol Studios which unfortunately will sit between the two hideous towers to-be. These echo chambers were built by the legendary Les Paul and still are attracting the top musical talent of the world to record there, which gives a lot of business to the area and are recognized globally as beyond valuable. Sinatra, the Beach Boys, The Beatles and hundreds of legendary acts have sought out recording there for the existing echo chambers. In 2007 one was damaged when the digging began to build that adjacent parking lot. With these buildings, they will all be ruined for sure. Who's going to answer for that?

Response to Comment No. 70-2

The Draft EIR accurately discloses the potential construction noise and vibration levels that could be experienced by the Capitol Record echo chambers and studios. For the purposes of CEQA analysis, the Project's physical vibration-related annoyance impacts on the existing environment (i.e., the Capitol Records Building's underground echo chambers) would be considered significant and unavoidable. Under the analysis for the Project's impact on the Capital Record echo chambers and studios, the only significant impact would be an operational use conflict, not the loss of, or damage to, a historic resource.

Comment No. 70-3

And have you even considered the traffic nightmare you will further aggravate? All the other development you have recently allowed will not even be functioning… just try getting to Trader Joes on

Vine now… it's at least 10-15 minutes to even get into the parking structure because the surrounding streets are infested with tourist foot traffic, cabs are parked all around the W hotel, and cars are backed up all the way up the hill past Yucca.

Response to Comment No. 70-3

The Draft EIR contains a detailed analysis of traffic impacts and a corresponding technical report. Please see those documents for traffic impacts. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 70-4

You will also have everyone trying to get on and off the 101 backing up the highway ramp. It's horrible as it is now on Argyle and with Vine being out of commission, this is a receipt for disaster. This is not proper civic planning! This is absolute greed driving your decision.

Response to Comment No. 70-4

The comment is noted. The traffic conditions on/off the northbound US-101 Freeway from Argyle Avenue are constrained by the conditions at the freeway mainline and the surface street intersection of Argyle Avenue and Franklin Avenue/US 101 NB On-Ramp. The proposed enhancements for the Argyle Avenue and Franklin Avenue/US 101 NB On-Ramp are identified in Mitigation Measure K.1-10 on pages I-94 and IV.K.1-58 of the Draft EIR (and revised to Mitigation Measure K.1-11 to accommodate a new Mitigation Measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR). As shown in the Traffic Study, Appendix IV.K.1 of Draft EIR, the Project traffic would not have significant impacts on freeway mainline.

Comment No. 70-5

Additionally, with all the recent earthquake activity in North America, nobody wants to even live in a high-rise, so undoubtedly they will sit with minimum capacity occupancy, just like the others that already exist on Vine. I ask you, who are they serving, save for greedy developers? Answer: just you and the guys making all the money to destroy such a historical corner.

Response to Comment No. 70-5

The Project Site is not listed within an Alquist-Prioli Fault Zoning Map area. For information regarding fault rupture and the potential for a major earthquake to occur, please refer to Response to Comment No 24-4 (Anderson, Robert) above.

Comment No. 70-6

You owe it to those you serve to revisit the building of such architectural ugly structures and the ethically-challanged glad-shaking deals you've been making on behalf of those you serve. It's truly disgusting.

Response to Comment No. 70-6

It should be noted that the Draft EIR analyzes potential aesthetic impacts in Section IV.A, Aesthetics. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 71_MORROW, MICHAEL

Michael Morrow

December 10, 2012

Comment No. 71-1

I'm almost a 66 year resident of Hollywood and am awestruck that a traffic study was not yet done for the proposed project. Former City Councilman, Mike Woo, knew how bad traffic could get, and that was one reason he had a four-story height limit set on new Hollywood construction. Towers ten times that seem out of the question of sanity for all but pedestrians. As popular as Hollywood has been, I'd rather it not have something build that would even resemble a tempting, twin-towers type target for any troubled terrorist. I'd think that City-Hall height would be enough for more than enough for any future (additional) Hollywood landmark,

Response to Comment No. 71-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. Also, it should be noted that a detailed traffic study was prepared for the Project and was circulated for public review along with the Draft EIR.

Comment No. 71-2

Finally, please extend the time for public comment on the traffic study, and let me know the results of a traffic study for the proposed project.

Response to Comment No. 71-2

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request. Also, as stated above, it should be noted that a detailed traffic study was prepared for the Project and was circulated for public review along with the Draft EIR.

LETTER NO. 72 - NEGRI, PATTI

Patti Negri

December 7, 2012

Comment No. 72-1

Thank you Jack, this is GREAT! We will shortly be sending an email around for hopefully ALL residents to do the same! ;o) Patti.

Response to Comment No. 72-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 73 - NELSON, TODD

Todd Nelson

December 11, 2012

Comment No. 73-1

When you have a moment, could you please confirm that you received our DEIR comment letter that was emailed to you yesterday afternoon? Thank you very much!

Response to Comment No. 73-1

The comment is referring to Comment Letter No. 09, (AMDA). The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 74 - PAGE, BARB

Barb Page

December 10, 2012

Comment No. 74-1

Please consider the traffic implications in the Hollywood area. The traffic on Franklin between the Mayfair market and Gower is already impossible and getting worse. This is unacceptable, to proceed without a traffic study. I object to the Millennium Hollywood Project because it is not ready unless/until the traffic studies have been completed!

Response to Comment No. 74-1

The commenter wants a traffic study done for the Project. As identified in the Draft EIR, a Traffic Study was performed for the Project and Section IV.K.1, Transportation – Traffic, of the Draft EIR summarizes the analysis presented in the Traffic Impact Study for the Millennium Hollywood Development, Hollywood, CA, which was prepared by Crain & Associates, dated June 2012 (Traffic Study). The scope and methodology of the analysis was determined in conjunction with the City of Los Angeles Department of Transportation (LADOT). The Traffic Study is contained in Appendix K.1 to this Draft EIR. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 75 - PHILLIPS, SUZANNE

Suzanne Phillips
2917 Ledgewood Drive, Los Angeles, CA 90068

December 9, 2012

Comment No. 75-1

I strongly object to the overly high towers proposed for Hollywood. I believe they will mar forever a world famously view of the Hollywood hills that the whole city enjoys.

Response to Comment No. 75-1

Please refer to Topical Response 2, Aesthetics, for information regarding views, including views of the Hollywood Sign, and overall visual character of the Project in Hollywood.

Comment No. 75-2

This area is already congested as we who live here know too well and I understand that parking. In the buildings will be inadequate.

Response to Comment No. 75-2

With regard to parking, the Project's parking was analyzed using a shared parking which may be applied to the Base Demand when the uses have different parking requirements and different demand patterns in a 24-hour cycle or between weekends and weekdays pursuant to the Development Agreement and the Development Regulations. This is consistent with Community Plan Update policies and Section 106.61 of the Green Building Code. The intent is to maximize efficient use of the Project Site by matching parking demand with complementary uses. As the actual number of spaces will be dependent upon the land uses constructed in accordance with the Equivalency Program, the calculation of the parking requirements shall be based on a detailed assessment prior to Project construction based on the procedures set forth below and in the Development Agreement. As discussed above, parking will be provided to meet demand.

Comment No. 75-3

I own 3 residential properties in the area as well as 2 commercial buildings. I live in Hollywoodland. Please pass my comments on.

Response to Comment No. 75-3

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 76 - POOLE, NANCY CARLA

Nancy Carla Poole
5860 Canyon Cove, Los Angeles, CA 90068

December 9, 2012

Comment No. 76-1

Please extend the public comment period for the Millennium Hollywood Project.

Response to Comment No. 76-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 76-2

The traffic study must be done. As a homeowner, I already experience congested traffic in the area. How will traffic get onto the 101?

Response to Comment No. 76-2

A traffic study was prepared and discussed in Section IV.K.1, Transportation - Traffic, of the Draft EIR. The Traffic Study is Appendix K.1 of the Draft EIR.

Traffic will access the 101 freeway via the existing onramps.

Comment No. 79-3

It will also be out of size compared to the surrounding buildings. This is a recipe for an eyesore that will ruin the historic Hollywood area.

Response to Comment No. 79-3

It should be noted that the Project Site does not contain a height limitation under current zoning. Also, the Draft EIR analyzed height and massing issues related to surrounding properties in Sections IV.A, Aesthetics, IV.C, Cultural Resources, and IV.G, Land Use Planning. The Draft EIR discloses that the Project allows for a scale and massing of new development that is significantly larger than other structures in the immediately surrounding area. The Draft EIR specifically acknowledges that the Project has the potential to add considerable height and density, and that the immediate surroundings of the on-site and adjacent historic resources will be altered. Alteration of the surrounding area however will not critically reduce the integrity of surrounding historic resources such that their eligibility for listing in national, state, or local registers will be impaired.

Please see Response to Comment No 14-5 (Hollywood Heritage), Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources for a discussion on the compatibility of the Project with the adjacent structures.

LETTER NO. 77 - REICHENBACH, FRAN (#1)

Fran Reichenbach

December 4, 2012

Comment No. 77-1

I just got off the phone with Srimal. She tells me that requests for an extension of time for commenting on this Environmental document have been received and while they are still being reviewed, she is of the understanding that you are officially preparing a statement refusing to allow such an extension of time. I also understand that you are in receipt of a request to extend this comment period by Eric Garcetti. I'm hoping that you will call me so we can discuss this. It would help to understand directly from you the rationale for denying so many requests.

Response to Comment No. 77-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 78 - REICHENBACH, FRAN (#2)

Fran Reichenbach

December 4, 2012

Comment No. 78-1

It is my opinion, that the Planning Department should be responsive to the people as well as the councilmember (Garcetti) who have made this request. Please extend the comment period.

Response to Comment No. 78-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 79 - REICHENBACH, FRAN (#3)

Fran Reichenbach

December 6, 2012

Comment No. 79-1

Attached is a copy of the extension request from the Hollywood Dell. Please consider and include in the file for the Millennium Hollywood Project.

Response to Comment No. 79-1

The extension request from the Hollywood Dell Civic Association is included as Comment Letter #13 and responded to in Comment 13-1.

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 80 - REZNIK, BENJAMIN (#1)

Benjamin M. Reznik
Jeffer Mangels Butler & Mitchell LLP
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067

December 6, 2012

Comment No. 80-1

We represent and are writing on behalf of HEI/GC Hollywood & Vine Condominiums, LLC and the Hollywood & Vine Residences Association, the owner and homeowners association, respectively, of the W Hollywood Hotel & Residences at 6250 Hollywood Boulevard, Los Angeles, California 90028. On October 25, 2012, the Planning Department circulated the Environmental Impact Report ("EIR") for the Millennium Hollywood Project for a 45-day comment period until December 10, 2012. We request that the comment period be extended to a total of 60 days ending on December 24, 2012. We also request notice of your approval of the extension by Friday, December 7, 2012.

The Project provides over a million square feet of new development including dwelling units, hotel, office, restaurant, health and fitness and retail uses on a property that has historic designation. The EIR is 1,250 pages with thousands of additional pages of Appendices. Due to the expansive scope of proposed development and the extraordinary length of the EIR, the extension is warranted under the California Environmental Quality Act. (CEQA Guidelines, § 15105) As the City frequently provides for a 60-day comment period on other large projects, this request is reasonable and consistent with City practices.

Response to Comment No. 80-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

LETTER NO. 81 - REZNIK, BENJAMIN (#2)

Benjamin M. Reznik
Jeffer Mangels Butler & Mitchell LLP
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067

December 10, 2012

Comment No. 81-1

On behalf of the HEI/GC Hollywood & Vine Condominiums, LLC ("HEI/GC") and the Hollywood & Vine Residences Association ("HVRA"), the owner and homeowners association, respectively, of the W Hollywood Hotel & Residences at 6250 Hollywood Boulevard, Los Angeles, California 90028 (the "W Residences"), we provide the following public comment regarding the Draft Environmental Impact Report ("DEIR") for the Millennium Hollywood Project (the "Project"), prepared by the City of Los Angeles (the "City").

On May 31, 2011, HEI/GC submitted a public comment letter regarding the scoping of the EIR for the Project. After review of the DEIR, we have several concerns about the Project and the accompanying environmental analysis, because the DEIR fails to fully evaluate the issues identified in this letter, and fails to properly analyze several additional issues relating to: project description, land use, aesthetics, parking, air quality, school and library services, parkland, historic resources, noise, landfill capacity and growth inducing impacts.

Response to Comment No. 81-1

The comment is an introduction and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

The comment states that the Draft EIR does not adequately analyze the potential environmental impacts of the Project and contains a number of inaccuracies and false assumptions that does not fully disclose all impacts. The subsequent comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR. Each of these has a Response to Comment, below.

Comment No. 81-2

I. The DEIR Does Not Contain a Stable, Accurate, and Finite Project Description, Precluding an Understanding of What the Project Actually Contains.

The DEIR contains an amorphous, confusing, and wholly unstable Project Description, which amounts in essence to a zone change with no definite proposal to accompany it. An "accurate, stable, and finite

project description is the *sine qua non* of an informative and legally sufficient EIR." *San Joaquin Raptor Rescue Center v. County of Merced,* 149 Cal. App. 4th 645, 655 (2007) *("San Joaquin Raptor II),* quoting *County of Inyo v. City of Los Angeles,* 71 Cal App. 3d 185, 193 (1977). Furthermore, "[a}n accurate Project Description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." *Silveira v. Las Gallinas Valley Sanitary Dist.,* 54 Cal. App. 4th 980, 990 (1997). Therefore, an inaccurate or incomplete project description renders the analysis of environmental effects inherently unreliable, in turn rendering impossible any evaluation of the benefits of the Project in light of its significant effects. Although extensive detail is not necessarily required, a DEIR must describe a project not only with sufficient detail, but also with sufficient accuracy, to permit informed decision-making. *See* CEQA Guidelines§ 15124.

Response to Comment No. 81-2

The comment states case law regarding the adequacy of project descriptions cites the CEQA Guidelines and contends that the project description is unstable and "amounts in essence to a zone change with no definite proposal to accompany it." An EIR requires an accurate and stable project description as described by the Commenter. This does not mean, however, that the project description must be rigid or inflexible. "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during the investigation evoking revision of the original proposal." *County of Inyo v. City of Los Angeles*, 71 Cal.App.3d 185, 199 (1977). While the proposed Project presents several design scenarios with the provision that the final development may be any combination of the designs analyzed in the Draft EIR, the Project Description is stable and presents the information required by CEQA to provide a meaningful basis for environmental review. The Project Description, provided in Section II, Project Description, of the Draft EIR, contains the required contents set forth in Section 15124 of the CEQA Guidelines, which was cited by the Commenter.

Specifically, Section 15124(a) of the CEQA Guidelines requires, "The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map." Consistent with these requirements, Figure II-1 on page II-3 of Section II, Project Description, of the Draft EIR depicts the regional vicinity of the Project Site, Figure II-5 on page II-17 and Figure II-6 on page II-19 provide Photo Location Maps of the Project Site, Figure II-7 on page II-25 provides a site plan of the Project Site, and Figure II-2 on page II-2 provides an aerial view of the Project Site and its environs.

Section 15124(b) of the CEQA Guidelines requires, "A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project." Pages II-44 through II-48 of Subsection D, in Section II, Project Description, of the Draft EIR discusses the Project Objectives. In addition, as stated on page II-44, "The underlying purpose of the Project is to revitalize the Project Site from its existing use to a vibrant and modern mixed-

use development that retains the iconic Capitol Records Complex while maximizing the opportunity for creative development consistent with the priorities of the City's urban land use policies for Hollywood and those expressed by various stakeholders."

Section 15124(c) of the CEQA Guidelines requires, "A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities." Pages II-15 through II-44 of Section II, Project Description, provides a discussion of the project's characteristics.

Section 15124(d) of the CEQA Guidelines requires, "A statement briefly describing the intended uses of the EIR". Pages II-49 through II-50 of Subsection E, in Section II, Project Description, of the Draft EIR provides a discussion of the "Intended Uses of the EIR."

Based on the above, the Project Description in the Draft EIR meets the requirements of CEQA and accurately describes the Proposed Project in an appropriate level of detail for evaluation and review of environmental impacts. Specifically, the EIR provides a reasonable worst case impact analysis for each category of impact. For each category, the EIR uses the scenario that would produce the greatest impact. Thus, the Project Description is designed to allow the EIR to create a Project impact "envelope" that comprehends all of the impacts of the range of Project build-out combinations. For a given environmental category, the EIR analyzes the scenario most likely to cause the greatest impact for that category.

This "worst-case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. *Dusek v. Redevelopment Agency*, 173 Cal.App.3d 1029, 1041 (1985); *County of Inyo v. City of Los Angeles,* 71 Cal.App.3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved).

Further, CEQA does not require that detailed engineering design be presented in the EIR. To the contrary, CEQA Guideline Section 15124 provides: "The description of the project . . . should not supply extensive detail beyond that needed for evaluation and review of environmental impact." See also, *Dry Creek Citizens Coalition v. County of Tulare*, 70 Cal.App.4th 20, 27-28 (1990) (conceptual design satisfies CEQA's requirement for a general description of the project, and precise engineering design is not required). Therefore, the Project Description in the Draft EIR includes a range of options that could result from the Project. CEQA does not prohibit an EIR from analyzing a range of potential options for a single project.

Comment No. 81-3

The DEIR fails to meet this foundational requirement and, ultimately, provides only the most basic understanding of what the Project entails. In fact, the only clear aspects of the Project are the doubling of

the currently permitted floor area ratio to allow development of about 1.2 million square feet ("s.f.") of some combination of uses, of which about 1.1 million s.f.an amount approximately equivalent to the Staples Center--comprises new development. Also, development of the Project would presumably occur sometime before the 2035 horizon year of the requested development agreement ("D.A."). The purported equivalency program and development regulations represent little more than a jumbled amalgam of different Project characteristics, different aspects of which are evaluated depending on the environmental issue area. A project description that allows anything is a project description that clarifies nothing.

Response to Comment No. 81-3

The comment is in regard to the adequacy of the Project Description under CEQA. The Project Description, provided in Section II, Project Description, of the Draft EIR contains the required contents set forth in Section 15124 of the CEQA Guidelines. See Response to Comment No. 81-2 (Reznik, Benjamin (#2)) above for a detailed assessment of the adequacy of the Project Description under CEQA.

Further, as described in Section II, Project Description, of the Draft EIR on Page II-21, "[t]hrough the analysis of the Concept Plan and two additional scenarios, the Commercial Scenario and the Residential Scenario, further described below, this Draft EIR analyzes the greatest potential impact on each environmental issue area..." Thus, the most intense impacts from each scenario represent the greatest environmental impacts permitted for any development scenario for the Project. This "worst-case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. *Dusek v. Redevelopment Agency*, 173 Cal. App. 3d 1029, 1041 (1985); *County of Inyo v. City of Los Angeles,* 71 Cal. App. 3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved).

With respect to the Equivalency Program, as described in Section II, Project Description, of the Draft EIR, it does not allow the Project Applicant to propose land uses that are not identified and studied in the Draft EIR. Further, it does not allow for development beyond the maximum impacts disclosed in the Draft EIR. The Project may not exceed any of the maximum impacts identified for each issue area from the Concept Plan, the Residential Scenario, or the Commercial Scenario.

The Equivalency Program would be implemented pursuant to the administrative procedures set forth in the Development Agreement. The process to initiate an exchange under the Equivalency Program would begin with the Project Applicant filing a request with the Department of City Planning. This request shall include detailed information identifying the land use transfer/exchange that is being proposed. The supporting documentation would also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR.

Comment No. 81-4

For instance, the EIR includes a basic "Concept Plan," as well as two additional scenarios-the so-called Commercial and Residential Scenarios. (DEIR, pp. 23, 27-28) However, further reading soon clarifies that these scenarios are merely three among many, as uses, floor area, and parking may be transferred between the two halves of the Project site. Moreover, as illustrated in the purported "Development Regulations," the only guarantees provided with respect to massing are a 150-foot-tall podium on each half of the Project site, above which any number of development configurations could occur. Development above the podium could result in towers or large, blocky structures ranging in height from 220 to 585 feet,[22] dwarfing the 151-foot-tall (including the spire) Capitol Records Building and potentially displacing the Century Plaza Towers as the tallest buildings outside of downtown Los Angeles. Or, as the building envelopes illustrated in the Development Regulations indicate, two massive walls of development more akin to the Las Vegas Strip's Planet Hollywood than to Hollywood Boulevard. Despite representations throughout the DEIR that the Development Regulations would guide and limit development, avoiding environmental impacts, the Development Regulations provide large building envelopes and a number of broad generalities masquerading as standards. For example, Section 6.2 (Street Walls) only encourages architectural elements to reduce the apparent massing of the inevitable monolith: it requires nothing. Similarly, section 6.6.1.f provides that windows be recessed, except where "inappropriate." Section 7.1.1 provides that the towers shall not appear "overwrought" and shall have "big, simple moves": how can 600-foot-tall structures not appear "overwrought" in comparison to adjacent development less than one third its height? [23]

Response to Comment No. 81-4

The comment raises concern that the Concept Plan, Commercial Scenario, and Residential Scenario are merely three among many uses, floor area, and parking, which may be transferred between the two halves of the Project Site. While flexibility is contemplated in the Development Agreement with regard to particular land uses, siting, and massing characteristics, the Draft EIR analyzes and discloses all potential land uses, the maximum FAR (6:1), and the range of parking that would be provided. A conceptual plan was prepared as an illustrative scenario to demonstrate a potential development program that implements the Development Agreement land use and development standards. The Concept Plan provides an illustrative assemblage of land uses and developed floor area that conforms to the terms of the Development Agreement. Two additional scenarios, the Commercial Scenario and the Residential Scenario were also prepared and analyzed. Through the analysis of the Concept Plan, the Commercial Scenario and the Residential Scenario, the Draft EIR analyzes the greatest potential impact on each environmental issue area. These maximum potential impacts per environmental issue area across all three plans form the greatest environmental impact permitted for any development scenario for the Project. In

[22] *By way of comparison, the Ritz Carlton at L.A. Live is 653 feet tall; the Century Plaza Towers are 571 feet tall.*

[23] *Particularly instructive in this regard is the acknowledgement in the Development Regulations that the "historic datum" for the community is 150 feet. See Development Regulations, § 7 .1.5. Thus, this development would, even under the most charitable reading, dwarf the surrounding neighborhood*

addition to the identified development scenarios listed in the Draft EIR, the proposed Equivalency Program would provide development flexibility so that the Project could respond to the growth of Hollywood and market conditions over the build-out duration of the development. Land uses to be developed would be allowed to be exchanged among the permitted land uses so long as the limitations of the Equivalency Program are satisfied and do not exceed the analyzed upper levels of environmental impacts that are identified in the Draft EIR or exceed the maximum FAR.

To respond to the commenter's statement that two massive walls of development will be built, it is well recognized that there is a large range of aesthetic characteristics and contrasts (including height) within the City of Los Angeles. This also applies to the existing aesthetic conditions surrounding the Project Site in the Hollywood community of Los Angeles, which consists primarily of surface parking lots, low-scale construction, and surrounding larger urban structures. The proposed structures could range from approximately 220 to 585 feet high, assuming they are built to the maximum height limit established in the Development Regulations. Heights up to 585 feet are allowed by right on the Project Site, as there are no zoning or other regulations that place height limits on the Project Site. From most vantage points the Project's towers would occupy the skyline and contribute to the urban form.

The visual character existing today at and around the Project Site is one of an urban landscape with a mixed-use nature and a variety of different heights and massing. As noted in the Draft EIR, there is minimal thematic or consistent visual character that defines either the Project Site or the surrounding aesthetic environment. Instead, the area is characterized by a variety of commercial, office, hotel, and mixed-use urban structures that range from historic mid-rise architecture to modern glass tower buildings with advertising signage.

The comment contends that the Development Regulations only provide broad generalities and provided a few examples. While the Development Regulations do provide some recommendations, the majority are requirements that guide and limit development. For example, Section 6.2, cited in the comment, requires the street wall to be articulated "to create a sense of different uses, visual uses and orientation." It also requires the street wall to "have proportions and architectural building details which emphasize and reflect the presence and importance of the pedestrian environment." Section 6.6.1, also cited in the comment, provides a number of requirements and limits including, but not limited to, the use of "sustainable materials," rooftop mechanical equipment is required to be screened and the screening "shall be designed to be integral with the building architecture and the visual impact shall be minimized."

The comment also cites Section 7.1.1, and questions, "how can 600-foot-tall structures not appear "overwrought" in comparison to adjacent development less than one third its height?" First, Section 7.1.1, requires that "[t]owers shall have their massing designed to reduce overall bulk and to appear slender." Second, Section 7.1.2, the section containing the term overwrought states in part that "[t]owers shall be designed to achieve a simple faceted geometry…[and] shall not appear overwrought or to have over manipulated-manipulated elements" As such, "overwrought" is not related to height, but rather related to the idea of a sleek tower as opposed to an overcomplicated or overly ornate tower.

Comment No. 81-5

Further, the purported Equivalency Program and Development Regulations allow development of a nearly infinite number of development mixes, ranging anywhere from nearly over 900 residential units (rental or owned) to none, anywhere from over 200 hotel rooms to none, and 215,000 s.f. or more of office uses. Other uses, such as restaurants and health/fitness clubs are listed, but may or may not appear in the final development.

Response to Comment No. 81-5

It is the overall intent of the Equivalency Program to allow development flexibility with respect to the buildout of the Project. Specifically, the Equivalency Program would provide development flexibility so that the Project could respond to the growth of Hollywood and market conditions over the build-out duration of the development. The City of Los Angeles has given developers a tool to allow the exchange of land uses among the permitted uses, so long as the limitations of the Equivalency Program are satisfied and do not exceed the analyzed upper levels of environmental impacts identified in the Draft EIR or exceed the maximum Floor Area Ratio (FAR).

Development proposed through the Equivalency Program allows the Applicant to construct land uses and structures that are consistent with the growth of Hollywood and local economy at the time of construction. It does not allow the Applicant to propose land uses that are not identified and studied in the Draft EIR nor does it allow any use to be proposed in excess of the studied impacts. Through the analysis of the Concept Plan and two additional scenarios, the Commercial Scenario and the Residential Scenario, the Draft EIR analyzes the greatest potential impact on each environmental issue area.

Procedurally, the Equivalency Program would be implemented pursuant to the administrative procedures set forth in the Development Agreement. The process to initiate an exchange under the Equivalency Program would begin with the Project Applicant filing a request with the Department of City Planning. This request shall include detailed information identifying the land use transfer/exchange that is being proposed. The supporting documentation would also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR.

This "worst-case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. *Dusek v. Redevelopment Agency*, 173 Cal.App.3d 1029, 1041 (1985); *County of Inyo v. City of Los Angeles,* 71 Cal.App.3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved).

Further, CEQA does not require that detailed engineering design be presented in the EIR. To the contrary, CEQA Guideline Section 15124 provides: "The description of the project . . . should not supply extensive

detail beyond that needed for evaluation and review of environmental impact." See also, *Dry Creek Citizens Coalition v. County of Tulare*, 70 Cal.App.4th 20, 27-28 (1990) (conceptual design satisfies CEQA's requirement for a general description of the project, and precise engineering design is not required). Therefore, the Project Description in the Draft EIR includes a range of options that could result from the Project. CEQA does not prohibit an EIR from analyzing a range of potential options for a single project.]

Comment No. 81-6

Thus, the project description fails not only to provide any meaningful description of the actually proposed development, but also, by using only generalities in terms of square footages, fails to provide any information about the actual uses planned for the Project site. As stated above, residential units could comprise rental units or for-sale units.

Response to Comment No. 81-6

The commenter asserts that the Project Description fails to provide information about actual uses for the Project. As stated earlier, in the Response to Comment No. 81-2, the Proposed Project presents several design scenarios, with the provision that the final development maybe any combination of the designs analyzed in the Draft EIR. CEQA and the City of Los Angeles provide essential flexibility tools to applicants so that Projects can respond to the ever-changing real estate market and needs of the Hollywood area. Even though the defined Concept Plan presented in the Draft EIR represents only one scenario that may result from the approval of the proposed Development Agreement, overall flexibility is contemplated in the Development Agreement with regard to particular land uses, siting, and massing characteristics. In addition to the identified development scenarios listed in the Draft EIR, the proposed Equivalency Program would provide development flexibility so that the Project could respond to the growth of Hollywood and market conditions over the build-out duration of the development. Land uses to be developed would be allowed to be exchanged among the permitted land uses so long as the limitations of the Equivalency Program are satisfied and do not exceed the analyzed upper levels of environmental impacts that are identified in the Draft EIR or exceed the maximum FAR.

Procedurally, the Equivalency Program would be implemented pursuant to the administrative procedures set forth in the Development Agreement. The process to initiate an exchange under the Equivalency Program would begin with the Project Applicant filing a request with the Department of City Planning. This request shall include detailed information identifying the land use transfer/exchange that is being proposed. The supporting documentation would also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR.

This "worst-case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. *Dusek v. Redevelopment Agency*, 173 Cal.App.3d 1029, 1041 (1985); *County of Inyo v. City of*

Los Angeles, 71 Cal.App.3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved).

Comment No. 81-7

The requested entitlements also include a conditional use permit for alcoholic beverage sales though, consistent with the rest of the project description, the DEIR fails to provide any specific information on this point (will the contemplated roof-top cafe (if the tower exceeds 550 feet in height), or other spaces, include alcohol service?). To the extent the Applicant has any specific plans for specialized uses that might occur on-site, the DEIR must describe those plans. *See Bakersfield Citizens for Local Control v. City of Bakersfield,* 124 Cal. App. 4th 1184, 1213 (2004) ("[T]o simply state as did the . . . EIR that 'no stores have been identified' without disclosing the type of retailers envisioned ... is not only misleading and inaccurate, but hints at mendacity."). The actual uses of the site could alter the impact analysis and, as described in more detail below, the significant omissions in the DEIR either prevent or obscure key impact analyses. As the project description stands, the community and decision-makers are simply left to wonder as to what the Applicant would ultimately construct and precisely what would occupy that square footage. Furthermore, changes to the Project would occur with the Applicant "filing a request," but no further detail is provided regarding the level of review and how the Project would achieve compliance with CEQA.

Response to Comment No. 81-7

The comment states that specific information regarding the conditional use permit for alcohol sales was not included in the Draft EIR and to the extent that "any specific plans for specialized uses that might occur on-site," the Draft EIR must describe those plans. As Commenter notes, the Project Description does identify that a CUP for off-site sale and on-site sale and consumption of alcoholic beverages is being requested by the Project Applicant. See Section II, Project Description, page II-49.

The Project Description provides more than the comment suggests regarding the location of alcohol sales by stating that "[f]ood and beverage uses would be provided both on the ground floor and within the hotel, sports club and office and on a possible rooftop observation deck. The food and beverage uses would include full-service restaurants and a café. The full service restaurant would also include outdoor dining areas." *Id*. at page II-30. As such, pursuant to the Project Description, the full-service restaurants and café, the hotel and the dining area of the potential rooftop observation deck could serve alcohol.

The Project Applicant is requesting a master conditional use permit to permit the onsite sales and consumption and sale for offsite consumption of a full line of alcoholic beverages. Because none of the specific operators of the alcohol-serving establishments can be known until after the Project is built, a blanket conditional use would require that each operator seek and obtain plan approval from the Zoning Administrator before the operator is authorized to serve alcohol within the project. The purpose of the

plan approval is to ensure that each operator proposes a use that is consistent and compatible with the blanket conditional use.

The master conditional use would consist of ten alcohol-related uses within the Project as follows:

1. Five sit-down restaurants or cafés with a full line of alcoholic beverages for onsite sales and consumption with food (Type 47 - bona fide public eating place), including a hotel restaurant that may feature live music and dancing.

2. One café or restaurant on the potential rooftop observation deck with a full-line of alcoholic beverages for onsite sales and consumption with food (Type 47 – bona fide public eating place).

3. One nightclub lounge with a full line of alcoholic beverages for onsite sales and consumption. While the nightclub lounge may serve food, it is intended to be a Type 48 stand-alone bar establishment and will include bottle service. The nightclub lounge may also feature live entertainment and dancing.

4. One retail establishment, such as a gourmet grocery or high-end wine and spirits store, selling a full line of alcoholic beverages for offsite consumption (Type 21 — offsite general).

5. Two mobile bars to provide alcohol service for special events at several locations on the Project Site, which may also feature live entertainment and dancing. Service of food and/or a full line of alcoholic beverages will be conducted at these special event locations either by the specified onsite providers or by appropriately licensed off-site providers.

The Draft EIR also discusses the food and beverage uses in Section IV.H, Noise, for example. It explains that "[t]he Project is anticipated to include outdoor eating and gathering places at the pedestrian level at-grade and above the ground floor on the podium levels and observation deck levels of the proposed towers. The podium levels would be developed with common open space areas, swimming pools and poolside seating, and outdoor dining." See Section IV.H, Noise, page IV.H-40. The section goes on to conclude that outdoor eating and gathering areas would not substantially alter the ambient outdoor noise levels at surrounding off site uses and that these impacts would be less than significant.

The Commenter cites *Bakersfield Citizens for Local Control v. City of Bakersfield*, 124 Cal. App. 4th 1184 (2004) ("*Bakersfield*"), for his contentions regarding specific plans for specialized uses and the argument that the actual uses on the site could alter the impact analysis. First, *Bakersfield* is a case primarily regarding the need for an urban decay study and corresponding analysis in the environmental impact report when a project includes a Supercenter. This Project does not propose a Superstore or any type of retail use that would require an urban decay study. To the extent that *Bakersfield*, could be broadly applicable here, the Project Applicant does not have any specific plans for specialized uses that might occur on-site and is not proposing any specialized uses like a Supercenter.

The Draft EIR studies all of the potential uses of the Project Site including residential, hotel, food and beverage (including alcohol) uses, retail, fitness center/sports club, and office use. Further specificity is unknown and not required because the end user (i.e. name or type of retail or name of restaurant) would not implicate new or different environmental effects other than those already addressed in the Draft EIR. See *Maintain Our Desert Environment v. Town of Apple Valley*, 120 Cal. App. 4th 396 (2004).

With regard to the comment that the public is left to wonder what will be built, please refer to Response to Comment No. 81-5 above (Reznik, Benjamin (#2)), for more information. Also, see Response to Comment No. 81-2 (Reznik, Benjamin (#2)) for additional information as to the Project Description's adequacy under CEQA.

Comment No. 81-8

As a result of the exclusions described above and in more detail below, the DEIR lacks the information necessary for reasoned and informed consideration of the Project's environmental impacts. *See* CEQA Guidelines *§* 15121(a). Moreover, given the many significant and unavoidable impacts the DEIR predicts that the Project will cause, the lack of specificity regarding the development proposal-specifically, the request for a building envelope and virtually unlimited physical and temporal flexibility-renders impossible any informed judgment by the decision-makers regarding the benefits of the Project against its significant effects, contrary to CEQA. *See King County Farm Bureau v. City of Hanford,* 221 Cal. App. 3d 692, 712 (1990). These omissions in the DEIR also deprive the decision-makers of substantial evidence upon which to make findings or adopt a statement of overriding considerations. The City must demand that the Applicant put forth an actual, finite development proposal, and must base both the environmental analysis and the consideration of the Project on that basis. The City must also revise and recirculate the DEIR to provide the public and decisionmakers the opportunity for informed comment and deliberation.

Response to Comment No. 81-8

The Commenter states that the Draft EIR lacks the information necessary for reasoned and informed consideration of the Project's environmental impacts. The Project Description presents the information required by CEQA to provide a meaningful basis for environmental review. An EIR requires an accurate and stable project description as described by the Commenter. This does not mean, however, that the project description must be rigid or inflexible. *See County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 199 (1977).

The Commenter expresses concern about the building envelope and the physical and temporal flexibility, however, the EIR provides a reasonable worst-case impact analysis for each category of impact. For each category, the EIR uses the scenario that would produce the greatest impact. Thus, the project description is designed to allow the EIR to create a Project impact "envelope" that comprehends all of the impacts of a range of Project build-out combinations. For a given environmental category, the EIR analyses the scenario most likely to cause the greatest impact for that category.

This "worst-case impact envelope" approach complies with CEQA, which allows a lead agency to approve a project that varies from the project described in the EIR, so long as all of the impacts are disclosed. *Dusek v. Redevelopment Agency*, 173 Cal. App. 3d 1029, 1041 (1985); *County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 190 (1977) (elastic project description not per se violation of CEQA, provided impacts analysis comprehends all potential impacts, lead agency may describe a project more broadly than the project actually approved).

Further, CEQA does not require that detailed engineering design be presented in the EIR. To the contrary, CEQA Guideline Section 15124 provides: "The description of the project . . . should not supply extensive detail beyond that needed for evaluation and review of environmental impact." See also, *Dry Creek Citizens Coalition v. County of Tulare*, 70 Cal. App. 4th20, 27-28 (1990) (conceptual design satisfies CEQA's requirement for a general description of the project, and precise engineering design is not required).

Therefore, the Project Description in the EIR includes a range of options that could result from the Project. CEQA does not prohibit an EIR from analyzing a range of potential options for a single project. As such, the City does not need to require the Project Applicant to put forth an "actual, finite development proposal" and the Draft EIR does not need to be revised and recirculated.

See Response to Comment No. 81-2 (Reznik, Benjamin (#2)) for additional information as to the Project Description's adequacy under CEQA.

Comment No. 81-9

II. The DEIR Fails to Adequately identify and Analyze the Significant Environmental Impacts of Removing the Zoning Restrictions and Amending the Community Plan.

The DEIR notes that the Property is within a C4-2D-SN zone, with a "D" development limitation that restrict the total floor area on the Property to a floor area ratio ("FAR") of 3:1 (Ord. No. 165659). (DEIR, III-25) The Property has a Regional Center Commercial land use designation. On June 19, 2012, the City Council approved a Community Plan Update that increased the FAR on the site to 4.5: 1. Subsequently, several neighborhood groups sued the City over the Community Plan Update in response to the proposed increase in density. These include *Save Hollywood.org v. City of Los Angeles* (BS 138370), *Fix the City, Inc. v. City of Los Angeles* (BS138580), and *La Mirada Neighborhood Association of Hollywood* (BS138369). These complaints allege violations of CEQA for failure to properly evaluate the increase in density, among other issues. These cases have been consolidated and are being heard by Judge Goodman in Los Angeles Superior Court, with yet unknown outcome. The Hollywood Chamber of Commerce intervened in the case, and is represented by Sheppard Mullin Richter & Hampton, the same attorneys that represent the developer of the Hollywood Millennium Project. A Motion to Compel documents is calendared for December 14, 2012. Possible outcomes of the litigation include a stay on issuing permits under the new 4.5:1 FAR density, or an order for additional environmental review under CEQA. As such, the DEIR must evaluate the Project under the existing FAR of 3:1, or provide a caveat

that if the court issues a petition for writ of mandate requiring additional CEQA review for the Community Plan Update, the Project will also require subsequent CEQA review.

The Project includes an increase in FAR from 3:1 to 6:1, which is double the currently permitted density on the site. The DEIR states that the Redevelopment Plan allows an increase in FAR from 4.5:1 to 6:1, if the proposed development furthers the goals and intent of the Redevelopment Plan and the Community Plan. (DEIR, III-26) However, the DEIR does not evaluate the increase in FAR from the existing permitted FAR of 3:1 to 4.5: 1, in the event that the Community Plan Update is not upheld in the court. Therefore, the DEIR must fully evaluate the land use impacts of doubling the density on the Property.

Response to Comment No. 81-9

The commenter is correct that a possible outcome of the litigation could include a stay on issuing permits under the newly proposed 4.5:1 FAR, however, the Project analyzes and discusses potential Project impacts under a 6:1 FAR, whether existing FAR is 3:1 per the "D" Limitation, or the modified FAR of 4.5:1 per the Hollywood Community Plan Update. The Draft EIR also evaluates the Project's consistency with both the 1988 Hollywood Community Plan and the Hollywood Community Plan Update, so if the litigation results in a stay or negates the implementation of the Hollywood Community Plan Update, the Project has already been evaluated based on the 1988 Hollywood Community Plan and no subsequent CEQA review is required. See pages IV.G.35-48 of the Draft EIR for the analysis of the Project's consistency with both the 1988 Hollywood Community Plan and the Hollywood Community Plan Update.

Further, as discussed in Section II, Project Description and Section IV.G, Land Use Planning, of the Draft EIR, the Project Applicant is requesting the removal of the "D" Limitation from the Project Site's zoning designation, thereby resulting in a FAR of 6:1. As such, the Project Applicant is not relying in any way on the Hollywood Community Plan Update for additional FAR. Further, the Regional Center Commercial land use designation allows for the construction of commercial, parking, and high-density multi-family residential uses. Development of the Project would include multi-family residential, retail, restaurant and commercial land uses, in addition to the Capitol Records Complex, which would be retained as part of the Project. Contrary to the commenter's statement that the Project is not consistent with zoning designations, this type of development would be consistent with the Regional Center Commercial land use designation of the 1988 Hollywood Community Plan and the Hollywood Community Plan Update.

Comment No. 81-10

III. The DEIR Does Not Evaluate Any Impacts Related to a Conditional Use Permit for the Sale of Alcoholic Beverages or Live Entertainment.

The DEIR lists one of the proposed uses of the DEIR as a "Conditional Use Permit for limited sale and on-site consumption of alcoholic beverages, live entertainment, and floor area ratio averaging in a unified

development". (DEIR, II-49) However, the DEIR fails to identify and fully evaluate the impacts for the proposed conditional uses for the sale of alcoholic beverages or live entertainment.

For a Conditional Use Permit for the sale of alcohol and/or live entertainment (CUB), the City requires specific information, such as (i) floor plans identifying areas where alcohol will be served and consumed, (ii) the total occupancy numbers of each area where alcohol will be served, (iii) the sensitive uses in the area that may be affected by the service of alcohol in this specific location, (iv) the hours of operation of the establishment, and the times when alcohol will be served within the hours of operation, (v) food service during alcohol service, (vi) the times at which live entertainment is permitted, (vii) mitigation measures, including design features and insulation, to limit the noise of live entertainment, (viii) particular mitigation measures for service of alcohol on outdoor patios and roof decks, and several other mitigation measures related to noise, traffic, security, parking, and impact on public services that are directly effected by the sale of alcohol and live entertainment. Hollywood is an area that is oversaturated with liquor licenses for both on and off-site consumption. Therefore, any proposed conditional use permit for the sale of alcohol or live entertainment must be thoroughly evaluated with input from the Police Department and community stakeholders, and each establishment within the Project must be evaluated separately. Therefore, a supplemental or subsequent MND or EIR is required for the service of alcohol and live entertainment use within the Property, at the time that the Applicant has completed at least schematic design level drawings for each establishment. This is the standard of review for CUB permits that has been consistently applied to the entitlements for the numerous hotels, restaurants and night clubs in the Hollywood area, and is required to properly evaluate the Project's environmental impacts under CEQA.

Response to Comment No. 81-10

The comment claims that the Draft EIR does not evaluate any impacts related to a conditional use permit (CUP) for the sale of alcoholic beverages or live entertainment. This issue was also raised and responded to in Response to Comment No. 81-7 (Reznik, Benjamin (#2)) above. Please see that response for a discussion of how the Draft EIR incorporates adequate information and analyses regarding the master conditional use permit for alcohol sales. In summary, the Draft EIR does analyze the potential impacts associated with the CUP for sale of alcoholic beverages and entertainment uses in the Draft EIR including, but not limited to, the project description, noise, public services, and land use sections.

The comment then recites, without a reference to any controlling municipal code sections, the apparent City of Los Angeles requirements for a CUP for the sale of alcohol and/or live entertainment. These requirements are noted, but are not germane to the environmental impact issues analyzed in the Draft EIR because these details will be reviewed by the City before issuance of permits to the establishments covered by the CUP.

It is important to recognize the CUP requested in the Draft EIR is a master CUP. A master CUP accomplishes the following: (1) establishes the maximum number of alcohol-serving establishments and locations within the project; (2) establishes the types of alcohol-serving establishments within the project;

and (3) establishes certain permitted activities within those establishments, such as live entertainment and dancing.

Response to Comment No. 81-7 (Reznik, Benjamin (#2)) above lists the establishments covered by the master CUP requested in the Draft EIR. Furthermore, this blanket CUP would require that each operator seek and obtain plan approval from the Zoning Administrator before the operator is authorized to serve alcohol within the Project. It follows that the Draft EIR has provided sufficient information and analysis to support approval of a master CUP with the understanding that the more specific plan approval review will be required before operation of permitted uses under the master CUP.

Next, the comment claims that the Hollywood area is oversaturated with liquor licenses for both on and off-site consumption. The comment demands that any CUP must be thoroughly evaluated for each separate establishment. As noted above, the forthcoming Zoning Administrator review would provide a case-by-case assessment of the proposed alcohol and entertainment operations. Thus, the Draft EIR provides a sufficient level of information and analysis to support the master CUP within the context of additional review by the City before certificates of occupancy are granted. Similarly, the comment asserts that a supplemental or subsequent Mitigated Negative Declaration (MND) or EIR is required at the completion of the schematic design level drawings for each alcohol or entertainment related venues proposed in the Project.

Again, note that the Draft EIR analyzes a master CUP. Subsequent review, and likely conditions of approval, will occur at the Zoning Administrator level, but that review will not require preparation of a new MND or EIR because the Draft EIR analyzes the potential impacts associated with the land uses contemplated under the master CUP.

Comment No. 81-11

IV. The Traffic Analysis Uses Inappropriate Trip Generation Rates.

As shown in page IV.K.1-34, the traffic analysis for the Project used a trip generation rate for residential units of 0.685 trips per unit. This rate is about two thirds of the trip generation rate employed in studies for other similarly sized projects. For example, the Casden Sepulveda Project EIR used a rate of 1 trip per unit. Both projects use discounts for transit proximity. However, the DEIR for the Project provides no substantial evidence to support this lower rate, and given the number of potential residential units (about 500 in one scenario), this trip generation difference is substantial and would have a material effect on the analysis. The City must revise the DEIR and traffic study either to substantiate the failure to employ an appropriate trip generation rate, or to revise the traffic study to reflect that rate.

Response to Comment No. 81-11

The comment states that the trip generation rate for residential units of 0.685 trips per unit is not appropriate and that the Casden Sepulveda Project EIR used a rate of 1 trip per unit. The comment seems to confuse the trip generation rates with the Trip Cap, as trip generation equations were used to determine

the trip generation for the residential units, not a rate. The rate of 0.685 vehicle trips per unit used for the Project in the Trip Cap is a back calculated rate from the Project trip generation, and is for Trip Cap purposes only. The Trip Cap rate of 0.685 vehicle trips per unit is based on the Project vehicle trip generation estimate (based on the trip generation equations), including adjustments, for the residential portion of the Project, divided by the number of residential units. The trip generation equations used for the residential units for Project generation is discussed in detail below. The comment references the Casden Sepulveda Project EIR, which used trip generation rates of 0.51 trips per unit for AM peak hour and 0.49 trips per unit for PM peak hour. Those rates were used because the Casden Sepulveda Project is located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan area, which requires the use of those rates as they reflect the conditions in that corridor. For instance, the project site for the Casden Sepulveda Project is not within walking distance of any of the Metro Rail stations and is in a low density area. Here, the Project Site is located within a quarter mile of a Red Line subway station and within walking distance of a variety of uses. The trip generation equations used in the Traffic Study and the Draft EIR are considered to be appropriate for the multi-family residential units as part of a mixed-use project in the Hollywood area and were approved by LADOT.

For the Project residential unit generation, trip generation equations from the ITE Trip Generation Manual were used to determine the trip generation for the residential units, not a rate. The ITE Trip Generation Manual provides both trip generation equations and rates for Apartments (Land Use 220). As shown in Appendix D of the Traffic Study and Appendix IV.K.1 of the Draft EIR, the equations (rather than rates) from the ITE Trip Generation Manual were used for the traffic generation estimates for the residential uses. The equations were selected and agreed to by LADOT because the coefficient of determination (R^2) value for the given equations exceeds 0.77 for both AM and PM peak hours and the values are within the range of the data, which demonstrates that the equations are a good fit for the Project data. The high R^2 value demonstrates that the equations are more reliable than rates given the Project component sizes are within the data range[24].

Further, the adjusted generation values used for the calculations reflect that different uses are more or less able to take advantage of the transit, walk-in, mixed-use and other opportunities at the Project Site. LADOT has determined that there is substantial evidence to support these adjustments and approved their use in the Draft EIR. For instance, in the ITE Trip Generation Manual the peak hour rates for High-Rise Apartments (Land-use 222) are 30-35% lower than the standard Apartment rates (Land Use 220). Further, it should be noted that the adjustments utilized in the Traffic Study are not unique in that LADOT has approved adjustments for transit use, walk-in factors and internal trips for other mixed-use projects in the immediate vicinity of a transit station. The LADOT adjustments reflect that the observed

[24] *In statistics, the coefficient of determination, denoted* R^2*, is used as a measure of the accuracy of a statistical model whose main purpose is the prediction of a "dependent" variable. As input, the model uses "independent" variables (known and related information). The* R^2 *is a number between 0 and 1.0, used to describe how well a regression line fits a set of data. An* R^2 *near 1.0 indicates that a regression line fits the data well, while an* R^2 *closer to 0 indicates a regression line does not fit the data very precisely.*

trips per residential unit are lower for mixed use, high density, transit served areas of Los Angeles (e.g. Downtown Los Angeles and Hollywood) than in the low-density outlying areas of Los Angeles.

Based on the above, the trip generation rates for the residential uses are substantiated and therefore neither the Draft EIR, nor the Traffic Study needs to be revised.

Comment No. 81-12

V. The DEIR Fails to Properly Analyze the Parking Required for the Project.

The DEIR fails to properly analyze the parking for the entire Project, in an area with a significant shortage of public parking for restaurant, entertainment and retail uses in the evenings, especially on the weekends. The Project is located in the Hollywood area near mass transit and several bus lines. These methods of transit are easily accessible for commuting to and from Hollywood for work during the day, and for tourists to access the Hollywood venues. However, the MTA lines are not frequently used for attending theater, restaurants, bars and nightclub venues in the evening, due to factors of convenience and safety. Although the Red Line has direct access to downtown for work commuting, it does not directly access most residential areas in the City, and therefore does not provide a viable alternative for commuting for evening entertainment.

The Property currently contains approximately 264 parking spaces available to the public. (DEIR, IV.K2-4). The Project removes and does not replace these parking spaces. In addition, the Project provides parking for office, retail, restaurant, and bar uses at a rate of two parking spaces per 1,000 square feet of floor area (per LAMC 12.21.A.4 (x)(3)). This is a special rate for projects within the Hollywood Redevelopment Project Area, based on proximity to transit. This rate is half of the rate of four-spaces/1,000 sf that is typically required for retail spaces in the City of Los Angeles, and one-tenth the standard rate of one-space/100 square feet for restaurant uses (LAMC 12.2l.A.4(c)(3), (4), (5)). The City adopted this rate to promote the use of mass transit in a Redevelopment Area; however, it has not proven effective, and restaurants and retail spaces are vastly underparked in Hollywood. There are not enough private lots to accommodate all of the restaurant valet services along Hollywood Boulevard and for individuals seeking to visit the restaurants, theaters and nightclubs. Therefore, the Project should include spaces available to the public to replace the 264 parking spaces that currently serve various existing restaurants and nightclubs through leases and other agreements. In addition, the Project should provide parking fully accessible to the public for all of the non-residential uses at the rates set forth in LAMC 12.2l.A.4(x)(3) without additional discount.

Although the DEIR states that the final parking layout will be determined by the final use configuration of the Project, the DEIR should require that the Project be fully parked to code standards within each phase of development, so that parking cannot be deferred to a later phase. In addition, any transit reduction analysis or shared parking analysis must consider that the office/restaurant/retail/commercial calculation of two parking spaces/1,000 square feet already includes a 50 percent reduction for proximity to transit.

Response to Comment No. 81-12

As shown in Section IV.K.2, Transportation - Parking, and the Shared Parking Analysis provided in Appendix E of the Traffic Study (Appendix IV.K.1 of the Draft EIR), the Project will provide sufficient parking supply for all uses within the Project Site, including the existing uses that will remain as part of the Project. As a mixed-use Project, different users will share a portion of the parking spaces during a 24-hour period. For example, spaces that are vacant on weekends when office employees are not at work will be available for use and used by retail, restaurant, or other Project users. The parking demand of different uses would peak at different times and the Shared Parking Analysis takes these different user demand cycles into account. In addition, to be conservative in the analysis, no discount was taken from the LAMC requirements (used as the base parking for the Shared Parking Analysis) to reflect the use of transit or other alternative modes by any category of Project user. Please refer to the Shared Parking Analysis for the detailed analysis and results. See Appendix E of Appendix IV.K.1 of the Draft EIR. Also see Response to Comment No. 09-50 (AMDA) for cumulative parking considerations.

The comment also states that the Draft EIR should require that the Project be fully parked to code standards within each phase of development, so that parking cannot be deferred to a later phase. The Project would be parked to meet demand based on the shared parking program within each phase of development. Further, the comment states that a shared parking analysis must consider that the office/restaurant/retail/commercial calculation of two parking spaces/1,000 square feet already includes a 50 percent reduction for proximity to transit. Pursuant to Section 12.21.A.4 (x)(3) of the LAMC, office/restaurant/retail/commercial uses are to be parked at two (2) parking spaces/1,000 square feet. This is the base parking requirement used for the shared parking analysis. The shared parking analysis does not calculate demand based on proximity to transit, but rather is applicable when uses, such as those of the Project, have different demand patterns in a 24-hour cycle or between weekends and weekdays.

Further, the comment recommends that the Project provide public parking to replace the parking spaces to be removed by the Project, provide parking for all of the non-residential uses at the rates set forth in LAMC 12.21.A.4 (x)(3) without additional discount. On weekends, when parking demand is less than on weekdays for all scenarios (see Appendix E of the Traffic Study in Appendix IV.K.1 of the Draft EIR), the on-site Project parking will be made available to patrons of currently under-parked off-site uses. This part of the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 81-13

VI. The DEIR Wrongly Downplays The Significance Conclusions Of The Air Quality Analysis.

I. The DEIR Provides a Misleading Discussion of Significant Unavoidable Air Quality Impacts.

The tables in the Air Quality analysis for the DEIR demonstrate that the Project would result in significant and unavoidable impacts to both local and regional air quality, as well as to any residents of the Project (should the Project include residential units). However, the discussion then impermissibly seeks to downplay and dilute the effect of those impacts. For*;* example, the analysis states on page IV.B.1-48 that even though impacts regarding toxic air contaminants ("TACs") are significant, they are typical of "other, similar residential developments in the City." However, there are no comparable developments within the community. Moreover, the analysis implies that such impacts would be mitigated by stating on the same page that local, regional, and federal regulations would "protect" sensitive receptors, but provides no discussion as to how this protection would occur or what form it would take. If impacts associated with ultrafine diesel particulate matter cannot be mitigated, and the cancer burden on the Project site remains in excess of established thresholds, what protection can regulations provide? The DEIR misleads the public and decisionmakers regarding the true extent of Project impacts.

Response to Comment No. 81-13

This comment confuses and incorrectly combines the issues of the Project's generation of TACs versus the Project's placement in an area that currently experiences elevated ambient air pollutants and TACs associated with the 101 Freeway. The first is a Project impact on the environment and is within the scope of the required CEQA analysis. The second is an impact of the existing environment on the Project, which is outside the scope of the required CEQA analysis. The Draft EIR clearly and correctly discloses the nature of these very different impact issue areas. Please refer to pages IV.B.1-48 through IV.B.1-53 of the Draft EIR for a detailed and adequate analysis of the Project's generation of TACs, and the Project's potential exposure to existing TACs in the Project area.

Please also see Response to Comment No. 08-2 (Southern California Association of Governments), which addresses potential TAC emissions and the Health Risk Assessment prepared for the Project. That response indicates that CEQA does not require an EIR to analyze or mitigate the impacts of the environment on a project. In this case, the air quality at the nearby 101 Freeway is part of an existing environmental condition. Although the Project brings people into this existing environmental condition, the existing air quality in the Project vicinity due to the 101 Freeway is not an impact of the Project on the environment. Instead, it is an impact of the environment on the Project. Courts have affirmed, the purpose of CEQA is "not to protect proposed projects from the existing environment" (*Baird v. County of Contra Cost*a (1995) 32 Cal.App.4th 1464; Pub. Res. Code Sections 21061, 21083(b), and 21060.5.) "[C]ourts have recognized that CEQA is not a weapon to be deployed against all possible development ills." (*South Orange County Wastewater Authority v. City of Dana Point* (2011) 196 Cal. App. 4th 1604, 1614.) It has a limited role. "The Legislature did not enact CEQA to protect people from the environment." (*Id*. at 1617-1618.) Therefore, the Draft EIR analysis is consistent with the CEQA Guidelines and case law that do not require an EIR to examine an effect on the project caused by the environment.

It should also be noted that the Final EIR incorporates additional air quality mitigation measures, in response to Comment No. 08-2 (Southern California Association of Governments) that will further reduce potential air quality impacts.

Comment No. 81-14

II. The DEIR Fails to Disclose That The Project Would Obstruct Implementation Of The 2007 Air Quality Management Plan

The DEIR states on page IV.B.1-54 that the Project, despite multiple significant project related and cumulative air quality impacts, including air quality impacts directly relating to cancer, would not obstruct implementation of the 2007 Air Quality Management Plan (the "AQMP"). However, the DEIR states on page IV.B.l-21 that the purpose of the AQMP is to reduce pollutants and meet state and federal air quality standards. In fact, the emissions thresholds published by the South Coast Air Quality Management District (the "SCAQMD") were developed for the purpose of attaining state and federal air quality standards. Thus, even if a project is consistent with broad growth projections, exceeding thresholds-particularly operational thresholds-would thwart the ability of the air basin to reach attainment. Indeed, this is the very meaning embodied in the concept of cumulative impacts. As stated on page IV.B.l-55 of the DEIR, the SCAQMD considers exceedences of emissions thresholds at the project level also to constitute cumulatively considerable contributions to cumulative impacts on regional air quality. Such a conclusion requires a determination that a cumulative impact-here, regional air quality and cancer risk-would occur in the first instance. *See Communities for a Better Environment v. California Resources Agency ("CBE"),* 103 Cal. App. 4th 98, 120 (2002). By contributing to-and by definition, worsening-the significantly impacted regional air quality, the Project impedes implementation of the AQMP. By failing to disclose this significant impact, the DEIR wrongly seeks to downplay it and robs the public and decisionmakers to understand the importance and effect of their decision to approve or reject the project. The City must revise the DEIR to accurately disclose this impact as significant and unavoidable. Also, where, as here, revisions to the EIR would disclose a significant impact not previously disclosed, the City must recirculate the DEIR to properly inform the public regarding the impacts of the Project. (CEQA Guidelines§ 15088.5(a)(1)).

Response to Comment No. 81-14

This comment asserts that all projects that exceed project level thresholds are cumulatively considerable and therefore would impede implementation of the AQMP. The AQMP was not formulated to put a cap on growth. Rather, a main goal of the AQMP is to establish a plan that can help accommodate inevitable growth in a way that ultimately improves cumulative air quality conditions across the Basin. Many large development projects by definition will exceed the project-level thresholds of significance. But, this does not mean that all large projects will conflict with goals or the implementation of the AQMP.

While the Draft EIR has accurately concluded that Project air quality emissions would in fact exceed the project level thresholds, the location and type of such development projects is equally relevant in

determining whether the Project will be consistent with the goals and objectives of the AQMP. The Draft EIR focuses the Project's AQMP consistency analysis on these parameters. Specifically, pages IV.B.1-31 and 32 state projects that are consistent with the projections of employment, population and housing forecasts identified by SCAG are considered to be consistent with the 2007 AQMP growth projections since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the 2007 AQMP.

As discussed in Section IV.I, Population, Housing, and Employment, of the Draft EIR, the Project would not exceed the population, housing, and employment projections and would not jeopardize attainment of the air quality conditions projected in the AQMP.

Also, Section IV.G, Land Use Planning, of the Draft EIR, provides further detailed analysis with respect to the Project's consistency with regional policies to reduce urban sprawl, efficient utilization of existing infrastructure, contribution to reducing regional congestion, and improved air quality through the reduction of regional vehicle miles traveled (VMT). Consistent with SCAG's Compass 2% Strategy, the Project would increase the density of residential uses within a targeted growth center that would result in placing residential uses in close proximity to a regional employment center and an area that is accessible via public modes of transportation. Concentrating density in an area currently served by public transit, (i.e., the Hollywood and Vine Metro Red Line Station, Hollywood DASH, and LADOT Commuter Express 422 & 423) would have the effect of reducing the Project's VMTs, which, in turn, reduces the mobile source air quality emissions attributable to vehicle trips.

Therefore, the Project provides housing closer to jobs at densities that are consistent with the VMT reduction strategies of the RCPG and AQMP. Based on the information presented above, the Project would not exceed the assumptions utilized in preparing the AQMP and would not have the potential to impair implementation of the AQMP. Accordingly, through evaluation of the Project against the two criteria for consistency with regional plans and the regional AQMP adopted by the SCAQMD, impacts with respect to regional plans and AQMP consistency would be less than significant.

Finally, there is no reason to recirculate because the comment does not reveal any new significant environmental impacts. The information commenter cites in order to support its claim that the Project is not consistent with the AQMP (i.e., the project's emission of ROG and NOx in excess of the criteria pollutant standards) is from the Draft EIR. See Draft EIR at Table IV.B.1-13 and page IV.B.1-55. Accordingly, there is no merit to the claim that the Draft EIR robs the public and decision-makers of an understanding of the importance and effect of their decision to approve or disapprove the project, where the Draft EIR already informs the public and decision-makers of the Project's ROG and NOx emissions. Even if the commenter's interpretation of how to determine consistency with the AQMP were correct, the mere inconsistency of a project with a plan is not itself an environmental impact. (*Lighthouse Field Beach Rescue v City of Santa Cruz* (2005) 131 Cal. App 4th 1170, 1206.) At best, an inconsistency with a land use control plan may point the decision-maker toward a secondary environmental impact, but "effects analyzed under CEQA must be related to a physical change." (Id. citing Guidelines, § 15358, subd. (b); Guidelines, § 15065, subd. (a) ; PRC § 21060.5, 21151, subd. (b), and § 21083, subd. (b).)

Here, the physical change is the change in the criteria air pollutant levels caused by the Project, which are already disclosed in the Draft EIR, not the alleged inconsistency with the Air Quality Management Plan.

Comment No. 81-15

VII. The DEIR Fails to Evaluate The Project's Indirect Impact on School Overcrowding and Library Services.

The DEIR states on page IV.J.3-16 that payment of school fees authorized under Senate Bill 50 ("SB50") would mitigate the impact of the Project on area schools, but failed to analyze the secondary effects of school-related traffic and construction activities on the surrounding community. Recent changes to SB50 now provide that school impact fees established according to the provisions of that statute comprise full and complete mitigation of impacts "on school facilities." Cal. Govt. Code § 65996(a) (emphasis added). Impacts "on school facilities" are narrow defined, and do not absolve a lead agency of the requirement to discuss impacts that could occur to parties other than the school itself. *Chawanakee Unified Sch. Dist. v. County of Madera,* 196 Cal. App. 4th 1016, 1028-29 (2011). Examples of impacts an EIR is obligated to address, where overcrowding and a need exists to construct new facilities to accommodate project or cumulative student generation, include traffic impacts associated with student travel to a new school facility, as well as indirect construction-related impacts on the environment surrounding a proposed school construction site. *Id.* at 1029.

Here, the DEIR has provided evidence (enrollment figures, and the facilities lack of ability to accommodate all of the Project-related student generation) that overcrowding could or would result from the addition of Project-generated and cumulatively generated students at Cheremoya Elementary and Le Conte Middle School. (DEIR, Table N.J.3-5) Having identified a future overcrowding condition at these schools, the DEIR failed to discuss measures necessary to accommodate Project-related and cumulative students, whether at the campuses identified, or at another location, and such measures could include construction of new buildings or expansion of existing buildings at those campuses. Although the impacts of any construction activities on the school would be mitigated by SB50 fees, the impacts of such construction on the communities surrounding the affected schools or school sites do not fall within the types of impacts that fees can mitigate and are therefore subject to analysis and mitigation in the DEIR. *Id.* Thus, the DEIR must evaluate the potential construction-related impacts of school expansion, such as air quality and noise issues associated with construction, new architectural coatings, and hardscaping improvements, as well as potential indirect traffic impacts associated with the use of the expanded school. The DEIR's failure to provide this analysis, particularly in the absence of evidence to contradict the claimed necessity to reopen a school, represents prejudicial failure. The City must revise the DEIR to disclose and evaluate impacts related to project-specific and cumulative contributions to overcrowding. The City must also recirculate the DEIR to inform the public of the true consequences of approving the Project.

Response to Comment No. 81-15

The comment notes that impacts of the Project on area schools would be mitigated by SB50 fees. The comment also notes that measures may include new buildings or new campuses. The LAUSD's response to the Draft EIR stated that there are no known schools planned in the area. See Appendix IV.J.3. The planning of new schools or expansions of existing schools is a process that occurs through the LAUSD years ahead of implementation and is not within the control of the Project Applicant. Given, the timeframe of the Project buildout and the unknown developments within LAUSD, it is speculative to anticipate secondary impacts such as school-related traffic, not originating at the Project Site. As far as cumulative impacts to schools, the geographic distribution of the Related Projects ensures that a wide variety of schools in the southern area of Local District 4 could serve the Related Projects. That combined with the requirement of the Related Projects to also pay the SB 50 fees, would reduce potential cumulative impacts to schools and thus the Project would not have a cumulatively considerable impact on schools. For a complete analysis of cumulative impacts on schools please see Section IV.J.3, Public Services-Schools, of the Draft EIR, pages IV.J.3-19-21.

Comment No. 81-16

Similarly, the DEIR concludes that the library system would be above capacity, because the Project would create a service population of 94,494 people by 2020, but the local library system is only designed to accommodate 90,000 people (DEIR, IV.J.5-12). The only mitigation is the payment of a $200 per capita mitigation fee. Although the Project complies with code through payment of mitigation fees, the Project is being developed in an area that does not have sufficient educational and information systems to support the residential development. Education and information are essential for creating and supporting an educated public and growing economy. Therefore, the Project should include educational and informational facilities for its residents, including resident library and business centers, free Internet access for educational and job purposes, and technical support.

Response to Comment No. 81-16

As discussed in Section IV.J.5, Public Services - Libraries, of the Draft EIR, the Los Angeles Public Library (LAPL) itself has recommended that the Project Applicant pay $200 per capita based on the projected residential population of the Project development to offset potential impacts from Project implementation. See Appendix J.5 of the Draft EIR. Furthermore, according to the LAPL, the funds from these fees would be used for staff, books, computers, and other library materials. In accordance with Section 15130 (a)(3) of the CEQA Guidelines, a project's contribution to cumulative impacts is not cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

Additionally and separate from any specific LAPL fees, the Project would contribute tax revenue to the City's General Fund through development. Regular funding of the operation of the LAPL system comes from the General Fund and fluctuates with City priorities.

Finally, the comment suggests that the Project include educational and informational facilities for its residents, including business centers, but does not challenge the adequacy of the analysis or conclusions of the Draft EIR. While the comment itself recognizes that the payment of fees is sufficient, it should be noted that as part of the TDM Program (Mitigation Measure K.1-4), the Project will provide business services that may include a business center and internet access. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 81-17

VIII. The DEIR Fails to Fully Evaluate the Project's Impact on Historic Resources On and Adjacent to the Property.

The DEIR concludes that the Project causes a significant impact to historic resources that cannot be fully mitigated; however, the DEIR fails to provide additional measures necessary to mitigate the significant impact to the extent feasible.

First, the Millennium Hollywood Project Historic Resources Technical Report, dated July 2012, by the Historic Resources Group (DEIR, Appendix IV.C), identifies several historic resources on the Property (including the Capital Records Building and the Gogerty Building), and immediately adjacent to the Property (including the contributing buildings to the Hollywood Boulevard Commercial and Entertainment District (the "Entertainment District"), such as the Pantages Theater, Equitable Building, and the Guaranty Building). The public view from street level on Hollywood Boulevard includes a streetscape of historic buildings from the first half of the 20th century that have a maximum height of 150 feet, and are visible without obstruction in front or behind. The public view from street level looking north on Vine Street from Hollywood Boulevard is an unobstructed view of the cylindrical shape of the Capital Records Building.

The proposed Project will drastically alter these views of historic structures, by providing 580+ foot towers that dominate the skyline above the Entertainment District, and by partially obscuring the Capital Records Building, even with the 4% triangular open space to the south. The Report states that in order for the Project to be considered a substantial adverse change, "it must be shown that the integrity and/or significance of the historic resources would be materially impaired by the proposed alteration." (Historic Report, p. 37) However, the Report then concludes that the Project's allowable height and density does have the "potential to block important views and obscure public sight lines, particularly from the south of Capital Records along Vine Street and from the Hollywood Freeway." (Historic Report, p. 37) The DEIR concludes that the Development Regulations (Section 6.1), which require certain setbacks, mitigate the impact to historic resources to the extent feasible. However, this is not sufficient under the Los Angeles Municipal Code or the Secretary of the Interior's Standards for Rehabilitation. The City's Office of Historic Resources does not just consider setback, massing and distance when evaluating a project's impact on an historic resource; it also considers the design, material, articulation, connectivity of visual lines, architectural style, space flow and other elements of a project's design. In order to properly evaluate the impact of the Project on the several historic resources on or near the Property, the Applicant

must provide schematic level design drawings with sufficient information regarding materials, façade articulation, and character to properly evaluate the necessary design modifications to fully mitigate any impact to the extent feasible. Therefore, a supplemental or subsequent EIR will be required at the time that schematic design has been completed for each phase of the Project to evaluate and mitigate impacts to the historic structures.

Response to Comment No. 81-17

The comment states that the Draft EIR concludes that the Project causes a significant impact to historic resources that cannot be fully mitigated. That statement is incorrect because the Draft EIR does not conclude that the Project causes a significant impact to historic resources. See Section IV.C, Cultural Resources of the Draft EIR, which clearly shows that the mitigation measures included in the Draft EIR will mitigate potential impacts to historic resources to a less-than-significant level under all development scenarios. These conclusions are supported by substantial evidence in the form of the Historic Resources Report circulated as an appendix to the Draft EIR.

Next, the commenter references the Historic Resources Report and states facts about the existing conditions around the Project Site. These facts are noted and are generally correct. No response to this portion of the comment is necessary.

Then, the commenter claims the Project will drastically alter views of historic structures. Please see the topical response for aesthetic impacts (Topical Response 2), which addresses views of the Capitol Records Building and surrounding historic resources. Also, see the Responses to Comment Letters No. 14 and No. 18 (from Hollywood Heritage and Los Angeles Conservancy, respectively) that address impacts to historic resources.

The commenter then recites a portion of the legal standard regarding the thresholds that triggers a "substantial adverse change" in the significance of a historic resource. It should be noted that these standards, among others, were used in the Historic Resources Report to assess the Project's potential impacts. Please see Response to Comment No. 19-3 (Los Angeles Conservancy), which provides a detailed response regarding the Draft EIR and the Historic Resources Report's application of the proper legal standards for assessing impacts.

Next, the commenter claims that the Draft EIR's use of the Development Regulations to mitigate impacts to historic resources is not sufficient under the Los Angeles Municipal Code or the Secretary of the Interior's Standards for Rehabilitation. It should be noted that all relevant standards from these sources were applied during preparation of the Draft EIR and the Historic Resources Report as explained here. First, the commenter does not cite to any specific portion of the municipal code, which precludes a specific response here. There are numerous references throughout the Draft EIR that demonstrate how the municipal code was used for environmental impact analysis. Second, the Historic Resources Report provides a detailed analysis of the Project's impacts to historic resources according to the Secretary of the Interior's Standards. See Section 6.3: Use of the Secretary of the Interior's Standards to Determine

Impacts in the Historic Resources Report as an example. Third, the Office of Historic Resources reviewed and approved the Historic Resources Report before circulation of the Draft EIR. Based on the application of all these requirements, the Draft EIR found that compliance with the Development Regulation and the historic resource mitigation measures in the Draft EIR reduce impacts to historic resources to a less than significant level.

Also, the commenter states that "[i]n order to properly evaluate the impact of the Project on the several historic resources on or near the Property, the Applicant must provide schematic level design drawings with sufficient information regarding materials, façade articulation, and character to properly evaluate the necessary design modifications to fully mitigate any impact to the extent feasible." The Historic Resources Report evaluated all of the potential development scenarios presented in the Development Regulations, including the specific setbacks, massing, and height scenarios before reaching the conclusion that the Project would have less than significant impacts on historic resources. No additional level of detail is necessary for an evaluation of the Project's potential impacts on historic resources.

Last, the commenter states that a supplemental or subsequent EIR is required. CEQA provides that a subsequent or supplemental EIR may be required if substantial changes proposed in the project will require major revisions of the EIR. Pub Res C §21166(a). More specifically under 14 Cal Code Regs §15162(a)(1), a further EIR may be required if proposed changes to the project will require "major revisions" to the previous EIR because of "new significant environmental effects or a substantial increase in the severity of previously identified significant effects." At this time, there are no major revisions to the Project proposed, neither are there new significant environmental effects that have been identified during the analysis prepared for the Final EIR. Therefore, a subsequent or supplemental EIR is not required.

Comment No. 81-18

Second, the Historic Report identifies the sound chambers of the Capital Records Building as character defining elements of the historic structure. The Report proposes that the Project include a shoring plan to ensure protection of the resource during construction, and general construction procedures to mitigate the possibility of settlement. (Historic Report, p. 51) However, this mitigation is not sufficient to preserve the special acoustic properties of the sound chambers. The sound chambers are significant not just for their architectural shape, but also for the quality of sound created in the space. This sound requires preservation of the chamber as well as the density of ground surrounding the chamber that is necessary to maintain the specific acoustic quality. The Applicant must evaluate this quality quantitatively, and then require that the quality be maintained during and after construction, as part of the proposed Adjacent Structure Monitoring Plan. (DEIR, MM C-2) The DEIR states that the preservation of the Capital Records and Gogerty Building is a landlord/tenant issue, because the Project and these historic properties are under common ownership. This is not true - Once a property is designated as an Historic-Cultural Monument, its preservation comes under the public trust. The quality of work necessary to maintain the Capital Records Building and its sound chambers will be identified by the City's Office of Historic Resources, and not negotiated between the owner and tenant.

Response to Comment No. 81-18

The commenter claims that the mitigation proposed for the echo chambers in the Capitol Records Building is not sufficient to preserve the acoustical qualities of the chambers. The commenter provides no evidence to support this claim. Nor does the commenter provide evidence to support the claim about maintaining the acoustic qualities of the echo chambers. It should be noted that the Draft EIR analyzed the construction and operational noise impacts of the Project on the underground echo chambers and supported that analysis with technical noise modeling. See Response to Comment No. 19-6 (Los Angeles Conservancy), which is summarized below.

The Noise section of the Draft EIR identifies the Capitol Records Building's underground echo/reverberation chambers as sensitive noise receptors. See Figure IV.H.1: Noise Monitoring and Sensitive Receptor Location Map, in the Draft EIR. The Draft EIR is also supported by a noise technical appendix. The Draft EIR concludes that the Project would have a temporary significant noise and vibration impact on the Capitol Records Building's recording facilities, but only during construction. The construction activities could cause noise and vibration impacts, but construction will not physically disturb the Capitol Records Building's recording facilities. The Noise section of the Draft EIR contains numerous mitigation measures to reduce potential noise impacts on nearby sensitive receptors, including the underground echo/reverberation chambers. Moreover, potential noise impacts on these uses will be minimized to the extent possible through agreements between the Capitol Records Building tenant and the Applicant, who owns the building. The Draft EIR accurately discloses the potential construction noise and vibration levels that could be experienced by the Capital Records Building's echo chambers. The Project will not have a long-term operational impact on the Capitol Records Building's recording studios. Therefore, the Development Regulations as drafted, in conjunction with the noise and vibration mitigation measures in the Draft EIR, ensure that all feasible steps have been taken to minimize impacts on the Capitol Records Building's recording facilities.

Next, the commenter claims that the Draft EIR asserts that preservation of the Capitol Records Building is a landlord-tenant issue. That relationship is relevant to the operational noises issues discussed above, but not compliance with any applicable preservation standards. The Draft EIR acknowledges that the Capitol Records Building has been designated as a Historical-Cultural Monument by the City of Los Angeles. As such, any future maintenance of the Capitol Records Building will comply with all City regulations and procedures regarding Historic-Cultural Monuments. Mitigation Measure C-3 in the Draft EIR stipulates "in the event any structural improvements are made to the Capitol Records Building during the life of the Project, such improvements shall be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation. Compliance with this measure shall be subject to the satisfaction of the Department of City Planning, Office of Historic Resources prior to any rehabilitation activities associated with the Capitol Records Building." Therefore, compliance with the mitigation measure is not limited to any landlord-tenant relationship.

Comment No. 81-19

Third, other recent projects in the area, such as the W Residences, were required to limit their height to 150 feet in order to be consistent with neighboring historic properties. The Applicant must provide an explanation regarding why it was architecturally and financially feasible for the W Residences to comply with a 150 foot height limit, but it is not feasible for the Applicant to provide the same height limit for identical uses on the adjacent block.

Response to Comment No. 81-19

The commenter's comparison of the Project with the W Residences is irrelevant for purposes of CEQA. The projects are on different sites, with different development plans, and different land use requirements. CEQA does not require the Draft EIR for the Project to explain the financial feasibility of a different project under different ownership. Regarding height, the Project is located on a parcel that does not have a height limit. As noted in response to Comment 81-29, there are no height limitations on the Project Site and the construction of 585 foot towers is currently allowed by right on the Project Site and no entitlements are needed for height.

In addition, it is well recognized that there is an extraordinary range of aesthetic characteristics and contrasts (including height) within the City of Los Angeles due to the intermingled suburban neighborhoods, dense urban areas, hillside residential areas, and accompanying urban fabric and infrastructure. In other words, there is minimal thematic or consistent visual character that defines the City. This also applies to the existing aesthetic conditions around the Project Site in the Hollywood community of Los Angeles, which consist primarily of surface parking lots, low-scale construction, and surrounding larger urban structures. As noted in the Draft EIR, there is minimal thematic or consistent visual character that defines either the Project Site or the surrounding aesthetic environment. Instead, the area is characterized by a variety of commercial, office, hotel, and mixed-use urban structures that range from historic mid-rise architecture to modern glass tower buildings with advertising signage.

As discussed in the Draft EIR, the Project would implement a modern mixed-use development consisting of modern, yet architecturally varied, urban structures that are consistent in use and character to the surrounding urban aesthetics environment and would not create a precedent setting development and/or structure. As illustrated in the urban silhouette figures in the Aesthetics Technical Report, the Project would become a prominent visual feature in the vicinity due to its proposed maximum heights. Also, the zoning on the Project Site allows for tall urban structures and the surrounding urban vicinity is populated with existing mid-rise towers and a variety of structures at different heights that present an erratic urban skyline.

Comment No. 81-20

Finally, the DEIR requires that the Applicant document the Project site in conformance with HABS standards. This documentation should require "at least" 25 images, and not "up to" 25 images (DEIR, MM C-5). Full documentation is the only method to ensure that the historic resource is properly maintained.

Response to Comment No. 81-20

The comment refers to Draft EIR Mitigation Measure C-5, which states, "Prior to construction, the environs of the Project Site (i.e., Project Site and surrounding area) shall be documented with up to twenty-five images in accordance with Historic American Building Survey (HABS) standards. Compliance with this measure shall be demonstrated through a written documentation to the satisfaction of the Department of City Planning, Office of Historic Resources prior to any construction." Photo documentation is intended to record the conditions of the Project Site prior to new development. While this documentation will comply with the applicable HABS standards as stated in the mitigation measure, the Final EIR revises the mitigation measures to require "at least" 25 images as requested by the commenter.

Accordingly, Mitigation Measure C-5 is revised as follows:

> Mitigation Measure C-5: Prior to construction, the environs of the Project Site (i.e., Project Site and surrounding area) shall be documented with ~~up to~~ at least twenty-five images in accordance with Historic American Building Survey (HABS) standards. Compliance with this measure shall be demonstrated through a written documentation to the satisfaction of the Department of City Planning, Office of Historic Resources prior to any construction.

Comment No. 81-21

IX. The DEIR Does Not Protect Views and the Insufficient Project Description Does Not Provide a Full Evaluation of Aesthetic Impact.

The DEIR concludes that the Project will have significant unavoidable impacts due to focal view obstruction, cumulative height and massing. (DEIR, I-ll) The Project does not include an actual architectural design, but proposes massing envelope standards, which include Development Standards, Density Standards, Tower Massing Standards, Building Height Standards, and Building and Streetscape Standards (DEIR, MM A.I-1) The DEIR then provides additional mitigation measures that attempt to mitigate any aesthetic, light/glare, or shade/shadow impacts that may be created within the design limitations. These mitigation measures include requiring treated or low-reflective materials (DEIR, MM A.I-4), and requiring certain spacing in the Tower Massing Standards to minimize shade (DEIR, MM A.2-l, 2-2). However, the aesthetic impact cannot be evaluated merely by creating massing standards, and certain limits on light and glare. The Applicant must provide the actual material and design of the various buildings in order to properly evaluate the environmental impact. The design includes the architectural style, the flow of space, the contrast to adjacent buildings, and the actual landscaping on streetscape and

higher levels. This cannot be properly evaluated by trying to imagine the infinite scenarios that may be created within these proposed standards. In addition, a finding that the Project will have "significant unavoidable impacts" should not provide a free pass for the architect to design a Project with any aesthetic impact as long as it complies with basic standards. Therefore, a supplement or subsequent EIR will be required for the construction of future buildings on the site.

Response to Comment No. 81-21

The commenter states that the DEIR does not protect views and that the project description does not provide a full evaluation of the aesthetic impact. The Draft EIR does include actual architectural design. See the Development Regulations circulated with the Draft EIR, which contain several figures demonstrating the Project design under various heights and massing scenarios. Regarding aesthetics and light and glare, see Section 6.6: Building Materials and Color Guidelines of the Development Regulations, which provides specific standards that control reflectivity and other aesthetic characteristics of the Project. Also see the topical response regarding aesthetics (Topical Response 2) for a detailed analysis of the Project aesthetics impacts. The Draft EIR contains sufficient detail to analyze impacts, and accordingly the Draft EIR analyzed the worst-case scenarios (i.e. the outer envelope of possible impacts) to present a conservative analysis that informs the public and the decision makers. Also, see Response to comment No. 81-17 (Reznik, Benjamin (#2)) for an analysis of why a subsequent or supplemental EIR is not required.

Moreover, the commenter challenges the adequacy of the Draft EIR with respect to the lack of a specific architectural design. However, as explained in Section II, Project Description of the Draft EIR, the Project includes the approval of Development Regulations that will establish a very specific set of design guidelines to ensure future project designs are consistent with the scope of analysis presented in the Draft EIR. The Development Regulations thereby provide adequate specificity about what would be permitted under the Project, which adequately informs the decision makers regarding whether to approve the Project.

Comment No. 81-22

X. The DEIR Underestimates the Impact of the Project on Parks.

The DEIR identifies certain park in-lieu fees required for the Project, including the Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1) and the Quimby Fees for Condominium Units (LAMC 17.12). The fees should also include all applicable recreation and park fees for residential units subject to a zone change, as set forth in LAMC 12.33 (the fees are identical to Quimby Fees for condominium units). In addition, all park in-lieu funds should be specifically allocated to parks within the immediate vicinity of the Project as a condition of the Development Agreement. This may include renovation to existing parks, or funding of future parks, such as the Hollywood Cap Park. The DEIR identifies the required open space per unit required by the Project (DEIR, MM J.4-1); however, this open space does

not count towards the required parkland, unless it exceeds the typical open space requirements. The DEIR must also evaluate the proposed 2-year closure of Runyon Canyon on the Project.

Response to Comment No. 81-22

The Project would comply with the requirements identified in Mitigation Measures J.4-2 and J.4-3, regarding payment of fees. The fees that are paid would be allocated according to the budget and planning purposes of the Los Angeles Department of Recreation and Parks (LADRP), as the use of the fees, pursuant to the LAMC, is to be determined by the LADRP, not the Project Applicant.

The comment states the proposed two-year closure of Runyon Canyon Park as something to be evaluated. The Los Angeles Department of Recreation and Parks identified Runyon Canyon Park as a regional park within 2 miles of the Project Site, in their letter for the Draft EIR dated September 27, 2011. See Appendix J.4 of the Draft EIR. There is no reference to a closure in the LADRP letter. Based on research performed in preparation of the Final EIR and review of the administrative record, there is no evidence of a proposed closure of Runyon Canyon. Further, there is no detail in the comment as to the timing of the closure and a potential closure is too speculative to analyze.

Comment No. 81-23

XI. The DEIR Improperly Considers Certain Area as Open Space.

The Development Regulations provide that a number of building forms and structures may encroach into Project-provided open space. These include building entries, architectural façade details (undefined and unlimited), and retail storefronts. "Open space" with such encroachments provides no benefit as such, and the DEIR wrongly allows the Project to take credit for providing such space.

Response to Comment No. 81-23

As described in Section II, Project Description, of the Draft EIR, the Development Regulations will ultimately determine the amount and placement of open space on the Project Site. In addition, the Development Regulations will set forth the standards and guidelines for all open space areas for the Project, including areas to be accessible to the public (grade level open space, publicly accessible passageways, and any observation deck-level rooftop open space which may be built) and areas to be designed for the residential uses (common open space and private open space).

The development of open space is an important objective for the overall Project design and the Development Regulations will ultimately determine the amount and placement of open space on the Project Site. The Project would be subject to the on-site open space requirements set forth in LAMC Section 12.21(G). Pursuant to LAMC Section 12.20.C.20(b), certain architectural features and other projections are allowed to project in to yards and open space.

Further, the various open space requirements discussed above are adequately disclosed and analyzed in the Draft EIR. For example, see the discussion on page IV.G-57 in Section IV.G. Land Use Planning, of the Draft EIR regarding open space, the LAMC, and the Development Regulations.

Comment No. 81-24

XII. The DEIR Failed To Adequately Evaluate and Mitigate Construction-Related Noise And Vibration Impacts.

A. The DEIR Construction Vibration Analysis Relies On Deferred Mitigation, The Effectiveness Of Which Is Unsubstantiated.

Mitigation for vibration-related building damage comprises measure H-11, which improperly defers development of mitigation and contains no quantifiable performance standards. For deferral of mitigation and analysis to properly occur, the DEIR must describe the nature of the actions anticipated for incorporation into the mitigation plan and provide performance standards. See, e.g., Communities for a Better Environment v. City of Richmond, 184 Cal. App. 4th 70, 95 (201 0). Here, the DEIR fails. No specific criteria are provided, except for a vague commitment not to adversely affect certain structures, and to develop and implement mitigation if damage is observed during construction. Further, measure H-11 provides no information regarding the actual nature of the options available to address potential impacts. Absent an articulation of such options, the mitigation is simply insufficient and does not provide enough information to allow informed consideration of the potential effects of the project. See Endangered Habitats League, Inc. v. County of Orange, 131 Cal. App. 4th 777, 794 (2005).

However, even if deferral of mitigation was appropriate in this instance (it is not), the DEIR has failed to explain why deferral is appropriate. This failure alone constitutes an abuse of discretion. *San Joaquin Raptor Rescue Center v. County of Merced,* 1749 Cal. App. 4th 645, 1670 (2005). Therefore, the City must revise the analysis to provide information adequate to inform decisionmakers and the public regarding the potential effects of the Project. The City must also recirculate the EIR to allow public comment on the new information that concerns this key impact analysis.

Response to Comment No. 81-24

With respect to building damage impacts from construction vibration, Mitigation Measure H-11 provides a thorough and effective performance based standard to ensure building damage impacts would be mitigated to less than significant levels. Mitigation Measure H-11 specifically sets performance standards for the adjacent structure monitoring plan. Mitigation measures may specify performance standards that would mitigate a significant impact and that might be achieved in various ways. 14 Cal Code Regs §15126.4(a)(1)(B). If it is not practical to define the specifics of a mitigation measure when the EIR is prepared, the agency may defer formulation of the specifics pending further study if the mitigation measure describes the options that will be considered and identifies performance standards. See *San*

Joaquin Raptor Rescue Ctr., 149 CA4th at 671; *Endangered Habitats League,* 131 CA4th at 794; *Defend the Bay v City of Irvine* (2004) 119 CA4th 1261, 1275, 15 CR3d 176.

While the performance standards in Mitigation Measure H-11 are not quantitative since it does not rely on a specific prevention of some specific amount of noise or vibration, it is stated as an absolute qualitative commitment "not to adversely impact or cause loss of support to neighboring/bordering structures." Substantial evidence for the effectiveness of this commitment is provided by the monitoring program, described in detail within Mitigation Measure H-11. This program will, at a minimum, use licensed qualified experts to detect all vibration as well as vertical and horizontal movement at elevation and lateral monitoring points on adjacent buildings and structures. As part of this commitment, "work will stop in the area of the affected building" if vibration or structural crack or movement thresholds are exceeded, and not resume until "measures have been taken to stabilize the affected building." In addition, the structure monitoring program must include "vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation to protect adjacent buildings from construction-related damage. In other words, Project construction activities must conform to the performance standards set in Mitigation Measure H-11 or else work would stop to avoid damage to structures. Thus, the Draft EIR has properly identified mitigation that reduces the potential impacts of the Project. Given the size of the project and the number and variety of affected structures analyzed for potential noise and vibration impacts, it is not feasible to forecast precisely what the monitoring measures and curative actions will be in greater detail. Nonetheless, Mitigation Measure H-11 sets forth the performance standards that the adjacent monitoring plan must include. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 81-25

B. The DEIR Construction Noise Analysis Failed To Evaluate The Effects of Construction Noise On Residents of the Project.

The Project Description never clarifies whether the East and West Sites would be developed only together, or in some sequence, during the 22-year building horizon requested by the Applicant (2013-2035). The Project Description states that the Project will take three to three and a half years to construct, if completed in a single phase, which is unlikely. Consequently, it is reasonable to assume that construction of the Project could occur in phases, and that an early phase of the Project may include residential units, which construction activities during a later phase could adversely affect. Given that the proximity of nearby sensitive receptors renders full construction noise mitigation technically infeasible according to the City's Noise Ordinance (see DEIR, p. IV.H-27), the probability exists that any residents present on either site during construction of a subsequent phase would experience construction noise levels well in excess of the City significance thresholds. Consequently, the DEIR has failed to disclose a significant, unavoidable impact of the Project, and must be amended to provide this analysis. Moreover, the presence of an additional significant impact requires recirculation of the EIR for public comment. CEQA Guidelines§ 15088.5(a)(l).

The fact that the DEIR determines that the noise will be "significant and unavoidable" does not provide a pass to allow any level of noise on the site during construction hours. Therefore, the Applicant must provide phase-specific standards at each phase of construction that limits the noise during construction to all extents feasible.

Response to Comment No. 81-25

The commenter is correct that the Draft EIR does not specify a sequence to the Project's development. As stated on page II-34 of the Draft EIR, "the development of the Project will be influenced and dependent upon the economic characteristics of the overall commercial office, entertainment, housing and hotel markets within Hollywood and Southern California. The Project includes a Development Agreement that would allow the long-term phased buildout of the Project. As such, the Project will be able to respond to changing economic and social demands within the local area."

CEQA does not require the analysis of a Project's impact on itself since the "environment" that must be surveyed to determine potential significant impacts consists of the physical conditions "existing within the area which will be affected by" the Project. Public Resources Code Section 21060.5. Occupants of buildings developed by the project are not present as part of the existing physical conditions of the Project site or the surrounding area, and no revisions to the Draft EIR are warranted to account for potential noise impacts on future occupants of Project buildings. It should also be noted that the only proposed noise sensitive receptors associated with the Project are residential uses. The Draft EIR already includes a mitigation measure (see mitigation measure H-13 in the MMRP) that requires the Project to be designed in manner to achieve the mandatory 45 dBA CNEL for interior spaces of multi-family residential uses.

Furthermore, the Draft EIR concluded the placement of the proposed residences on the Project Site would result in significant and unavoidable exterior noise impacts for the proposed residential uses. In any event, occupants of the early phases of development will be fully aware of the Project's scale and will choose to reside of the Project Site with the knowledge that the Project Site is in early phases of development. As such, these occupants will be making an informed decision to occupy a site that will be affected by ongoing construction activities.

Comment No. 81-26

C. The DEIR Construction Noise Analysis Failed to Evaluate The Effects of Construction Noise on the W Hotel and Residences.

The DEIR identifies the Lofts at Hollywood & Vine, a residential project on the north side of Hollywood Boulevard, as a sensitive use within proximity of the Project site that has the potential to be impacted by the Project. (DEIR, Page N H-15) However, the DEIR does not identify the W Residences, which includes a hotel and residential units, as a sensitive use. The W Residences are located directly across the street from the Pantages Theater, which has a height of 44 feet at the street façade, and 68 feet at the rear

of the parcel. The DEIR notes that there will be a peak noise level increase of 33.8-47.9 dB at the Pantages Theater and 10.1 dB at the Lofts. (DEIR, Page IV.H-25)

Any construction work above the 44 foot height will not be buffered by the Pantages Theater structure, and will be clearly audible at the W Residences, which has a height of 150 feet. Therefore, the DEIR must evaluate the impact of construction noise on the W Residences over the 22 year period. The DEIR must include conditions, such as appropriate noise buffers during construction, including at the upper stories. The DEIR must also provide proper notice to surrounding neighbors, which will affect the ability to utilize the hotel rooms and residential units facing the Project during the various construction periods.

Response to Comment No. 81-26

This comment asserts that the Draft EIR failed to evaluate the effects of construction noise on the W Hotel and Residences located south of Hollywood Boulevard approximately 315 feet south of the Project Site's closest property line. Based on the same methodologies utilized in the Draft EIR, peak construction noise levels at this distance would be approximately 70 dBA. As illustrated in Table IV.H-4 of the Draft EIR, the existing noise levels for land uses fronting Hollywood Boulevard traffic between Vine Street Argyle Avenue (i.e., the location of the W Hotel and Residences) is approximately 70.4 dBA CNEL.

Thus, the Project's construction-related noise increase at the W Hotel and Residences located approximately 315 feet south of the Project Site's closest property would not have the potential to increase noise levels above existing conditions in the Project area. These impacts would be less than significant and no additional mitigation measures are warranted.

Comment No. 81-27

D. The DEIR Fails to Adequately Evaluate Operational Noise Caused by Outdoor Patios and Rooftop Decks

The DEIR also fails to properly identify noise impacts during the operation of the Project. The DEIR states that the residential units, hotels, and restaurants, will have outdoor areas and rooftop patios. The DEIR fails to identify the location of these outdoor areas, and fails to provide typical mitigation measures required of other hotel rooftops in the areas, such as (i) time limits for rooftop patio use, (ii) prohibition of live entertainment and limits to background music on rooftops, and (iii) proper design and landscaping to locate noisier areas, such as pools, away from residential uses. A subsequent or supplemental environmental review is necessary prior to approval of specific outdoor areas for residential, hotel and restaurant use.

Response to Comment No. 81-27

The Draft EIR adequately disclosed the potential noise impacts associated with people and activities and events within the common outdoor spaces, podium levels, and observation decks. Specifically, page IV.H-40 of the Draft EIR states the Project is anticipated to include outdoor eating and gathering places at

the pedestrian level at-grade and above the ground floor on the podium levels and observation deck levels of the proposed towers. The podium levels would be developed with common open space areas, swimming pools and poolside seating, and outdoor dining.

It is anticipated that outdoor noise would be generated by people talking, swimming pool activity, and occasional amplified music, television, and related announcements during special events. As shown in Table IV.H-3 of the Draft EIR, ambient noise levels in the Project vicinity have the potential to exceed 70 dBA CNEL. Given the existing relatively high ambient noise levels at the Project Site, the distance provided between the podium levels and any noise sensitive receptors, and attenuation of sound created by existing and/or proposed structures that may block the line of sight between receptors and noise sources, it is not expected that Project-related outdoor noise levels would substantially increase the ambient noise at surrounding off-site uses.

In addition, the Project would be required to comply with Section 112.01 of the LAMC, which would ensure outdoor eating and gathering areas would not substantially alter the ambient outdoor noise levels at surrounding off site uses and these impacts would be less than significant.

Comment No. 81-28

E. The DEIR Failed To Adequately Evaluate Construction-Related Vibration Impacts To The Capitol Records Echo Chambers

Page IV.H-30 of the DEIR includes a discussion of potential vibration-related building damage that could occur as a result of the Project. However, although it includes structures such as the Capitol Records Complex (receptor 15), it omits the Capitol Records echo chambers (receptor 16). Though the remainder of the Capitol Records Complex is characterized as fragile for the purposes of the analysis, the analysis fails to discuss why the echo chambers, which are also part of the complex, are not.

Response to Comment No. 81-28

The Draft EIR accurately discloses the potential construction noise and vibration levels that could be experienced on adjacent land uses, including the Capital Record echo chambers. Specifically page IV.H-30 of the Draft EIR states that construction impacts would produce potentially significant impacts with respect to human annoyance and disrupting existing studio recording operations.

However, the Capitol Records Building's underground recording studios are located on the Project Site, which is owned and operated by the Project Applicant. As such, any vibration-related land use conflicts would be resolved through tenant-landlord agreements and further coordination between each entity with respect to on-site activities. For the purposes of CEQA analysis, however, the Project's physical vibration-related annoyance impacts on the existing environment (i.e., the Capitol Records Building's underground echo chambers) would be considered significant and unavoidable.

With respect to potential damages from construction vibration, Mitigation Measure H-11 provides a thorough and effective performance based standard to ensure building damage impacts would be mitigated to less than significant levels. See also the response to Comment No. 19-6 (Los Angeles Conservancy) for further information regarding potential impacts on the echo chambers.

Comment No. 81-29

The DEIR Failed To Disclose Growth-Inducing Impacts Of The Project.

The Project includes, among other requests, a zone change that would allow a substantially more intensive commercial or mixed use of the Project site. Yet the DEIR includes no analysis of the impacts of the substantially increased development allowed under the new designation, or even of the (intended) growth-inducement potential of the change in designation.

The Project would vastly increase the allowable density of development in the Project site and vicinity. As described on page II-7 of the DEIR, the Project would rezone the Project site from C4 to C2, and would also remove the existing density limitation. Collectively, these changes are intended to double the permitted floor area ratio and remove all limitations on height, allowing construction of towers as tall as (in the case of the Project) 585 feet. Simply put, the Project would bring downtown and Century City building heights and density to Hollywood, establishing a precedent for other projects to follow, and an expectation among developers regarding the square footage they can obtain. Development consistent with the new designation therefore becomes foreseeable, and the failure of the DEIR to evaluate, even in a general sense, the reasonably foreseeable cumulative development facilitated by the Project renders the impact analysis incomplete and inadequate. Consequently, the City must revise the DEIR to include this analysis, and must recirculate the DEIR to allow informed decision-making by the City regarding this undeniably precedent-setting project.

Response to Comment No. 81-29

The commenter is correct that the Project is requesting a zone change from C4 to C2 and a removal of the "D" Limitation" to allow a higher FAR for the Project Site. However, the zone change from C4 to C2 is to allow for the sports club use and does not have any effect on the FAR or height. Further, contrary to the commenter's contention, neither the zone change nor the removal of the "D" Limitation removes any height limitations. There are no height limitations on the Project Site. The construction of 585-foot towers in currently allowed by right on the Project Site and no entitlements are needed for height.

Further, there is analysis of the impacts under the new designation in Section IV.G, Land Use Planning, of the Draft EIR. For example, as discussed in Section IV.G, Land Use Planning, of the Draft EIR, the Project is consistent with the Hollywood Community Plan Update Land Use Policy 2.13, which states that new projects should utilize higher FARs to incentivize mixed-use development around transit nodes and along commercial corridors served by the Metro Rail, Metro Rapid Bus, or 24-hour bus lines.

The commenter also states that the Project fails to analyze growth-inducing impacts of the Project and that the Project would increase the allowable density of development in the Project Site and the vicinity. While the removal of the "D" Limitation would allow for the FAR to be increased from 4.5:1 under the Community Plan Update (or from 3:1 if the Update is stayed or invalidated) for the Project Site, it would not allow for an increased FAR in the vicinity of the Project. Any future projects in the vicinity of the Project Site would be subject to zoning and land use designations and restrictions for their respective sites. As described in the Draft EIR, these requirements would regulate future land uses and provide development standards for such land uses that would preclude potential land use consistency and compatibility impacts. Section V. General Impacts Categories, subsection D. Growth-Inducing Impacts contains an adequate analysis of growth-inducing impacts per Section 15126.2(d) of the CEQA Guidelines. Further, Section IV.G, Land Use Planning, of the Draft EIR adequately discusses Cumulative Impacts consistent with Section 15355 of the CEQA Guidelines. As concluded in the Land Use Planning section, with implementation of the proposed Development Regulations, including the Project Design Features (PDFs), and upon approval of the requested actions in the Draft EIR, development of the Project together with future forecasted growth would not be anticipated to substantially conflict with the intent of the City General Plan, with other applicable land use plans, or with the LAMC regarding the future development of the Hollywood area.

Comment No. 81-30

I. The DEIR Underestimates the Impact of the Project on Landfill Capacity and Mischaracterizes the Impact as Less Than Significant.

According to page IV.L.3-1 0, the landfills currently serving the City have remaining capacity of 9,947 tons per day ("tpd") of solid waste. However, as also acknowledged in the DEIR, one of those landfills, Chiquita Canyon, has only three years of capacity remaining. Consequently, even under the most aggressive development scenario, only a single landfill will serve the City by the time the Project becomes operational. If the Applicant obtains a 22-year term on the proposed D.A., fewer than ten years of landfill capacity will remain by the time the Project is constructed. Although some plans exist for future expansion, such plans have not yet been approved, and the DEIR carefully avoids a description of the likelihood or timing of such an expansion occurring. Consequently, landfill space within and near the City remains at a premium and is properly considered a diminishing asset. Therefore, until such time as additional or alternative means of solid waste disposal become available, a cumulative impact regarding such capacity exists, and the Project's contribution to that impact is cumulatively considerable. The City must revise the DEIR to reflect the proper impact category, and must recirculate the DEIR for public comment, consistent with CEQA Guidelines§ 15088.5(a)(1).

Response to Comment No. 81-30

The comment does not provide evidence regarding the limited landfill capacity claimed by the commenter. Also, the comment does not recognize that the Project could be built out far in advance of the full 22-year term of the Development Agreement. These misconceptions render the comment

unsubstantiated on this issue. Nonetheless, the commenter claims that a cumulative significant impact would occur with regards to landfill capacity. In addition, the commenter infers that hypothetically only a single landfill would serve the City when the Project becomes operational. Again, there is no evidence provided in the comment to support this assertion.

In contrast, the Draft EIR states that the Sunshine Canyon and Chiquita Canyon Landfills have a remaining available daily intake of 9,947 tons per day (tpd). The cumulative solid waste generation shown in Table IV.L.3-7 of Section IV.L.3, Utilities and Service Systems - Solid Waste, of the Draft EIR, would represent approximately 0.17 percent of the remaining combined daily intake capacity at the Sunshine Canyon and Chiquita Canyon Landfills. As shown in the Draft EIR, the Sunshine Canyon and Chiquita Canyon Landfills have existing adequate capacity for the Related Projects and the Project. Also, the Draft EIR states on page IV.L.3-3 that an expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 23,872,000 tons (a 21-year life expectancy), which demonstrate potential additional capacity. Similarly, Draft EIR explains on page IV.L.3-10 that operations within the City and the Project Site would continue to be subject to and support the requirements set forth in AB939 requiring each city or county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling and composting, which reduces total solid waste loads into the available landfills. Unlike the comment, these conclusions are supported by numeric calculations based on currently available public information. Therefore, the Draft EIR has performed an adequate fact-based impact analysis. There is no need for further analysis of hypothetical claims set forth in the comment.

Comment No. 81-31

In summary, HEIIGC and HVRA support the broad vision and diverse mix of uses for the Project, however they strongly object to the scale of the Project, in terms of height and density, and the lack of specificity of the requested entitlements that will allow a variety of configurations not evaluated in this DEIR. Thank you for your consideration and response to these comments. If you have any additional questions, please contact me directly at (310) 201- 3572 or bmr@jmbm.com.

Response to Comment No. 81-31

This comment is a conclusion statement to their letter. For additional information regarding a potential variety of configurations allowed under the Project, please refer to Response to Comment No. 09-66 (AMDA). The comment is noted for the records and will be forwarded to the decision-making bodies.

LETTER NO. 82 - ROSBY, LOIS

Lois Rosby

December 10, 2012

Comment No. 82-1

I am writing to request that you reconsider building two skyscrapers on Vine at Hollywood Blvd. Presently, the traffic congestion in this area is horrific and with the addition of the two skyscrapers, it will be next to impossible to get home during rush hour. Please consider the residents that reside in the area.

Response to Comment No. 82-1

It should be noted that the Draft EIR analyzes potential traffic impacts in Section IV.K, Transportation. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 83 - ROSENFELD, JACK

Jack Rosenfeld

December 7, 2012

Comment No. 83-1

As an area resident, I have two main concerns with respect to this proposed project: the height of the proposed towers, and traffic mitigation.

Response to Comment No. 83-1

The comment is an introduction and does not otherwise state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 83-2

1. Building heights.

The Draft EIR states:

 Height Zone B would permit development to a maximum height of 585 feet above grade and would be located on the eastern half of the West Site fronting Vine Street.

 Height Zone C would be located on the west side of the East Site fronting Vine Street (south of the Capitol Records Building) and would permit development to be a maximum height of 585 feet above grade.

With all due respect, towers that reach 585 feet in height would be unacceptable. I do support sensible development, in harmony with the existing physical landscape. The Capitol Records building, as well as the 12-story towers at Hollywood and Vine (the old Equitable building, the Taft building, and the Broadway building), are the baseline that should be considered in determining an appropriate height for the new towers. The two new towers, as proposed, are completely out of scale with the neighborhood. They will cast long shadows and they will overwhelm the landmark Capitol Records building. which is one of this city's iconic structures. Aesthetically, the 585 foot towers would be a disaster. Limiting the towers to 12 stories, or even 20 stories, would be a vast improvement.

Response to Comment No. 83-2

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Please refer to Topical Response 2, Aesthetics, for additional information regarding views and overall visual character of the Project in Hollywood.

With regard to the commenter's concern with shadows being cast on the neighboring Capitol Records Building, overall compliance with the Draft EIR Development Regulations would ensure that no sensitive land use is shaded for more than three continuous hours between 9:00 AM and 3:00 PM. Thus, as determined in the Draft EIR, with adherence to the Development Regulations and the Mitigation Measures identified, the Project's shade and shadow impacts would be mitigated to less-than-significant levels.

The Project would retain the Capitol Records Building.

Please see Response to Comment Nos. 19-2, 19-3, and 19-4 (Los Angeles Conservancy), and Topical Response 4, Cultural Resources, for a discussion on the compatibility of the Project with the adjacent historic Capitol Records building.

Comment No. 83-3

2. Traffic mitigation measures; parking issues.

There are basically three ways to enter or exit the Hollywood Dell: (1) a left or right turn from Ivar onto Franklin, which an uncontrolled intersection; (2) a left or right turn from Dix Street onto Cahuenga, (also uncontrolled); and (3) a left or right turn from Odin onto Cahuenga (also uncontrolled). We need traffic mitigation, by way of controlled signals or other improvements. At present, it is already a challenge to travel south from the Dell into Hollywood. The Millennium project will inevitably aggravate traffic. A condition of approval should be traffic mitigation, by way of signalized intersections or other measures, to facilitate movement into and out of the Dell.

Response to Comment No. 83-3

The comment is noted. Right-turn in, right-turn out, and left turn-in movements at the locations cited in the comment require gaps only in a single direction of traffic. Further, numerous other routes to/from the Dell neighborhood are available, including the signalized intersection at Vine Street and Argyle Avenue. As such, signalization would not be required at the locations specified in the comment. Additionally, little Project traffic is anticipated to travel north of the Hollywood (US 101) Freeway as shown in Figures IV.K.1-5 and IV.K.1-6, Project Traffic Volumes (Net) AM and PM Peak Hour, respectively. Therefore, the Project impacts on access to/from the Dell neighborhood are not anticipated to be significant.

Comment No. 83-4

On a related point, the project approval should ensure that the Millennium Project does not burden street parking in the Dell, which is already scarce.

Response to Comment No. 83-4

With regard to parking, the Project's parking was analyzed using a shared parking which may be applied to the Base Demand when the uses have different parking requirements and different demand patterns in a 24-hour cycle or between weekends and weekdays pursuant to the Development Agreement and the Development Regulations. This is consistent with Community Plan Update policies and Section 106.61 of the Green Building Code. The intent is to maximize efficient use of the Project Site by matching parking demand with complementary uses. As the actual number of spaces will be dependent upon the land uses constructed in accordance with the Equivalency Program, the calculation of the parking requirements shall be based on a detailed assessment prior to Project construction based on the procedures set forth below and in the Development Agreement. As discussed above, parking will be provided to meet demand.

LETTER NO. 84 – ROSENTHAL, JAMIE

Jamie Rosenthal

December 10, 2012

Comment No. 84-1

i am writing in support of an extension of the public comment period for the environmental impact report. i am outraged that the allotted public comment time period has not allowed sufficient time for a necessary independent traffic study that is imperative for a project of this scale.

Response to Comment No. 84-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

Comment No. 84-2

i am a hollywood dell home owner and i am a commercial building owner whose property abuts this project as well as a business owner for 13 years at that property. i know quite well the traffic problems that already exist in this area since it is my exact commute each day. there are many more than 5 intersections that will be impacted by this project. all it takes is a drive at rush hour from my business on yucca street, to meet my son's school bus at gelson's market less than a mile away on franklin and back to my home in the hollywood dell to see first hand the disastrous traffic problems that currently exist. the eir report does not adequately address or provide solutions on the issues of infrastructure and traffic that will surround this project and negatively impact this area as a result of this over scaled project. while i do not expect the out of town developers to care about the negative impact their project will have on the quality of life in our community, i do expect the city of los angeles to respect and support the voices of the thousands of tax payers and voters who have invested millions of dollars in their homes and properties in this neighborhood. a more detailed independent traffic study could provide alternative insights that could lead to viable solutions for this already troubled and poorly functioning problem. this can only benefit all of the residents of los angeles.

Response to Comment No. 84-2

It should be noted that the Draft EIR analyzes potential impacts related to traffic in Section IV.K, Transportation. That section is supported with detailed traffic modeling and reports contained in the traffic appendices circulated with the Draft EIR. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. Please refer to Appendix IV.K.1 of the Draft EIR for a detailed Traffic Study. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 84-3

please extend the public comment time period to allow for an independent traffic study.

Response to Comment No. 84-3

With regard to conducting an independent traffic study, the Project's Traffic Study was conducted within the parameters and approved by the Los Angeles Department of Transportation (LADOT), as defined in the Memorandum of Understanding, included as Appendix A to the Traffic Study. The Study concluded that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections. The Study and subsequent letter from the LADOT dated August 16, 2012, and included as Appendix IV.K.2 to the Draft EIR, included Project requirements as mitigation measures to fully or partially reduce impacts.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. (See CEQA Guidelines Section 15204). The Traffic Impact Study for the Draft EIR concluded that there would be operational impacts due to the Project at two study intersections and also cumulative impacts at five study intersections.

LETTER NO. 85 - SANJURJO, ERIK

Erik Sanjurjo

November 30, 2012

Comment No. 85-1

Please find attached a letter from HUNC pertaining to a position we have taken on the Millennium project. I am submitting the letter on behalf of myself, our president and our governing Board.

Our PLUM Committee is meeting again next Thursday to further consider what specific issues we would like the City to address when deliberating over the project. We will send another letter.

Response to Comment No. 85-1

The letter in reference is included as Comment Letter No. 15, from the Hollywood United Neighborhood Council. The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 86 - SCHOENFELDT, JAY

Jay Schoenfeldt

December 5, 2012

Comment No. 86-1

I recently received notification of the Environmental Impact Report regarding the Millennium project. The proposed project will, no doubt, dramatically alter the Hollywood skyline. Is this development in Hollywood's best interest? As a neighboring property owner, I am generally enthusiastic with Hollywood's redevelopment. However, I am not in favor of the proposed scale of the Millennium Project and it's alternatives.

Response to Comment No. 86-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 86-2

After review of the renderings found at http://millenniumhollywood.net/project-overview/, I think the project's two new skyscrapers will compromise the architectural integrity of the landmark Capitol Records building. The developer states that the two towers will "frame views of the Capitol Records Building". I disagree. The existing Capitol Records building will be dwarfed by the two proposed towers that, conceptually, will stand at nearly three times the height of the 13 floor Hollywood Landmark as per the architectural rendering on the former weblink.

Response to Comment No. 86-2

Please refer to Topical Response 2, Aesthetics, for additional information regarding views.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Comment No. 86-3

Architectural preservation is important to Angelinos. That is why we have over two dozen Historic Preservation Overlay Zones throughout the city. The Millennium Project should pay homage to the existing Capitol Records building by allowing it to be the focal point rather than miniaturized by two skyscrapers sandwiching the landmark.

Response to Comment No. 86-3

This comment relates to the preservation of the existing Capitol Records Buildings, and the commenter is pointed to Section IV.C, Cultural Resources, of the Draft EIR for an in depth discussion of the protection of the Capitol Records Building. Specifically, the Draft EIR and Project is designed to protect the historic significance of the Capitol Records Building and this is a stated objective of the Project. To meet that objective, the Project includes Development Regulations that include standards for grade level open space, and tower massing that seek to protect important public views to the Capitol Records Building and help ensure that it is appropriately distanced from the new construction so that the mass and scale does not overwhelm its architectural significance.

Also in response to the historic Capitol Records Building, Mitigation Measure C-2, which is a shoring plan to protect adjacent historic resources, is recommended in the Draft EIR to minimize the Project's potential construction impacts on the acoustics of the underground studios the in the Capitol Records Building. Therefore, the Draft EIR concludes that the development of the Project consistent with the Development Regulations and recommended Mitigation Measure C-2 would not alter the surroundings of the Capitol Records Building in a manner that would materially impair its significance as an historical resource.

Comment No. 86-4

It is important for in-fill developments to be in harmony with their surroundings. The neighboring buildings are all medium to low-rise developments with varying degrees of architectural pedigree. I don't see how this pair of behemoth skyscraper will fit in with its neighbors. The proposed project seeks to overshadow and dominate the surrounding Hollywood area with its vertical density and massive rentable floor area. It seems a project better suited for the Las Vegas strip.

Response to Comment No. 86-4

Please refer to Topical Response 2, Aesthetics for information regarding views and potential aesthetic impacts associated with the Project. In addition, Section IV.A of the Draft EIR contains and extensive analysis of aesthetic impacts.

Comment No. 86-5

It's for the above reasons that I object to the proposed Millennium Project, but would be in favor of a smaller scale concept that highlights the architecture of the Capitol Records landmark without compromising its integrity. This can be accomplished by developing a commercial focused development with a height less than the Captiol Records landmark. However, this is not an alternative as per the EIR. I therefore am in favor of no development at this point in time.

Response to Comment No. 86-5

The comment is a conclusion statement. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. The comment states that the Draft EIR and related Project should not be approved. The previous comments in the letter go into more detail as to the concerns and perceived inadequacies of the Draft EIR. Each of these has a Response to Comment, above.

LETTER NO. 87 - SCHWAB, CHRISTOF

Christof Schwab

December 9, 2012

Comment No. 87-1

I have been a resident of the Hollywood Hills since 1966 and have seen Hollywood descend from a very livable area to a shabby neighborhood filled with tacky stores, tattoo parlors, head shops, and mediocre restaurants. Attempts have been made in the past to revive the area but were always sabotaged by fierce opposition from mostly ignorant activists who were trying to preserve something that was not worth saving.

The recent developments along Vine Street and Hollywood Boulevard, such as the W Hotel and residential complex have already had a remarkable effect on Hollywood, and I feel that the new Millennium/Capitol Records Project will substantially enhance the ongoing rejuvenation of the area. When residents move in, they will support upscale stores, restaurants and other business ventures, and the homeowners from the Hollywood Hills will not have to drive to other areas to go shopping or to find a good meal.

Based on the somewhat alarmist e-mails I have received from the local neighborhood association, I believe that the opposition to this project is mainly founded in ignorance and activist hysteria. Obviously traffic will increase but in my experience (I am a retired licensed structural engineer), issues such as parking and utilities will be addressed as part of the overall planning. I have confidence in the professionalism of the planners and designers that they will find acceptable solutions to these problems.

My wife and I would like to express our full support for the proposed development.

Response to Comment No. 87-1

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 88 - SHELTON, MARTY

Marty Shelton
Vice President, NAI Capital, Inc.

December 9, 2012

Comment No. 88-1

I submit this letter in support of the Millennium Hollywood Project and the positive impact it will have on the continued revitalization of Hollywood. I understand the developer is seeking approval of a Development Agreement and with that they would also implement an Equivalency Program. In my opinion, the Equivalency Program shows the developer intends to be responsive to market demands and the economy going forward which can only benefit the Hollywood Community.

Also, as a representative of the ownership of 6363 Hollywood Boulevard, Hollywood, CA we welcome the economic growth the project will generate, jobs both construction and permanent, the transit oriented nature of the project, the planned open space and finally the preservation of the Capitol Records building.

Response to Comment No. 88-1

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 89 - SHEPODD, LYNN

Lynn Shepodd
Resident Hollywoodland Up Beachwood Canyon

December 8, 2012

Comment No. 89-1

Is it true you passed no height limits for Cahuenga and Vine Streets? This is lousy if it is true.

Response to Comment No. 89-1

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 89-2

I know the city has to build to stay modern but we have to drive to work and the more units you put the harder it will be.

Response to Comment No. 89-2

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 90 - SHONTZ, LEXIS

Lexis Shontz
V.P. The Lofts at Hollywood + Vine
6253 Hollywood Blvd., Suite 903, Los Angeles, CA 90028

November 7, 2012

Comment No. 90-1

Thank you for sharing the Environmental Impact Report for the Millennium Hollywood Project. I am a resident, property owner and the Vice President of the Board of Directors of The Lofts at Hollywood + Vine located at 6253 Hollywood Blvd., Los Angeles, CA 90028. I want to register a serious level of concern, not opposition but concern regarding the development of this project over the next 20 odd years.

Response to Comment No. 90-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 90-2

How can I keep myself and my constituency of homeowners apprised of the who, what, when and how regarding the "unavoidable environmental impacts" discussed in your report dated October 25, 2012? Will there be a timeline? Is there a way to keep us updated during the life of the project?

Response to Comment No. 90-2

The commenter would like to be notified of any further actions regarding the Draft EIR and proposed Final EIR. The public can keep track of the Final EIR process by visiting the City of Los Angeles Department of City Planning website here: www.http://cityplanning.lacity.org. When the Final EIR is heard at future public hearings, all those who commented during the public review period of the Draft EIR will also receive a notice in the mail identifying when and where future hearings will be held. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 90-3

Will there be any measures to protect us and our property from such impacts?

Response to Comment No. 90-3

Section V., Mitigation Monitoring and Reporting Program (MMRP) of this Final EIR includes all of the mitigation measures identified to reduce or avoid environmental impacts of the project and notes the monitoring phase, the enforcement phase, and the applicable department or agency responsible for ensuring that each mitigation measure is implemented.

Comment No. 90-4

I think the more informed, protected and respected we are as neighbors, the less concerning this development will be.

Response to Comment No. 90-4

The comment is a conclusion to the letter and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 91 - SMITH, CRAIG

Craig Smith
Smith Law Firm
21550 Oxnard Street, Suite 760, Woodland Hills, CA 91367

December 10, 2012

Comment No. 91-1

Pleased be advised that this office represents 1718 Vine St., LLC, the owner of the property located at 1718 Vine Street, Los Angeles, California 90028.

Pursuant to your request, we write to you to voice or client's comments concerning the EIR study and the City's actions concerning the project.

Response to Comment No. 91-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 91-2

Our client has concerns involving the manner in which the development will obstruct its access to the rear portion of its property. While our client generally supports the Millennium Hollywood Project, it does not to the extent it is denied access to its property. Our client reserves all of its rights and remedies in this regard.

Response to Comment No. 91-2

The commenter's concerns regarding access are not specific concerns regarding the scope of development within the Project site or related to the adequacy of the analysis in the Draft EIR. Regarding access, the commenter does not substantiate the concern with a specific environmental impact to be studied in the Draft EIR. The Applicant does not propose construction outside the parcels it controls and will develop the Project pursuant applicable City standards. The analysis in the Draft EIR adequately concludes that the driveways and building layout will not introduce any unusual adverse hazards. The final Site Plan/plot plan will also be reviewed by the LAFD and the LAPD to ensure adequate emergency access for the Project and the for the surrounding businesses.

The City's permit process will ensure that no hazards are introduced into the final design and that the driveways will comply with the City's applicable emergency and other access requirements. The final construction Site Plan will be assessed in detail by the City of Los Angeles Department of Transportation

(LADOT) as part of the building permit plan set approval process to ensure that 1) adequate emergency circulation is being provided prior to a building permit being issued, 2) width and gate set back requirements are all met to ensure that queues do not extend into the public rights-of-way, and 3) adequate driveway sight distance continues to be provided for vehicles maneuvering into or out of the Project driveways.

LETTER NO. 92 - SMITH, JIMMIE

Jimmie Smith

November 4, 2012

Comment No. 92-1

I reside at 6253 Hollywood Blvd. As my building is the only residential space within direct proximity of the proposed Millennium Hollywood Project, I and the other residents of my building will certainly experience some of the largest impacts of this construction.

To state it simply: I am concerned.

Response to Comment No. 92-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 92-2

I am concerned about the traffic implications both during construction and after, when the project is finished.

Response to Comment No. 92-2

A traffic study was prepared and discussed in Section IV.K.1, Transportation - Traffic, of the Draft EIR. The study included an analysis and mitigation measures for implementation during construction and for operation.

Comment No. 92-3

I am concerned about what will surely be a huge increase in dust. Our building has an historical designation and therefore we are not allowed to make changes to the exterior aesthetic of the building, this includes the windows. Already, without any construction, battling dust is a constant problem. How will this be mitigated? Our cars are parked in an outdoor lot adjacent to the building. How will mitigation of continual dust issues be addressed for our cars?

Response to Comment No. 92-3

With regard to the commenter's dust concern, pages IV.B.1-35 and IV.B.1-26 of the Draft EIR include a comprehensive discussion regarding the Project's construction air quality assumptions, including dust.

The total PM10 and PM2.5 emissions disclosed in the Draft EIR accurately reflect the Project's potential air quality emissions. It should be noted that Mitigation Measure B.1-1 ensures compliance with SCAQMD Rule 403 – Fugitive Dust, which would serve to reduce PM10 and PM2.5dust emissions by as much as 61% during the construction phases.

Comment No. 92-4

And lastly, my largest concern is the change in topography. These massive structures will obliterate my view of one of the best aspects of my loft - my view of the Hollywood sign. I know a view is not my right, but it would be devastating to lose it.

Response to Comment No. 92-4

Please refer to Topical Response 2, Aesthetics, for information regarding views of the Hollywood Sign.

Comment No. 92-5

From proposed design sketches I am also concerned that I will lose my view if the Capitol Records building. This along with the view if the Hollywood sign were among the principal reasons for me to live here. Have any provisions been made for these issues?

Response to Comment No. 92-5

Please refer to Topical Response 2, Aesthetics, for additional information regarding views of the Capitol Records Building and views of the Hollywood Sign.

LETTER NO. 93 - SMITH, MD SAM

MD Sam Smith
President, MD Sam Smith, CFP
8033 W. Sunset Blvd., Suite 893, Los Angeles, CA 90046

December 6, 2012

Comment No. 93-1

I am writing you today in SUPPORT of the Millenium Hollywood Project.

Over the course of the last several years as a businessman living and working in Hollywood, I have watched the evolution of the Millenium Hollywood Project and witnessed the exceptional consideration of our community, its long term best interests and the overall vitality of Hollywood as it transforms itself in the new century. MHP is a sterling example of next generation Transit Oriented Development that will enable residents, workers and visitors to enjoy a quality of life that is transformational at its core.

Hollywood's renaissance has continued its uphill climb despite the recent economic setbacks. The Millenium Hollywood Project will greatly enhance Hollywood's ability to continue this evolution. The investment of the project and the economic inertia it will create will bring new energy to our city. The long term effect on our tax base and economic vitality will be broad reaching and well distributed throughout the surrounding communities.

The Millenium Hollywood Project has taken great lengths to preserve and enhance the iconic Capitol Records Building while bringing much needed pedestrian energy to the neighborhood.

The design of the project has succeeded in considering the view and the impact of the project from every angle. From every vantage point the project brings a new perspective to our future city and its citizens.

Every great vision creates change and change is not always comfortable at first. Every great vision also requires courage. Courage to believe in the possibility.

The possibility created by the Hollywood Millenium Project is a vibrant regional center that will bring new life and new energy to an already electric city! Let's move this project forward!

Response to Comment No. 93-1

This comment is stating its support for the Project.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 94 - TABOR, MAUREEN

Maureen Tabor

December 9, 2012

Comment No. 94-1

This is a note to express my opposition to The Hollywood Millennium Project.

As a home owner in Beachwood Canyon, this project has an adverse effect on me and on my property value. The traffic created would be unsustainable, dangerous, and ruin the small rise of good small developments in our area. I accept change, but this massiveness contemplated is not the kind of change that will improve the area.

Response to Comment No. 94-1

It should be noted that the Draft EIR analyzes potential traffic impacts in Section IV.L, Transportation. Otherwise, the comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 95 - TAGER, ALISA

Alisa Tager
2731 Woodshire Drive, Los Angeles, CA 90068

December 9, 2012

Comment No. 95-1

I would like to voice my opposition to this project.

I am a long-time resident of Beachwood and I have seen the traffic increase radically over the past decade.

I am concerned there have been no impact studies on the traffic and impact on local infrastructure.

Please postpone this project until further studies have been done to assess the problems and propose solutions.

Response to Comment No. 95-1

A traffic study was prepared and discussed in Section IV.K.1, Transportation - Traffic, of the Draft EIR.

With regard to the commenter's concern with the existing infrastructure surrounding the Project Site, please refer to Response to Comment No. 18-5 (Hollywoodland Homeowners Association (#2)) above. According to Section IV.L, Utilities and Service Systems, of the Draft EIR, the Project suggests mitigation measures and code-compliance requirements to help offset potential impacts from water, sewer, solid waste, and energy. As stated in these sections of the Draft EIR, the Project would not create a significant impact to any utility system and not a problem deferred, as suggested by the commenter.

LETTER NO. 96 - THALER, SCOTT (#1)

Scott Thaler

December 9, 2012

Comment No. 96-1

Please extend public comment period and allow time for a full traffic survey of the area!!!!!

Response to Comment No. 96-1

For information on extending the comment period, please see Topical Response 1, Draft EIR Review Period Extension Request.

The Draft EIR analyzed traffic in a comprehensive traffic study according to the guidelines and parameters of the Los Angeles Department of Transportation.

LETTER NO. 97 - THALER, SCOTT (#2)

Scott Thaler

December 9, 2012

Comment No. 97-1

[Blank]

Note that the comment within the email was blank, but the subject line was: "NO!"

Response to Comment No. 97-1

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 98 - THALER, SCOTT (#3)

Scott Thaler

December 11, 2012

Comment No. 98-1

Traffic study.

Environmental Impact

All need detail study before such an undertaking.

Response to Comment No. 98-1

The Draft EIR analyzed traffic in a comprehensive traffic study according to the guidelines and parameters of the Los Angeles Department of Transportation.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 99 - THOELKE, SCOTT

Scott Thoelke

December 10, 2012

Comment No. 99-1

My wife and I live in Hollywood. We have lived here for over 20 years and own a home. I'm am strongly against the large scale development ideas being floated to over develop Hollywood. There are already to many empty buildings unoccupied in the Hollywood area to consider adding more. The streets are already over crowded with cars most of the day. The pollution potential is horrifying. Air, ground waist and audio pollution would kill the neighborhood. Hollywood is a Mecca for tourists to visit because it represents "Old Hollywood". A small town where the film industry developed into a huge industry. Allowing expansion would eventually turn Hollywood into a city that would look like many other generic cities across the United States. There would be no reason for tourists to come here any longer as the small town feel would be gone. Please do not allow the large scale development of Hollywood as it would drive long time residents to leave and bring down the tone of Beachwood Canyon and the entire Hollywood area.

Response to Comment No. 99-1

It should be noted that the Draft EIR analyzes potential land use compatibility, traffic, air quality, and aesthetics in Sections IV.G, Land Use Planning, IV.K, Transportation, IV.B, Air Quality Analysis, and IV.A, Aesthetics respectively. The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 100 -TURNER, DAVID

David Turner
2279 Fink Street, Los Angeles, CA 90068

December 8, 2012

Comment No. 100-1

I agree with my neighbor Jack Rosenfeld on the congestion and further degradation of traffic flow in an area on the brink of gridlock now. That is what erecting these buildings will enact. Are you going to eliminate personal transportation? It sounds to me like it is doomed. Our Mayor wants Hollywood to be like New York City.

Response to Comment No. 100-1

It should be noted that the Draft EIR analyzes potential traffic impacts in Section IV.K, Transportation. Otherwise, the comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 100-2

I am a third generation native of Los Angeles. I really don't like the direction this city is taking, and I will fight it religiously. All these electric billboards cheapen and degrade My quality of life and increase driving danger, and they seem to go with tall buildings to help pay the cost. I vote "NO"

Response to Comment No. 100-2

The comment is a conclusion to the letter and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 101 - VAN ZYL, JENNIFER AND RUDY

Jennifer and Rudy Van Zyl
2775 Rinconia Drive, Hollywood, CA 90068

December 9, 2012

Comment No. 101-1

My husband and I are writing you incensed over the proposed Hollywood Millennium Project.....as residents in the district just north of the project we and every neighbor we have talked to are VERY MUCH AGAINST THIS PROJECT...shame on you for even considering such a ugly, out of place and road-clogging development. Our comments below:

Response to Comment No. 101-1

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 101-2

-These buildings are a good 400 feet too high from a visual standpoint;

Response to Comment No. 101-2

Please refer to Topical Response 2, Aesthetics, for additional information regarding views corridors.

Please refer to Response to Comment No. 16-3 (Hollywood United Neighborhood Council (#2)) for a discussion on the Project's overall height.

Comment No. 101-3

-Have you been to the Franklin/Vine/Cahuenga area lately during rush hour? The other night it took me 40 minutes!!! to get from Santa Monica & Vine Street into my Hollywood Dell neighborhood...two almost 600 feet buildings will only worsen that situation;

Response to Comment No. 101-3

The Project includes mitigation measures for intersection specific improvements:

K.1-10 Intersection Specific Improvements – Argyle Avenue/Franklin Avenue – US 101 Freeway Northbound On-Ramp – To mitigate the significant traffic impact at this intersection under both existing

(2011) and future (2020) conditions, the Project Applicant shall restripe this intersection to provide a left-turn lane, two through lanes, and a right-turn lane for the southbound approach and two left-turn lanes and a shared through/right lane for the northbound approach. The final design of this improvement would require the joint approval of Caltrans and LADOT.

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 101-4

-What about improving infrastructure in the area? We need better freeway entrance/exits and better maintained roads and sidewalks and public parking lots like Beverly Hills and Santa Monica;

Response to Comment No. 101-4

Road and sidewalk maintenance and public parking lots are under the jurisdiction of the City of Los Angeles. The Project includes several mitigation measures designed to alleviate impacts to roads and sidewalks, such as:

- Sidewalk pavement reconstruction/improvements, and improved amenities such as landscaping and shading particularly along the sidewalks on Ivar Avenue and Argyle Avenue linking the project to the Hollywood/Vine Metro Red Line Station.

- Traffic signal system upgrades

- Highway dedications and street widening to meet the revised street standards of the recently adopted Hollywood Community Plan Update.

With regard to parking, the Project's parking was analyzed using a shared parking which may be applied to the Base Demand when the uses have different parking requirements and different demand patterns in a 24-hour cycle or between weekends and weekdays pursuant to the Development Agreement and the Development Regulations. This is consistent with Community Plan Update policies and Section 106.61 of the Green Building Code. The intent is to maximize efficient use of the Project Site by matching parking demand with complementary uses. As the actual number of spaces will be dependent upon the land uses constructed in accordance with the Equivalency Program, the calculation of the parking requirements shall be based on a detailed assessment prior to Project construction based on the procedures set forth below and in the Development Agreement. As discussed above, parking will be provided to meet demand.

Comment No. 101-5

-We need real green space and open areas in Hollywood area-- virtual green space with vines on the side of 600 feet towers is not green space!

Response to Comment No. 101-5

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 101-6

-If you think residents in these buildings will use the Metro, you are mistaken. The Metro still does not go to the places where people go-- the airport, Beverly Hills, Century City, the Hollywood Bow (another shameful failure by our City officials that there is not a stop at the Bowl...wish I could send all those buses to your neighborhood);

Response to Comment No. 101-6

The Metro's routes and destinations are beyond the scope of the EIR and not under the jurisdiction of the City of Los Angeles. However, Metro's long range planning and Measure R programs include routes that will eventually connect to LAX, Beverly Hills, and Century City. The Hollywood Bowl bus situation is also not Project-related.

The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 101-7

-What about the poorly maintained and developed Cahuenga Pass? The ghetto-inspired chainlink fences should instead be sound walls to contain the heavy traffic on the streets and not spill into surrounding residential area. We need a bike/walk path OFF THE STREET so people can walk and ride between Hollywood and the Valley...if this were the Westside/Sepulveda Pass, it would be much safer, more beautiful and functional as sadly that is were the City and State spends it's infrastructure funds. Meanwhile, the reason most tourists visit LA is to come to Hollywood...and when they do it's filled with garbage, chainlink fences, the homeless, stripper clothing stores, souvenir shops and pedestrian unfriendly streets.

Response to Comment No. 101-7

It should be noted that the Draft EIR analyzes potential traffic impacts in Section IV.K, Transportation. The comment is an opinion and does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 101-8

-We do not want Vine Street area of Hollywood to become like the awful user-unfriendly Hollywood & Highland complex! I don't know a single neighbor who goes there and instead we all drive by and go the the well-developed Grove. WE DO NOT WANT OUR NEIGHBORHOOD TO BECOME ANOTHER TIMES SQUARE!

Response to Comment No. 101-8

The Project Site has a Regional Center Commercial land use designation in the General Plan. It should be noted that the Draft EIR analyzes land use compatibility issues in Section IV.G, Land Use Planning. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 101-9

We are amazed at how this project has gotten so far and that City officials will even consider such a project...they even misrepresented the surrounding area in their renders by making the Hollywood Dell look like a flatland loaded with housing projects!

Response to Comment No. 101-9

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration

Comment No. 101-10

We will fight this project and urge others to do the same. This is not responsible growth for Hollywood.

Response to Comment No. 101-10

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 102 - VINITSKY, ELLEN

Ellen Vinitsky
6359 Primrose Avenue, Los Angeles, CA 90068

October 28, 2012

Comment No. 102-1

I have a great many concerns about the proposed Millennium Project.

Response to Comment No. 102-1

The comment is an introduction and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 102-2

I am concerned about traffic in Hollywood. I live above Franklin, between Vine and Cahuenga and getting anywhere south of Franklin and north of Santa Monica Boulevard has become an ordeal in the last several years and will only get worse.

Response to Comment No. 102-2

Proposed enhancements for the Argyle/Franklin at 101/DOT connection are identified in Mitigation Measure K.1-10 on pages I-94 and IV.K.1-58 of the Draft EIR (and revised to Mitigation Measure K.1-11 to accommodate a new Mitigation Measure K.1-4, as described in Section IV, Corrections and Additions to the Draft EIR). This comment is noted for the record and will be forwarded to the decision makers for their consideration.

See Response to Comment No. 26-2 (Becklund, Laurie) for additional information the proposed mitigation to this intersection. The second part of the comment is an opinion and does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 102-3

I am concerned about the little Ma & Pa stores that have left the Hollywood area or will be forced to, including all the wonderful book stores that lined Hollywood Boulevard, only to be replaced by T-Shirt store, "Smoke Shops" and the likes, because mega-buildings with "retail space" will discourage anyone from patronizing the area businesses other than those manufactured for tourists.

Response to Comment No. 102-3

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 102-4

I am concerned with all of the clubs in Hollywood where patrons park in our sleepy little neighborhoods and trash them and how a mega-building will only increase the population and traffic and visitors and such.

Response to Comment No. 102-4

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 102-5

In Downtown Los Angeles, there was an organic growth, where old buildings were renovated, saved, refurbished and the neighborhoods grew in an inclusive way, not in the way a million-square-foot building will overshadow everything in its path. Look at the old Bank District as an example.

Response to Comment No. 102-5

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 102-6

I worry about the residents who have been displaced,

Response to Comment No. 102-6

The commenter suggests that the Project would displace existing residents and businesses of Hollywood, which is false. In fact, the Project would contribute toward the population growth forecast for the City of Los Angeles, and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. The Project would increase the density of residential uses by bringing more housing units, with a varying range of sizes, closer to major employment centers, which in turn would increase revenue for the Hollywood area rather than displace existing businesses. This additional density would also be located in an area currently served by public transit, (Metro Red Line, Hollywood DASH, and LADOT Commuter

Express 422 & 423) and would be located near existing transportation corridors. The Project's density falls within the range of densities found within the area, and provides housing closer to jobs at densities that are consistent with the VMT reduction strategies of the RCPG and AQMP.

Comment No. 102-7

the businesses displaced and more so-

Response to Comment No. 102-7

Please refer to Response to Comment No. 102-6 (Vinitsky, Ellen) above for more information on displacement of businesses.

Comment No. 102-8

-the incredible loss of Hollywood history that has been torn down building by building.

Response to Comment No. 102-8

It should be noted that the Draft EIR analyzes potential historic resource impacts in Section IV.C, Cultural Resources. Otherwise, the comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 102-9

I worry about the loss of a view, a beautiful view for those of us above Franklin.

Response to Comment No. 102-9

Please refer to Topical Response 2, Aesthetics, for information regarding views and views of the Hollywood Sign.

Comment No. 102-10

It seems to me that as usual - big business and developers have been favored far beyond us tax payers and residents. It seems like favoritism for the connected few who got in on the project and will make a ton of money for themselves - like payola. It appears that anyone able to jump on this wagon will get to put their mouth on the government tit at the expense of anyone else and we - the residents and taxpayers- will have to pick up the tab for decades to come.

Response to Comment No. 102-10

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 102-11

I am deeply opposed to this project.

Please submit my name as one of opposition.

Response to Comment No. 102-11

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 103 - WESTBROOK, YVONNE

Yvonne Westbrook

December 9, 2012

Comment No. 103-1

I have read the reports and heard both sides, pro and con; I believe it is in the best interest of both Hollywood residents and those proposing the plan to do more research before moving ahead. This seems a prudent decision, since many residents, who live day in and day out in the area will be affected in some way. I have been a resident and home owner in Hollywoodland for 40 years, am not opposed to change and have seen and felt the negative impact on traffic and air quality.

Response to Comment No. 103-1

It should be noted that the Draft EIR analyzes potential traffic and air quality impacts in Section IV.K, Transportation, and IV.B, Air Quality Analysis respectively. Otherwise, the comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 103-2

Our infrastructure cannot handle more traffic; I had an office in the Taft Building at Hollywood and Vine...I moved my office after The W Hotel was finished because the traffic became intolerable, as did the parking and I was losing client's as a result. This is true of the intersection at Hollywood and Highland, it's true of the project on the north east corner of Vine and Sunset. The very thing that made Hollywood livable, the ease of movement, has been lost and we cannot afford to support similar projects. I don't think that business and financial interests should rule the community--a community should be ruled by the heart.

Response to Comment No. 103-2

The Draft EIR analyzed traffic in a comprehensive traffic study according to the guidelines and parameters of the Los Angeles Department of Transportation. The traffic study looked at a number of intersections, including Hollywood Boulevard / Vine Street intersection and Sunset Boulevard / Vine Street intersection. The traffic study acknowledges that the Project plus mitigation traffic impacts at five study intersections (including the two identified in the comment) under the Future (2020) conditions would remain at a significant level even with implementation of the mitigation measures.

The comment does not state a specific concern or question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 104 - WHITM, JUDITH

Judith Whitm

December 10, 2012

Comment No. 104-1

Cui bono? The residents of this already congested area don't benefit. The city services which will be overloaded and thus increase fees paid by those who don't benefit? The number of feeder streets that are already parking lots?

Response to Comment No. 104-1

The commenter asks "cui bono?", meaning for whose benefit and states that the residents of the area don't benefit, and asks if the city services and streets will benefit. Regarding City services and infrastructure please refer to Response to Comment No. 18-5 (Hollywoodland Homeowners Association (#2)) above. Also, it should be noted that the Draft EIR analyzes potential traffic impacts in Section IV.K, Transportation.

Other portions of this comment do not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 104-2

The hundreds of thousands of property taxpayers who PAY for a view don't benefit.

Response to Comment No. 104-2

Please refer to Topical Response 2, Aesthetics, for information regarding views, including views of the Hollywood Sign.

Comment No. 104-3

Gee, who benefits? Politicians who get campaign donations? From the builders who get zone variance without citizen approval?

The list goes on. Doesn't it?

Response to Comment No. 104-3

The commenter continues to question who benefits, but does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 104-4

Don't do this without voter approval. Please.

Response to Comment No. 104-4

The comment does not state a specific question regarding the adequacy of the Draft EIR in identifying and analyzing the environmental impacts of the Project. As such, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. 105 – MELROSE HILL NEIGHBORHOOD ASSOCIATION

Melrose Hill Neighborhood Association
Edward Villareal Hunt, President
4928 West Melrose Hill, Los Angeles, CA 90029

February 1, 2013

Comment No. 105-1

We are concerned about adding this substantial Millennium Project population to Park starved Hollywood without adding a commensurate amount of additional parkland. We understand this project has a requirement to pay Quimby fees.

Our recommendation is that the Quimby Fees be directed toward the Construction of the first phase of the Proposed Hollywood Central Park to be constructed over the nearby 101 Freeway.

Response to Comment No. 105-1

According to Section IV.J.4, Public Services - Parks and Recreation, of the Draft EIR, the City imposes Quimby fees and Park and Recreation fees pursuant to LAMC Section 17.12 and LAMC Section 21.10.3, respectively, based on the number of units proposed within a project to help offset potential project and cumulative environmental impacts on parkland.

As noted in the Draft EIR, the Project would comply with the requirements identified in Mitigation Measures J.4-2 and J.4-3 regarding payment of fees for the acquisition and development of park and recreational sites. It should be noted that the fees that are paid would be allocated according to the budget and planning purposes of the Los Angeles Department of Recreation and Parks (LADRP) because use of the fees is pursuant to the LAMC and is determined by the LADRP. The Project Applicant does not determine how these fees are used by the City.

This comment is noted and will be provided to the decision makers for consideration.

IV. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

INTRODUCTION

This section presents corrections and additions that have been made to the text of the Draft EIR. These changes include revisions resulting from responses to comments and others that are necessary to provide clarifications to the project description and analysis and to correct non-substantive errors. The revisions are organized by section and page number as they appear in the Draft EIR. Text deleted from the Draft EIR is shown in ~~strikethrough~~, and new text is underlined. For corrections resulting from a response to a comment on the documents, references refer to the comment letter number and name of commenter.

Table of Contents

1. Page ii under VI. Alternatives to the Proposed Project, list number 2 – Insert a period (".") between the "4" and "5" to read:

   Reduced Density Mixed-Use Development 4.5:1 FAR VI-15

Section I Introduction/Summary

2. Page I-7 the first two paragraphs are to be removed and the following is to be added:

   ~~This Draft EIR analyzes the greatest potential environmental impact of the Project for each environmental issue area. The Project may not exceed these maximum impacts for each issue area. For instance, with respect to the Project's traffic impacts, a vehicular trip cap was established. The trip cap represents the total number of peak hour trips (AM plus PM peak hour trips) that may be generated by the Project.~~

   ~~To develop the trip cap, trip rates for each land use were calculated based on the total AM (7 AM to 10 PM) plus PM (3 PM to 6 PM) peak hour trips generated per land use. The Commercial Scenario was determined to have the maximum (AM plus PM peak hour) trips equal to 1,498 trips. The Commercial Scenario is therefore the most impactful scenario. The maximum allowable peak hour trips permitted under any development scenario would be limited to 1,498 total peak hour trips. The total development of land uses for the Project resulting from the Equivalency Program will not exceed this trip cap.~~

   This Draft EIR analyzes the greatest potential environmental impact of the Project for each environmental issue area. The Project may not exceed these maximum impacts for each issue area. For instance, with respect to the Project's traffic impacts, a vehicular trip cap was established. The trip cap represents the maximum AM peak hour trips and the maximum PM peak hour trips that may be generated by the Project.

   To develop the trip cap, trip rates for each land use were calculated based on the AM peak hour trips and the PM peak hour trips generated per land use. The Commercial Scenario was determined to have

the maximum AM peak hour trips (574) and the maximum PM peak hour trips (924). The Commercial Scenario is therefore the most impactful scenario. The maximum allowable peak hour trips permitted under any development scenario would be limited to 574 AM peak hour trips and 924 PM peak hour trips (the Trip Cap). The total development of land uses for the Project resulting from the Equivalency Program will not exceed this Trip Cap.

3. Page I-73 within Table I-1, Summary of Environmental Impacts/Mitigation Measures/Level of Significance After Mitigation – Remove the extraneous "w" in the word "necessawry" in Mitigation Measures J.2-1 so that the sentence containing the word will read:

   The bottom of the fence shall have filter fabric to prevent silt run off where necessa~~w~~ry.

4. Table I-1, Summary of Environmental Impacts/Mitigation Measures/Level of Significance After Mitigation – The table's "Mitigation Measures" column will be modified to include the changes, revisions, and additions of the mitigation measures identified below for Aesthetics, Air Quality, Cultural Resources, Noise, and Transportation – Traffic.

Section II Project Description

5. Page II-21, the last paragraph is to be removed and replaced as follows:

   ~~For instance, with respect to the Project's maximum aggregate traffic impacts, a vehicular trip cap will be established. This trip cap will control whether any particular exchange of land uses is permitted under the Program. In connection with traffic impacts, trip rates for each land use have been identified to determine the Project's maximum allowable AM (7 AM to 10 AM) and PM (3 PM to 6 PM) peak hour trips. Using the established trip rates identified in Table II-2, Trip Cap Computation By Land Use Type, the trip cap was established. The trip cap represents the number of trips (AM plus PM peak hour trips) associated with the most trip-intensive development scenario of the Project, which is the Commercial Scenario. As shown in Table II-3, Project Trip Cap, the trip cap is 1,498 trips and thus the maximum allowable peak hour trips that would be allowed under any development scenario would be limited to 1,498 total peak hour trips. The development of land uses resulting from the Equivalency Program will use the generation rates in Table II-2 to determine peak hour trips and will not exceed this trip cap, which establishes the maximum AM and PM peak hour traffic impacts that are analyzed by this Draft EIR. The EIR will establish, as discussed under Section IV, Environmental Impact Analysis, maximum levels for every other environmental impact produced by the Project. As discussed above, in no instance will any development scenario permitted by the Development Agreement and Equivalency Program exceed the maximum environmental impacts studied in this Draft EIR of which maximum vehicular trips is only one of several environmental thresholds.~~

   For instance, with respect to the Project's maximum traffic impacts, a vehicular trip cap will be established. This trip cap will control whether any particular exchange of land uses is permitted

under the Equivalency Program. In connection with traffic impacts, trip rates for each land use have been identified to determine the Project's maximum allowable AM (7 AM to 10 AM) and PM (3 PM to 6 PM) peak hour trips. Using the established trip rates identified in Table II-2, Trip Cap Computation By Land Use Type, the trip cap was established. The trip cap represents the number of AM peak hour trips and PM peak hour trips associated with the most trip-intensive development scenario of the Project, which is the Commercial Scenario. As shown in Table II-3, Project Trip Cap, the " Trip Cap" is 574 AM peak hour trips and 924 PM peak hour trips and thus the maximum allowable peak hour trips that would be allowed under any development scenario would be limited to574 AM peak hour trips and 924 PM peak hour trips. The development of land uses resulting from the Equivalency Program will use the generation rates in Table II-2 to determine peak hour trips and will not exceed this Trip Cap, which establishes the maximum AM peak hour trips and the maximum PM peak hour traffic impacts that are analyzed by this Draft EIR. The EIR will establish, as discussed under Section IV, Environmental Impact Analysis, maximum levels for every other environmental impact produced by the Project. As discussed above, in no instance will any development scenario permitted by the Development Agreement and Equivalency Program exceed the maximum environmental impacts studied in this Draft EIR of which maximum vehicular trips is only one of several environmental thresholds.

6. Page II-22, Table II-2, Trip Cap Computation by Land Use Type and Table II-3, Project Trip Cap, are replaced with the following tables:

Table II-2
Trip Cap Computation By Land Use Type

Land Use/Activity		Peak Hour Trips Factor		
Construction Period		**AM**	**PM**	**Unit**
110	Construction Employee*	0.440	0.420	trips/employee
N/A	Construction Trucks**	0.625	0.625	trips/truck load
Operational Period				
220	Residential	0.358	0.328	trips/du
310	Hotel	0.476	0.504	trips/rm
492	Health/Fitness Club	0.788	1.950	trips/ksf
710	General Office	0.913	0.360	trips/ksf
820	Retail***			
	(1-25,000 sf)	1.444	5.026	trips/ksf
	(25,001+ sf)	0.559	2.604	trips/ksf
931	Restaurant	0.520	4.840	trips/ksf
N/A	Car Rental Facility	0.373	0.871	trips/ksf

* The trip rates per peak construction worker used are the ITE Trip Generation, 8th edition manual rates for a Light Industrial site (LU 110).

** Standard City haul route conditions prohibit such truck activity during the excavation and shoring construction phase and thereby 0 truck trips are to be assumed for that phase. The 0.625 rates apply to the average trucks hauling loads to or from the site on a weekday during each other construction phase.

*** Incrementally applied to the retail building area on the site at the conclusion of a development phase.

Table II-3
Project Trip Cap

Land Use Category	Use Size	AM Peak Hour Trips	PM Peak Hour Trips
220 Residential	461 du	165 trips	151 trips
310 Hotel	254 rm	121 trips	128 trips
492 Health/Fitness Club	80 ksf	63 trips	156 trips
710 General Office	150 ksf	137 trips	54 trips
820 Retail	100 ksf	78 trips	321 trips
931 Quality Restaurant	25 ksf	13 trips	121 trips
N/A Car Rental	-8 ksf	(3) trips	(7) trips
Site Total (Trip Cap)		574 trips	924 trips

7. Page II-23, beginning with the first full sentence in the first paragraph is to be removed and replaced as follows:

   ~~This request shall include detailed information identifying the land use transfer/exchange that is being proposed and supplemental information documenting how the proposed land uses are consistent with the overall AM and PM peak hour trip cap identified in Table II-3, Project Trip Cap. The supporting documentation shall also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR.~~

   This request shall include detailed information identifying the land use transfer/exchange that is being proposed and supplemental information documenting how the proposed land uses are consistent with the AM peak hour and PM peak hour Trip Cap identified in Table II-3, Project Trip Cap. The supporting documentation shall also provide sufficient information to demonstrate that the proposed Equivalency Program would not exceed the maximum environmental impacts identified in the Draft EIR.

8. Page II-23, Footnote 4 is revised as follows:

   Note: All square footage numbers for the Project ~~represent net square footage.~~ are based on the definition of floor area. ~~The term "net square feet" is defined in LAMC Section 14.5.3.~~ Floor area is defined in Section 12.03 of the LAMC as the area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing of helicopters, basement storage areas.

9. Page II-24, Table II-4, Millennium Hollywood Development Proposed Concept Plan Land Use and Square-Footage Summary, is revised as follows:

   Footnote B: GSF=Gross Square Feet. For purposes of analyzing the volume of new construction, the total GSF was assumed to be 15% above the ~~"Net Developed Floor Area"~~ floor area as defined by the LAMC.

   Footnote C: The total office square footage included under the "~~Net Developed~~ Floor Area" column includes the existing 114,303 sf of office space occupied by the Capitol Records Complex which will be retained as part of the Project.

10. Page II-24, Table II-4, Millennium Hollywood Development Proposed Concept Plan Land Use and Square-Footage Summary, the third column heading is revised as follows:

    Proposed ~~Net Developed~~ Floor Area (sf)[a]

11. Page II-31, the last paragraph is revised to reflect that there could be up to six levels of below grade parking on the West Site:

    Based on the Code required parking standards and the implementation of a shared parking program, it is envisioned that the Project would include up to three levels of above-grade parking within the podium structures, up to six levels of below grade parking on the East Site, and up to ~~four~~six levels of below grade parking on the West Site.

12. Page II-32, the second sentence under the heading "*g. Signage and Lighting*" is revised to reflect that Ordinance 181340 is an amendment of the Hollywood Signage Supplemental Use District and its provisions replace and supersede the provisions set for the in Ordinance 176172:

    The Project Site is located within the Hollywood Signage SUD (Ord. No. 181340~~176172~~, LAMC Section 13.11), and is thus subject to the rules and regulations established in the Hollywood Signage SUD.

13. Page II-49, the following discretionary action is to be added to the bullet list, after the Variance for sports club parking:

    - City Planning Commission Authority for Reduced On-Site Parking with Remote Off-site Parking or Transportation Alternatives to allow for shared parking/reduced on-site parking.

Section IV.A.2 Aesthetics – Shade/Shadow

14. Mitigation Measure A.2-2 is revised as follows:

    The Project shall conform to the Tower Massing Standards as identified in Section 7 of the Millennium Hollywood Development Regulations which include, but are not limited to, the following Standards: (7.3.1) A tower 220 feet or greater in height above curb level shall be located with its equal or longer dimension parallel to the north-south streets; (7.5.1) Towers shall be spaced to provide privacy, natural light, and air, as well as to contribute to an attractive skyline; and (7.5.2) Generally, any portion of a tower shall be spaced at least 80 feet from all other towers on the same parcel, except the following which ~~will~~ shall meet Planning Code: 1) the towers are offset (staggered), 2) the largest windows in primary rooms are not facing one another, or 3) the towers are curved or angled.

Section IV.B.1 Air Quality

15. In response to Comment Letter No. 07 (South Coast Air Quality Management District), the following mitigation measure has been revised as follows:

Mitigation Measure B.1-4 The Project shall incorporate residential air filtration systems with filters meeting or exceeding ASHRAE 52.2 Minimum Efficiency Reporting Value (MERV) of 13, to the satisfaction of the Department of Building and Safety. The CC&Rs recorded for the residential units on the Project Site shall incorporate this measure. High efficiency filters shall be installed and maintained for the life of the Project.

16. In response to Comment Letter No. 07 (South Coast Air Quality Management District), the following additional mitigation measures have been added to Section IV.B.1, Air Quality, of the Draft EIR:

Mitigation Measure B.1-3 Haul truck fleets during demolition and grading excavation activities shall use newer truck fleets (e.g., alternative fueled vehicles or vehicles that meet 2010 model year United States Environmental Protection Agency NO_X standards), where commercially available. At a minimum, truck fleets used for these activities shall use trucks that meet EPA 2007 model year NOx emissions requirements.

Mitigation Measure B.1-6 Heating Ventilation and Air Conditioning (HVAC) air intakes shall be located either on the roof of structures or within areas of the Project Site that are distant from the 101 Freeway to the extent that such placement is compatible with final site design.

Mitigation Measure B.1-7 For portions of new structures that contain sensitive receptors and are located within 500-feet of the 101 Freeway, the project design shall limit the use of operable windows and/or the orientation of outdoor balconies.

Mitigation Measure B.1-8 The Project shall provide electric outlets on residential balconies and common areas for electric barbeques to the extent that such uses are permitted on balconies and common areas per the Covenants, Conditions and Restrictions recorded for the property.

Mitigation Measure B.1-9 The Project shall use electric lawn mowers and leaf blowers, electric or alternatively fueled sweepers with HEPA filters, and use water-based or low VOC cleaning products for maintenance of the building.

17. The previously existing mitigation measures in Section IV.B.1, Air Quality, of the Draft EIR are to be renumbered to accommodate the additional mitigation measure now identified as B.1-3. Any references in the Draft EIR that refer to the previous mitigation measure number now refer to the new mitigation measure number:

- Previous mitigation measure B.1-3 is now B.1-4.

- Previous mitigation measure B.1-4 is now B.1-5.

- All mitigation measures will change the words "must", "will", and "would" to "shall", as indicated in Section V, Mitigation Monitoring and Reporting Program, of the Final EIR

B.1-4 The Project shall meet the requirements of the City of Los Angeles Green Building Code. Specifically, as it relates to the reduction of air quality emissions, the Project shall:

- Be designed to exceed Title 24 2008 Standards by 15%;

- Reduce potable water consumption by 20% through the use of low-flow water fixtures;

- Provide readily accessible recycling areas and containers. It is estimated this ~~would~~ shall achieve a minimum 10% reduction of solid waste deposited at local landfills; and

- All residential grade equipment and appliances provided and installed shall be ENERGY STAR labeled if ENERGY STAR is applicable to that equipment or appliance.

Section IV.C Cultural Resources

18. Page IV.C-48, Mitigation Measure C-5, is revised to read:

Mitigation Measure C-5 Prior to construction, the environs of the Project Site (i.e., Project Site and surrounding area) shall be documented with ~~up to~~at least twenty-five images in accordance with Historic American Building Survey (HABS) standards. Compliance with this measure shall be demonstrated through a written documentation to the satisfaction of the Department of City Planning, Office of Historic Resources prior to any construction.

19. Page IV.C-48, Mitigation Measure C-6, part a. The Society of Professional Archaeologists no longer exists and the new entity is the Register of Professional Archaeologists. Revise reference to Society of Professional Archaeologist (SOPA) to read:

a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the ~~Society~~Register of Professional Archaeologists (~~S~~ROPA) or a ~~S~~ROPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;

Section IV.G Land Use Planning

20. Pages IV.G-15 and IV.G.16 is revised to reflect that Ordinance 181340 is an amendment of the Hollywood Signage Supplemental Use District and its provisions replace and supersede the provisions set for the in Ordinance 176172, and to show that supergraphic signs are prohibited:

Hollywood Signage Supplemental Use District (SUD)

Ordinance 181340 is the amendment of the Hollywood Signage Supplemental Use District (SUD), which was originally established by Ordinance 176172~~ established the SUD~~. This ordinance was enacted to acknowledge and promote the continuing contribution of signage to the distinctive aesthetic of Hollywood, as well as to control the blight created by poorly placed, badly designed signs throughout Hollywood. Specifically, the Ordinance seeks to:

1) provide for the systematic execution of the Hollywood Community Plan and Redevelopment Plan;

2) promote appropriate and economically viable signage;

3) limit visual clutter by regulating the number, size, and location of signs;

4) minimize potential traffic hazards and protect public safety;

5) protect street views and scenic vistas of the Hollywood Sign and the Hollywood Hills; ~~and~~

6) protect and enhance major commercial corridors and properties; and

7) Provide a public benefit and enhancement to the community environment.

The Project Site is located within the established boundaries of the SUD.

~~Under the SUD, there are specific standards for supergraphic signs. A supergraphic sign is defined as "a sign, consisting of an image which is applied to and made integral with a wall, or projected onto a wall or printed on vinyl, mesh or other material, and which does not comply with the provisions of Section 91.6201 et seq. of the Municipal Code, relating to wall signs, mural signs, off-site signs and/or temporary signs." According to the SUD, a supergraphic sign may include off-site advertising and shall comply with the following standards:~~

- ~~A Supergraphic Sign shall not be allowed on any lot where a billboard or solid panel roof sign is located.~~
- ~~To qualify for a Supergraphic Sign an applicant shall participate in the sign reduction program, pursuant to Section 9 of the SUD.~~

- ~~The exposed face of a Supergraphic Sign shall be approximately parallel to the plane of the wall upon which it is located.~~

- ~~A maximum of two Supergraphic Signs may be located on a building provided the images are located on opposite walls of the building and cannot be viewed at the same time from any location.~~

- ~~A Supergraphic Sign shall be at least 1,200 square feet in size.~~

- ~~The written message, including logos, shall not exceed 15 percent of the total area of the sign.~~

Section 6, Supplemental Use District Compliance Requirements, of Ordinance 181340 ~~of the SUD~~ provides that all applications for signs within a redevelopment project area shall be approved by the CRA/LA or its successor agency staff for that area, pursuant to any regulations or design guidelines adopted by the CRA/LA or its successor agency.

Section 7, Standards for Specific Types of Signs, of Ordinance 181340 provides standards for various types of signs, including location, dimension, and illumination standards.

21. Page IV.G-20, the last sentence under the heading "SN Designation", is revised to reflect that Ordinance 181340 is an amendment of the Hollywood Signage Supplemental Use District and its provisions replace and supersede the provisions set for the in Ordinance 176172:

    The Project Site is within the boundaries of the adopted Hollywood Signage Supplemental Use District (Ordinance No. 181340~~176172~~), which is discussed above.

22. Page IV.G-40, the following will be added to Table IV.G-4, Hollywood Community Plan Update Consistency Analysis, between Policy LU.3.4 and Policy LU.3.8:

    Policy LU.3.5: Discourage curb-cuts next to sidewalks on streets with a high level of pedestrian traffic, when alternative access exists.

    Consistent: The Project is designed to minimize curb cuts to the maximum extent possible by providing alternative access points to the Project Site from both sidewalks and interior entrances. Access points are provided where necessary to allow vehicles to enter and exit the Project Site and no curb cuts are proposed to strictly allow pedestrians to access the Project Site. Curb cuts are minimized along Hollywood Blvd., where most of the sidewalk activity exists. Therefore, the Project would be consistent with this policy.

    Policy LU 3.6: Discourage the siting of parking lots next to sidewalks, which carry high volumes of pedestrian traffic.

Consistent: The Project is proposing to remove the existing parking lots and provide on-site parking within on-site parking garages. No new parking lots are proposed to be constructed near existing or proposed sidewalks. Overall, this minimizes pedestrian traffic though parking lots and minimizes vehicular traffic through walking areas. Therefore, the Project would be consistent with this policy.

23. Page IV.G-54, the first sentence under the heading "Hollywood Signage Supplemental Use District (SUD)", is revised to reflect that Ordinance 181340 is an amendment of the Hollywood Signage Supplemental Use District and its provisions replace and supersede the provisions set for the in Ordinance 176172:

    Ordinance 176172 established the SUD and Ordinance 181340 amended it.

Section IV.H Noise

24. In response to Comment Letter No. 09 (AMDA), the following mitigation measures have been revised or added as follows:

Mitigation Measure H-3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from ~~the nearest noise- and vibration-sensitive~~ all adjacent land uses. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be operated efficiently to minimize noise impacts to the maximum extent feasible.

Mitigation Measure H-6 The Project contractor shall use power construction equipment with ~~state-of-the-art~~ noise shielding and muffling devices in accordance with the manufacturer's recommendations~~as available~~.

Mitigation Measure H-7 Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the adjacent land uses and surrounding noise-sensitive receptors to the maximum extent feasible during construction.

Mitigation Measure H-11 All new construction work shall be performed so as not to adversely impact or cause loss of support to on-site and neighboring/bordering structures. Preconstruction conditions documentation ~~will~~ shall be performed to document conditions of the on-site and neighboring/bordering buildings, including the Pantages Theater, the Avalon Theater, the Art Deco Storefronts on Yucca Street, the AMDA

building at 1777 Vine Street, and the Capitol Records Complex, prior to construction activities. The structure monitoring program ~~will~~ shall be developed for implementation and monitoring during construction.

The performance standards of the adjacent structure monitoring plan ~~will~~ shall including the following. All new construction work ~~will~~ shall be performed so as not to adversely impact or cause loss of support to neighboring/bordering structures. Preconstruction conditions documentation ~~will~~ shall be performed to document conditions of the neighboring/bordering buildings, including the historic structures that are on or adjacent to the Project Site, prior to initiating construction activities. As a minimum, the documentation ~~will~~ shall consist of video and photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings immediately bordering the Project Site. A registered civil engineer or certified engineering geologist ~~will~~ shall develop recommendations for the adjacent structure monitoring program that ~~will~~ shall include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program ~~will~~ shall include vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, work ~~will~~ shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent structures.

Mitigation Measure H-13 All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Mitigation Measure H-14 All mitigation measures restricting construction activity ~~will~~ shall be posted at the Project Site and all construction personnel ~~will~~ shall be instructed as to the nature of the noise and vibration mitigation measures.

Mitigation Measure H-15 Rubber tired equipment shall be utilized when applicable, such as a combination loader/excavator for light-duty construction operations. Tracked excavator and tracked bulldozers ~~will~~ shall be utilized during mass excavation as necessary to facilitate timely completion of the excavation phase of development.

Mitigation Measure H-16 All plans and specifications and construction means and methods shall be provided to EMI/Capitol Records for review concurrently with their submission to the City of Los Angeles Department of Building & Safety.

Mitigation Measure H-17 In the event that excavation and development design encounters the foundation or structural walls of the Capitol Records Building echo chamber, a not less than two-inch thick closed cell neoprene foam liner ~~will~~ shall be applied to exposed excavation at the West Site adjacent to the EMI/Capitol Records echo chamber provided that: (1) the liner is approved for this use by the City of Los Angeles Department of Building & Safety (if not so approved, then an equivalent product approved for this use by the City of Los Angeles Department of Building and Safety shall be applied) and (2) a Miradrain system (or equivalent product) for drainage and waterproofing ~~will~~ shall be installed per manufacturer recommendations. A 10 to 12 inch thick cast-in-place or shotcrete wall ~~will~~ shall then be built to attenuate operational noise created by the Project.

25. In response to Comment Letter No. 59 (Jordon, David), the following mitigation measure has been added:

Mitigation Measure H-12 Driven soldier piles shall be prohibited during construction. Augered piles are permitted.

26. The previously existing mitigation measures in Section IV.H, Noise, of the Draft EIR are to be renumbered to accommodate the additional mitigation measures now identified as H-12 through H-17. Any references in the Draft EIR that refer to the previous mitigation measure number now refer to the new mitigation measure number:

- Previous mitigation measure H-12 is now H-18.
- Previous mitigation measure H-13 is now H-19.
- All mitigation measures will change the words "must", "will", and "would" to "shall", as indicated in Section V, Mitigation Monitoring and Reporting Program, of the Final EIR

H-10 Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding properties that discloses the construction schedule, including the various types of activities and equipment that ~~would~~ shall be occurring throughout the duration of the construction period.

Section IV.J.1 Public Services – Fire Protection

27. Figure IV.J.1-1, Fire Stations Locations – Fire Station 82 moved to its new location (2 blocks southeast from Bronson Avenue to Hollywood Boulevard) in June 2012, after the Draft EIR had received a correspondence from the LAFD on December 14, 2011 listing the previous location.

    Table IV.J.1-1, Existing Fire Stations Serving the Project Site, and Table IV.J.1-3, Average Response Times July 5, 2011-December 14, 2011, list both the old address that was valid at the time the data was collected and the LAFD response was written, as well as noting the new address as of June 2012.

28. Mitigation Measure J.1-7 is revised as follows:

J.1-7 Project Applicant shall submit an emergency response plan to LAFD prior to occupancy of the Project for review and approval. The emergency response plan ~~will~~ shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Any required modifications shall be identified and implemented prior to occupancy of the Project.

Section IV.J.2 Public Services – Police

29. Mitigation Measure J.2-5 is revised as follows:

    The Project shall incorporate landscaping designs that ~~will~~ shall allow high visibility around the buildings, and shall consult with the LAPD with respect to its landscaping plan.

Section IV.K.1 Transportation – Traffic

30. On page IV.K.-31, the following is revised:

    AM Peak Hour and ~~Plus~~ PM Peak Hour Trip Cap and Mitigation Triggers

    As discussed in Section II, Project Description, of this Draft EIR, the controlling parameters of the Project shall be established by the proposed Millennium Hollywood Development Agreement (Development Agreement) between the City of Los Angeles and the Project Applicant. The Development Agreement includes Project design features such as the types of uses to be developed, the maximum height of the buildings, the amount of required parking, and the connections of the Project Site to the nearby Metro Red Line station and other area transportation facilities.

    For purposes of impact analysis, a Trip Cap has been developed to control the extent and intensity of uses developed on the Project Site through implementation of the Development Agreement. Similarly, this document establishes the levels of Project development that would "trigger" the traffic mitigation measures established in the Traffic Study, as approved by LADOT. Appendix H, Millennium Hollywood Project Trip Cap and Mitigation Triggers, demonstrates when the developer

would be required to implement certain traffic mitigation measures that correspond to the amount of development on the Project Site and the related traffic trips.

The trip generation calculations, development size limit (based on the Trip Cap), and mitigation measure triggers are listed in Appendix H to the Final EIR and are discussed in detail below.

Trip Generation Calculations

Adjustments to ITE Assumptions

The level of potential traffic generated by the mixed-use components of the Project is a fundamental part of the Traffic Study. In it, adjustments to the basic ITE trip generation rates are listed individually by component in the Traffic Study. The adjustments were made because the vehicular travel behavior of a mixed-use project (located in a heavily-developed urban area near rail and mass transit options) is materially different than vehicular travel behavior of the single-use suburban sites studied for the ITE manual.

In addition, the adjusted trip generation values from the Traffic Study are based on the SCAG model and approved by LADOT. The trip generation values in the Traffic Study generation table are:

Base (ITE) generation and Reductions for:

Internal Commute Trips,

Internal Support Trips,

Transit/Walk-in Trips, and

Pass-by Trips.

Similar adjustments were made to the existing uses trip generation estimates as were made to the trip generation estimates for the proposed uses associated with the Project. The adjustments to the existing uses trip generation were made to properly account for the Project traffic impacts, as the existing uses are also in a location within an urban community, next to a transit railway station.

31. on Page IV.K.1-32 to 35, the following is revised:

Trip Cap Calculation

As depicted in Table IV.K.1-6, Adjusted Trip Generation Based on the Project Uses - Commercial Scenario, the Commercial Scenario would produce ~~1,498 trips~~ 547 AM peak hour trips and 924 PM peak hour trips. For purposes of environmental impact analysis, the ~~1,498 trips~~ 547 AM peak hour trips and 924 PM peak hour trips "Trip Cap" represents the number of trips associated with the most trip-intensive

development scenario of the Project. This Trip Cap shall control whether any particular exchange of land uses is permitted under the Equivalency Program in the Development Agreement. The Trip Cap represents the number of trips (AM plus PM peak hour trips) associated with the most trip-intensive development scenario of the Project, which is the Commercial Scenario. The Trip Cap is 547 AM peak hour trips and 924 PM peak hour trips ~~1,498 trips~~ and thus the maximum allowable peak hour trips that would be allowed under any development scenario would be limited to 547 AM peak hour trips and 924 PM peak hour trips~~1,498 total peak hour trips~~. Accordingly, the Trip Cap was used to analyze the maximum level of potential traffic impacts associated with Project development.

Table IV.K.1-6
Adjusted Trip Generation Based on the Project Uses – Commercial Scenario

Land Use Category	Use Size	AM Peak Hour Trips	PM Peak Hour Trips
220 Residential	461 du	165 trips	151 trips
310 Hotel	254 rm	121 trips	128 trips
492 Health/Fitness Club	80 ksf	63 trips	156 trips
710 General Office	150 ksf	137 trips	54 trips
820 Retail	100 ksf	78 trips	321 trips
931 Quality Restaurant	25 ksf	13 trips	121 trips
N/A Car Rental	-8 ksf	(3) trips	(7) trips
Site Total (Trip Cap)		574 trips	924 trips

Project Component Trip Generation Calculation Procedures

The Project may be built in several phases, and the aggregate site development for each phase shall be evaluated to ensure that the Trip Cap would not be exceeded by cumulative Project Site development. Further, due to the potential for the Project to be constructed over many years, the implementation of traffic mitigation measures is phased to correspond with the amount of development (and associated trips) on the Project Site. As noted above, certain levels of development shall "trigger" the requirement to implement traffic mitigation measures before construction.

The mitigation measures trigger based on generation would be implemented as follows:

- First, a trip generation calculation would be required before any building permits are issued for each phase of development. Project trip generation for two separate periods (i.e., a construction period and an operational period) would be analyzed for each development phase.

- Second, the calculated trip values would be compared to the trigger trip values for each measure to determine those measures that would be required to be implemented with that phase. The required measures for the construction phase and operations phase would consist of all measures not previously implemented and for which the calculated trip generation value exceeds the trigger value.

The table and narrative below explain how the trip generation would be calculated. Table IV.K.1-7, Trip Cap Computation Factors By Construction Activity and Land Use Level Type, ~~and Table IV.K.1-8, Trip Cap Computation Factors by Land Use Type Level~~ contain the Project's proposed construction activities and land uses, and a corresponding trip generation multiplying factor, which would be used to create trip generation estimates.

For the Construction Period, a set of trip generation calculations would consider the maximum level of construction period trip generation based on construction trucks and employees. The construction activities would first be considered in the trip generation calculations. Construction activity employees were considered to generate traffic similar to a light industrial use. No credit was taken for the transit/walk-in employee trips or other factors. The Passenger Car Equivalent (PCE) factor for trucks is applied to account for the trucks' larger size and traffic impact. The PCE factor, depending upon truck size, ranges from 1 to 3. A conservative average PCE of 2.5 was assumed and applied to the trucks entering or exiting the Project Site on a daily basis. It was generally assumed that there would be 1 inbound and 1 outbound trip per load and the truck trips would be spread evenly over an 8-hour work day. For soils export, however, the standard City Haul Route conditions do not allow truck trips to be made during peak hours. Therefore, none of the truck trips shall be added to the peak hour trip generation and associated traffic impacts for the Excavation and Shoring phase.

For the Operational Period, a second calculation would be made for the build out and occupancy phase. The Operational Period calculation typically represents a longer term period with higher trip generation than the Construction Period.

The Operational Period multiplying factors were calculated based on the Traffic Study data summarized in Table IV.K.1-6. The measure of land use intensity for each Project use was also taken from the Traffic Study data summarized in Table IV.K.1-6. The trip generation data and land-use intensity assumptions were then used to establish the rate of trip generation per unit of development for the Project as outlined in Table IV.K.1-7, Trip Cap Computation Factors By Construction Activity and ~~and Table IV.K.1-8, Trip Cap Computation Factors by~~ Land-Use Type Level.

The trip generation estimates for the Operational Period are all based on procedures in the ITE Trip Generation Manual, except for the rental car facility, which is not an ITE land-use and which shall be demolished as part of the Project. For the residential use, the land-use intensity is measured in terms of dwelling units. For the hotel, the measurement is for the number of rooms. For all other uses, the square footage of building area is used as the land-use intensity parameter.

Table IV.K.1-7
Trip Cap Computation Factors By Construction Activity and Land-Use Type Level

Land Use/Activity		Peak Hour Trips Factor		
Construction Period		**AM**	**PM**	**Unit**
110	Construction Employee*	0.440	0.420	trips/employee
N/A	Construction Trucks**	0.625	0.625	trips/truck load
Operational Period				
220	Residential	0.358	0.328	trips/du
310	Hotel	0.476	0.504	trips/rm
492	Health/Fitness Club	0.788	1.950	trips/ksf
710	General Office	0.913	0.360	trips/ksf
820	Retail***			
	(1-25,000 sf)	1.444	5.026	trips/ksf
	(25,001+ sf)	0.559	2.604	trips/ksf
931	Restaurant	0.520	4.840	trips/ksf
N/A	Car Rental Facility	0.373	0.871	trips/ksf

* The trip rates per peak construction worker used are the ITE Trip Generation, 8th edition manual rates for a Light Industrial site (LU 110).

** Standard City haul route conditions prohibit such truck activity during the excavation and shoring construction phase and thereby 0 truck trips are to be assumed for that phase. The 0.625 rates apply to the average trucks hauling loads to or from the site on a weekday during each other construction phase.

*** Incrementally applied to the retail building area on the site at the conclusion of a development phase.

As part of the application for the building permit, the total amount of trips shall be calculated based on the above trip generation factors and the net land-uses included on the Project Site during the development phase would be determined. For analytical purposes, the total development would be comprised of the following elements:

a) All buildings currently occupying the Project Site which were constructed after the Development Agreement was approved;

b) All buildings removed from the Site which were existing when the Development Agreement was approved (as a credit);

c) Any buildings proposed to be constructed on the Project Site for which a previous application was filed and not withdrawn, but which has not yet been constructed; and

d) The current development phase being applied for.

The trip generation level for each of the four land-use elements shall be determined using the rates in Table IV.K.1-~~7~~8. The trip generation for land-use items a), b), and c) shall be the same for both the

Construction and Operational Periods. The trip generation value for land-use ~~element~~ item d) can vary between the estimates for the construction and operational. The Project Construction Period and Operational Period trip generation shall be separately determined from the summation of the trip generation for the four land-use elements discussed above.

32. on Page IV.K.1-41 to 44, the following is revised:

To stay within the envelope of environmental impact analysis, the Project trips must remain within the Trip Cap upon completion and occupancy of the development (defined herein as the Operational Period). Table IV.K.1-10, Sample AM and PM Peak Hours Trip Level Computations For Comparison to the Trip Cap and Mitigation Trigger Values, shows a sample set of AM and PM trip level computations that compare each development scenario (Concept Plan, Commercial Scenario, and Residential Scenario) to the Trip Cap. As this table demonstrates, under all three scenarios the Project trip generation would remain at, or below, the Trip Cap value of ~~1,498~~ 574 AM peak hour and 924 PM peak hour trips.

Table IV.K.1-10
Sample AM Plus PM Trip Level Computations
For Comparison to the Trip Cap and Mitigation Trigger Values

		Component Size	AM Peak Hour	PM Peak Hour
Concept Plan				
220	Residential	492 du	176 trips	161 trips
310	Hotel	200 rm	95 trips	101 trips
492	Health/Fitness Club	35 ksf	28 trips	68 trips
710	General Office	215 ksf	197 trips	78 trips
820	Retail (1-25,000 sf)	15 ksf	22 trips	75 trips
	(25,001+ sf)	0 ksf	0 trips	0 trips
931	Restaurant	34 ksf	18 trips	165 trips
N/A	Car Rental Facility	-8 ksf	-3 trips	-7 trips
110	Construction Employee	0 emp	0 trips	0 trips
N/A	Construction Truck	0 trucks	0 trips	0 trips
	Total		**533 trips**	**641 trips**
Commercial Scenario (Traffic Study)				
220	Residential	461 du	165 trips	151 trips
310	Hotel	254 rm	121 trips	128 trips
492	Health/Fitness Club	80 ksf	63 trips	156 trips
710	General Office	150 ksf	137 trips	54 trips
820	Retail (1-25,000 sf)	25 ksf	36 trips	126 trips
	(25,001+0 sf)	75 ksf	42 trips	195 trips
931	Restaurant	25 ksf	13 trips	121 trips
N/A	Car Rental Facility	-8 ksf	-3 trips	-7 trips
110	Construction Employee	0 emp	0 trips	0 trips
N/A	Construction Truck	0 trucks	0 trips	0 trips
	Total		**574 trips**	**924 trips**
Residential Scenario				
220	Residential	897 du	321 trips	294 trips
310	Hotel	0 rm	0 trips	0 trips
492	Health/Fitness Club	30 ksf	24 trips	59 trips
710	General Office	114 ksf	104 trips	41 trips
820	Retail (1-25,000 sf)	25 ksf	36 trips	126 trips
	(25,001+ sf)	0 ksf	0 trips	0 trips
931	Restaurant	10 ksf	5 trips	48 trips
N/A	Car Rental Facility	-8 ksf	-3 trips	-7 trips
110	Construction Employee	0 emp	0 trips	0 trips
N/A	Construction Truck	0 trucks	0 trips	0 trips
	Total		**487 trips**	**561 trips**

As Table IV.K.1-11 shows, the level of trip-making activity from the Project Site during the AM and PM peak hours is well below the Trip Cap of 574 AM peak hour and 924 PM peak hour trips. ~~the combined peak hours will be 1,068 trips, which is more than one-quarter below the Trip Cap of 1,498 trips~~

Table IV.K.1-11
Trip Generation During Project Construction For Each Construction Phase

Construction Phase	AM Peak Hour Construction Period Trips			PM Peak Hour Construction Period Trips		
	Trucks	Workers[1]	Total	Trucks	Workers[1]	Total
Average for Phase						
1 Demolition	3	4	7	3	4	7
2 Excavation & Shoring	0	26	26	0	25	25
3 Foundation & Below Grade	19	37	56	19	36	55
4 Building Superstructure	31	70	101	31	67	98
5 Exterior Finishing	19	81	100	19	78	97
6 Framing / Rough In	9	132	141	9	126	135
7 Finishes	28	275	303	28	263	291
Peak of Phase						
1 Demolition	4	6	10	4	6	10
2 Excavation & Shoring	0	33	33	0	32	32
3 Foundation & Below Grade	26	44	70	26	42	68
4 Building Superstructure	38	77	115	38	74	112
5 Exterior Finishing	26	99	125	26	95	121
6 Framing / Rough In	14	176	190	14	168	182
7 Finishes	32	308	340	32	294	326

Notes:
1 Conservatively assumes that construction worker shifts begin and end as typical industrial shifts.
2 Soils import/export truck trips are not allowed in the peak hours.

Table IV.K.1-12, Trip Generation During Project Construction By Month Within the Construction Period, utilizes the Table IV.K.1-11 information and calculates the level of Construction Trips during each construction phase period of months. It was assumed that each activity would be at its average level, except each phase will be at its peak when 1) that phase is the only phase operating on the Project Site, or 2) that phase is in its starting month and would not occupy the entire site at any time. As Table IV.K.1-12 shows, the maximum level of trip-making activity from the Project Site during the AM peak hour will be 496 trips, which is nearly 15% lower than the Trip Cap of 574 AM peak hour trips. The highest PM peak hour construction generation is 479 trips, slightly greater than half of the Trip Cap level of 924 PM peak hour trips.

Table IV.K.1-12
Trip Generation During Project Construction
By Month Within the Construction Period

	AM Peak Hour								PM Peak Hour							
Month(s)	Phase1	Phasa2	Phasa3	Phasa4	Phasa5	Phasa6	Phasa7	Total	Phase1	Phasa2	Phasa3	Phasa4	Phasa5	Phasa6	Phasa7	Total
1	10							10	10							10
2 - 8		33						33		32						32
9		19	42					61		18	42					60
10 - 12			70					70			68					68
13 - 14			42	100				142			42	97				139
15				115				115				112				112
16 - 23				100	125	190		415				97	121	182		400
22 - 25				100	71	84	241	496				97	69	80	233	479
26 - 28					71	84	241	396					69	80	233	382
29 - 38							340	340							326	326

* Phases -- 1 = Demolition, 2 = Excavation and Shoring, 3 =Foundation and Below Grade, 4 = Building Superstructure, 5 = Exterior Finishing, 6 = Framing / Rough In, and 7 = Finishes.

33. Page IV.K.-128 to 130, under Mitigation Measures:

MITIGATION MEASURES

Mitigation measures for the various scenarios analyzed in this Draft EIR are identified and discussed within the applicable subheadings presented above for the Project Plus Existing Conditions (2011), the Project Plus Future Conditions (2020), the Project Plus Future Horizon Year (2035), the Project with No Vine Street Access, and the Project Component Location Shifting Traffic Impact Analysis, respectively. To address the flexibility afforded by the proposed Development Agreement in building out the Project, the following provides additional information with respect to mitigation triggers for implementing the Mitigation Measures identified herein.

Off-Site Transportation Mitigation Measure Implementation Schedule

The mitigation triggers are intended to implement traffic mitigations prior to the construction or occupancy levels that would create traffic impacts. Thus, prior to issuance of any building permit, issuance of a permit allowing a change of land-use, or other approval ~~of a discretionary action~~ that would affect Project trip generation, the number of Operational Period and Construction Period trips to be generated by the Project shall be calculated using the procedures described above. The results of the calculations shall be compared to the Trip Cap value of 574 AM peak hour trips and 924 PM peak hour trips ~~1,498 AM plus PM net peak hour trips~~. No building permits shall be issued or other measures taken by the City, which would allow the Project-related trip generation to exceed the Trip Cap ~~value~~, unless other supplemental analysis is completed. The results shall also be compared to the triggers based on the trip generation level.

Trigger mechanisms are to be used for mitigation measures that shall be directly implemented by the Project Applicant. However, payments shall be made based on the payment schedule set forth below for mitigation measures that shall be implemented by the City. Project payments to the trust funds for the Bicycle Plan Trust Fund and Signal Systems Upgrades shall be made proportional to each phase's trip generation value. The number of trips shall be multiplied by the rates set forth in Table IV.K.1-32, "Trigger" Values and Fee Payment Schedule For Off-Site Transportation Mitigation Measures, accounting for inflation based on the Marshall Valuation Service Comparative Cost Index (per City standards), and the higher of the amount based on the AM peak hour and PM peak hour trips shall be due.

The AM peak hour and PM peak hour trigger value/payment amount for each off-site mitigation measure is listed in Table IV.K.1-32. The Project Applicant shall be responsible for implementing all off-site Transportation Mitigation Measures for which either of the two trigger values (AM peak hour or PM peak hour would be exceeded by that phase of development and making any required payment corresponding to the higher value of that phase of development.

The calculated trip generation for each phase shall be compared to the Table IV.K.1-32 trigger values to determine if the trigger value for each measure is exceeded by the Phase Trip Generation Value. If the trigger for one or more off-site transportation Mitigation Measures shall be exceeded by the Construction Period trips, a B-permit application must be filed with the Bureau of Engineering for that improvement prior to any building permit being issued. The application shall include the posting of a bond, for implementing that mitigation measure prior to the associated approval becoming effective. Filing the B-permit with a bond ensures that the triggered mitigation measure shall be implemented to address the related traffic impact. If the Operational Period trips exceed a trigger, that corresponding mitigation measure shall be implemented prior to the issuance of any certificate of occupancy (C of O) for that phase being issued by the City.[1] The mitigation trigger applies to any and all buildings proposed to be part of that phase. For any other approval by the City (e.g. a change of use) which is determined to cause the Project trip generation to exceed a trigger for a Transportation Mitigation Measure, a B-permit application must be filed with the Bureau of Engineering prior to approval.

For those measures requiring a payment to a trust fund administered by the City (the Bicycle Plan Trust Fund and the Signal System Enhancements), the full payment for that phase shall be made to the City prior to any certificate of occupancy (temporary or permanent) being issued for a building in that phase.

There are other Project-related construction period transportation impacts and corresponding mitigation measure that are not directly related to the Project's trip generation level. Instead, these impacts are a

[1] Temporary Certificates of Occupancy may be granted in the event of any delay through no fault of the Applicant, provided that, in each case, the Project Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. LADOT Correspondence to the Department of City Planning, dated August 16, 2012 (See Appendix K.2 to this Draft EIR).

result of the temporary capacity loss (such as intrusions into the City's right of way) from Construction Period activities. As a result, there shall also be a review of any such Project activities during construction for each Project phase and the mitigation measures would be implemented accordingly.

Table IV.K.1-32
"Trigger" Values and Fee Payment Schedule
For Off-Site Transportation Mitigation Measures

Measure	Trip Trigger	Payment Schedule
	AM/PM	AM/PM
Hollywood Community Transportation Management Organization (TMO)	110 AM/ 210 PM	
Bicycle Plan Trust Fund		$436/AM trip; $271/PM trip
Signal System Upgrades*	Completed Prior to any C of O	$1,611/AM trip; $1,001/PM trip*
* The Project Applicant may pay the per trip amount for the Signal System Upgrades, or in the alternative, the City and Project Applicant may instead agree to the Project Applicant installing the Signal System Upgrades under a B-permit, to be completed prior to any C of O.		

The Transit Enhancements must be completed prior to any Certificate of Occupancy and a Caltrans Encroachment Permit must be applied for prior to any Certificate of Occupancy pursuant to the LADOT Correspondence to the Department of City Planning, dated August 16, 2012. See Appendix K.2 of this Draft EIR.

On-Site Transportation Project Features and Mitigation Measure Implementation Schedule

On-site transportation Project features from the Project Description and Mitigation Measures recommended in the EIR include:

- The Project Transportation Demand Management (TDM) Program,
- The Pedestrian, Bicycle, Automobile and Delivery Circulation Systems,
- Widenings or dedications for adjacent public streets,
- Site Loading Facilities, and

- The Parking Provisions.

Standard City of Los Angeles procedures shall be followed for the building permits associated with each phase of development. The requirements shall consider the building(s) uses being planned for each phase and the layout of the Project Site at the completion of each development phase. Plans for the physical on-site transportation infrastructure shall accompany each building permit application or, if determined to be appropriate by the Director of the Planning Department, with any other application for an approval by the City. The on-site requirements shall be phased so as to appropriately serve the specific buildings to be developed on the Project Site within each phase. For example:

- Greater loading dock capacity per square foot of building area shall be required for retail or restaurant uses than for office uses; and

- The parking demand for each phase shall be calculated using the shared parking provisions of the Development Agreement, as studied in the Shared Parking Analysis and the EIR, and that amount of parking shall be provided for that phase. If less parking is provided, additional environmental analysis shall be required, however, the Project Applicant may provide more parking than required by the shared parking calculations.

Pursuant to the LADOT Correspondence to the Department of City Planning, dated August 16, 2012 (See Appendix K.2 to this Draft EIR*)*, prior to the issuance of the first building permit, the TDM Program shall be prepared and submitted to LADOT for review and a final TDM Program approved by LADOT is required prior to issuance of the first C of O for the Project. The TDM Program shall include measures to serve the occupants of the proposed building(s) (as well as retaining service to any other buildings on the Project Site), a description of how the building(s) shall comply with the City's Municipal Code bicycle requirements, and how the building(s) shall provide access to and/or encourage use of the area transit facilities. The TDM Program shall also address the implementation of other methods to encourage ridesharing and other alternative mode usage, including parking management, car and bike sharing, and on-site transit pass sales.

The TDM Programs for all phases of the Project shall contain the measures listed in Table IV.K.1-33, Transportation Demand Management Measures To Be Included in All TDM Plans.

Table IV.K.1-33
Transportation Demand Management Measures
To Be Included in All TDM Plans

▪ Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator
▪ A bicycle, transit, and pedestrian friendly environment
▪ Administrative support for the formation of carpools/vanpools
▪ Flexible/alternative work schedules and telecommuting programs
▪ Parking provided as an option only for all leases and sales
▪ A provision requiring compliance with the State Parking Cash-out Law in all leases
▪ Distribution of information to all residents and employees of the onsite pedestrian, bicycle and transit rider services, including shared car and shared bicycle services
Source: Crain & Associates, February 2013.

While the final TDM Program shall be approved by LADOT prior to issuance of the first C of O for the Project, the implementation of the additional specific measures below shall be included in the program beginning with the triggers listed in Table IV.K.1-34, **"**Trigger" Values for Selected On-Site Transportation Demand Management Measures.

Table IV.K.1-34
"Trigger" Values for Selected On-Site
Transportation Demand Management Measures

Measure	**Trigger**
Inclusion of business services to facilitate work-at-home arrangements for the proposed residential uses, if constructed	50 Residential Units
Provision of a self-service bicycle repair area and shared tools for residents and employees	50 ksf of Net New Office Use or 50 Residential Units
Provide car share amenities (including a minimum five parking spaces for a shared car program)	500 Net New Parking Spaces
Bike Parking Required per the Municipal Code in a Bike Friendly Manner	10 ksf of Net New Non-Residential Uses
Showers, and Lockers Required per the Municipal Code in a Bike Friendly Manner	50 ksf of Net New Office Use
Source: Crain & Associates, February 2013. ~~June 2012~~	

34. In response to Comment Letter No. 05 (Metropolitan Transportation Authority (Metro)), the following additional mitigation measure has been added to Section IV.K.1, Transportation - Traffic, of the Draft EIR:

Mitigation Measure K.1-4 The Project Applicant shall contact the Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines.

35. The previously existing mitigation measures in Section IV.K.1, Transportation - Traffic, of the Draft EIR are to be renumbered to accommodate the additional mitigation measure now identified as K.1-4. Any references in the Draft EIR that refer to the previous mitigation measure number now refer to the new mitigation measure number:

- Previous mitigation measures K.1-4 through K.1-12 are now K.1-5 through K.1-13, respectively.

- All mitigation measures will change the words "must", "will", and "would" to "shall", as indicated in Section V, Mitigation Monitoring and Reporting Program, of the Final EIR

K.1-3 Prior to the issuance of a grading permit, the Project Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Project Applicant to the following haul route conditions:

i All Project construction haul truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.

ii Except under a permitted exception, all hauling (both delivery and export) shall be during the hours of 9:00 AM to 4:00 PM or 6:30 PM to 9:00 PM. Any exceptions to the above time limits ~~must~~ shall be permitted by the Department of Building and Safety in consultation with the Department of Transportation. Exceptions to the haul activity time limits are to be permitted only when necessary, such as for the continuation of concrete pours that can not reasonably be completed otherwise.

iii Permitted Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.

iv Project haul trucks shall be restricted to 18-wheel trucks or smaller.

v The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).

vi Streets shall be cleaned of spilled materials at the termination of each work day.

vii The final approved haul routes and all the conditions of approval shall be available on the job site at all times.

viii The Contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

ix Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.

x All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

xi All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.

xii All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.

xiii The Project Applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.

xiv All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.

xv "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.

xvi One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."

xvii The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.

xviii Any desire to change the prescribed routes ~~must~~ shall be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at 213.485.3711 before the change takes place.

xix The permittee shall notify the Street Use Inspection Division, 213.485.3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.

xx A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond shall be issued by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling 213.977.6039

K.1-5 Transportation Demand Management (TDM) – The Project is a mixed-use development, located within a quarter mile radius of the Hollywood/Vine Metro Red Line Transit Station and allows immediate access to the Metro Red Line rail system. Additionally, a number of Metro and LADOT bus routes are less than one-quarter mile (considered to be within reasonable walking distance) from the Project Site, providing access for Project employees, visitors, residents and guests. The Project Site is surrounded by numerous supporting and complementary uses, such as additional housing for employees and additional shopping for residents within walking distance. The Project shall take advantage of these opportunities through a pedestrian/bicycle friendly design and implementation of a TDM program. A preliminary TDM program shall be prepared

and provided for LADOT review prior to the issuance of the first building permit for the Project and a final TDM program approved by LADOT is required prior to the issuance of the first certificate of occupancy for the Project. The TDM Program applies to the new land uses to be developed as part of the final development program for the Project. To the extent a TDM Program element is specific to a use, such element shall be implemented at such time that new land use is constructed. Both the pedestrian/bicycle friendly design and TDM program shall be acceptable to the Departments of Planning and Transportation. The TDM program shall include, but not be limited to, the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- A bicycle, transit, and pedestrian friendly environment;
- Administrative support for the formation of carpools/vanpools;
- Inclusion of business services to facilitate work-at-home arrangements for the proposed residential uses, if constructed;
- Flexible/alternative work schedules and telecommuting programs;
- Provide car share amenities (including a minimum of 5 parking spaces for shared car program);
- Parking provided as an option only for all leases and sales;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Provision of a self-service bicycle repair area and shared tools for residents and employees;
- Distribution of information to all residents and employees of the onsite pedestrian, bicycle and transit rider services, including shared car and shared bicycle services;
- Coordinate with LADOT to provide space for a future Integrated Mobility Hub;
- Guaranteed ride home program potentially via the shared car program;
- Transit routing and schedule information;
- Transit pass sales;
- Rideshare matching services;

- Bike and walk to work promotions;
- Visibility of the alternative commute options through a location on the central court of the Project Site;
- Preferential rideshare loading/unloading or parking location;
- Financial contribution to the City's Bicycle Plan Trust Fund that is currently being established (CF 10-2385-S5).

In addition to these TDM measures, LADOT also recommends that the Project Applicant explore the implementation of an on-demand van, shuttle or tram service that connects the Project to off-site transit stops based on the transportation needs of the Project's employees, residents and visitors. Such a service ~~can~~ shall be included as an additional measure in the TDM program if it is deemed feasible and effective by the Project Applicant.

K.1-7 Integrated Mobility Hubs – To support the goals of the Project's TDM plan and to expand the City's program, the Project Applicant shall coordinate with LADOT to provide space for a Mobility Hub in a convenient location within or near the Project Site. The Project Applicant has offered to provide on-site parking spaces for shared cars that could be a project-specific amenity or be linked with the larger Mobility Hubs program. The Project Applicant shall also provide space that ~~would~~ shall accommodate bicycle parking, bicycle lockers, and shared bicycles. LADOT is currently working on an operating plan and assessment study for the Mobility Hubs project that ~~will~~ shall include specific sites, designs, and blueprints for Mobility Hub stations. The results of this study ~~will~~ shall assist in determining the appropriate location and space needed to accommodate a Mobility Hub at the Project Site.

K.1-9 Bike Plan Trust Fund – The Project Applicant shall contribute a one-time fixed-fee of $250,000 to be deposited into the City's Bicycle Plan Trust Fund that is currently being established (CF 10-2385-S5). These funds ~~will~~ shall be used by LADOT, in coordination with the Department of City Planning and Council District 13, to implement bicycle improvements within the Hollywood area. However, improvements within Hollywood that are consistent with the City's complete streets and smart growth policies ~~will~~ shall also be eligible expenses utilizing these funds. Any measures implemented by using the fund shall be consistent with the General Plan Transportation Element. Items beyond signing and striping, such as curb realignment and signal system modifications, may be included in the funded projects, to the degree necessary for safe and efficient operation. Should shuttle riders on the DASH system warrant an increase in capacity, the Project funding may instead be used for the purchase of a shuttle vehicle for the DASH system.

K.1-10 Traffic Signal System Upgrades – The Project Applicant shall be required to implement the traffic signal upgrades identified in Attachment 3 to the LADOT's Correspondence to the Department of City Planning, dated August 16, 2012 (See Appendix K.2 to this Draft EIR). Should the project be approved, then a final determination on how to implement these traffic signal upgrades ~~will~~ shall be made by LADOT prior to the issuance of the first building permit. These signal upgrades shall be implemented either by the Project Applicant through the B-permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then the Project Applicant ~~will~~ shall be required to pay LADOT the estimated cost to implement the upgrades, and LADOT shall design and construct the upgrades. If the upgrades are implemented by the Project Applicant through the B-Permit process, then these traffic signal improvements ~~will~~ shall be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy.

K.1-11 Intersection Specific Improvements – Argyle Avenue/Franklin Avenue – US 101 Freeway Northbound On-Ramp – To mitigate the significant traffic impact at this intersection under both existing (2011) and future (2020) conditions, the Project Applicant shall restripe this intersection to provide a left-turn lane, two through lanes, and a right-turn lane for the southbound approach and two left-turn lanes and a shared through/right lane for the northbound approach. The final design of this improvement ~~will~~ shall require the joint approval of Caltrans and LADOT.

K.1-13 Implementation of Improvements and Mitigation Measures. The Project Applicant shall be responsible for the cost and implementation of any necessary traffic signal equipment modifications and bus stop relocations associated with the proposed transportation improvements described above. Unless otherwise noted, all transportation improvements and associated traffic signal work within the City of Los Angeles ~~will~~ shall be guaranteed through the B-Permit process of the Bureau of Engineering, prior to the issuance of any building permits and completed prior to the issuance of any certificates of occupancy. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the Project Applicant, provided that, in each case, the Project Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, at (213) 928-9663, to arrange a pre-design meeting to finalize the proposed design needed for the project.

36. The following additional mitigation measure has been added to Section IV.K.1, Transportation - Traffic, of the Draft EIR:

Mitigation Measure K.1-14 East Site Residential Unit and Reserved Residential Parking Cap. On the East Site, residential development shall be limited to 450 residential units and 675 reserved residential parking spaces.

37. In response to Comment Letter No. 59 (Jordon, David), Table IV.K-21**,** Critical Movement Analysis (CMA) Summary Horizon Year (2035) Traffic Conditions - With Project Plus Mitigation, will be revised to remove erroneous minus signs in the "Future With Project Plus Mitigation Impact" column and other typographical errors. While the Draft EIR contained typographical errors, the correct values were included in the Traffic Study in Appendix IV.K.1 of Draft EIR. The corrected Table IV.K-21 is recreated on the following page.

Table IV.K.1-21
Critical Movement Analysis (CMA) Summary
Horizon Year (2035) Traffic Conditions - With Project Plus Mitigation

			Horizon Year Conditions									
										Future WP Plus Mitigation		
		Peak	Future WO		Future WP							
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact			CMA	LOS	Impact	
2	Highland Avenue (North) &	AM	0.914	E	0.926	E	0.012	*		0.915	E	0.001	
	Franklin Avenue	PM	1.039	F	1.057	F	0.018	*		1.044	F	0.005	
4	Cahuenga Boulevard &	AM	1.021	F	1.037	F	0.016	*		1.024	F	0.003	
	Franklin Avenue	PM	1.176	F	1.202	F	0.026	*		1.189	F	0.013	*
6	Argyle Ave. &	AM	0.907	E	0.923	E	0.016	*		0.867	D	-0.040	
	Franklin Ave./US-101 Fwy. NB On-Ramp	PM	1.184	F	1.213	F	0.029	*		1.179	F	-0.005	
9	Cahuenga Boulevard &	AM	0.574	A	0.578	A	0.004			0.567	A	-0.007	
	Yucca Street	PM	0.767	C	0.806	D	0.039	*		0.790	C	0.023	
14	La Brea Avenue &	AM	1.154	F	1.160	F	0.006			1.149	F	-0.005	
	Hollywood Boulevard	PM	1.035	F	1.048	F	0.013	*		1.036	F	0.001	
15	Highland Avenue &	AM	0.983	E	0.989	E	0.006			0.978	E	-0.005	
	Hollywood Boulevard	PM	1.157	F	1.181	F	0.024	*		1.168	F	0.011	*
16	Cahuenga Boulevard &	AM	1.056	F	1.080	F	0.024	*		1.067	F	0.011	*
	Hollywood Boulevard	PM	0.991	E	1.035	F	0.044	*		1.018	F	0.027	*
18	Vine Street &	AM	1.035	F	1.087	F	0.052	*		1.069	F	0.034	*
	Hollywood Boulevard	PM	1.021	F	1.064	F	0.043	*		1.048	F	0.027	*
19	Argyle Avenue &	AM	0.743	C	0.759	C	0.016			0.747	C	0.004	
	Hollywood Boulevard	PM	0.999	E	1.021	F	0.022	*		1.007	F	0.008	
20	Gower Street &	AM	1.077	F	1.089	F	0.012	*		1.077	F	0.000	
	Hollywood Boulevard	PM	0.973	E	0.989	E	0.016	*		0.977	E	0.004	
26	Vine Street &	AM	0.745	C	0.764	C	0.019			0.751	C	0.006	
	Selma Avenue	PM	0.799	C	0.836	D	0.037	*		0.821	D	0.022	*
29	Cahuenga Boulevard &	AM	0.913	E	0.929	E	0.016	*		0.918	E	0.005	
	Sunset Boulevard	PM	0.981	E	0.996	E	0.015	*		0.984	E	0.003	
31	Vine Street &	AM	1.095	F	1.115	F	0.020	*		1.101	F	0.006	
	Sunset Boulevard	PM	1.131	F	1.169	F	0.038	*		1.152	F	0.021	*
34	Vine Street &	AM	0.640	B	0.655	B	0.015			0.643	B	0.003	
	De Longpre Avenue	PM	0.783	C	0.805	D	0.022	*		0.791	C	0.008	
35	Vine Street &	AM	0.966	E	0.980	E	0.014	*		0.969	E	0.003	
	Fountain Avenue	PM	1.077	F	1.099	F	0.022	*		1.086	F	0.009	
36	Vine Street &	AM	1.048	F	1.063	F	0.015	*		1.051	F	0.003	
	Santa Monica Boulevard	PM	1.128	F	1.146	F	0.018	*		1.133	F	0.005	

* indicates a significant impact prior to mitigation.

38. On page IV.K.1-36, after the Project Component Shifting Analysis, the following will be added:

The Concept Plan and the Residential Scenario Analysis

This supplemental analysis utilizes the same methodology described above to assess the traffic impacts that would arise based on the Concept Plan or the Residential Scenario.

Concept Plan – The Concept Plan includes approximately 492 residential dwelling units (approximately 700,000 square feet of residential floor area), up to 200 luxury hotel rooms (approximately 167,870 square feet of floor area), approximately 215,000 square feet of office space including the existing 114,303 square-foot Capitol Records Complex, approximately 34,000 square feet of quality food and beverage uses, approximately 35,100 square feet of fitness/sports club use, and approximately 15,000 square feet of retail use.

Residential Scenario – The Residential Scenario would consist of approximately 897 residential dwelling units (approximately 987,667 square feet of residential floor area), no hotel uses, no increase in office space beyond the 114,303 square feet of office space that currently exist in the Capitol Records Complex, approximately 25,000 square feet of retail space, approximately 10,000 square feet of quality food and beverage uses, and approximately 30,000 square feet of fitness/sports club uses.

39. In response to several comments on the Draft EIR, an updated construction traffic analysis, including individual intersection impact analyses, was conducted (the report is included as Appendix D, Updated Construction Traffic Impacts Including Individual Intersection Impact Analyses, to this Final EIR). The following text will be added to Section IV.K.1, Transportation – Traffic of the Draft EIR, beginning on page IV.K.1-44, before the Haul Route section:

Introduction

A detailed construction traffic impact analysis has been conducted for the Project to assess potential traffic impacts at individual intersections during the construction period. This analysis is in addition to the analyses prepared for the Project traffic impacts upon completion and occupancy, and the construction period trip generation. The procedures, assumptions and results of this updated analysis are detailed below.

Construction Phase Descriptions

The Project construction activities are estimated to occur over a 38 month period, with completion estimated to occur prior to or during 2020. To be conservative, this analysis of construction traffic impacts is based on both existing (2011) and future (2020) conditions.

The construction activities will be sequenced throughout several phases and are expected to follow the time durations shown in Table IV.K-1.14. It should be noted that some overlap may occur

between phases during development, but peak trip generation levels are anticipated to occur mostly during the mid-phase periods. Low levels of construction activity are expected during potential overlap periods as activity levels during any overlap of the phases are anticipated to be less than the peak level for the ending and/or starting phase.

Table IV.K-14
Project Construction Phases

Phase	Approximate Time Period	Start Month	End Month
1. Demolition	1 month	1	1
2. Excavation & Shoring	8 month	2	9
3. Foundation & Below Grade	6 month	9	14
4. Building Superstructure	13 month	13	25
5. Exterior Finishing	13 month	16	28
6. Framing / Rough In	13 month	16	28
7. Finishes	17 month	22	38

To reflect the maximum construction traffic generation from the Project Site and to the surrounding streets, it is assumed that all construction-related vehicles, including construction worker private vehicles, would access and park, or be stored on (or within a half-mile) of the Project Site throughout the construction process. Likewise, it is expected that on-site construction activity will fluctuate on a weekly basis, depending largely on the number of workers and construction trucks needed for the on-going activities during each particular time period. However, to remain conservative, the portion of the Project construction phase generating the highest daily construction-related traffic was analyzed as representing the entire phase.

Based on the total amount of Project construction work and the anticipated durations, the maximum number of delivery/haul trucks and construction workers on-site per day will vary according to the construction phases as shown in Table IV.K.1-15 below.

Table IV.K.1-15
Project Construction Delivery/Haul Trucks and Workers by Phase

Phase	Truck Loads/Day	Workers/Day
1. Demolition	6 trucks	14 workers
2. Excavation & Shoring	120 trucks	75 workers
3. Foundation & Below Grade	40 trucks	100 workers
4. Building Superstructure	60 trucks	175 workers
5. Exterior Finishing	40 trucks	225 workers
6. Framing / Rough In	20 trucks	400 workers
7. Finishes	50 trucks	700 workers

Construction Trip Generation

The traffic-generating characteristics of various land uses have been surveyed and documented in many studies conducted under the auspices of the Institute of Transportation Engineers (ITE). The most recent information is provided in the 9th Edition of the ITE Trip Generation manual, which was used as the basis for calculating the non delivery/haul vehicle trips associated with the construction of the Project. Commute patterns of workers and support needs will be similar to the typical industrial workers. Therefore, the Daily and AM and PM peak hour trip rates used for determining the Project's non delivery/haul vehicle trip generating potential per construction worker is considered to be approximately the same or less than the per employee rates developed for General Light Industrial uses. These rates are shown in Table IV.K.1-16.

Table IV.K.1-16
Project Trip Generation Rates and Equations

General Light Industrial (per employee) – LU 110

Daily: T = 3.02 (E)

AM Peak Hour: T = 0.44 (E); I/B = 83%, O/B = 17%

PM Peak Hour: T = 0.42 (E); I/B = 21%, O/B = 79%

Where:

T = trip ends *E = employee*

I/B = inbound *O/B = outbound*

Source: Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington D.C., 2012.

The ITE rates are for ongoing operations of all vehicle trips, including trips from trucks. However, to be conservative, construction delivery/haul truck trips were calculated separately and added to the trips of construction workers. Further, in order to categorize the traffic impacts of construction trucks, each truck trip was given a Passenger Car Equivalent (PCE) via a standardized multiplier. Using factors in the Interim Materials on Highway Capacity, Circular Number 212, construction truck trips are expected to have a PCE multiplier of 2.5. Using the above conservative assumptions, a construction-related trip generation estimate was calculated for the peak of each phase and is illustrated in Table IV.K.1-17 below.

Table IV.K.1-17
Construction-Related Trip Generation by Phase

Construction Stages			Daily	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total		PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
1. Demolition	Workers	14 /day	42	5	1	6		1	5	6
	Delivery/Haul Trucks *	6 /day	30	2	2	4		2	2	4
	Phase 1 Total		**72**	**7**	**3**	**10**	**0**	**3**	**7**	**10**
2. Excavation & Shoring	Workers	75 /day	227	27	6	33		7	25	32
	Delivery/Haul Trucks **	120 /day	600	0	0	0		0	0	0
	Phase 2 Total		**827**	**27**	**6**	**33**	**0**	**7**	**25**	**32**
3. Foundation & Below Grade	Workers	100 /day	302	37	7	44		9	33	42
	Delivery/Haul Trucks *	40 /day	200	13	13	26		13	13	26
	Phase 3 Total		**502**	**50**	**20**	**70**	**0**	**22**	**46**	**68**
4. Building Superstructure	Workers	175 /day	529	64	13	77		16	58	74
	Delivery/Haul Trucks *	60 /day	300	19	19	38		19	19	38
	Phase 4 Total		**829**	**83**	**32**	**115**	**0**	**35**	**77**	**112**
5. Exterior Finishing	Workers	225 /day	680	82	17	99		20	75	95
	Delivery/Haul Trucks *	40 /day	200	13	13	26		13	13	26
	Phase 5 Total		**880**	**95**	**30**	**125**	**0**	**33**	**88**	**121**
6. Framing / Rough In	Workers	400 /day	1,208	146	30	176		35	133	168
	Delivery/Haul Trucks *	20 /day	100	7	7	14		7	7	14
	Phase 6 Total		**1,308**	**153**	**37**	**190**	**0**	**42**	**140**	**182**
7. Finishes	Workers	700 /day	2,114	256	52	308		62	232	294
	Delivery/Haul Trucks *	50 /day	250	16	16	32		16	16	32
	Phase 7 Total		**2,364**	**272**	**68**	**340**	**0**	**78**	**248**	**326**
Total Maximum Daily Construction Trips			**2,364**	**272**	**68**	**340**	**0**	**78**	**248**	**326**

* In passenger car equivalents (PCEs) using a PCE factor of 2.5 per truck; Truck trips are divided into 8 working hours to calculate hourly trips.

** Soils import/export truck trips are not allowed in the peak hours.

As illustrated in Table IV.K.1-17, the maximum number of construction-related vehicles accessing the Project Site is expected to occur during the maximum intensity time within Phase 7. To be conservative, the following analysis assumes the Phase 7 maximum trip generation (2,364 daily trips with 340 AM Peak Hour trips and 326 PM Peak Hour trips) for the duration of all seven phases.

Since construction workers are expected to live throughout the Los Angeles region, they are also expected to travel to the Project Site from all directions. As such, the construction workers' trip distribution is assumed to be the same as the Project office use distribution in the analysis below, since the distribution is based on the assumption that the Project employees will also live throughout the region.

The local portion of the delivery/haul truck route is mainly from/to the US 101 Freeway. Therefore, a separate distribution was developed and used for the delivery/haul truck route. Using these assignment percentages, construction period traffic volumes for the AM and PM peak hours are shown in Figures 3(a) and 3(b) of Attachment A of Appendix D, Updated Construction Traffic Impacts Including Individual Intersection Impact Analyses, of the Final EIR, respectively. These trips are analyzed in the following sections in order to determine the maximum Project traffic impacts expected to occur during the construction period.

Intersection Construction Traffic Impacts of the Project

This analysis utilizes the same methodology used for the Commercial Scenario, which are the procedures outlined in Circular Number 212 of the Transportation Research Board[2].

The analysis of existing and future traffic conditions at the study intersections was conducted using the same procedures and assumptions for the Commercial Scenario. Specifically, to be conservative and consistent with Commercial Scenario analysis, the "Existing (2011) Plus Construction" traffic volumes were based on the "Existing (2011) Without Project" traffic volumes from the Traffic Study, plus the addition of the volumes from Figures 3(a) and 3(b) that contain the maximum construction-related traffic volumes. The "Future (2020) With Construction" traffic volumes were based on the "Future (2020) Without Project" volumes of the Traffic Study, plus the addition of the volumes from Figures 3(a) and 3(b) in Appendix D, Updated Construction Traffic Impacts Including Individual Intersection Impact Analyses, of the Final EIR, that contain the maximum construction-related traffic volumes.

[2]Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980

Table IV.K.1-18
Level of Service (LOS) As a Function of Critical Movement Analysis (CMA) and Intersection Capacity Utilization (ICU) Values

Level of Service	Description of Operating Characteristics	Range of CMA/ICU Values
A	Uncongested operations; all vehicles clear in a single cycle.	≤ 0.60
B	Same as above.	>0.60 ≤ 0.70
C	Light congestion; occasional backups on critical approaches.	>0.70 ≤ 0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80 ≤ 0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90 ≤ 1.00
F	Forced flow with stoppages of long duration.	> 1.00

The existing physical roadway conditions and signal information were based on the Traffic Study.

The Project's maximum construction period impacts on existing and future conditions were calculated and are summarized in Table IV.K.1-19, on the following page.

Table IV.K.1-19
Existing (2011) and Future (2020) Critical Movement Analysis (CMA)
Without and With Project Construction Trips

			Existing (2011)					Future (2020)				
		Peak	W/O Construction		With Construction			W/O Construction		With Construction		
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact
1	Cahuenga Boulevard &	AM	0.353	A	0.354	A	0.001	0.409	A	0.411	A	0.002
	US-101 Fwy. NB Off-Ramp	PM	0.648	B	0.652	B	0.004	0.749	C	0.753	C	0.004
2	Highland Avenue (North) &	AM	0.734	C	0.744	C	0.010	0.855	D	0.864	D	0.009
	Franklin Avenue	PM	0.833	D	0.835	D	0.002	0.978	E	0.980	E	0.002
3	Highland Avenue (South) &	AM	0.763	C	0.763	C	0.000	0.873	D	0.873	D	0.000
	Franklin Avenue	PM	0.744	C	0.744	C	0.000	0.869	D	0.869	D	0.000
4	Cahuenga Boulevard &	AM	0.833	D	0.837	D	0.004	0.967	E	0.970	E	0.003
	Franklin Avenue	PM	0.955	E	0.963	E	0.008	1.104	F	1.113	F	0.009
5	Vine St. &	AM	0.377	A	0.378	A	0.001	0.435	A	0.435	A	0.000
	Franklin Ave./US-101 Fwy. SB Off-Ramp	PM	0.628	B	0.632	B	0.004	0.716	C	0.721	C	0.005
6	Argyle Ave. &	AM	0.669	B	0.680	B	0.011	0.854	D	0.865	D	0.011
	Franklin Ave./US-101 Fwy. NB On-Ramp	PM	0.789	C	0.807	D	0.018	1.067	F	1.083	F	0.016 *
7	Gower Street &	AM	0.591	A	0.597	A	0.006	0.677	B	0.683	B	0.006
	Franklin Avenue	PM	0.752	C	0.755	C	0.003	0.867	D	0.871	D	0.004
8	Beachwood Drive &	AM	0.663	B	0.671	B	0.008	0.755	C	0.763	C	0.008
	Franklin Avenue	PM	0.664	B	0.670	B	0.006	0.764	C	0.769	C	0.005
9	Cahuenga Boulevard &	AM	0.447	A	0.448	A	0.001	0.538	A	0.539	A	0.001
	Yucca Street	PM	0.617	B	0.622	B	0.005	0.723	C	0.729	C	0.006
10	Ivar Avenue &	AM	0.095	A	0.113	A	0.018	0.125	A	0.149	A	0.024
	Yucca Street	PM	0.169	A	0.181	A	0.012	0.217	A	0.229	A	0.012
11	Vine Street &	AM	0.429	A	0.481	A	0.052	0.545	A	0.598	A	0.053
	Yucca Street	PM	0.378	A	0.420	A	0.042	0.514	A	0.565	A	0.051
12	Argyle Avenue &	AM	0.111	A	0.163	A	0.052	0.256	A	0.309	A	0.053
	Yucca Street	PM	0.300	A	0.357	A	0.057	0.533	A	0.590	A	0.057
13	Fuller Avenue &	AM	0.507	A	0.507	A	0.000	0.642	B	0.643	B	0.001
	Hollywood Boulevard	PM	0.425	A	0.428	A	0.003	0.585	A	0.588	A	0.003
14	La Brea Avenue &	AM	0.898	D	0.899	D	0.001	1.099	F	1.103	F	0.004
	Hollywood Boulevard	PM	0.737	C	0.741	C	0.004	0.984	E	0.988	E	0.004
15	Highland Avenue &	AM	0.708	C	0.710	C	0.002	0.931	E	0.932	E	0.001
	Hollywood Boulevard	PM	0.741	C	0.746	C	0.005	1.106	F	1.112	F	0.006
16	Cahuenga Boulevard &	AM	0.741	C	0.772	C	0.031	1.002	F	1.015	F	0.013 *
	Hollywood Boulevard	PM	0.701	C	0.709	C	0.008	0.947	E	0.955	E	0.008
17	Ivar Avenue &	AM	0.366	A	0.371	A	0.005	0.535	A	0.541	A	0.006
	Hollywood Boulevard	PM	0.416	A	0.421	A	0.005	0.607	B	0.613	B	0.006
18	Vine Street &	AM	0.734	C	0.762	C	0.028	0.972	E	1.000	F	0.028 *
	Hollywood Boulevard	PM	0.703	C	0.723	C	0.020	0.972	E	0.994	E	0.022 *
19	Argyle Avenue &	AM	0.445	A	0.459	A	0.014	0.719	C	0.733	C	0.014
	Hollywood Boulevard	PM	0.617	B	0.630	B	0.013	0.969	E	0.978	E	0.009
20	Gower Street &	AM	0.693	B	0.706	C	0.013	0.999	E	1.013	F	0.014 *
	Hollywood Boulevard	PM	0.637	B	0.648	B	0.011	0.913	E	0.925	E	0.012 *

Table IV.K.1-19 (continued)
Existing (2011) and Future (2020) Critical Movement Analysis (CMA)
Without and With Project Construction Trips

			Existing (2011)						Future (2020)					
		Peak	W/O Construction		With Construction				W/O Construction		With Construction			
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact		CMA	LOS	CMA	LOS	Impact	
21	Bronson Avenue &	AM	0.527	A	0.539	A	0.012		0.723	C	0.735	C	0.012	
	Hollywood Boulevard	PM	0.479	A	0.489	A	0.010		0.682	B	0.692	B	0.010	
22	US-101 Fwy. SB Ramps &	AM	0.471	A	0.483	A	0.012		0.661	B	0.673	B	0.012	
	Hollywood Boulevard	PM	0.357	A	0.360	A	0.003		0.532	A	0.534	A	0.002	
23	US-101 Fwy. NB Ramps &	AM	0.340	A	0.353	A	0.013		0.515	A	0.528	A	0.013	
	Hollywood Boulevard	PM	0.311	A	0.313	A	0.002		0.511	A	0.515	A	0.004	
24	Cahuenga Boulevard &	AM	0.468	A	0.469	A	0.001		0.655	B	0.656	B	0.001	
	Selma Avenue	PM	0.561	A	0.562	A	0.001		0.761	C	0.762	C	0.001	
25	Ivar Avenue &	AM	0.121	A	0.125	A	0.004		0.241	A	0.245	A	0.004	
	Selma Avenue	PM	0.294	A	0.297	A	0.003		0.431	A	0.434	A	0.003	
26	Vine Street &	AM	0.467	A	0.471	A	0.004		0.697	B	0.700	C	0.003	
	Selma Avenue	PM	0.512	A	0.516	A	0.004		0.757	C	0.761	C	0.004	
27	Argyle Avenue And	AM	0.256	A	0.261	A	0.005		0.467	A	0.472	A	0.005	
	Selma Avenue	PM	0.338	A	0.343	A	0.005		0.655	B	0.661	B	0.006	
28	Highland Avenue &	AM	0.886	D	0.887	D	0.001		1.170	F	1.171	F	0.001	
	Sunset Boulevard	PM	0.831	D	0.832	D	0.001		1.065	F	1.068	F	0.003	
29	Cahuenga Boulevard &	AM	0.673	B	0.676	B	0.003		0.866	D	0.870	D	0.004	
	Sunset Boulevard	PM	0.703	C	0.707	C	0.004		0.931	E	0.934	E	0.003	
30	Ivar Avenue &	AM	0.355	A	0.365	A	0.010		0.475	A	0.484	A	0.009	
	Sunset Boulevard	PM	0.513	A	0.515	A	0.002		0.661	B	0.664	B	0.003	
31	Vine Street &	AM	0.806	D	0.816	D	0.010	*	1.031	F	1.040	F	0.009	
	Sunset Boulevard	PM	0.737	C	0.740	C	0.003		1.076	F	1.079	F	0.003	
32	Argyle Avenue &	AM	0.439	A	0.443	A	0.004		0.669	B	0.671	B	0.002	
	Sunset Boulevard	PM	0.443	A	0.449	A	0.006		0.773	C	0.778	C	0.005	
33	Cahuenga Boulevard &	AM	0.341	A	0.343	A	0.002		0.435	A	0.437	A	0.002	
	De Longpre Avenue	PM	0.389	A	0.391	A	0.002		0.502	A	0.503	A	0.001	
34	Vine Street &	AM	0.468	A	0.473	A	0.005		0.593	A	0.597	A	0.004	
	De Longpre Avenue	PM	0.585	A	0.597	A	0.012		0.736	C	0.747	C	0.011	
35	Vine Street &	AM	0.684	B	0.690	B	0.006		0.907	E	0.913	E	0.006	
	Fountain Avenue	PM	0.765	C	0.768	C	0.003		1.022	F	1.026	F	0.004	
36	Vine Street &	AM	0.754	C	0.765	C	0.011		0.989	E	1.000	E	0.011	*
	Santa Monica Boulevard	PM	0.797	C	0.804	D	0.007		1.070	F	1.077	F	0.007	
37	Vine Street &	AM	0.747	C	0.752	C	0.005		0.961	E	0.966	E	0.005	
	Melrose Avenue	PM	0.821	D	0.823	D	0.002		1.039	F	1.041	F	0.002	

An * indicates a significant impact (LADOT Revised Scale).

As shown in the Impact columns of Table IV.K.1-19, construction of the Project is expected to significantly impact one study intersection under the Existing (2011) conditions and five study intersections under the Future (2020) conditions. All these significantly impacted study intersections with the Project construction traffic were concluded to be significantly impacted study intersections by the Commercial Scenario.

By applying the same mitigation measures as proposed for the Commercial Scenario below, all of the significant Project construction traffic impacts would be mitigated to less than significant level except one study intersection – Vine Street and Hollywood Boulevard under the Future (2020) conditions. The results are shown in Table IV.K.1-20 for the Existing (2011) conditions and Table IV.K.1-21 for the Future (2020) conditions with the implementation of the recommended mitigation. For the Commercial Scenario below, this same intersection and 4 other intersections were reported to have significant impacts remaining with the recommended mitigation measures.

Table IV.K.1-20
Existing (2011) Critical Movement Analysis (CMA)
Without and With Mitigation Measure

			Existing (2011)								
			W/O Construction		With Construction				With Construction With Mitigation		
No.	Intersection	Peak Hour	CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact
31	Vine Street & Sunset Boulevard	AM	0.806	D	0.816	D	0.010	*	0.805	D	-0.001
		PM	0.737	C	0.740	C	0.003		0.730	C	-0.007

An * indicates a significant impact (LADOT Revised Scale).

Table IV.K.1-21
Future (2020) Critical Movement Analysis (CMA)
Without and With Project Construction Trips

			Future (2020)								
			W/O Construction		With Construction				With Construction With Mitigation		
No.	Intersection	Peak Hour	CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact
6	Argyle Ave. & Franklin Ave./US-101 Fwy. NB On-Ramp	AM	0.854	D	0.865	D	0.011		0.814	D	-0.040
		PM	1.067	F	1.083	F	0.016	*	1.056	F	-0.011
16	Cahuenga Boulevard & Hollywood Boulevard	AM	1.002	F	1.015	F	0.013	*	1.004	F	0.002
		PM	0.947	E	0.955	E	0.008		0.943	E	-0.004
18	Vine Street & Hollywood Boulevard	AM	0.972	E	1.000	F	0.028	*	0.986	E	0.014 *
		PM	0.972	E	0.994	E	0.022	*	0.981	E	0.009
20	Gower Street & Hollywood Boulevard	AM	0.999	E	1.013	F	0.014	*	1.001	F	0.002
		PM	0.913	E	0.925	E	0.012	*	0.913	E	0.000
36	Vine Street & Santa Monica Boulevard	AM	0.989	E	1.000	E	0.011	*	0.989	E	0.000
		PM	1.070	F	1.077	F	0.007		1.066	F	-0.004

An * indicates a significant impact (LADOT Revised Scale).

40. The previously numbered tables in Section IV.K.1,Transportation - Traffic, of the Draft EIR are to be renumbered to accommodate the additional tables IV.K.1-14 to IV.K.1-21 and the additional Tables IV.K.1-39 to IV.K.1-44. Any references in the Draft EIR that refer to the previous table number now refer to the new table numbers:

- Previous Tables IV.K.1-14 through IV.K.1-30 are now numbered Tables IV.K.1-22 through IV.K.1-38.

- Previous Tables IV.K.1-31 through IV.K.1-33 are now numbered Tables IV.K.1-45 through IV.K.1-47.

41. On page IV.K.1-127, before the mitigation measures section, the following will be added:

The Concept Plan and the Residential Scenario

Analysis of both the Concept Plan and the Residential Scenario was also prepared although both Scenarios generate lower traffic volumes than the Commercial Scenario analyzed above. A summary of the net Project trip generation is included in Table IV.K.1.39, Project EIR Scenarios Net Trip Generation Summary.

Table IV.K.1-39
Project EIR Scenarios
Net Trip Generation Summary

		AM Peak Hour			PM Peak Hour		
Scenario	**Daily**	**I/B**	**O/B**	**Total**	**I/B**	**O/B**	**Total**
Traffic Study Project (Commercial Scenario)	9,922	321	253	574	486	438	924
Concept Plan	7,271	230	229	459	377	286	663
Residential Scenario	5,747	79	296	375	342	185	527

As shown in Table IV.K.1-39, the Commercial Scenario has the greatest peak hour traffic generation. The Concept Plan would generate lower traffic volumes than the Commercial Scenario. The Residential Scenario would have the lowest traffic volumes among the Scenarios. The Concept Plan and the Residential Scenario are collectively referred to as the "Project EIR Scenarios" herein.

Existing (2011) Plus Project EIR Scenarios Traffic Conditions

The Project EIR Scenarios traffic assignment patterns are based on the roadway network assumptions and the project distribution patterns from the Traffic Study. The separate assignment patterns for the residential, office and other commercial uses that were used in the Traffic Study were also used for this analysis. The AM and PM peak hours Project trip values at each intersection were calculated by applying the inbound and outbound distribution percentages from the Traffic Study and the Future (2020) conditions were determined using the procedures from the report.

Specifically, the distributions from Figures 5(a) through 5(c) of the Traffic Study were applied to the net Project trip generation as shown in Attachment B of Appendix F, Concept Plan and Residential Scenario Traffic Impact Analysis, of the Final EIR, for each Project EIR Scenario. The total net AM and PM peak-hour traffic volumes at the 37 study intersections for each Project EIR Scenario are depicted in Figures 1 and 2 of Attachment C of Appendix F, Concept Plan and Residential Scenario Traffic Impact Analysis, of the Final EIR. Adding the Project EIR Scenario volumes shown in Attachment C to the existing volumes shown in Figure 4 of the Traffic Study (Existing (2011) Without Project conditions), the Existing Plus Project EIR Scenarios volumes were developed for each Scenario.

Existing Plus Project EIR Scenarios traffic conditions were analyzed using the following assumptions:

- The Critical Movement Analysis (CMA) methodology used in the Traffic Study analysis was used in the Project EIR Scenarios traffic impacts analyses;
- The lane configurations from the Traffic Study were also utilized in the CMA calculations; and
- The LADOT significance criteria utilized in the Traffic Study were utilized for this analysis.

As shown in Table IV.K.1-40, Critical Movement Analysis ("CMA") Summary Existing (2011) Plus Project EIR Scenarios Traffic Conditions, the Concept Plan and Residential Scenario would generate fewer significant traffic impacts relative to Existing (2011) Plus Project EIR Scenarios conditions than the Commercial Scenario, which was studied in the Traffic Study. The Commercial Scenario would have significant impacts at three intersections in the AM peak hour and four intersections in the PM peak hour. The Concept Plan would have significant impacts at two intersections in the AM peak hour and three intersections in the PM peak hour. The Residential Scenario would have significant impacts at two intersections in the AM peak hour and no intersections in the PM peak hour. All of the significant impacts under the Concept Plan and Residential Scenarios would be at intersections significantly impacted under the Commercial Scenario.

Table IV.K.1-40
Critical Movement Analysis ("CMA") Summary
Existing (2011) Plus Project EIR Scenarios Traffic Conditions

			Existing		Existing + EIR Scenarios										
					+ Commercial Scenario (Traffic Study)				+ Concept Plan				+ Residential Scenario		
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact	
1	Cahuenga Boulevard &	AM	0.353	A	0.359	A	0.006		0.357	A	0.004		0.357	A	0.004	
	US-101 Fwy. NB Off-Ramp	PM	0.648	B	0.661	B	0.013		0.655	B	0.007		0.652	B	0.004	
2	Highland Avenue (North) &	AM	0.734	C	0.746	C	0.012		0.744	C	0.010		0.738	C	0.004	
	Franklin Avenue	PM	0.833	D	0.852	D	0.019		0.847	D	0.014		0.845	D	0.012	
3	Highland Avenue (South) &	AM	0.763	C	0.763	C	0.000		0.763	C	0.000		0.763	C	0.000	
	Franklin Avenue	PM	0.744	C	0.745	C	0.001		0.745	C	0.001		0.745	C	0.001	
4	Cahuenga Boulevard &	AM	0.833	D	0.848	D	0.015		0.845	D	0.012		0.845	D	0.012	
	Franklin Avenue	PM	0.955	E	0.981	E	0.026	*	0.970	E	0.015	*	0.964	E	0.009	
5	Vine St. & Franklin Ave.	AM	0.377	A	0.379	A	0.002		0.379	A	0.002		0.379	A	0.002	
	/US-101 Fwy. SB Off-Ramp	PM	0.628	B	0.636	B	0.008		0.632	B	0.004		0.630	B	0.002	
6	Argyle Ave. & Franklin Ave.	AM	0.669	B	0.686	B	0.017		0.683	B	0.014		0.677	B	0.008	
	/US-101 Fwy. NB On-Ramp	PM	0.789	C	0.820	D	0.031	*	0.809	D	0.020	*	0.797	C	0.008	
7	Gower Street &	AM	0.591	A	0.598	A	0.007		0.597	A	0.006		0.593	A	0.002	
	Franklin Avenue	PM	0.752	C	0.759	C	0.007		0.757	C	0.005		0.755	C	0.003	
8	Beachwood Drive &	AM	0.663	B	0.673	B	0.010		0.671	B	0.008		0.667	B	0.004	
	Franklin Avenue	PM	0.664	B	0.682	B	0.018		0.680	B	0.016		0.679	B	0.015	
9	Cahuenga Boulevard &	AM	0.447	A	0.451	A	0.004		0.450	A	0.003		0.449	A	0.002	
	Yucca Street	PM	0.617	B	0.655	B	0.038		0.639	B	0.022		0.630	B	0.013	
10	Ivar Avenue &	AM	0.095	A	0.130	A	0.035		0.108	A	0.013		0.099	A	0.004	
	Yucca Street	PM	0.169	A	0.215	A	0.046		0.194	A	0.025		0.186	A	0.017	
11	Vine Street &	AM	0.429	A	0.484	A	0.055		0.468	A	0.039		0.445	A	0.016	
	Yucca Street	PM	0.378	A	0.467	A	0.089		0.441	A	0.063		0.424	A	0.046	
12	Argyle Avenue &	AM	0.111	A	0.161	A	0.050		0.149	A	0.038		0.136	A	0.025	
	Yucca Street	PM	0.300	A	0.393	A	0.093		0.359	A	0.059		0.337	A	0.037	
13	Fuller Avenue &	AM	0.507	A	0.510	A	0.003		0.509	A	0.002		0.511	A	0.004	
	Hollywood Boulevard	PM	0.425	A	0.431	A	0.006		0.429	A	0.004		0.427	A	0.002	
14	La Brea Avenue &	AM	0.898	D	0.902	E	0.004		0.902	E	0.004		0.904	E	0.006	
	Hollywood Boulevard	PM	0.737	C	0.751	C	0.014		0.746	C	0.009		0.745	C	0.008	
15	Highland Avenue &	AM	0.708	C	0.715	C	0.007		0.714	C	0.006		0.715	C	0.007	
	Hollywood Boulevard	PM	0.741	C	0.765	C	0.024		0.758	C	0.017		0.755	C	0.014	
16	Cahuenga Boulevard &	AM	0.741	C	0.784	C	0.043	*	0.779	C	0.038		0.755	C	0.014	
	Hollywood Boulevard	PM	0.701	C	0.745	C	0.044	*	0.736	C	0.035		0.734	C	0.033	
17	Ivar Avenue &	AM	0.366	A	0.402	A	0.036		0.398	A	0.032		0.404	A	0.038	
	Hollywood Boulevard	PM	0.416	A	0.468	A	0.052		0.455	A	0.039		0.451	A	0.035	
18	Vine Street &	AM	0.734	C	0.786	C	0.052	*	0.779	C	0.045	*	0.778	C	0.044	*
	Hollywood Boulevard	PM	0.703	C	0.762	C	0.059	*	0.744	C	0.041	*	0.734	C	0.031	
19	Argyle Avenue &	AM	0.445	A	0.461	A	0.016		0.459	A	0.014		0.456	A	0.011	
	Hollywood Boulevard	PM	0.617	B	0.635	B	0.018		0.632	B	0.015		0.633	B	0.016	
20	Gower Street &	AM	0.693	B	0.705	C	0.012		0.701	C	0.008		0.695	B	0.002	
	Hollywood Boulevard	PM	0.637	B	0.653	B	0.016		0.649	B	0.012		0.644	B	0.007	
21	Bronson Avenue &	AM	0.527	A	0.537	A	0.010		0.535	A	0.008		0.529	A	0.002	
	Hollywood Boulevard	PM	0.479	A	0.490	A	0.011		0.487	A	0.008		0.483	A	0.004	
22	US-101 Fwy. SB Ramps &	AM	0.471	A	0.482	A	0.011		0.480	A	0.009		0.473	A	0.002	
	Hollywood Boulevard	PM	0.357	A	0.361	A	0.004		0.360	A	0.003		0.360	A	0.003	

Table IV.K.1-40 (continued)
Critical Movement Analysis ("CMA") Summary
Existing (2011) Plus Project EIR Scenarios Traffic Conditions

No.	Intersection	Peak Hour	Existing w/o Project CMA	Existing w/o Project LOS	Existing + EIR Scenarios: + Commercial Scenario (Traffic Study) CMA	+ Commercial Scenario (Traffic Study) LOS	+ Commercial Scenario (Traffic Study) Impact		+ Concept Plan CMA	+ Concept Plan LOS	+ Concept Plan Impact		+ Residential Scenario CMA	+ Residential Scenario LOS	+ Residential Scenario Impact	
23	US-101 Fwy. NB Ramps & Hollywood Boulevard	AM	0.340	A	0.352	A	0.012		0.349	A	0.009		0.342	A	0.002	
		PM	0.311	A	0.322	A	0.011		0.319	A	0.008		0.317	A	0.006	
24	Cahuenga Boulevard & Selma Avenue	AM	0.468	A	0.479	A	0.011		0.479	A	0.011		0.483	A	0.015	
		PM	0.561	A	0.578	A	0.017		0.576	A	0.015		0.577	A	0.016	
25	Ivar Avenue & Selma Avenue	AM	0.121	A	0.144	A	0.023		0.139	A	0.018		0.139	A	0.018	
		PM	0.294	A	0.332	A	0.038		0.322	A	0.028		0.318	A	0.024	
26	Vine Street & Selma Avenue	AM	0.467	A	0.487	A	0.020		0.485	A	0.018		0.491	A	0.024	
		PM	0.512	A	0.549	A	0.037		0.539	A	0.027		0.535	A	0.023	
27	Argyle Avenue And Selma Avenue	AM	0.256	A	0.263	A	0.007		0.263	A	0.007		0.263	A	0.007	
		PM	0.338	A	0.347	A	0.009		0.346	A	0.008		0.345	A	0.007	
28	Highland Avenue & Sunset Boulevard	AM	0.886	D	0.890	D	0.004		0.890	D	0.004		0.891	D	0.005	
		PM	0.831	D	0.832	D	0.001		0.834	D	0.003		0.834	D	0.003	
29	Cahuenga Boulevard & Sunset Boulevard	AM	0.673	B	0.689	B	0.016		0.687	B	0.014		0.687	B	0.014	
		PM	0.703	C	0.718	C	0.015		0.715	C	0.012		0.715	C	0.012	
30	Ivar Avenue & Sunset Boulevard	AM	0.355	A	0.367	A	0.012		0.365	A	0.010		0.360	A	0.005	
		PM	0.513	A	0.530	A	0.017		0.526	A	0.013		0.525	A	0.012	
31	Vine Street & Sunset Boulevard	AM	0.806	D	0.826	D	0.020	*	0.823	D	0.017	*	0.823	D	0.017	*
		PM	0.737	C	0.774	C	0.037		0.763	C	0.026		0.758	C	0.021	
32	Argyle Avenue & Sunset Boulevard	AM	0.439	A	0.445	A	0.006		0.445	A	0.006		0.445	A	0.006	
		PM	0.443	A	0.451	A	0.008		0.450	A	0.007		0.449	A	0.006	
33	Cahuenga Boulevard & De Longpre Avenue	AM	0.341	A	0.349	A	0.008		0.349	A	0.008		0.353	A	0.012	
		PM	0.389	A	0.403	A	0.014		0.400	A	0.011		0.401	A	0.012	
34	Vine Street & De Longpre Avenue	AM	0.468	A	0.484	A	0.016		0.483	A	0.015		0.485	A	0.017	
		PM	0.585	A	0.608	B	0.023		0.601	B	0.016		0.596	A	0.011	
35	Vine Street & Fountain Avenue	AM	0.684	B	0.698	B	0.014		0.695	B	0.011		0.697	B	0.013	
		PM	0.765	C	0.787	C	0.022		0.782	C	0.017		0.779	C	0.014	
36	Vine Street & Santa Monica Boulevard	AM	0.754	C	0.769	C	0.015		0.767	C	0.013		0.761	C	0.007	
		PM	0.797	C	0.815	D	0.018		0.809	D	0.012		0.807	D	0.010	
37	Vine Street & Melrose Avenue	AM	0.747	C	0.753	C	0.006		0.753	C	0.006		0.751	C	0.004	
		PM	0.821	D	0.828	D	0.007		0.827	D	0.006		0.825	D	0.004	

An * indicates a significant impact (LADOT Revised Scale).

Future (2020) With Project EIR Scenarios Traffic Conditions

As for Existing (2011) conditions, Future(2020) traffic impact estimates for the Project EIR Scenarios were prepared utilizing the same roadway network assumptions and the project distribution patterns used in the Traffic Study. The Future (2020) Without Project traffic volumes from the Traffic Study were combined with the net Project EIR Scenarios traffic volumes to develop the Future (2020) With Project EIR Scenarios.

As shown in Table IV.K.1-41, Critical Movement Analysis ("CMA") Summary Future (2020) With Project EIR Scenarios Traffic Conditions, the Concept Plan and the Residential Scenario would generate significant traffic impacts at fewer locations than the Commercial Scenario analyzed in the Traffic Study. The Commercial Scenario would have significant impacts at seven intersections in the AM peak hour and thirteen intersections in the PM peak hour. The Concept Plan would have significant impacts at six intersections in the AM peak hour and twelve intersections in the PM peak hour. The Residential Scenario would have significant impacts at five intersections in the AM peak hour and eight intersections in the PM peak hour. All of the significant impacts under the Concept Plan and Residential Scenario would be at intersections significantly impacted under the Commercial Scenario.

Mitigation Measures

The same mitigation measures as above were applied to the intersections with significant Project traffic impacts under the Concept Plan and the Residential Scenario. As concluded above, the Commercial Scenario has significant impacts remaining at 2 intersections under Existing (2011) conditions and 5 intersections under Future (2020) conditions after applying the mitigation measures. As shown in Table IV.K.1-42, Critical Movement Analysis ("CMA") Summary Existing (2011) Plus Project EIR Scenarios Traffic Conditions With Mitigation Measures, by applying the same mitigation measures to the Concept Plan and the Residential Scenario impacts for Existing (2011) conditions, all of the significant Project traffic impacts would be mitigated to a less than significant level. As such, there would be no significant and unavoidable traffic impacts for the Concept Plan or the Residential Scenario under Existing (2011) conditions.

Table IV.K.1-41
Critical Movement Analysis ("CMA") Summary
Future (2020) With Project EIR Scenarios Traffic Conditions

No.	Intersection	Peak Hour	Future (2020) w/o Project CMA	LOS	Future (2020) With EIR Scenarios: + Commercial Scenario (Traffic Study) CMA	LOS	Impact		+ Concept Plan CMA	LOS	Impact		+ Residential Scenario CMA	LOS	Impact	
1	Cahuenga Boulevard &	AM	0.409	A	0.415	A	0.006		0.413	A	0.004		0.413	A	0.004	
	US-101 Fwy. NB Off-Ramp	PM	0.749	C	0.761	C	0.012		0.756	C	0.007		0.753	C	0.004	
2	Highland Avenue (North) &	AM	0.855	D	0.867	D	0.012		0.864	D	0.009		0.859	D	0.004	
	Franklin Avenue	PM	0.978	E	0.997	E	0.019	*	0.992	E	0.014	*	0.990	E	0.012	*
3	Highland Avenue (South) &	AM	0.873	D	0.873	D	0.000		0.873	D	0.000		0.873	D	0.000	
	Franklin Avenue	PM	0.869	D	0.869	D	0.000		0.869	D	0.000		0.869	D	0.000	
4	Cahuenga Boulevard &	AM	0.967	E	0.981	E	0.014	*	0.978	E	0.011	*	0.978	E	0.011	*
	Franklin Avenue	PM	1.104	F	1.130	F	0.026	*	1.119	F	0.015	*	1.113	F	0.009	
5	Vine St. & Franklin Ave.	AM	0.435	A	0.437	A	0.002		0.437	A	0.002		0.437	A	0.002	
	/US-101 Fwy. SB Off-Ramp	PM	0.716	C	0.725	C	0.009		0.721	C	0.005		0.718	C	0.002	
6	Argyle Ave. & Franklin Ave.	AM	0.854	D	0.871	D	0.017		0.867	D	0.013		0.863	D	0.009	
	/US-101 Fwy. NB On-Ramp	PM	1.067	F	1.096	F	0.029	*	1.086	F	0.019	*	1.075	F	0.008	
7	Gower Street &	AM	0.677	B	0.685	B	0.008		0.683	B	0.006		0.679	B	0.002	
	Franklin Avenue	PM	0.867	D	0.874	D	0.007		0.872	D	0.005		0.870	D	0.003	
8	Beachwood Drive &	AM	0.755	C	0.765	C	0.010		0.763	C	0.008		0.759	C	0.004	
	Franklin Avenue	PM	0.764	C	0.782	C	0.018		0.779	C	0.015		0.778	C	0.014	
9	Cahuenga Boulevard &	AM	0.538	A	0.542	A	0.004		0.541	A	0.003		0.539	A	0.001	
	Yucca Street	PM	0.723	C	0.761	C	0.038		0.745	C	0.022		0.736	C	0.013	
10	Ivar Avenue &	AM	0.125	A	0.158	A	0.033		0.143	A	0.018		0.133	A	0.008	
	Yucca Street	PM	0.217	A	0.263	A	0.046		0.243	A	0.026		0.235	A	0.018	
11	Vine Street &	AM	0.545	A	0.601	B	0.056		0.585	A	0.040		0.561	A	0.016	
	Yucca Street	PM	0.514	A	0.609	B	0.095		0.577	A	0.063		0.559	A	0.045	
12	Argyle Avenue &	AM	0.256	A	0.312	A	0.056		0.301	A	0.045		0.293	A	0.037	
	Yucca Street	PM	0.533	A	0.647	B	0.114		0.614	B	0.081		0.591	A	0.058	
13	Fuller Avenue &	AM	0.642	B	0.645	B	0.003		0.645	B	0.003		0.646	B	0.004	
	Hollywood Boulevard	PM	0.585	A	0.591	A	0.006		0.589	A	0.004		0.587	A	0.002	
14	La Brea Avenue &	AM	1.099	F	1.106	F	0.007		1.105	F	0.006		1.104	F	0.005	
	Hollywood Boulevard	PM	0.984	E	0.997	E	0.013	*	0.993	E	0.009		0.991	E	0.007	
15	Highland Avenue &	AM	0.931	E	0.937	E	0.006		0.936	E	0.005		0.938	E	0.007	
	Hollywood Boulevard	PM	1.106	F	1.130	F	0.024	*	1.124	F	0.018	*	1.120	F	0.014	*
16	Cahuenga Boulevard &	AM	1.002	F	1.026	F	0.024	*	1.022	F	0.020	*	1.016	F	0.014	*
	Hollywood Boulevard	PM	0.947	E	0.991	E	0.044	*	0.982	E	0.035	*	0.981	E	0.034	*
17	Ivar Avenue &	AM	0.535	A	0.571	A	0.036		0.567	A	0.032		0.574	A	0.039	
	Hollywood Boulevard	PM	0.607	B	0.663	B	0.056		0.646	B	0.039		0.643	B	0.036	
18	Vine Street &	AM	0.972	E	1.024	F	0.052	*	1.017	F	0.045	*	1.016	F	0.044	*
	Hollywood Boulevard	PM	0.972	E	1.014	F	0.042	*	1.001	F	0.029	*	0.993	E	0.021	*
19	Argyle Avenue &	AM	0.719	C	0.735	C	0.016		0.733	C	0.014		0.730	C	0.011	
	Hollywood Boulevard	PM	0.969	E	0.989	E	0.020	*	0.989	E	0.020	*	0.993	E	0.024	*
20	Gower Street &	AM	0.999	E	1.011	F	0.012	*	1.008	F	0.009		1.002	F	0.003	
	Hollywood Boulevard	PM	0.913	E	0.930	E	0.017	*	0.925	E	0.012	*	0.921	E	0.008	
21	Bronson Avenue &	AM	0.723	C	0.733	C	0.010		0.731	C	0.008		0.725	C	0.002	
	Hollywood Boulevard	PM	0.682	B	0.693	B	0.011		0.690	B	0.008		0.687	B	0.005	
22	US-101 Fwy. SB Ramps &	AM	0.661	B	0.672	B	0.011		0.670	B	0.009		0.664	B	0.003	
	Hollywood Boulevard	PM	0.532	A	0.536	A	0.004		0.535	A	0.003		0.534	A	0.002	

Table IV.K.1-41 (continued)
Critical Movement Analysis ("CMA") Summary
Future (2020) With Project EIR Scenarios Traffic Conditions

			Future (2020)		Future (2020) With EIR Scenarios										
					+ Commercial Scenario (Traffic Study)				+ Concept Plan				+ Residential Scenario		
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact	
23	US-101 Fwy. NB Ramps &	AM	0.515	A	0.527	A	0.012		0.525	A	0.010		0.518	A	0.003	
	Hollywood Boulevard	PM	0.511	A	0.524	A	0.013		0.520	A	0.009		0.518	A	0.007	
24	Cahuenga Boulevard &	AM	0.655	B	0.665	B	0.010		0.665	B	0.010		0.670	B	0.015	
	Selma Avenue	PM	0.761	C	0.778	C	0.017		0.775	C	0.014		0.777	C	0.016	
25	Ivar Avenue &	AM	0.241	A	0.264	A	0.023		0.259	A	0.018		0.259	A	0.018	
	Selma Avenue	PM	0.431	A	0.469	A	0.038		0.459	A	0.028		0.455	A	0.024	
26	Vine Street &	AM	0.697	B	0.716	C	0.019		0.714	C	0.017		0.721	C	0.024	
	Selma Avenue	PM	0.757	C	0.794	C	0.037		0.785	C	0.028		0.781	C	0.024	
27	Argyle Avenue And	AM	0.467	A	0.474	A	0.007		0.474	A	0.007		0.474	A	0.007	
	Selma Avenue	PM	0.655	B	0.665	B	0.010		0.663	B	0.008		0.662	B	0.007	
28	Highland Avenue &	AM	1.170	F	1.174	F	0.004		1.173	F	0.003		1.175	F	0.005	
	Sunset Boulevard	PM	1.065	F	1.067	F	0.002		1.067	F	0.002		1.068	F	0.003	
29	Cahuenga Boulevard &	AM	0.866	D	0.884	D	0.018		0.881	D	0.015		0.881	D	0.015	
	Sunset Boulevard	PM	0.931	E	0.946	E	0.015	*	0.944	E	0.013	*	0.943	E	0.012	*
30	Ivar Avenue &	AM	0.475	A	0.487	A	0.012		0.484	A	0.009		0.479	A	0.004	
	Sunset Boulevard	PM	0.661	B	0.679	B	0.018		0.675	B	0.014		0.674	B	0.013	
31	Vine Street &	AM	1.031	F	1.050	F	0.019	*	1.047	F	0.016	*	1.047	F	0.016	*
	Sunset Boulevard	PM	1.076	F	1.113	F	0.037	*	1.102	F	0.026	*	1.097	F	0.021	*
32	Argyle Avenue &	AM	0.669	B	0.674	B	0.005		0.674	B	0.005		0.675	B	0.006	
	Sunset Boulevard	PM	0.773	C	0.781	C	0.008		0.779	C	0.006		0.778	C	0.005	
33	Cahuenga Boulevard &	AM	0.435	A	0.443	A	0.008		0.443	A	0.008		0.447	A	0.012	
	De Longpre Avenue	PM	0.502	A	0.515	A	0.013		0.513	A	0.011		0.513	A	0.011	
34	Vine Street &	AM	0.593	A	0.609	B	0.016		0.607	B	0.014		0.610	B	0.017	
	De Longpre Avenue	PM	0.736	C	0.759	C	0.023		0.751	C	0.015		0.747	C	0.011	
35	Vine Street &	AM	0.907	E	0.921	E	0.014	*	0.919	E	0.012	*	0.921	E	0.014	*
	Fountain Avenue	PM	1.022	F	1.045	F	0.023	*	1.040	F	0.018	*	1.037	F	0.015	*
36	Vine Street &	AM	0.989	E	1.005	F	0.016	*	1.002	F	0.013	*	0.997	E	0.008	
	Santa Monica Boulevard	PM	1.070	F	1.088	F	0.018	*	1.082	F	0.012	*	1.079	F	0.009	
37	Vine Street &	AM	0.961	E	0.967	E	0.006		0.967	E	0.006		0.965	E	0.004	
	Melrose Avenue	PM	1.039	F	1.046	F	0.007		1.045	F	0.006		1.043	F	0.004	

An * indicates a significant impact (LADOT Revised Scale).

Table IV.K.1-42
Critical Movement Analysis ("CMA") Summary
Existing (2011) Plus Project EIR Scenarios Traffic Conditions With Mitigation Measures

					Existing + EIR Scenarios																				
					Traffic Study - Commercial Scenario							Concept Plan						Residential Scenario							
		Peak	Existing w/o Project		With Project			With Project+Mitigation				With Project			With Project+Mitigation			With Project			With Project+Mitigation			
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact		CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact		
4	Cahuenga Boulevard &	AM	0.833	D	0.848	D	0.015	0.836	D	0.003		0.845	D	0.012	0.833	D	-0.001	0.845	D	0.012					
	Franklin Avenue	PM	0.955	E	0.981	E	0.026 *	0.967	E	0.012 *		0.970	E	0.015 *	0.958	E	0.003	0.964	E	0.009					
6	Argyle Ave. & Franklin Ave.	AM	0.669	B	0.686	B	0.017	0.674	B	0.005		0.683	B	0.014	0.670	B	0.001	0.677	B	0.008					
	/US-101 Fwy. NB On-Ramp	PM	0.789	C	0.820	D	0.031 *	0.806	D	0.016		0.809	D	0.020 *	0.796	D	0.007	0.797	C	0.008					
16	Cahuenga Boulevard &	AM	0.741	C	0.784	C	0.043 *	0.770	C	0.029		0.779	C	0.038				0.755	C	0.014					
	Hollywood Boulevard	PM	0.701	C	0.745	C	0.044 *	0.728	C	0.027		0.736	C	0.035				0.734	C	0.033					
18	Vine Street &	AM	0.734	C	0.786	C	0.052 *	0.768	C	0.034		0.779	C	0.045 *	0.762	C	0.029	0.778	C	0.044 *	0.762	C	0.028		
	Hollywood Boulevard	PM	0.703	C	0.762	C	0.059 *	0.744	C	0.041 *		0.744	C	0.041 *	0.728	C	0.025	0.734	C	0.031	0.719	C	0.017		
31	Vine Street &	AM	0.806	D	0.826	D	0.020 *	0.812	D	0.006		0.823	D	0.017 *	0.810	D	0.004	0.823	D	0.017 *	0.811	D	0.005		
	Sunset Boulevard	PM	0.737	C	0.774	C	0.037	0.759	C	0.022		0.763	C	0.026	0.750	C	0.012	0.758	C	0.021	0.745	C	0.008		

An * indicates a significant impact (LADOT Revised Scale).

Table IV.K.1-43, Critical Movement Analysis ("CMA") Summary Future (2020) With Project EIR Scenarios Traffic Conditions With Mitigation Measures, shows resulting impacts for the Future (2020) conditions with mitigation measures. For the Concept Plan under the Future (2020) conditions, significant Project traffic impacts would remain at three intersections, intersections which were also concluded to remain significant for the Commercial Scenario analyzed in the Traffic Study. The remaining significantly impacted intersections are:

16. Cahuenga Boulevard and Hollywood Boulevard (PM Peak Hour);

18. Vine Street and Hollywood Boulevard (AM and PM Peak Hours); and

31. Vine Street and Sunset Boulevard (PM Peak Hour).

For the Residential Scenario under the Future (2020) conditions, significant Project traffic impacts would remain significant at three intersections, which are intersections concluded to remain significant in the Traffic Study and the Draft EIR. The remaining significantly impacted intersections are:

16. Cahuenga Boulevard and Hollywood Boulevard (PM Peak Hour);

18. Vine Street and Hollywood Boulevard (AM Peak Hour); and

19. Argyle Avenue and Hollywood Boulevard (PM Peak Hour).

Two of these three intersections were concluded to remain significant under the Commercial Scenario analyzed above. One additional significant and unavoidable impact at the intersection of Argyle Avenue and Hollywood Boulevard would remain after implementation of the mitigation measures above. This intersection was concluded to be mitigated to a less than significant level with the mitigation measures for the Commercial Scenario analyzed above and was concluded to remain significantly impacted with implementation of the mitigation measures under the Maximum East Site Development Scenario.

Table IV.1-43
Critical Movement Analysis ("CMA") Summary
Future (2020) With Project EIR Scenarios Traffic Conditions With Mitigation Measures

			Future (2020)		Future (2020) + EIR Scenarios																			
					Traffic Study - Commercial Scenario						Concept Plan						Residential Scenario							
					With Project			With Project+Mitigation			With Project			With Project+Mitigation			With Project			With Project+Mitigation			
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact
2	Highland Avenue (North) &	AM	0.855	D	0.867	D	0.012	0.856	D	0.001	0.864	D	0.009	0.853	D	-0.002	0.859	D	0.004	0.848	D	-0.007
	Franklin Avenue	PM	0.978	E	0.997	E	0.019 *	0.983	E	0.005	0.992	E	0.014 *	0.980	E	0.002	0.990	E	0.012 *	0.978	E	0.001
4	Cahuenga Boulevard &	AM	0.967	E	0.981	E	0.014 *	0.969	E	0.003	0.978	E	0.011 *	0.966	E	-0.001	0.978	E	0.011 *	0.967	E	0.000
	Franklin Avenue	PM	1.104	F	1.130	F	0.026 *	1.116	F	0.012 *	1.119	F	0.015 *	1.107	F	0.003	1.113	F	0.009	1.102	F	-0.002
6	Argyle Ave. & Franklin Ave.	AM	0.854	D	0.871	D	0.017	0.818	D	-0.036	0.867	D	0.013	0.815	D	-0.039	0.863	D	0.009			
	/US-101 Fwy. NB On-Ramp	PM	1.067	F	1.096	F	0.029 *	1.062	F	-0.004	1.086	F	0.019 *	1.057	F	-0.009	1.075	F	0.008			
14	La Brea Avenue &	AM	1.099	F	1.106	F	0.007	1.095	F	-0.004	1.105	F	0.006				1.104	F	0.005			
	Hollywood Boulevard	PM	0.984	E	0.997	E	0.013 *	0.985	E	0.001	0.993	E	0.009				0.991	E	0.007			
15	Highland Avenue &	AM	0.931	E	0.937	E	0.006	0.926	E	-0.005	0.936	E	0.005	0.926	E	-0.005	0.938	E	0.007	0.927	E	-0.004
	Hollywood Boulevard	PM	1.106	F	1.130	F	0.024 *	1.117	F	0.010 *	1.124	F	0.018 *	1.111	F	0.005	1.120	F	0.014 *	1.109	F	0.003
16	Cahuenga Boulevard &	AM	1.002	F	1.026	F	0.024 *	1.013	F	0.010 *	1.022	F	0.020 *	1.009	F	0.007	1.016	F	0.014 *	1.004	F	0.001
	Hollywood Boulevard	PM	0.947	E	0.991	E	0.044 *	0.974	E	0.026 *	0.982	E	0.035 *	0.966	E	0.019 *	0.981	E	0.034 *	0.966	E	0.019 *
18	Vine Street &	AM	0.972	E	1.024	F	0.052 *	1.006	F	0.034 *	1.017	F	0.045 *	1.001	F	0.029 *	1.016	F	0.044 *	1.000	F	0.028 *
	Hollywood Boulevard	PM	0.972	E	1.014	F	0.042 *	0.998	E	0.026 *	1.001	F	0.029 *	0.987	E	0.015 *	0.993	E	0.021 *	0.980	E	0.008
19	Argyle Avenue &	AM	0.719	C	0.735	C	0.016	0.722	C	0.003	0.733	C	0.014	0.721	C	0.003	0.730	C	0.011	0.718	C	-0.001
	Hollywood Boulevard	PM	0.969	E	0.989	E	0.020 *	0.976	E	0.007	0.989	E	0.020 *	0.976	E	0.007	0.993	E	0.024 *	0.979	E	0.010 *
20	Gower Street &	AM	0.999	E	1.011	F	0.012 *	1.000	E	0.001	1.008	F	0.009	0.997	E	-0.002	1.002	F	0.003			
	Hollywood Boulevard	PM	0.913	E	0.930	E	0.017 *	0.917	E	0.004	0.925	E	0.012 *	0.913	E	0.000	0.921	E	0.008			
29	Cahuenga Boulevard &	AM	0.866	D	0.884	D	0.018	0.871	D	0.005	0.881	D	0.015	0.869	D	0.003	0.881	D	0.015	0.870	D	0.003
	Sunset Boulevard	PM	0.931	E	0.946	E	0.015 *	0.934	E	0.003	0.944	E	0.013 *	0.931	E	0.001	0.943	E	0.012 *	0.931	E	0.000
31	Vine Street &	AM	1.031	F	1.050	F	0.019 *	1.037	F	0.006	1.047	F	0.016 *	1.034	F	0.003	1.047	F	0.016 *	1.035	F	0.004
	Sunset Boulevard	PM	1.076	F	1.113	F	0.037 *	1.098	F	0.022 *	1.102	F	0.026 *	1.089	F	0.012 *	1.097	F	0.021 *	1.084	F	0.008
35	Vine Street &	AM	0.907	E	0.921	E	0.014 *	0.910	E	0.003	0.919	E	0.012 *	0.908	E	0.001	0.921	E	0.014 *	0.909	E	0.002
	Fountain Avenue	PM	1.022	F	1.045	F	0.023 *	1.031	F	0.009	1.040	F	0.018 *	1.027	F	0.005	1.037	F	0.015 *	1.025	F	0.003
36	Vine Street &	AM	0.989	E	1.005	F	0.016 *	0.993	E	0.003	1.002	F	0.013 *	0.991	E	0.002	0.997	E	0.008			
	Santa Monica Boulevard	PM	1.070	F	1.088	F	0.018 *	1.075	F	0.005	1.082	F	0.012 *	1.070	F	0.000	1.079	F	0.009			

An * indicates a significant impact (LADOT Revised Scale).

In order to address the significant impact on Intersection No. 19 Argyle Avenue and Hollywood Boulevard, it is recommended that the following mitigation measure is also implemented

K.1-14 East Site Residential Unit and Reserved Residential Parking Cap. On the East Site, residential development shall be limited to 450 residential units and 675 reserved residential parking spaces.

Level of Significance After Mitigation

To reflect this added mitigation measure, the residential distribution percentages at the East and West Sites adjacent intersections (listed below) were revised for an analysis of the Residential Scenario With Added Mitigation. The intersections affected by the East Site residential unit and reserved residential parking limitation are:

11. Vine Street and Yucca Street

12. Argyle Avenue and Yucca Street

18. Vine Street and Hollywood Boulevard

19. Argyle Avenue and Hollywood Boulevard

26. Vine Street and Selma Avenue

27. Argyle Avenue and Selma Avenue.

Utilizing the updated distribution percentages, the Project impacts under Existing (2011) and Future (2020) conditions were calculated for the Residential Scenario Plus Added Mitigation. The CMA values and the resulting traffic impacts are summarized in Table IV.K.1-44. As shown in Table IV.K.1-44, with mitigation measure IV.K.1-14, the significant impact at the intersection of Argyle Avenue and Hollywood Boulevard under the Future (2020) conditions under the Residential Scenario would be mitigated to a less than significant level.

Table IV.K.1-44
Critical Movement Analysis ("CMA") Summary
Existing (2011) and Future (2020) With Residential Scenario Traffic Conditions
With Added Mitigation

			Existing (2011)									Future (2020)								
		Peak	Existing		Existing + Project			WP + Mitigation				Without Project		With Project			WP + Mitigation			
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact		CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
11	Vine Street &	AM	0.429	A	0.445	A	0.016					0.545	A	0.562	A	0.017				
	Yucca Street	PM	0.378	A	0.427	A	0.049					0.514	A	0.563	A	0.049				
12	Argyle Avenue &	AM	0.111	A	0.141	A	0.030					0.256	A	0.296	A	0.040				
	Yucca Street	PM	0.300	A	0.341	A	0.041					0.533	A	0.595	A	0.062				
18	Vine Street &	AM	0.734	C	0.780	C	0.046	*	0.763	C	0.029	0.972	E	1.018	F	0.046	*	1.001	F	0.029	*
	Hollywood Boulevard	PM	0.703	C	0.736	C	0.033		0.722	C	0.019	0.972	E	0.993	E	0.021	*	0.980	E	0.008	
19	Argyle Avenue &	AM	0.445	A	0.454	A	0.009					0.719	C	0.728	C	0.009		0.717	C	-0.002	
	Hollywood Boulevard	PM	0.617	B	0.629	B	0.012					0.969	E	0.989	E	0.020	*	0.976	E	0.007	
26	Vine Street &	AM	0.467	A	0.491	A	0.024					0.697	B	0.721	C	0.024					
	Selma Avenue	PM	0.512	A	0.536	A	0.024					0.757	C	0.781	C	0.024					
27	Argyle Avenue And	AM	0.256	A	0.263	A	0.007					0.467	A	0.475	A	0.008					
	Selma Avenue	PM	0.338	A	0.344	A	0.006					0.655	B	0.661	B	0.006					

An * indicates a significant impact (LADOT Revised Scale).

Section IV.K.2 Transportation – Parking

42. Page IV.K.2-2, the paragraph under the heading "Shared Parking" is revised as follows:

~~Section 12.24.X.20 permits two (2) or more uses to share off-street parking spaces if it is determined that a lower total number of parking spaces than would be required will provide adequate parking for the uses. The determination is made based on an analysis of parking demand, among other requirements. While this determination is usually made by a Zoning Administrator upon application, the Project Applicant is requesting approval of a shared parking program through the Development Agreement.~~

Section 12.21 A.4 (y) permits the City Planning Commission to grant reduced on-site parking with remote off-site parking or transportation alternatives in connection with a City Planning Commission approval of an application otherwise subject to its jurisdiction including, but not limited to approval of a zone change, height district change, supplemental use district, or conditional use. Here the location of the Project Site allows for a number of transportation alternatives to be used by residents, visitors, employees, and guests. The Project Site is within a quarter mile of the Hollywood/Vine Metro Red Line Transit Station and numerous LADOT and Metro bus routes. While this determination will allow reduced parking via the shared parking program, the Applicant is also requesting approval of the shared parking program through the Development Agreement, as the parking standards and procedures for calculating the parking demand are established in the Development Regulations.

43. Page IV.K.2-8, the second sentence under the heading "Shared Parking" is revised as follows:

This is consistent with Community Plan Update policies~~, Section 12.24.X.20 of the LAMC~~, and Section 106.61 of the Green Building Code.

44. Page IV.K.2-8, the second and third paragraphs under the heading "Shared Parking" are revised as follows:

The individual land use parking requirements for each component of a phase of development shall be calculated from Section 10.1.1 of the Development Regulations, as described above, to establish the "Base Demand." ~~The number of required automobile parking spaces established under the Base Demand may be reduced by the same number as the number of bicycle spaces required per section 10.4 of the Development Regulations. The resulting adjusted, or reduced, automobile parking rates shall be applied to the proposed building(s) to be constructed in each phase of development.~~ For parking spaces that are to be shared between uses, the calculated minimum parking requirement for the Project Site~~, including that new phase of construction,~~ is to be adjusted from the Base Demand based on the procedures in *Shared Parking, Urban Land Institute, 2nd Edition* (2005) and in the shared parking demand analysis contained in Appendix K.1 to this Draft EIR.

45. Page IV.K.2-19 to K.2-20, under the heading "Bicycle Standards" is revised as follows:

Bicycle Parking shall be provided per the LAMC requirements.

~~The Bicycle Standards for commercial, office, and retail land uses are identified in Table IV.K.2-5, Proposed Bicycle Parking Standards, below. For all uses identified in this table, a minimum of 2 short-term and 2 long-term bicycle parking spaces shall be provided. Where there is a combination of uses on a lot, the number of bicycle parking spaces required shall be the sum of the requirements of the various uses.~~

~~Table IV.K.2-5~~
~~Proposed Bicycle Parking Standards~~

~~Land Use~~	~~Short Term Bicycle Parking~~	~~Long Term Bicycle Parking~~
~~Office~~	~~1 per 10,000 sq. ft.~~	~~1 per 5,000 sq. ft.~~
~~Health Clubs~~	~~1 per 2,000 sq. ft.~~	~~1 per 2,000 sq. ft.~~
~~Restaurant and Bars~~	~~1 per 2,000 sq. ft.~~	~~1 per 2,000 sq. ft.~~
~~Restaurant (less than 1,000 sq. ft.)~~	~~2 per restaurant~~	~~2 per restaurant~~
~~Retail (General)~~	~~1 per 2,000 sq. ft.~~	~~1 per 2,000 sq. ft.~~
~~Retail (Furniture)~~	~~1 per 10,000 sq. ft.~~	~~1 per 10,000 sq. ft.~~
~~Hotel~~	~~1 per 20 guest rooms~~	~~1 per 20 guest rooms~~
~~All other commercial uses~~	~~1 per 10,000 sq. ft.~~	~~1 per 10,000 sq. ft.~~
~~*Source: Millennium Hollywood Development Regulations, 2012*~~		

~~For all residential buildings containing more than three dwelling units or more than five guest rooms, long- and short-term bicycle parking shall be provided. Long-term bicycle parking shall be provided at a rate of one space per dwelling unit or guest room. In addition, short-term bicycle parking shall be provided at one space per ten dwelling units or guest rooms. A minimum of two short-term bicycle parking spaces shall be provided in such cases.~~

~~In instances where a building may contain both dwelling units and guest rooms, the sum of dwelling units and guest rooms shall be used to determine the amount of long and short term parking. Any combination that results in more than five combined dwelling units and guest rooms will require bicycle parking.~~

46. Page IV.K.2-24, the first two sentences in the first full paragraph is revised as follows:

As discussed previously in this Section, the Project includes a shared parking program to ensure the Project's peak parking demand is met throughout the year, consistent with policies in the Hollywood Community Plan Update~~, Section 12.24.X.20 of the LAMC,~~ and Section 106.6.1 of the Green Building Code. Implementation of the shared parking program will be a component of the Development Regulations, ~~and~~ as authorized through the approval of the Project's proposed Development Agreement and City Planning Commission approval pursuant to Section 12.21 A (y) of the LAMC.

Section IV.L.2Utilities and Service Systems – Wastewater

47. Page IV.L.2-17, an additional sentence and minor revisions will be added after the second sentence in the first full paragraph. This is the result of a letter from the Bureau of Sanitation dated January 8, 2013 and submitted in response to the Notice of Completion of the Draft EIR. The BOS recognized that there are parts of its system that are constrained. The Draft EIR anticipated this potential constraint and stated that if there is insufficient capacity, then a secondary line would need to be made to another line with sufficient capacity (from the September 27, 2011 BOS letter, included as Appendix IV.L.4, of the Draft EIR). The January 8, 2013 BOS letter, included as Appendix I, Bureau of Sanitation inter-departmental correspondence, Jan 8, 2013, of the Final EIR, provides additional specificity of where a secondary connection could be made. The additional sentence and minor revisions are shown underlined below:

As described in the City's BOS letter, and discussed above, further detailed gauging and evaluation may be needed as part of the permit process to identify the most suitable sewer connection point(s). If, for any reason, the local sewer lines have insufficient capacity, then the Project Applicant will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. The BOS identified the connection to be made as either to the 8-inch line on Vine Street and/or the 12-inch line on Yucca Street. The construction of a secondary line, if necessary, would not result in significant impacts as the construction would be of short duration and with the implementation of best practices, such as the use of a flagman during work in the public right of way~~,~~ during construction, would not significantly impact traffic or emergency access. A final approval for sewer capacity and connection permit will be made at ~~that~~ the time of final building design.

Section VI, Alternatives to the Project

48. Pages VI-32, VI-59, VI-86, VI-113, and VI-139, under the heading "Construction Traffic", the second sentence is revised as follows:

~~Thus, during the Project's construction phase, the Project would generate an approximate maximum combined 1,068 peak hour trips (well below the Project's trip cap of a combined 1,498 peak hour trips)~~

The maximum level of trip-making activity from the Project Site during the AM peak hour will be 496 trips, which is nearly 15% lower than the Trip Cap of 574 AM peak hour trips. The highest PM peak hour construction generation is 479 trips, slightly greater than half of the Trip Cap level of 924 PM peak hour trips.

Appendix II, Development Regulations

49. Page 50 of the Development Regulations, under the heading "b. Calculating Shared Parking" is revised as follows (and the revised page 50 is included on the following page):

(i) The individual land use parking requirements for each component of a phase of development shall be calculated from Section 10.1.1. above to establish the "Base Demand."

~~(ii) The Base Demand will be adjusted by the number of bicycle spaces required per section 10.4. The following internal use reduction factors shall also be applied when 10,000 office equivalent square feet each of office, residential and other commercial uses will all be active on the Site:~~

~~**Internal Use Reduction Factors**~~

~~Residential **5%**~~

~~Hotel **5%**~~

~~Office **15%**~~

~~Other Commercial **15%**~~

~~The resulting minimum automobile parking rates shall be applied to the proposed building(s) to be constructed in each phase of development.~~

(~~i~~ii) For parking spaces that are to be shared between uses, the calculated minimum parking requirement for the Site, including that new phase of construction, is to be adjusted from the Base Demand based on the procedures in *Shared Parking*, Urban Land Institute, 2nd Edition (2005) or another source as determined by the Director of Planning.

50. Page 51and 52 of the Development Regulations, under the heading "10.4 Bicycle Standards" is revised so that all of previous section 10.4.1 is removed and replaced with (and the revised pages 51-52 are included on the following pages):

    10.4.1 Bicycle parking shall be provided per code requirements.

51. Page 53 of the Development Regulations, under the heading "11.1 Hollywood Signage Supplemental Use District" is revised as follows:

    Signage shall be subject to Ordinance 181340 ~~176172~~: Hollywood Signage Supplemental Use District (Amended) pursuant to Section 13.11 of the Los Angeles Municipal Code.

a. Shared parking may be applied to the Section 10.1.1 base rates for the Site when the uses have different parking requirements and different demand patterns in a 24-hour cycle or between weekends and weekdays. The intent is to maximize efficient use of the site by matching parking demand with complimentary uses. The calculation of the parking requirements shall be based on a detailed assessment prior to its construction.

b. Calculating Shared Parking:

(i) The individual land use parking requirements for each component of a phase of development shall be calculated from Section 10.1.1. above to establish the "Base Demand."

(ii) For parking spaces that are to be shared between uses, the calculated minimum parking requirement for the Site, including that new phase of construction, is to be adjusted from the Base Demand based on the procedures in *Shared Parking*, Urban Land Institute, 2nd Edition (2005) or another source as determined by the Director of Planning.

10.2 Additional Regulations

10.2.1 The automobile parking spaces required shall be provided either on the same lot as the use for which they are intended to serve or on another lot located within 750 feet of the lot; said distance to be measured horizontally along the streets between the two lots, except that where the parking area is located adjacent to an alley, public walk or private easement which is easily usable for pedestrian travel between the parking area and the use it is to serve, the 750-foot distance may be measured along said alley, walk or easement.

10.2.2 Curb cuts for driveways shall be located no closer than 50 feet to the intersection of two streets unless approved by The Department of Transportation.

10.2.3 Access driveways to parking facilities not at signalized intersections shall not exceed 28 feet in width. The minimum separation between drives located along the same frontage shall be 50 feet.

10.2.4 Parking and loading access shall be shared where feasible.

10.2.5 Priority placement within parking structures shall be given to bike parking, car-share parking, and other alternative ride vehicles.

10.2.6 Pedestrian entrances to all parking shall be directly from the street, except that underground parking garages may be entered directly from a building.

10.3 Screening

10.3.1 Above grade parking for the first 20 feet shall be lined with habitable floor area having a minimum depth of 20 feet along street frontages where feasible and shall be designed to blend in with the form and massing and to look like an integral part of the building, with the use of windows and/or cladding, or by landscaping, or green screens, or a combination thereof. The interior of a parking structure shall be designed to be screened from the view of streets and sidewalks.

10.4 Bicycle Standards

10.4.1 Bicycle parking shall be provided per code requirements.

10.5 Transportation Demand Management Plan

10.5.1 The Project shall incorporate a comprehensive transportation demand management plan.

10.5.2 The transportation demand management plan shall set forth best practices that relate to the Project Site and the Project's building design features in order to:

a. Promote bicycle and pedestrian circulation within the Project Site.

b. Promote alternative modes of transportation.

c. Create pedestrian linkages to public and private amenities outside the Project Site.

d. Provide convenient and attractive onsite pedestrian linkages for routes to the Metro Red Line Station at Hollywood Boulevard and Vine Street.

e. Provide adequate parking, but provide incentives to tenants and residents to utilize alternative modes of travel. The incentives shall include bicycle facilities, car sharing, discounted subway passes, and parking spaces as an only optional part of all lease and sale agreements.

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V. MITIGATION MONITORING AND REPORTING PROGRAM

A. Introduction

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" (Mitigation Monitoring and Reporting Program).

Section 15097 of the *CEQA Guidelines* provides additional direction on mitigation monitoring or reporting:

15097. MITIGATION MONITORING OR REPORTING.

> *(a) This section applies when a public agency has made the findings required under paragraph (1) of subdivision (a) of Section 15091 relative to an EIR or adopted a mitigated negative declaration in conjunction with approving a project. In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.*

The City of Los Angeles is the Lead Agency for the Project. Any agency listed below is assumed to be within the City of Los Angeles, unless its jurisdiction is listed separately.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified Project design features or mitigation measures to avoid or to reduce potentially significant environmental impacts of the Project. For purposes on the analysis below, references to mitigation measures includes the Project design features. The measures below are from the Draft EIR as well as the additions and modifications made in the Final EIR as a result of the Comments received on the Draft EIR. These additions and modifications are listed in Section IV, Corrections and Additions to the Draft EIR, of the Final EIR.

This Mitigation Monitoring and Reporting Program (MMRP) is designed to monitor implementation of these mitigation measures identified for the Project. The MMRP is subject to review and approval by the Lead Agency as part of the certification of the EIR and adoption of project conditions. The required mitigation measures are listed and categorized by impact area, as identified in the EIR, with an accompanying identification of the following:

- Monitoring Phase, the phase of the Project during which the mitigation measure shall be monitored;
    - Pre-Construction, including the design phase
    - Construction
    - Pre-Occupancy (prior to issuance of a Certificate of Occupancy)
    - Occupancy (post-construction)
- Enforcement Agency, the agency with the power to enforce the mitigation measure; and
- Monitoring Agency, the agency to which reports including feasibility, compliance, implementation, and development are made.
- Action(s) Indicating Compliance, the action(s) of which the Enforcement or Monitoring Agency indicates that compliance with the identified mitigation measure has been implemented.

The Project Applicant shall be responsible for implementing all mitigation measures unless otherwise noted. The MMRP performance shall be monitored annually to determine the effectiveness of the measures implemented in any given year and reevaluate the mitigation needs for the upcoming year.

B. Program Modification

After review and approval of the MMRP by the Lead Agency, minor changes and modifications to the MMRP are permitted, but can only be made by the Applicants or their successors subject to the approval by the City of Los Angeles. This flexibility is necessary due to the nature of the MMRP, and the need to protect the environment with a workable program. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

C. Mitigation Monitoring and Reporting Program

Section IV.A.1 Aesthetics – Views/Light and Glare

A.1-1 Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed immediately upon discovery.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Field inspection sign-off

A.1-2 The Project shall be developed in conformance with the Millennium Hollywood Development Standards, including, but not limited to, the Density Standards, the Building Height Standards, the Tower Massing Standards, and Building and Streetscape Standards. Prior to construction, Site Plans and architectural drawings shall be submitted to the Department of City Planning to assess compatibility with the Development Standards.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of City Planning
Action Indicating Compliance:	Plan approval

A.1-3 The Project shall include low-level directional lighting at ground, open terrace and tower levels of the exterior of the proposed structures to ensure that architectural, parking and security lighting does not spill onto adjacent residential properties. The Project's lighting shall be in conformance with the lighting requirements of the City of Los Angeles Green Building Code to reduce light pollution.

Monitoring Phase:	Pre-Construction (Design Phase); Pre-Occupancy
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of City Planning
Actions Indicating Compliance:	Plan approval; Field inspection sign-off

A.1-4 The Project's façades and windows shall be constructed or treated with low-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Action Indicating Compliance: Plan approval

Section IV.A.2 Aesthetics – Shade/Shadow

A.2-1 The Project shall conform to the Tower Massing Standards as identified in Section 6 of the Millennium Hollywood Development Regulations which include, but are not limited to, the following Tower Lot Coverage standards identified in Table 6.1.1, Tower Massing Standards: 48% tower lot coverage between 150 and 220 feet above curb level, 28% tower lot coverage between 151 and 400 feet above curb level, 15% tower lot coverage between 151 and 550 feet above curb level, and 11.5% tower lot coverage between 151 and 585 feet above curb level. The Project shall also conform to Standard 6.1.3, which states that at least 50% of the total floor area shall be located below 220 feet.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Action Indicating Compliance: Plan approval

A.2-2 The Project shall conform to the Tower Massing Standards as identified in Section 7 of the Millennium Hollywood Development Regulations which include, but are not limited to, the following Standards: (7.3.1) A tower 220 feet or greater in height above curb level shall be located with its equal or longer dimension parallel to the north-south streets; (7.5.1) Towers shall be spaced to provide privacy, natural light, and air, as well as to contribute to an attractive skyline; and (7.5.2) Generally, any portion of a tower shall be spaced at least 80 feet from all other towers on the same parcel, except the following which shall meet Planning Code: 1) the towers are offset (staggered), 2) the largest windows in primary rooms are not facing one another, or 3) the towers are curved or angled.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning
Action Indicating Compliance: Plan approval

Section IV.B.1 Air Quality

B.1-1 The Project Applicant shall include in construction contracts the control measures required and/or recommended by the SCAQMD at the time of development, including but not limited to the following:

Rule 403 - Fugitive Dust

- Use watering to control dust generation during demolition of structures or break-up of pavement;
- Water active grading/excavation sites and unpaved surfaces at least three times daily;
- Cover stockpiles with tarps or apply non-toxic chemical soil binders;
- Limit vehicle speed on unpaved roads to 15 miles per hour;
- Sweep daily (with water sweepers) all paved construction parking areas and staging areas;
- Provide daily clean-up of mud and dirt carried onto paved streets from the Site;
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more; and
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Quarterly compliance report submitted by contractor

B.1-2 To reduce on-site construction related air quality emissions, the Project Applicant shall ensure all construction equipment meet or exceed Tier 3 off-road emission standards.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Quarterly compliance report submitted by contractor

B.1-3 Haul truck fleets during demolition and grading excavation activities shall use newer truck fleets (e.g., alternative fueled vehicles or vehicles that meet 2010 model year United States Environmental Protection Agency NO_X standards), where commercially available. At a minimum, truck fleets used for these activities shall use trucks that meet EPA 2007 model year NOx emissions requirements.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Quarterly compliance report submitted by contractor

B.1-4 The Project shall meet the requirements of the City of Los Angeles Green Building Code. Specifically, as it relates to the reduction of air quality emissions, the Project shall:

- Be designed to exceed Title 24 2008 Standards by 15%;
- Reduce potable water consumption by 20% through the use of low-flow water fixtures;
- Provide readily accessible recycling areas and containers. It is estimated this shall achieve a minimum 10% reduction of solid waste deposited at local landfills; and
- All residential grade equipment and appliances provided and installed shall be ENERGY STAR labeled if ENERGY STAR is applicable to that equipment or appliance.

Monitoring Phase:	Pre Construction (Design Phase); Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Actions Indicating Compliance:	Plan approval; Field inspection sign-off

B.1-5 The Project shall incorporate residential air filtration systems with filters meeting or exceeding the ASHRAE 52.2 Minimum Efficiency Reporting Value (MERV) of 13, to the satisfaction of the Department of Building and Safety. The CC&Rs recorded for the residential units on the Project Site shall incorporate this measure. High efficiency filters shall be installed and maintained for the life of the Project.

Monitoring Phase:	Pre Construction (Design Phase); Construction; Occupancy
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

Actions Indicating Compliance: Plan approval; Field inspection sign-off; Annual compliance report submitted by building management

B.1-6 Heating Ventilation and Air Conditioning (HVAC) air intakes shall be located either on the roof of structures or within areas of the Project Site that are distant from the 101 Freeway to the extent that such placement is compatible with final site design.

Monitoring Phase: Pre Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval; Field inspection sign-off;

B.1-7 For portions of new structures that contain sensitive receptors and are located within 500-feet of the 101 Freeway, the project design shall limit the use of operable windows and/or the orientation of outdoor balconies.

Monitoring Phase: Pre Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval; Field inspection sign-off;

B.1-8 The Project shall provide electric outlets on residential balconies and common areas for electric barbeques to the extent that such uses are permitted on balconies and common areas per the Covenants, Conditions and Restrictions recorded for the property.

Monitoring Phase: Pre Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval; Field inspection sign-off;

B.1-9 The Project shall use electric lawn mowers and leaf blowers, electric or alternatively fueled sweepers with HEPA filters, and use water-based or low VOC cleaning products for maintenance of the building.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

Action Indicating Compliance: Annual compliance report submitted by building management

Section IV.B.2 Greenhouse Gas Emissions

Mitigation Measure B.1-3, identified in Section IV.B.1, Air Quality, outlining requirements of the LA Green Building Code, is applicable to GHG emission reductions.

Section IV.C Cultural Resources

C-1 The Project Applicant shall prepare a plan to ensure the protection and preservation of any portions of the Hollywood Walk of Fame that are threatened with damage during construction. This plan shall conform to the performance standards contained in the Hollywood Walk of Fame Terrazzo Pavement, Installation and Repair Guidelines as adopted by the City in March of 2011, and be approved to the satisfaction of the Department of City Planning Office of Historic Resources prior to any construction activities.

Monitoring Phase:	Pre-Construction; Construction
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of City Planning, Office of Historic Resources
Actions Indicating Compliance:	Approval of Hollywood Walk of Fame plan; Field inspection sign-off

C-2 The Project Applicant shall prepare an adjacent structure monitoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation, and general construction procedures to mitigate the possibility of settlement due to the removal of adjacent soil. Particular attention shall be paid to maintaining the Capitol Records Building underground recording studios and their special acoustic properties. The adjacent structure monitoring plan shall be approved to the satisfaction of the Department of City Planning, Office of Historic Resources and Department of Building and Safety prior to any construction activities.

The performance standards of the adjacent structure monitoring plan shall include the following: All new construction work shall be performed so as not to adversely impact or cause loss of support to neighboring/bordering structures. Preconstruction conditions documentation shall be performed to document conditions of the neighboring/bordering buildings, including the historic structures that are on or adjacent to the Project Site, prior to initiating construction activities. As a minimum, the documentation shall consist of video and photographic documentation of accessible and visible areas on the exterior and select interior façades of the buildings immediately bordering the Project Site. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure monitoring program that shall include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack

monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program shall include vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent structures.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of City Planning; Department of Building and Safety
Monitoring Agency: Department of City Planning, Office of Historic Resources
Actions Indicating Compliance: Approval of adjacent structure monitoring plan; Field inspection sign-off

C-3 There are currently no plans to renovate the Capitol Records Building as part of the Project. However in the event any structural improvements are made to the Capitol Records Building during the life of the Project, such improvements shall be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation. Compliance with this measure shall be subject to the satisfaction of the Department of City Planning, Office of Historic Resources prior to any rehabilitation activities associated with the Capitol Records Building.

Monitoring Phase: Construction; Occupancy (any improvements to Capitol Records Building)
Enforcement Agency: Department of City Planning, Office of Historic Resources
Monitoring Agency: Department of City Planning, Office of Historic Resources
Action Indicating Compliance: Plan approval

C-4 There are currently no plans to renovate the Gogerty Building as part of the Project. However, in the event any structural improvements are made to the Gogerty Building during the life of the Project, such improvements shall be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation. Compliance with this measure shall be subject to the satisfaction of the Department of City Planning, Office of Historic Resources prior to any rehabilitation activities associated with the Gogerty Building.

Monitoring Phase: Construction; Occupancy (any improvements to the Gogerty Building)
Enforcement Agency: Department of City Planning, Office of Historic Resources
Monitoring Agency: Department of City Planning, Office of Historic Resources
Action Indicating Compliance: Plan approval

C-5 Prior to construction, the environs of the Project Site (i.e., Project Site and surrounding area) shall be documented with at least twenty-five images in accordance with Historic American Building Survey (HABS) standards. Compliance with this measure shall be demonstrated through a written documentation to the satisfaction of the Department of City Planning, Office of Historic Resources prior to any construction.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	Department of City Planning, Office of Historic Resources
Monitoring Agency:	Department of City Planning, Office of Historic Resources
Action Indicating Compliance:	Written approval from the Office of Historic Resource

C-6 If any archaeological materials are encountered during the course of Project development, all further development activity shall halt and:

a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Register of Professional Archaeologists (ROPA) or a ROPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;

b. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource;

c. The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report; and

d. Project development activities may resume once copies of the archaeological survey, study or report are submitted to the SCCIC Department of Anthropology. Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.

A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to issuance of a grading permit.

Monitoring Phase:	Pre-Construction; Construction
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Archaeologist field inspection sign-off

C-7 If any paleontological materials are encountered during the course of Project development, all further development activities shall halt and:

a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;

b. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource;

c. The Project Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report; and

d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum. Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to issuance of a grading permit.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Paleontologist field inspection sign-off

C-8 If human remains are discovered at the Project Site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety; Los Angeles County Coroner
Action Indicating Compliance: Public Works Department or

Native American Heritage Commission sign-off

Section IV.D Geology and Soils

D-1 The design and construction of the Project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.

Monitoring Phase:	Pre-Construction (Design Phase); Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Actions Indicating Compliance:	Plan approval; Field inspection sign-off

D-2 Prior to the issuance of building or grading permits, the Project Applicant shall submit a final geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The final geotechnical report shall ensure adequate geotechnical support for the proposed structures given the existing geologic conditions on the Project Site. The final geotechnical report shall make final design-level recommendations regarding liquefaction, expansive soils, soil strength loss, estimation of settlement, lateral movement and reduction in foundation soil-bearing capacity, as well as carry forward the applicable recommendations contained in the preliminary geotechnical report. The final geotechnical report shall include additional borings, test pits, groundwater monitoring wells, subsurface shear wave velocity testing, and laboratory testing that shall ensure adequate geotechnical support for the Project's proposed structures and inform compliance with all applicable building codes.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Actions Indicating Compliance:	Plan approval; Written satisfaction of Department of Building and Safety

D-3 Towers and other very heavily loaded structures shall be supported by a mat foundation, CIDH pile foundation, an ACIP pile, or a combination of a mat and pile foundation system. Drilled pile bearings within the Old Alluvium shall range from approximately 24 to 36 inches in diameter and shall be designed for loads between approximately 300 to 1,000 kips per pile or higher. Preliminary shallow foundation net bearing capacities in the Old Alluvium shall range from about 6,000 to 10,000 psf.

Monitoring Phase: Pre-Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval; Field inspection sign-off

D-4 Lighter low-rise structures shall be supported on individual spread footings bearing in the Young Alluvium designed for bearing pressures from about 2,000 to 4,000 psf.

Monitoring Phase: Pre-Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval; Field inspection sign-off

D-5 Floor slabs shallower than el 347 on the West Site shall be designed as slab-on-grade. Subject to final design-level geotechnical considerations, a pressure slab and waterproofing shall be required for the East Site.

Monitoring Phase: Pre-Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval; Field inspection sign-off

D-6 Laterally-braced below-grade walls shall be designed for at-rest earth pressures. Below-grade walls free to rotate at the top shall be designed for active soil pressures. Seismic earth pressure and surcharge pressures shall be accounted for in the below-grade wall design. Hydrostatic pressures shall be accounted for in the design for walls below el 347. Subject to final design-level geotechnical considerations, an equivalent fluid pressure of 60 pcf shall be assumed for non-yielding below grade walls.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Plan approval

D-7 A wall drainage system shall be installed behind below-grade walls to minimize the potential accumulation of hydrostatic pressure behind the walls. Waterproofing shall be required for walls below about el 347.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Plan approval

D-8 Temporary excavation support, likely soldier beams, and lagging with tiebacks shall be required to facilitate the proposed deep below-grade excavation.

Monitoring Phase:	Pre-Construction (Design Phase); Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Actions Indicating Compliance:	Plan approval; Field inspection sign-off

D-9 Underpinning of the buildings bordering the East Site and West Site shall be required depending on final new building below-grade footprint limits and proximity to these structures.

Monitoring Phase:	Pre-Construction (Design Phase); Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Actions Indicating Compliance:	Plan approval; Field inspection sign-off

D-10 Pre-construction conditions documentation shall be performed to document conditions of the neighboring/bordering buildings, including the historic structures that are on or adjacent to the Project Site, prior to construction activities. An adjacent structure monitoring program shall be developed for implementation and monitoring during construction.

The performance standards of the adjacent structure monitoring plan shall include the following: All new construction work shall be performed so as not to adversely impact or cause loss of support to neighboring/bordering structures. Pre-construction conditions documentation shall be performed to document conditions of the neighboring/bordering buildings, including the historic structures that are on or adjacent to the Project Site, prior to initiating construction activities.

As a minimum, the documentation shall consist of video and photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings

immediately bordering the Project Site. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure monitoring program that shall include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program shall include vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent structures.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Approval of adjacent structure monitoring plan; Field inspection sign-off

Section IV.E Hazards and Hazardous Materials

E-1 Before subsurface excavation, the Project Applicant shall conduct a Phase II Subsurface Investigation, in areas identified as being previously used for automobile fueling operations, to determine the extent to which soil or groundwater contamination, if any, beneath the Property has been impacted by historical activities. Any soil contamination and underground storage tanks associated with such historical usage shall be abated in accordance with all applicable City, state, and federal regulations.

Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Submittal of Phase II Subsurface Investigation; Documentation of abatement of any soil contamination and USTs

E-2 Prior to demolition of any existing on-site structures, all asbestos-containing materials identified on the properties shall be abated in accordance with all applicable City, state, and federal regulations.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Plan approval and issuance of demolition permit

E-3 Prior to the issuance of a demolition permit for any existing on-site structure, all lead-based paint identified on the properties shall be abated in accordance with all applicable City, state, and federal regulations.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Plan approval and issuance of demolition permit

E-4 Before subsurface excavation, the Project Applicant shall conduct a subsurface investigation of the suspected subsurface steel structure (located on the 1720 North Vine Street parcel) noted during the geophysical survey to ensure proper removal or treatment of the structure during development activities. Any removal or treatments implemented shall be in accordance with all applicable City, state, and federal regulations.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Submittal of subsurface investigation; Field inspection sign-off

E-5 Before subsurface excavation, the Project Applicant shall conduct a subsurface investigation of the suspected USTs (located on the 1749 North Vine Street parcel) to ensure proper removal or treatment of the structures during development activities. Any removal or treatments implemented shall be in accordance with all applicable City, state, and federal regulations.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Submittal of subsurface investigation; Field inspection sign-off

Section IV.F Hydrology and Water Quality

F-1 Excavation and grading activities shall be scheduled during dry weather periods, to the extent feasible. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the Project Site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Field inspection sign-off

F-2 Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Los Angeles Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicated Compliance: Field inspection sign-off

F-3 Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Field inspection sign-off

F-4 All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Quarterly compliance report submitted by contractor

F-5 Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicated Compliance: Quarterly compliance report submitted by contractor

F-6 Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Quarterly compliance report submitted by contractor

F-7 Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Field inspection sign-off

F-8 The Project Applicant shall implement storm water best management practices (BMPs) to treat and infiltrate the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook, Part B, Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be required.

Monitoring Phase: Pre-Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval;
Submittal of certificate; Field inspection sign-off

F-9 Post-development peak storm water runoff discharge rates shall not exceed the estimated pre-development rate.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Plan approval

F-10 The amount of impervious surface shall be reduced to the extent feasible by using permeable pavement materials where appropriate, including: pervious concrete/asphalt, unit pavers (e.g., turf block), and granular materials (e.g., crushed aggregates, cobbles, etc.).

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Plan approval

F-11 A roof runoff system shall be installed, as feasible, where the site is suitable for installation.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of Public Works
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Plan approval

F-12 All storm drain inlets and catch basins within the Project area shall be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Public Works
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Field inspection sign-off

F-13 Legibility of stencils and signs shall be maintained.

Monitoring Phase:	Occupancy
Enforcement Agency:	Department of Public Works
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Field inspection sign-off

F-14 Materials with the potential to contaminate storm water shall be placed in an enclosure, such as a cabinet or shed or similar structure that prevents contact with or spillage to the storm water conveyance system.

Monitoring Phase:	Construction; Occupancy
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Field inspection sign-off

F-15 Storage areas shall be paved and sufficiently impervious to contain leaks and spills.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Plan approval

F-16 An efficient irrigation system shall be designed and implemented by a certified landscape contractor to minimize runoff including: drip irrigation for shrubs to limit excessive spray; a SWAT-tested weather-based irrigation controller with rain shutoff; matched precipitation (flow) rates for sprinkler heads; rotating sprinkler nozzles; minimum irrigation system distribution uniformity of 75 percent; and flow reducers.

Monitoring Phase:	Pre-Construction (Design Phase); Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Actions Indicating Compliance:	Plan approval; Field inspection sign-off

F-17 The Owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the

Owner(s) to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.

Monitoring Phase: Occupancy
Enforcement Agency: Department of City Planning; Department of Building and Safety
Monitoring Agency: Department of City Planning
Actions Indicating Compliance: Approval of Form CP-6770; Field inspections sign-off

F-18 Toxic wastes shall be discarded at a licensed regulated disposal site.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Quarterly compliance report submitted by contractor

F-19 The Project Applicant shall comply with all mandatory storm water permit requirements (including, but not limited to SWPPP and SUSMP requirements) at the Federal, State and local level.

Monitoring Phase: Pre-Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval;
Quarterly compliance report submitted by contractor

Section IV.G Land Use Planning

No mitigation measures are required.

Section IV.H Noise

H-1 The Project shall comply with the City of Los Angeles Noise Ordinance No. 144331 and 161574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;

Quarterly compliance report submitted by contractor

H-2 Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday or national holidays. No construction activities shall occur on any Sunday.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

H-3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from all adjacent land uses. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be operated efficiently to minimize noise impacts to the maximum extent feasible.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

H-4 Construction activities shall be scheduled so as to avoid as feasible operating several pieces of equipment simultaneously, which causes high noise levels.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

H-5 Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

H-6 The Project contractor shall use power construction equipment with noise shielding and muffling devices in accordance with the manufacture's recommendations.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

H-7 Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the adjacent land uses and surrounding noise-sensitive receptors to the maximum extent feasible during construction.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

H-8 All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

H-9 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Actions Indicating Compliance:	Field inspection sign-off; Quarterly compliance report submitted by contractor

H-10 Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding properties that discloses the construction schedule, including the various types of activities and equipment that shall be occurring throughout the duration of the construction period.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Documentation of notification provided

H-11 All new construction work shall be performed so as not to adversely impact or cause loss of support to on-site and neighboring/bordering structures. Pre-construction conditions documentation shall be performed to document conditions of the on-site and neighboring/bordering buildings, including the Pantages Theater, the Avalon Theater, the Art Deco Storefronts on Yucca Street, the AMDA building at 1777 Vine Street, and the Capitol Records Complex, prior to construction activities. The structure monitoring program shall be developed for implementation and monitoring during construction.

The performance standards of the adjacent structure monitoring plan shall include the following. All new construction work shall be performed so as not to adversely impact or cause loss of support to neighboring/bordering structures. Pre-construction conditions documentation shall be performed to document conditions of the neighboring/bordering buildings, including the historic structures that are on or adjacent to the Project Site, prior to initiating construction activities. As a minimum, the documentation shall consist of video and photographic documentation of

accessible and visible areas on the exterior and select interior façades of the buildings immediately bordering the Project Site. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure monitoring program that shall include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program shall include vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent structures.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Approval of adjacent structure monitoring plan; Field inspection sign-off

H-12 Driven soldier piles shall be prohibited during construction. Augered piled are permitted.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off; Quarterly compliance report submitted by contractor

H-13 All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off; Quarterly compliance report submitted by contractor

H-14 All mitigation measures restricting construction activity shall be posted at the Project Site and all construction personnel shall be instructed as to the nature of the noise and vibration mitigation measures.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off; Quarterly compliance report submitted by contractor

H-15 Rubber tired equipment shall be utilized when applicable, such as a combination loader/excavator for light-duty construction operations. Tracked excavator and tracked bulldozers shall be utilized during mass excavation as necessary to facilitate timely completion of the excavation phase of development.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Field inspection sign-off; Quarterly compliance report submitted by contractor

H-16 All plans and specifications and construction means and methods shall be provided to EMI/Capitol Records for review concurrently with their submission to the City of Los Angeles Department of Building & Safety.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Confirmation of submittal to EMI/Capitol Records and Department of Building and Safety

H-17 In the event that excavation and development design encounters the foundation or structural walls of the Capitol Records Building echo chamber, a not less than two-inch thick closed cell neoprene foam liner shall be applied to exposed excavation at the West Site adjacent to the EMI/Capitol Records echo chamber provided that: (1) the liner is approved for this use by the City of Los Angeles Department of Building & Safety (if not so approved, then an equivalent product approved for this use by the City of Los Angeles Department of Building and Safety shall be applied) and (2) a Miradrain system (or equivalent product) for drainage and waterproofing shall be installed per manufacturer recommendations. A 10 to 12 inch thick cast-in-place or shotcrete wall shall then be built to attenuate operational noise created by the Project.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Field inspection sign-off

H-18 All new mechanical equipment associated with the Project shall comply with Section 112.02 of the City of Los Angeles Municipal Code, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

Monitoring Phase: Pre-Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Actions Indicating Compliance: Plan approval; Field inspection sign-off

H-19 Consistent with Section 99.05.507.4.1 of the LAMC (LA Green Building Code), Exterior Noise Transmission, the proposed building envelope shall have an STC of at least 50, and exterior windows shall have a minimum STC of 30. Furthermore, the Project shall comply with Title 24 Noise Insulation Standards, which specifies the maximum allowable sound transmission between dwelling units in new multi-family buildings, and limits allowable interior noise levels in new multi-family residential units to 45 dBA CNEL.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Action Indicating Compliance: Plan approval

Section IV.I Population, Housing, and Employment

No mitigation measures are required.

Section IV.J.1 Public Services – Fire Protection

J.1-1 During demolition and construction, LAFD access from major roadways shall remain clear and unobstructed.

Monitoring Phase: Construction
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of Building and Safety; Los Angeles Fire Department
Action Indicating Compliance: Field inspection sign-off

J.1-2 The Project Applicant shall submit a plot plan to the LAFD prior to occupancy of the Project, for review and approval, which shall provide the capacity of the fire mains serving the Project Site. Any required upgrades shall be identified and implemented prior to occupancy of the Project.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of Building and Safety; Los Angeles Fire Department
Action Indicating Compliance: Approval of plan by LAFD

J.1-3 The design of the Project Site shall provide adequate access for LAFD equipment and personnel to the structure.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of Building and Safety; Los Angeles Fire Department
Action Indicating Compliance: Plan approval

J.1-4 No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel, except for dwelling units, where travel distances shall be computed to the front door of the unit.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of Building and Safety; Los Angeles Fire Department
Action Indicating Compliance: Plan approval

J.1-5 During the plan check process, the Project Applicant shall submit plot plans for LAFD approval of access and fire hydrants.

Monitoring Phase: Pre-Construction (Design)
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of Building and Safety; Los Angeles Fire Department

Action Indicating Compliance: Approval of plot plans by LAFD

J.1-6 The Project shall provide adequate off-site public and on-site private fire hydrants in its final designs.

Monitoring Phase: Pre-Construction (Design)
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of Building and Safety; Los Angeles Fire Department
Action Indicating Compliance: Plan approval

J.1-7 Project Applicant shall submit an emergency response plan to LAFD prior to occupancy of the Project for review and approval. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Any required modifications shall be identified and implemented prior to occupancy of the Project.

Monitoring Phase: Pre-Occupancy
Enforcement Agency: Los Angeles Fire Department
Monitoring Agency: Department of Building and Safety; Los Angeles Fire Department
Action Indicating Compliance: Approval of Emergency Response Plan by LAFD

Section IV.J.2 Public Services – Police

J.2-1 The contractor shall provide temporary, minimum 6-foot-high, commercial-grade, chain-link construction fences to protect construction zones on both the East and West Sites. The perimeter fence shall have gates installed to facilitate the ingress and egress of equipment and the work force. The bottom of the fence shall have filter fabric to prevent silt run off where necessary. Straw hay bales shall be utilized around catch basins when located within the construction zone. The perimeter and silt fence shall be maintained while in place. Where applicable, the construction fence shall be incorporated with a pedestrian walkway. Temporary lighting shall be installed and maintained at the pedestrian walkway. Should sections of the site fence have to be removed to facilitate work in progress, barriers and or K – rail shall be utilized to isolate and protect the public from unsafe conditions.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department
Actions Indicating Compliance: Field inspection sign-off;

Quarterly compliance report submitted by contractor

J.2-2 The Project shall provide for the deployment of a private security guard to monitor and patrol the Site on an as-needed basis appropriate to the phase of construction throughout the construction period.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

J.2-3 Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the LAPD.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department
Actions Indicating Compliance: Field inspection sign-off;
LAPD approval of marked access points;
Quarterly compliance report submitted by contractor

J.2-4 If there are partial closures to streets surrounding the Project Site, flagmen shall be used to facilitate the traffic flow until such temporary street closures are complete.

Monitoring Phase: Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Action Indicating Compliance: Field inspection sign-off

J.2-5 The Project shall incorporate landscaping designs that shall allow high visibility around the buildings, and shall consult with the LAPD with respect to its landscaping plan.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department

Action Indicating Compliance: Plan approval

J.2-6 The Project shall provide security lighting around buildings and parking areas in order to improve security, and shall consult with the LAPD as to its lighting plan.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department
Action Indicating Compliance: Plan approval

J.2-7 The Project Site's public and private recreational facilities shall be designed to ensure a high visibility of these areas, including the provision of adequate lighting for security.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department
Action Indicating Compliance: Plan approval

J.2-8 The Project Applicant shall provide the LAPD with the opportunity to review Project plans at the plan check stage of plan approval and shall incorporate any reasonable LAPD recommendations.

Monitoring Phase: Pre-Construction (Design Phase)
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department
Action Indicating Compliance: Plan approval

J.2-9 The Project Applicant shall provide the LAPD with a diagram of each portion of the Project Site, showing access routes and additional access information as requested by the LAPD, to facilitate police response.

Monitoring Phase: Pre-Construction (Design Phase); Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Los Angeles Police Department
Action Indicating Compliance: Plan approval

Section IV.J.3 Public Services – Schools

J.3-1 The Project Applicant shall pay all applicable school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Los Angeles Unified School District
Action Indicating Compliance:	Issuance of building permit

Section IV.J.4 Public Services – Parks and Recreation

J.4-1 The Project shall provide a minimum of 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms pursuant to the requirements of LAMC Section 12.21(G). A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs, or trees and at least one 36 inch box tree is required for every four dwelling units.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of City Planning
Action Indicating Compliance:	Plan approval

J.4-2 The Project shall pay all applicable fees associated with the Dwelling Unit Construction Tax set forth in LAMC Section 21.10.3(a)(1). The applicable dwelling unit tax shall be paid to the Department of Building and Safety and placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety
Action Indicating Compliance:	Issuance of building permit

J.4-3 Pursuant to Section 17.12 of the Los Angeles Municipal Code, the Project Applicant shall pay all applicable Quimby fees to the City of Los Angeles for the construction of condominium dwelling units, prior to approval and recordation of the final map.

Monitoring Phase:	Pre-Construction (Design Phase)
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of City Planning
Action Indicating Compliance:	Approval and recordation of final map

Section IV.J.5 Public Services – Libraries

J.5-1 The Project Applicant shall pay a mitigation fee of $200 per capita, based on the projected resident population of the proposed development, to the Los Angeles Public Library to offset the potential impact of additional library facility demand in the Project Area.

Monitoring Phase:	Pre-Occupancy
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Los Angeles Public Library; Department of City Planning
Action Indicating Compliance:	Issuance of certificate of occupancy

Section IV.K.1 Transportation – Traffic

K.1-1 To mitigate potential temporary traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Project Applicant shall, prior to construction, develop a Construction Management Plan/Worksite Traffic Control Plan (WTCP) to be approved by LADOT. The WTCP shall be designed to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation on the public streets in the area of the Project. The WTCP shall include temporary roadway striping and signage for traffic flow as necessary, elements compliant with conditions xv through xvii in Measure K.1-3, and the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project. The Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Any construction related hauling traffic shall be restricted to off-peak hours.

Monitoring Phase:	Pre-Construction; Construction
Enforcement Agency:	Department of Transportation
Monitoring Agency:	Department of Transportation
Action Indicating Compliance:	Approval of WTCP

K.1-2 In order to minimize peak period construction trips, construction related traffic shall be restricted to off-peak hours. The following language is to be incorporated into the WTCP**:**

i On weekdays, work shifts shall not begin between 7:01 AM and 9:29 AM.

ii Work shifts shall not end between 3:31 PM and prior to 6:29 PM.

The WTCP shall also include Mitigation Measure K.1-3, Condition ii, time restrictions for hauling.

Monitoring Phase:	Pre-Construction; Construction
Enforcement Agency:	Department of Transportation
Monitoring Agency:	Department of Transportation
Actions Indicating Compliance:	Approval of WTCP; Quarterly compliance report submitted by contractor

K.1-3 Prior to the issuance of a grading permit, the Project Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Project Applicant to the following haul route conditions:

i All Project construction haul truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.

ii Except under a permitted exception, all hauling (both delivery and export) shall be during the hours of 9:00 AM to 4:00 PM or 6:30 PM to 9:00 PM. Any exceptions to the above time limits shall be permitted by the Department of Building and Safety in consultation with the Department of Transportation. Exceptions to the haul activity time limits are to be permitted only when necessary, such as for the continuation of concrete pours that can not reasonably be completed otherwise.

iii Permitted Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.

iv Project haul trucks shall be restricted to 18-wheel trucks or smaller.

v The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).

vi Streets shall be cleaned of spilled materials at the termination of each work day.

vii The final approved haul routes and all the conditions of approval shall be available on the job site at all times.

viii The Contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

ix Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.

x All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

xi All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.

xii All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.

xiii The Project Applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.

xiv All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.

xv "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.

xvi One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."

xvii The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.

xviii Any desire to change the prescribed routes shall be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at 213.485.3711 before the change takes place.

xix The permittee shall notify the Street Use Inspection Division, 213.485.3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.

xx A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond shall be issued by the Central District

Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling 213.977.6039

Monitoring Phase:	Pre-Construction; Construction
Enforcement Agency:	Department of Transportation
Monitoring Agency:	Department of Transportation; Department of Building and Safety; Los Angeles Police Department
Actions Indicating Compliance:	Plan approval; Issuance of grading permit; Field inspection sign-off; Quarterly compliance report submitted by contractor

K.1-4 The Project Applicant shall contact the Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines.

Monitoring Phase:	Construction
Enforcement Agency:	Department of Transportation
Monitoring Agency:	Metro; Department of Transportation
Action Indicating Compliance:	Quarterly compliance report submitted by contractor

K.1-5 Transportation Demand Management (TDM) – The Project is a mixed-use development, located within a quarter mile radius of the Hollywood/Vine Metro Red Line Transit Station and allows immediate access to the Metro Red Line rail system. Additionally, a number of Metro and LADOT bus routes are less than one-quarter mile (considered to be within reasonable walking distance) from the Project Site, providing access for Project employees, visitors, residents and guests. The Project Site is surrounded by numerous supporting and complementary uses, such as additional housing for employees and additional shopping for residents within walking distance. The Project shall take advantage of these opportunities through a pedestrian/bicycle friendly design and implementation of a TDM program. A preliminary TDM program shall be prepared and provided for LADOT review prior to the issuance of the first building permit for the Project and a final TDM program approved by LADOT is required prior to the issuance of the first certificate of occupancy for the Project. The TDM Program applies to the new land uses to be developed as part of the final development program for the Project. To the extent a TDM Program element is specific to a use, such element shall be implemented at such time that new land use is constructed. Both the pedestrian/bicycle friendly design and TDM program shall be acceptable to the Departments of Planning and Transportation. The TDM program shall include, but not be limited to, the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;

- A bicycle, transit, and pedestrian friendly environment;
- Administrative support for the formation of carpools/vanpools;
- Inclusion of business services to facilitate work-at-home arrangements for the proposed residential uses, if constructed;
- Flexible/alternative work schedules and telecommuting programs;
- Provide car share amenities (including a minimum of 5 parking spaces for shared car program);
- Parking provided as an option only for all leases and sales;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Provision of a self-service bicycle repair area and shared tools for residents and employees;
- Distribution of information to all residents and employees of the onsite pedestrian, bicycle and transit rider services, including shared car and shared bicycle services;
- Coordinate with LADOT to provide space for a future Integrated Mobility Hub;
- Guaranteed ride home program potentially via the shared car program;
- Transit routing and schedule information;
- Transit pass sales;
- Rideshare matching services;
- Bike and walk to work promotions;
- Visibility of the alternative commute options through a location on the central court of the Project Site;
- Preferential rideshare loading/unloading or parking location;
- Financial contribution to the City's Bicycle Plan Trust Fund that is currently being established (CF 10-2385-S5).

In addition to these TDM measures, LADOT also recommends that the Project Applicant explore the implementation of an on-demand van, shuttle or tram service that connects the Project to off-

site transit stops based on the transportation needs of the Project's employees, residents and visitors. Such a service shall be included as an additional measure in the TDM program if it is deemed feasible and effective by the Project Applicant.

Monitoring Phase: Pre-Construction; Construction; Pre-Occupancy; Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Actions Indicating Compliance: TDM program approval; Issuance of building permit; Issuance of certificate of occupancy; Quarterly compliance report submitted by contractor; Annual compliance report submitted by building management

K.1-6 Hollywood Community Transportation Management Organization (TMO) – The Project shall join or help create a TMO serving the Hollywood Area by providing a meeting area and initial staffing for one year (free of charge). The Project owner shall participate in the TMO as a member. The TMO shall offer services to member organizations, which include:

- Matching services for multi-employer carpools,
- Multi-employer vanpools (to serve areas that are identified as under served by transit, but contain the residences of the Hollywood area employees),
- Help coordinating the Bicycle Share and Car Share programs,
- Promotion and implementation of pedestrian, bicycle and transit stop enhancements (such as transit/bicycle lanes), and
- Other efforts to encourage and increase the use of alternative transportation modes in the Hollywood area.

Monitoring Phase: Pre-Construction; Construction; Pre-Occupancy; Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Actions Indicating Compliance: Plan approval; Quarterly compliance report submitted by contractor; Annual compliance report submitted by building management

K.1-7 Integrated Mobility Hubs – To support the goals of the Project's TDM plan and to expand the City's program, the Project Applicant shall coordinate with LADOT to provide space for a Mobility Hub in a convenient location within or near the Project Site. The Project Applicant has offered to provide on-site parking spaces for shared cars that could be a project-specific amenity or be linked with the larger Mobility Hubs program. The Project Applicant shall also provide space that shall accommodate bicycle parking, bicycle lockers, and shared bicycles. LADOT is currently working on an operating plan and assessment study for the Mobility Hubs project that shall include specific sites, designs, and blueprints for Mobility Hub stations. The results of this study shall assist in determining the appropriate location and space needed to accommodate a Mobility Hub at the Project Site.

Monitoring Phase: Pre-Construction; Construction; Pre-Occupancy, Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Actions Indicating Compliance: Plan approval;
Quarterly compliance report submitted by contractor;
Annual compliance report submitted by building management

K.1-8 Transit Enhancements –The Project shall provide a pedestrian friendly environment through sidewalk pavement reconstruction/improvements, and improved amenities such as landscaping and shading particularly along the sidewalks on Ivar Avenue and Argyle Avenue linking the project to the Hollywood/Vine Metro Red Line Station. Enhancements shall include reconstructing damaged or missing pavement in the sidewalks along Ivar Avenue and Argyle Avenue between the Project Site and the Hollywood/Vine Metro Red Line Transit Station, and installing up to four transit shelters with benches at stops within a block of the Project Site, as deemed appropriate by LADOT. The LADOT designation of locations shall be made in consultation with Los Angeles County Metropolitan Transportation Authority (Metro).

Monitoring Phase: Pre-Construction; Construction; Pre-Occupancy; Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: LA County Transportation Authority; Department of Transportation
Actions Indicating Compliance: Plan approval;
Quarterly compliance report submitted by contractor;
Annual compliance report submitted by building management

K.1-9 Bike Plan Trust Fund – The Project Applicant shall contribute a one-time fixed-fee of $250,000 to be deposited into the City's Bicycle Plan Trust Fund that is currently being established (CF 10-2385-S5). These funds shall be used by LADOT, in coordination with the Department of City

Planning and Council District 13, to implement bicycle improvements within the Hollywood area. However, improvements within Hollywood that are consistent with the City's complete streets and smart growth policies shall also be eligible expenses utilizing these funds. Any measures implemented by using the fund shall be consistent with the General Plan Transportation Element. Items beyond signing and striping, such as curb realignment and signal system modifications, may be included in the funded projects, to the degree necessary for safe and efficient operation. Should shuttle riders on the DASH system warrant an increase in capacity, the Project funding may instead be used for the purchase of a shuttle vehicle for the DASH system.

Monitoring Phase: Pre-Construction; Construction; Pre-Occupancy; Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Actions Indicating Compliance: Plan approval;
Quarterly compliance report submitted by contractor;
Annual compliance report submitted by building management

K.1-10 Traffic Signal System Upgrades – The Project Applicant shall be required to implement the traffic signal upgrades identified in Attachment 3 to the LADOT's Correspondence to the Department of City Planning, dated August 16, 2012 (See Appendix K.2 to this Draft EIR). Should the project be approved, then a final determination on how to implement these traffic signal upgrades shall be made by LADOT prior to the issuance of the first building permit. These signal upgrades shall be implemented either by the Project Applicant through the B-permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then the Project Applicant shall be required to pay LADOT the estimated cost to implement the upgrades, and LADOT shall design and construct the upgrades. If the upgrades are implemented by the Project Applicant through the B-Permit process, then these traffic signal improvements shall be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy.

Monitoring Phase: Pre-Construction; Construction; Pre-Occupancy; Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: Bureau of Engineering; Department of Transportation
Actions Indicating Compliance: Issuance of building permit;
Quarterly compliance report submitted by contractor;
Issuance of certificate of occupancy;
Annual compliance report submitted by building management

K.1-11 Intersection Specific Improvements – Argyle Avenue/Franklin Avenue – US 101 Freeway Northbound On-Ramp – To mitigate the significant traffic impact at this intersection under both existing (2011) and future (2020) conditions, the Project Applicant shall restripe this intersection to provide a left-turn lane, two through lanes, and a right-turn lane for the southbound approach and two left-turn lanes and a shared through/right lane for the northbound approach. The final design of this improvement shall require the joint approval of Caltrans and LADOT.

Monitoring Phase:	Pre-Construction; Construction; Pre-Occupancy
Enforcement Agency:	Caltrans**;** Department of Transportation
Monitoring Agency:	Caltrans; Department of Transportation
Actions Indicating Compliance:	Approval of design by Caltrans and LADOT; Implementation of improvement

K.1-12 Highway Dedication and Street Widening Requirements – The City Council recently adopted the updated Hollywood Community Plan. The new plan includes revised street standards that provide an enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Vine Street has been designated as a Modified Major Highway Class II requiring a 35-foot half-width roadway within a 50-foot half-width right-of-way. Yucca Street between Ivar Avenue and Vine Street is classified as a Secondary Highway, which requires a 35-foot half-width roadway within a 45-foot half-width right-of-way. Yucca Street between Vine Street and Argyle Avenue is classified as a Local Street. Ivar Avenue and Argyle Avenue are also classified as Local Streets. A Local Street requires a 20-foot half width roadway within a 30-foot half-width right-of-way. The Project Applicant shall check with BOE's Land Development Group to determine if there are any highway dedication, street widening and/or sidewalk requirements for this project.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	Department of Transportation
Monitoring Agency:	Bureau of Engineering; Department of Transportation
Action Indicating Compliance:	Confirmation with Bureau of Engineering

K.1-13 Implementation of Improvements and Mitigation Measures. The Project Applicant shall be responsible for the cost and implementation of any necessary traffic signal equipment modifications and bus stop relocations associated with the proposed transportation improvements described above. Unless otherwise noted, all transportation improvements and associated traffic signal work within the City of Los Angeles shall be guaranteed through the B-Permit process of the Bureau of Engineering, prior to the issuance of any building permits and completed prior to

the issuance of any certificates of occupancy. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the Project Applicant, provided that, in each case, the Project Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact LADOT's B-Permit Coordinator, at (213) 928-9663, to arrange a pre-design meeting to finalize the proposed design needed for the project.

Monitoring Phase: Pre-Construction; Construction; Pre-Occupancy; Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: Bureau of Engineering; Department of Transportation
Actions Indicating Compliance: Issuance of building permit; Quarterly compliance report submitted by contractor; Issuance of certificate of occupancy

K.1-14 East Site Residential Unit and Reserved Residential Parking Cap. On the East Site, residential development shall be limited to 450 residential units and 675 reserved residential parking spaces.

Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Bureau of Engineering; Department of Transportation
Action Indicating Compliance: Issuance of building permit

Section IV.K.2 Transportation – Parking

K.2-1 No sidewalk in the pedestrian route along a public right-of-way shall be closed for construction unless an alternative pedestrian route is provided that is no more than 500 feet greater in length than the closed route.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Actions Indicating Compliance: Plan Approval; Quarterly compliance report submitted by contractor

K.2-2 Construction Related Parking. Off-street parking shall be provided for all construction-related employees generated by the Project. No employees or subcontractors shall be allowed to park on surrounding residential streets for the duration of all construction activities. There shall be no staging or parking of heavy construction vehicles on the surrounding street for the duration of all construction activities. There shall be no staging or parking of construction vehicles, including

vehicles that transport workers, on any residential street in the immediate area. All construction vehicles shall be stored on-site unless returned to the base of operations.

Monitoring Phase: Pre-Construction; Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Actions Indicating Compliance: Plan Approval;
Quarterly compliance report submitted by contractor

Section IV.L.1 Utilities and Service Systems – Water

L.1-1 In the event of temporary partial public street closures, the Project Applicant shall employ flagmen during the construction of water line work, to facilitate the flow of traffic.

Monitoring Phase: Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation
Action Indicating Compliance: Field inspection sign-off

Section IV.L.2 Utilities and Service Systems – Wastewater

No mitigation measures are required.

Section IV.L.3 Utilities and Service Systems – Solid Waste

L.3-1 All waste shall be disposed of properly and in accordance with the City's Bureau of Sanitation standards. Appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation shall be used. The bulk recyclable material such as broken asphalt and concrete, brick, metal and wood shall be hauled by truck to an appropriate facility. Non-recyclable materials/wastes shall be hauled by truck to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works**;** Bureau of Sanitation
Monitoring Agency: Department of Public Works**;** Bureau of Sanitation
Actions Indicating Compliance: Field inspection sign-off;
Quarterly compliance report submitted by contractor

L.3-2 Recycling bins shall be provided at all trash locations, to promote recycling of paper, metal, glass, and other recyclable materials during operation of the Project. These bins shall be emptied and recycled accordingly and consistent with AB 939 as a part of the Project's regular solid waste disposal program.

Monitoring Phase:	Occupancy
Enforcement Agency:	Department of Public Works**;** Bureau of Sanitation
Monitoring Agency:	Department of Public Works**;** Bureau of Sanitation
Action Indicating Compliance:	Annual compliance report submitted by building management

Section IV.L.4 Utilities and Service Systems – Energy Conservation

No mitigation measures are required.

Appendix A

Comment Letters

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

December 11, 2012

Srimal P. Hewawitharana
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: Millennium Hollywood Project
SCH#: 2011041094

Dear Srimal P. Hewawitharana:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 10, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH#	2011041094
Project Title	Millennium Hollywood Project
Lead Agency	Los Angeles, City of

Type	EIR Draft EIR
Description	The proposed development project includes the construction of approximately 1,052,667 net sf of new developed floor area. The historic Capital Records Building and the Gogerty Building are within the Project Site. These historic structures would be preserved and maintained and are operating as office and music recording facilities under long term lease. Including the existing approximately 114,303 sf Capitol Records Complex, the Project would include a maximum of approximately 1,116,970 net sf of floor area resulting in a 6:1 Floor Area Ratio averaged across the Project Site. The Project would also demolish and/or remove the existing approximately 1,800 sf rental car facility.

Lead Agency Contact

Name	Srimal P. Hewawitharana		
Agency	City of Los Angeles		
Phone	(213) 978-1359	**Fax**	
email			
Address	200 N. Spring Street, Room 750		
City	Los Angeles	**State** CA	**Zip** 90012

Project Location

County	Los Angeles				
City	Los Angeles, City of				
Region					
Lat / Long	34° 06' 8.2" N / 118° 19' 36" W				
Cross Streets	Hollywood Boulevard and Vine Street				
Parcel No.	5546-030-028,5546-004-032 & more				
Township	1S	**Range** 14W	**Section** 10	**Base**	SBB&M

Proximity to:

Highways	SR-2, US-101
Airports	
Railways	Metro Red Line Subway
Waterways	
Schools	
Land Use	

Project Issues	Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects
Reviewing Agencies	Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received	10/25/2012	**Start of Review**	10/25/2012	**End of Review**	12/10/2012

STATE OF CALIFORNIA Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

C1500
12/10/12
e

October 29, 2012

Srimal Hewawitharana, Environmental Specialist II
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: SCH#2011041094 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"Millennium Hollywood Project;"** located in Hollywood Community Plan Area; of the City of Los Angeles Los Angeles County California

Dear Srimal Hewawitharana:

The NAHC is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendment s effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously. .

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

December 12, 2012

Srimal P. Hewawitharana
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: Millennium Hollywood Project
SCH#: 2011041094

Dear Srimal P. Hewawitharana:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on December 10, 2012. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project. 2-1

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2011041094) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-9140
FAX: (213) 897-1337

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DEC 12 2012
STATE CLEARING HOUSE

December 10, 2012

Ms. Srimal Hewawitharana
Department of City Planning
City of Los Angeles
200 N. spring Street, Room 750
Los Angeles, CA 90012

check 12/10/12 ltr e

IGR/CEQA No. 121036AL-DEIR
Referenced to IGR/CEQA No. 110501AL-NOP
Millennium Hollywood Project
Vic. LA-101, PM 7.37
SCH #: 2011041094

Dear Ms. Hewawitharana:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would include the construction of approximately 1 million square feet of developed floor area. The historic Capitol Records Building and the Gogerty Building would remain within the project site. The Project would demolish and/or remove the existing rental car facility. The project would develop a mix of land uses including 461 residential dwelling units, 254 luxury hotel rooms, 264,303 square feet of office space, 25,000 square feet of restaurant space, 80,000 square feet of health and fitness club space, and 100,000 square feet of retail space.

Below are Caltrans' major concerns with the Draft Environmental Impact Report (DEIR) for the Millennium Hollywood Project:

1. Caltrans submitted a comment letter dated May 18, 2011, on the Notice of Preparation (NOP) and met with the developer's consultant on September 15, 2011, to discuss Caltrans' concerns about the project's impact on the US-101 freeway and on/off ramps within the 5 miles radius of the project site. The traffic consultant acknowledged Caltrans' concerns and it was understood by both parties that the traffic procedures for analyzing impacts to the state highway system would follow standard statewide procedures outlined in Caltrans Traffic Study Guide. However, the June 2012 Traffic Impact Study (TIS), which is the basis for the traffic impact discussion in the DEIR, did not follow those procedures and does not analyze the impacts to the state highway system.

2. There was no analysis performed for any of the freeway elements. The TIS only used the Los Angeles County Congestion Management Program (CMP) criteria. However, the CMP fails to provide adequate information as to direct and cumulative impacts to the freeway mainline and ramps, per CEQA.

3. Currently, the Level of Service (LOS) for US-101 is operating at LOS F. Any additional trips will worsen the existing freeway condition. The TIS did not include a cumulative traffic analysis for US-101, which would consider the trips generated from the 58 related projects that are referred to in the DEIR, the proposed NBC Universal Project, and growth from the Hollywood Community Plan (Plan). Because the TIS prepared for the Plan in 2005 determined that build-out of the Plan would result in significant transportation impacts to the US-101, the Plan created a Transportation Improvement and Mitigation Plan (TIMP) to identify future improvements to the US-101. Since the proposed project site is located within the Plan area, the identified improvements should have been taken into consideration, as well as improvements listed in Metro's Long Range Transportation Plan.

4. Page IV.K.1-60 of the DEIR states: "The Project would result in a less than significant impact with respect to trip generation upon CMP locations and on freeway segments. No mitigation is required." This conclusion is not based on any credible analysis that could be found anywhere in the DEIR. It is Caltrans' opinion, based on the work that we have done in this area, that this project will result in significant impacts to the state highway system.

5. The submitted traffic analysis did not include the following ramp intersections that are closest to the project site, which may be significantly impacted by this development:

   - SB Route 101 on-ramp from Argyle Avenue
   - SB Route 101 off-ramp to Gower Avenue
   - NB Route 101 off-ramp to Gower Avenue
   - SB Route 101 off-ramp to Cahuenga Blvd.
   - SB Route 101 on-ramp from Cahuenga Blvd.
   - SB Route 101 off-ramp to Vine Street

   The traffic analysis at these off-ramps needs to show projected queue build-up upstream of the off-ramp. Although most of the on-ramps are meter controlled, the analysis needs to show how the added/over-flow volume to the on-ramp may affect other nearby intersections, including off-ramps. Caltrans is concerned that the freeway ramps will back up, creating a potentially unsafe condition. To ensure the ramps do not back up, the intersections adjacent to the ramps must be able to absorb the off-ramp volumes at the same time as they serve local circulation and land uses.

6. As shown in the DEIR, Table 5 Project Trip Generation, the project will generate a 19,486 average daily vehicle trips with 1,064/1,888 vehicle trips during the AM/PM peak hours. These volumes appear to be low and Caltrans requests that the lead agency verify

them. Also, the trip reduction credits taken are not in compliance with the Caltrans Traffic Impact Study Guide and any deviation should be properly justified and substantiated. For example, the 30% reduction of the retail pass-by trips is significantly high without justification. Utilizing such high reduction rates will result in inadequate identification of traffic impacts and mitigation, thus violating CEQA.

To address these concerns, an analysis for the project's impacts to the freeway system should be performed based on the proposed scope of the project as described in the DEIR and would need to include all of the following to determine the actual impact of this project on the State facilities in the project vicinity:

a. If the project will be developed in phases, the project added demand and trip assignment to US-101 should be based on each phase of the project, otherwise it should be based on 100% occupancy.

b. The Trip Generation figures and its distribution need to be forecasted based on a Select Zone Analysis. Based on the magnitude of the project and its close proximity to US-101, the trip assignment appears to be unreasonably low. Please elaborate on the trip assignment methodology utilized.

c. Trip Generation figures from other sources should be cross-referenced by the source, page number, year, and table numbers.

d. The off ramps on NB and SB US-101, between Vermont Avenue and Highland Avenue, which would represent the most impacted area by the proposed Development, should be analyzed utilizing the Highway Capacity Manual (HCM) 85th Percentile Queuing Analysis methodology with the actual signal timings at the ramps' termini.

e. Similarly, the on ramps on NB and SB US-101, within the same area, should be analyzed utilizing the same methodology and with the actual metering rates. These rates can be obtained by contacting Ms. Afsaneh Razavi, Senior Transportation Engineer, Caltrans Ramp Metering Department at (323) 259-1841.

f. An HCM weaving analysis needs to be performed for both the NB and the SB mainline segments, between the on and off ramps within the same area, utilizing balanced traffic demands entering and exiting the weaving segments.

Caltrans is concerned that the project impacts may result in unsafe conditions due to additional traffic congestion, unsafe queuing, and difficult maneuvering. These concerns need to be adequately addressed in the EIR. In summary, without the necessary traffic analysis, Caltrans cannot recognize the TIS and DEIR as adequately identifying and mitigating the project's impacts to the State highway facilities.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-9140
FAX: (213) 897-1337

Flex your power!
Be energy efficient!

December 10, 2012

Ms. Srimal Hewawitharana
Department of City Planning
City of Los Angeles
200 N. spring Street, Room 750
Los Angeles, CA 90012

IGR/CEQA No. 121036AL-DEIR
Referenced to IGR/CEQA No. 110501AL-NOP
Millennium Hollywood Project
Vic. LA-101, PM 7.37
SCH #: 2011041094

Dear Ms. Hewawitharana:

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1. Caltrans submitted a comment letter dated May 18, 2011, on the Notice of Preparation (NOP) and met with the developer's consultant on September 15, 2011, to discuss Caltrans' concerns about the project's impact on the US-101 freeway and on/off ramps within the 5 miles radius of the project site. The traffic consultant acknowledged Caltrans' concerns and it was understood by both parties that the traffic procedures for analyzing impacts to the state highway system would follow standard statewide procedures outlined in Caltrans Traffic Study Guide. However, the June 2012 Traffic Impact Study (TIS), which is the basis for the traffic impact discussion in the DEIR, did not follow those procedures and does not analyze the impacts to the state highway system. 3-2

2. There was no analysis performed for any of the freeway elements. The TIS only used the Los Angeles County Congestion Management Program (CMP) criteria. However, the CMP fails to provide adequate information as to direct and cumulative impacts to the freeway mainline and ramps, per CEQA. 3-3

3. Currently, the Level of Service (LOS) for US-101 is operating at LOS F. Any additional trips will worsen the existing freeway condition. The TIS did not include a cumulative traffic analysis for US-101, which would consider the trips generated from the 58 related projects that are referred to in the DEIR, the proposed NBC Universal Project, and growth from the Hollywood Community Plan (Plan). Because the TIS prepared for the Plan in 2005 determined that build-out of the Plan would result in significant transportation impacts to the US-101, the Plan created a Transportation Improvement and Mitigation Plan (TIMP) to identify future improvements to the US-101. Since the proposed project site is located within the Plan area, the identified improvements should have been taken into consideration, as well as improvements listed in Metro's Long Range Transportation Plan. 3-4

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5. The submitted traffic analysis did not include the following ramp intersections that are closest to the project site, which may be significantly impacted by this development: 3-6

   - SB Route 101 on-ramp from Argyle Avenue
   - SB Route 101 off-ramp to Gower Avenue
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   - SB Route 101 off-ramp to Cahuenga Blvd.
   - SB Route 101 on-ramp from Cahuenga Blvd.
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   The traffic analysis at these off-ramps needs to show projected queue build-up upstream of the off-ramp. Although most of the on-ramps are meter controlled, the analysis needs to show how the added/over-flow volume to the on-ramp may affect other nearby intersections, including off-ramps. Caltrans is concerned that the freeway ramps will back up, creating a potentially unsafe condition. To ensure the ramps do not back up, the intersections adjacent to the ramps must be able to absorb the off-ramp volumes at the same time as they serve local circulation and land uses.

6. As shown in the DEIR, Table 5 Project Trip Generation, the project will generate a 19,486 average daily vehicle trips with 1,064/1,888 vehicle trips during the AM/PM peak hours. These volumes appear to be low and Caltrans requests that the lead agency verify 3-7

them. Also, the trip reduction credits taken are not in compliance with the Caltrans Traffic Impact Study Guide and any deviation should be properly justified and substantiated. For example, the 30% reduction of the retail pass-by trips is significantly high without justification. Utilizing such high reduction rates will result in inadequate identification of traffic impacts and mitigation, thus violating CEQA. 3-7 (Cont)

To address these concerns, an analysis for the project's impacts to the freeway system should be performed based on the proposed scope of the project as described in the DEIR and would need to include all of the following to determine the actual impact of this project on the State facilities in the project vicinity: 3-8

a. If the project will be developed in phases, the project added demand and trip assignment to US-101 should be based on each phase of the project, otherwise it should be based on 100% occupancy.

b. The Trip Generation figures and its distribution need to be forecasted based on a Select Zone Analysis. Based on the magnitude of the project and its close proximity to US-101, the trip assignment appears to be unreasonably low. Please elaborate on the trip assignment methodology utilized. 3-9

c. Trip Generation figures from other sources should be cross-referenced by the source, page number, year, and table numbers. 3-10

d. The off ramps on NB and SB US-101, between Vermont Avenue and Highland Avenue, which would represent the most impacted area by the proposed Development, should be analyzed utilizing the Highway Capacity Manual (HCM) 85th Percentile Queuing Analysis methodology with the actual signal timings at the ramps' termini. 3-11

e. Similarly, the on ramps on NB and SB US-101, within the same area, should be analyzed utilizing the same methodology and with the actual metering rates. These rates can be obtained by contacting Ms. Afsaneh Razavi, Senior Transportation Engineer, Caltrans Ramp Metering Department at (323) 259-1841. 3-12

f. An HCM weaving analysis needs to be performed for both the NB and the SB mainline segments, between the on and off ramps within the same area, utilizing balanced traffic demands entering and exiting the weaving segments. 3-13

Caltrans is concerned that the project impacts may result in unsafe conditions due to additional traffic congestion, unsafe queuing, and difficult maneuvering. These concerns need to be adequately addressed in the EIR. In summary, without the necessary traffic analysis, Caltrans cannot recognize the TIS and DEIR as adequately identifying and mitigating the project's impacts to the State highway facilities. 3-14 3-15

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 121036AL.

3-15 (Cont)

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Comment Letter No. 4

ERIC GARCETTI

COUNCILMEMBER, CITY OF LOS ANGELES • DISTRICT 13

November 2, 2012

Los Angeles City Planning Department
200 N. Spring St, Room 525
Los Angeles, CA 90012

Attn: Planning Director, Michael LoGrande

Dear Michael:

The Planning Department has released the draft Environmental Impact Report (EIR) for the proposed Millennium Project at 1750 Vine Street, which commenced a 45 day public comment period. The proposed project is large in scale and includes what could be one of the tallest buildings in all of Hollywood. As I'm sure you are aware, the proposed project has generated controversy among my constituents. Accordingly, I request that the public comment period be extended to 60 days to increase the public's opportunity to comment on the draft EIR. 4-1

Sincerely,

E. Gh

ERIC GARCETTI
Councilmember, 13th District

CITY HALL OFFICE: 200 NORTH SPRING STREET, ROOM 475 • LOS ANGELES, CA 90012 • 213.473.7013 • FAX: 213.613.0819
HOLLYWOOD DISTRICT OFFICE: 5500 HOLLYWOOD BLVD., 4TH FLR • LOS ANGELES, CA 90028 • 323.957.4500 • FAX: 323.957.6841
GLASSELL PARK DISTRICT OFFICE: 3750 VERDUGO RD. • LOS ANGELES, CA 90065 • 323.478.9002 • FAX: 323-478-1296

COUNCILMEMBER.GARCETTI@LACITY.ORG • WWW.CD13.COM

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

November 6, 2012

Ms. Srimal Hewawitharana
Environmental Specialist II
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: Millennium Hollywood Project

Dear Ms. Hewawitharana:

The Los Angeles County Metropolitan Transportation Authority (LACMTA) is in receipt of the Draft Environmental Impact Report (EIR) for the Millennium Hollywood Project. This letter conveys recommendations from MTA concerning a number of issues in relation to the proposed project. 5-1

Congestion Management Program TDM Requirements

While the Draft EIR identifies transportation demand management (TDM) policies and programs that would be incorporated into the proposed project, CMP TDM Guidelines require that projects which include a non-residential development component exceeding 100,000 square feet incorporate a specific set of TDM measures into project design. These TDM requirements are detailed in Appendix C and summarized in Exhibit 4-1 in the 2010 CMP. 5-2

Potential Impacts to Metro Bus Service during Project Construction

Although the proposed project is not expected to result in any long-term impacts on transit:

> Several transit corridors with Metro bus service could be impacted by the project. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators including LADOT may also be impacted and therefore should be included in construction outreach efforts. 5-3

If you have any questions regarding these comments, please contact me at 213-922-2836 or by email at hartwells@metro.net.

Sincerely,

Scott Hartwell
CEQA Review Coordinator, Long Range Planning

STATE OF CALIFORNIA Edmund G. Brown, Jr., *Governor*

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

October 29, 2012

Srimal Hewawitharana, Environmental Specialist II
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: SCH#2011041094 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"Millennium Hollywood Project;"** located in Hollywood Community Plan Area; of the City of Los Angeles Los Angeles County California

Dear Srimal Hewawitharana:

The NAHC is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendment s effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously. .

6-1

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

6-2

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

6-2 (Cont)

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

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6-3

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a). 6-4

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts
Los Angeles County
October 29, 2012

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3094 Mace Avenue, Apt. B Gabrielino
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(619) 294-6660-work
(310) 428-5690 - cell
(310) 587-0170 - FAX
bacuna1@gabrieinotribe.org

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
lcandelaria1@gabrielinoTribe.org
626-676-1184- cell
(310) 587-0170 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011041094; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Millennium Hollywood Project; located in the Hollywood Community Plan Area of the City of Los Angeles; Los Angeles County, california.

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
(626) 926-4131
gabrielenoindians@yahoo.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011041094; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Millennium Hollywood Project; located in the Hollywood Community Plan Area of the City of Los Angeles; Los Angeles County, california.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: December 11, 2012 December 11, 2012
Srimal.hewawitharana@lacity.org

Ms. Srimal Hewawitharana
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Review of the Draft Environmental Impact Report (Draft EIR) for the Millennium Hollywood Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality benefits from projects that facilitate mixed land uses in close proximity to mass transit. However, given the significant health risk impacts from placing the proposed project's sensitive land uses (e.g., residential uses) within close proximity to the 101 Freeway (a significant source of Toxic Air Contaminants, TACs) it is crucial that the lead agency implement all feasible measures to reduce this impact. Further, AQMD staff recommends that the lead agency consider additional mitigation measures to minimize the project's significantregional construction and operations-related air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Lastly, the lead agency should consider updating the health risk assessment (HRA) based on more recent emission factors and traffic data. Details regarding these comments are attached to this letter. 7-1

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

7-1 (Cont)

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC121107-01
Control Number

Health Risk Mitigation

1. The Draft EIR concludes the residents living on the project site will be exposed to significant levels of air pollution from the nearby freeway. The lead agency also concludes that the one proposed mitigation measure (enhanced filtration in building's ventilation system) will not reduce this impact to a less than significant level. The HRA contained in the Draft EIR appropriately contains additional measures that seem to be feasible to reduce potential exposures. Specifically, the Final EIR should consider:

   a. Placing air intakes as far from the freeway as possible (for example, on the roof),
   b. Limiting the use of operable windows and/or balconies on portions of the site closest to the freeway,

   Also, the Final EIR should consider two additional measures:

   c. Provide a means to ensure that high efficiency filters will continue to be maintained and replaced for the life of the project (e.g., through a provision in the covenants, conditions and restrictions, CC&Rs), and
   d. Consider maintaining positive pressure with the building's filtered ventilation system in living spaces to reduce infiltration of unfiltered outdoor air.

7-2

Operational Mitigation Measures

2. Given that the lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NOx and VOC's the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

   Transportation
   a. Require electric car charging stations (not just wiring infrastructure) for both non-residential and residential uses at the project site.

   Energy
   b. Require the project site to include a solar photovoltaic or an alternate system with means of generating renewable electricity.

   Other
   c. Provide outlets for electric and propane barbecues in residential areas.
   d. Require use of electric lawn mowers and leaf blowers.
   e. Require use of electric or alternatively fueled sweepers with HEPA filters.
   f. Require use of water-based or low VOC cleaning products.

7-3

Construction Equipment Mitigation Measures

3. The lead agency determined that the proposed project will exceed the CEQA construction significance threshold regionally for NOx and VOC's and locally for

7-4

PM2.5 and NOX; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

7-4 (Cont)

Health Risk Assessment

4. The proposed project will allow new high density residential units to be placed in close proximity to the 101 Freeway that currently carries over 200,000 vehicles per day. As a result, the project's sensitive land uses will be exposed to a significant source of TACs. In determining potential health risks, the lead agency should use the most comprehensive and recent air quality data available. Therefore, the AQMD staff recommends that the lead agency consider revising its health risk assessment using the latest emissions factors from EMFAC 2011 as opposed to the outdated CT-EMFAC 2007, and using the Caltrans Performance Measurement System (PeMS)[1] to analyze the duration, volume, and speed of peak traffic activity on the 101 Freeway.

7-5

[1] http://pems.dot.ca.gov/

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December 10, 2012

Ms. Srimal Hewawitharana
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Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012
Srimal.hewawitharana@lacity.org

RE: Comments on the Draft Environmental Impact Report for the Millennium Hollywood Project [SCAG No. I20120255]

Dear Ms. Hewawitharana:

Thank you for submitting the Draft Environmental Impact Report for the Millennium Hollywood Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines. 8-1

Based on SCAG staff's review, the proposed project supports the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) by focusing growth near transit areas and increasing the variety of available transportation and housing choices in the Hollywood neighborhood in Los Angeles California. SCAG staff comments are detailed in the attachment to this letter. 8-2

When available, please send a copy of the Final Environmental Impact Report to the attention of Pamela Lee at SCAG, 818 West 7th Street, 12th floor, Los Angeles, California, 90017 or by email to leep@scag.ca.gov. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or leep@scag.ca.gov. Thank you.

Sincerely,

Jonathan Nadler,
Manager, Compliance and Performance Assessment

December 10, 2012 **SCAG No. I20120255**
Ms. Hewawitharana

SCAG STAFF COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MILLENNIUM HOLLYWOOD PROJECT [SCAG NO. I20120255]

SUMMARY

SCAG is the designated Regional Transportation Planning Agency under state law responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the adopted 2012-2035 RTP/SCS. 8-3

Based on SCAG staff review, the proposed project supports the applicable goals of the 2012-2035 RTP/SCS, and the analysis in the DEIR is properly based on the growth forecasts adopted as part of the 2012-2035 RTP/SCS.

2012-2035 RTP/SCS GOALS

The 2012-20135 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag.ca.gov). The goals included in the 2012 RTP/SCS, listed below, may be pertinent to the proposed project. 8-4

2012-2035 RTP/SCS GOALS	
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*
RTP/SCS G3:	*Ensure travel safety and reliability for all people and goods in the region*
RTP/SCS G4:	*Preserve and ensure a sustainable regional transportation system*
RTP/SCS G5:	*Maximize the productivity of our transportation system*
RTP/SCS G6:	*Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)*
RTP/SCS G7:	*Actively encourage and create incentives for energy efficiency, where possible*
RTP/SCS G8:	*Encourage land use and growth patterns that facilitate transit and non-motorized transportation*
RTP/SCS G9:	*Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*

SCAG Staff Comments

The proposed project would promote economic growth throughout the Hollywood neighborhood through the development of new amenities and land uses while attracting businesses, residents, and tourists that generate new revenue sources for the City of Los Angeles (DEIR page II-47; RTP/SCS Goal G1). 8-5

The project will encourage land use and growth patterns that facilitate transit and non-motorized transportation. The project is located adjacent to a Metro Red Line Station near the Hollywood Boulevard and Vine Street intersection and includes pedestrian oriented, mixed-use community design features. The Los Angeles City Bicycle Plan designates several streets within the project site as bicycle lanes (DEIR page III-36; RTP/SCS Goals G2, G5, G6, and G8). 8-6

Through the implementation of a Transportation Demand Management Program (TDM) mitigation measure, the proposed project is expected to achieve a 15 percent reduction in project-generated vehicle trips and reduce associated traffic congestion and emissions (DEIR page IV.B.1-41; RTP/SCS Goals G2 and G6). 8-7

Through mixed-use, infill development near transit stations and major transit corridors, the proposed project encourages mobility and accessibility throughout the project site, encourages land use and growth patterns that facilitate transit and non-motorized transportation and supports regional connectivity. The proposed additional residential density and commercial uses would be located in an area currently served by public transit, including the Metro Rail Red Line, and would be located near existing transportation corridors, including Hollywood Boulevard (DEIR page IV.G-28; RTP/SCS Goals G2, G3, G5, G6, and G8). 8-8

Active transportation will be encouraged throughout the proposed project's design. Pedestrian linkages, walkways, and bike locks will be provided as a part of the project to help provide a variety of travel choices (DEIR page IV.G-31; RTP/SCS Goals G2, G5, G6, and G8). 8-9

The project supports the preservation and productivity of our sustainable regional transportation system. The project accommodates growth and is located near mass transit, thereby reducing air quality impacts, greenhouse gas emissions and traffic congestion (DEIR page IV.G-44; RTP/SCS Goals G4, G5, and G6). 8-10

2012-2035 RTP/SCS REGIONAL GROWTH FORECASTS

The Draft EIR for the Millennium Hollywood Project should reflect the most recently adopted SCAG forecasts, which are the 2012-2035 RTP/SCS population, household and employment forecasts (adopted by the SCAG regional Council in April 2012). The forecasts for the region and jurisdiction are presented below.

Adopted SCAG Region Wide Forecasts			Adopted City of Los Angeles Forecasts		
	Year 2020	Year 2035		Year 2020	Year 2035
Population	19,663,000	22,091,000	Population	3,991,700	4,320,600
Households	6,458,000	7,325,000	Households	1,455,700	1,626,600
Employment	8,414,000	9,441,000	Employment	1,817,700	1,906,800

8-11

SCAG Staff Comments
Pages IV.I-4 and IV.I-8 indicate that the Draft EIR population, household and employment analyses were based on the adopted SCAG 2012-2035 RTP/SCS Regional Growth Forecasts.

MITIGATION

SCAG Staff Comments
SCAG staff recommends review of the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix for additional guidance, as appropriate. The SCAG List of Mitigation Measures may be found here: http://scag.ca.gov/igr/pdf/SCAG_IGRMMRP_2012.pdf 8-12

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December 10, 2012

Client-Matter: 46782-060

VIA E-MAIL AND U.S. MAIL

Ms. Srimal P. Hewawitharana
Environmental Specialist II
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Environmental Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Comments on the Draft Environmental Impact Report for the Millennium Hollywood Project (Case Number: ENV-2011-675-EIR)

Dear Ms. Hewawitharana:

This firm represents AMDA College and Conservatory of the Performing Arts ("AMDA"). On behalf of AMDA, thank you for providing us with the opportunity to comment on the Draft Environmental Impact Report ("DEIR") for the Millennium Hollywood Project (the "Project"). The proposed Project would be constructed directly adjacent to AMDA's approximately 2-acre campus in Hollywood. In particular, AMDA's building at 1777 Vine Street ("AMDA's 1777 Vine Street Building"), a five-story facility housing the majority of AMDA's classrooms, acting rehearsal rooms, dance studios, and private voice rooms, shares a property line with the Project where one of the two proposed 585-foot high towers could be built without even the most minor of setbacks. Thus, the impacts of the proposed Project's construction alone could be catastrophic to AMDA if not properly mitigated in accordance with the California Environmental Quality Act ("CEQA"). 9-1

As one of the key players in Hollywood's revitalization, first purchasing and painstakingly restoring 6305 Yucca Street, an eight-story Art Deco building (the "Vine Tower") that serves as the administrative and student hub of AMDA's campus, and then building a formidable presence on the block bounded by Yucca Street, Vine Street, Ivar Avenue, and U.S. 101 (the "Hollywood Freeway"), much of which is now used for student residences, AMDA is not opposed to the continued development and revitalization of the neighborhood it is so proud to call home. AMDA welcomes responsible development and looks forward to working with community stakeholders on the continued improvement of Hollywood.

However, a massive one million-plus square foot project needs to be appropriately analyzed and mitigated under CEQA, something which this DEIR fails to do. As a threshold 9-2

matter, although the DEIR acknowledges that schools are sensitive receptors, it does not identify AMDA as a sensitive receptor. This is unacceptable; all of the Project's potentially significant impacts to AMDA must be disclosed, analyzed, and mitigated to the maximum extent feasible. Likewise, CEQA requires an accurate, stable, and finite project description, yet the DEIR's equivalency program would allow virtually any type of development to be built, irrespective of what the DEIR renderings and vague development regulations (the "Development Regulations") might indicate. Greater specificity about the project is necessary for the public to meaningfully participate in the approval process for the Project.

9-2 (Cont)

9-3

In short, the DEIR fails to comply with CEQA's minimum legal requirements in several respects and must be revised and re-circulated.

I. AMDA AND ITS HOLLYWOOD CAMPUS.

AMDA is one of the country's preeminent non-profit colleges for the performing arts, with its two campuses in New York City and Los Angeles recognized internationally for launching some of the most successful careers in theater, film, and television. Fully accredited by the National Association of Schools of Theater ("NAST")[1], AMDA's Los Angeles campus enrolls approximately 700 students from throughout the world and offers both a 4-year bachelor of fine arts and various 2-year certificate programs. Since 2003, AMDA's Hollywood campus has been a thriving community of young artists engaged daily in everything from general education courses typical of more traditional 4-year colleges, to musical theater, dance studios, and voice recitals.

9-4

AMDA's campus is comprised of several buildings in the immediate vicinity of the Project. The Vine Tower, AMDA's main building, is kitty-corner from the Project and houses administrative offices, classrooms, studio spaces, a costume shop, a stage combat armory, a computer lab, the AMDA Café, the campus store and a black box theatre. AMDA's 1777 Vine Street Building across the street from the Vine Tower, and sharing a property line with the Project site, is a five-story facility with 23 classrooms, 11 private voice studios, acting rehearsal rooms, a student lounge, the film production office, the scene shop, and other ancillary AMDA uses. An outdoor performance space, a campus piazza, a performing arts library, and film, television and editing facilities are also located on campus.

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[1] NAST has been designated by the United States Department of Education as the agency responsible for the accreditation throughout the United States of freestanding institutions and units offering theatre and theatre-related programs (both degree-and non-degree-granting). NAST cooperates with the six regional associations in the process of accreditation and, in the field of teacher education, with the National Council for Accreditation of Teacher Education. NAST consults with the American Alliance for Theatre and Education, the Association for Theatre in Higher Education, and similar organizations in the development of NAST standards and guidelines for accreditation.

Finally, six residential buildings, primarily on the same block as the Vine Tower, have been purchased, or are otherwise controlled by AMDA, for student housing (The Franklin Building, the Yucca Street Apartments, the Allview Apartments, Ivar Residence Hall, the Vine Street Apartments, and the "Bungalows").

9-4 (Cont)

Simply stated, AMDA's investment in, and commitment to the Hollywood community is sustained and substantial.

II. THE HOLLYWOOD MILLENNIUM PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT.

9-5

The DEIR has several flaws and must be revised and re-circulated to comply with CEQA. Set forth below are our specific comments on the DEIR.

A. The DEIR's Equivalency Program is Much Too Broad To Apprise the Public of the Project's Impacts.

As a threshold matter, the DEIR is more a program-level EIR than a project-level EIR. The ultimate project that could be built under this DEIR could be almost all apartments, all condominiums, all hotel, all health/fitness club, all office, all restaurant, or all retail – so long as the total vehicle trip count falls within a cap set forth in the DEIR. As explained in greater detail throughout this comment letter, protection of the environment is about more than vehicle trip counts. Although CEQA does not foreclose equivalency program analysis, there comes a point when an equivalency program is so over-ambitious that the public has no idea what type of uses will ultimately be built, where on the site they will be, what their general design will be, and what the *ultimate environmental impacts* will be.

9-6

That is the case here. The DEIR's attempt to analyze every possible development scenario results in an environmental analysis that fails to disclose and analyze the most basic of things – like project driveways and ingress and egress from the Project's approximately 4.5 acre site. Will left-turns be allowed out of the Project's Vine driveways (assuming there will be Vine driveways)? The answer to that simple question can have a dramatic impact on traffic circulation in one of Hollywood's most congested areas, but the DEIR is silent on these basics. Likewise, the DEIR is completely inconsistent with the project that has been applied for, and which could be built under the proposed Development Agreement. For example, the Project applications call for approximately seven stories of above-ground parking. (See Exhibit A.) The DEIR, however, says there will likely be three. (See Exhibit B.) In other instances, key Project components, including a night-club and an outdoor viewing deck with a café and alcohol sales, are completely missing from the DEIR's environmental analysis. (See Exhibit C.) The DEIR's renderings and *discussion* about the "Development Regulations" might imply good design, but

9-7

the plans submitted with the application would indicate that huge podium parking structures with large, massive, undifferentiated walls are back in vogue. (See Exhibit D.) Ultimately, because the Project Development Agreement and Development Regulations are so vague, nothing in the DEIR would prevent the absurd, say twenty stories above-ground parking.

9-7 (Cont)

The case law on equivalency programs is limited, but the general principles behind CEQA are clear. First, an accurate, stable, and consistent project description is required for a legally sufficient EIR. Inconsistencies in the project description, including "using variable figures" can be fatal. *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 653 (holding that the failure to provide a stable and consistent project description invalidated the EIR); also see *City of Santee v. County of San Diego* (1989) 214 Cal. App. 3d 1438, 1454-55 (concluding that an EIR that did not contain an accurate, stable, and finite project description could not "adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences.").

9-8

In short, we have no idea what will be built, except that it will likely be massive. And even if the DEIR analyzed ingress and egress for the Concept Plan, for example, that analysis would be meaningless because the Applicant has no obligation to build the Concept Plan or a project that looks anything like it. An EIR cannot stultify CEQA's public disclosure requirements. *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 198 ("A curtailed, enigmatic or unstable project description draws a red herring across the path of public input."); also see *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 405 ("An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.").

9-9

The DEIR fails to provide a meaningful understanding of the Project. By analyzing the Concept Plan, the DEIR gives the public the impression that something approaching that plan will be built even though the Development Agreement allows different parts of the Project site to be sold to different developers who may choose to build something that bears no real resemblance to the Concept Plan. (See Development Agreement, Section 6.8.1.)(Exhibit E.) This is all the more shocking given that the Development Agreement also provides that no subsequent approvals/environmental review would be required for any subsequent build-out of the Project. (See Development Agreement, Section 3.1.5.)(Exhibit F.) Without discussing things as simple as ingress and egress (required analysis for much smaller projects), or what will ultimately be built, the DEIR's enigmatic project description has the effect of cutting the public out of some of the more important questions about the Project. And it certainly cannot provide the City Council with enough information to support a Statement of Overriding Considerations. CEQA requires more.

9-10

B. The DEIR Excludes Analysis and Mitigation of Clearly Significant and Adverse Noise and Vibration Impacts to AMDA and Avoids Meaningful Analysis and Mitigation of Noise and Vibration Impacts, Generally.

1. The DEIR Fails to Disclose and Analyze AMDA as a Sensitive Receptor.

The *L.A. CEQA Thresholds Guide* defines noise sensitive land uses to include residences, transient lodging, *schools*, libraries, churches, hospitals, nursing homes, *auditoriums*, *concert halls*, amphitheaters, playgrounds, and parks. (*L.A. CEQA Thresholds Guide,* p. I.1-2.) Although the DEIR acknowledges that schools, auditoriums, and concert halls are sensitive receptors at page IV.H-15, inexplicably AMDA – which shares a property line with the Project – is excluded from the list of sensitive land uses adjacent to the Project site.[2] The DEIR's omission of AMDA as a sensitive receptor is a material error in the DEIR that has prevented significant impacts from being disclosed and mitigated. 9-11

To be perfectly clear, AMDA is a school and the quintessential sensitive receptor. Within AMDA's 1777 Vine Street Building, for example, when students are not taking classes such as "Harmony Review Lab," "Sight Singing Review Lab," and "Piano Lab," they may be practicing their singing in a private voice room, dancing ballet in one of the dance studios, or doing breathing exercises with a voice tutor. Every day, the AMDA campus is a thriving hub of productions, recitals, rehearsals, and classes from early morning until about 11:30 p.m., and in summer months AMDA's outdoor stage hosts multiple productions. How all this could continue to happen with the immediately adjacent construction of over one million square feet of towers is something the DEIR cannot ignore.

2. The DEIR Must Disclose, Analyze, and Mitigate Significant Construction Noise Impacts to AMDA.

The DEIR must be re-circulated with information about the magnitude of construction and operational noise impacts to AMDA, as well as all feasible mitigation measures that would reduce those impacts. It is impossible to state the precise construction-related noise impacts to AMDA because the DEIR ignored analysis of AMDA altogether, but there can be no question that the impacts will be extremely significant and adverse. Table IV.H-9 of the DEIR, for example, reveals that noise levels at the Pantages and Avalon Theaters, both of which are anywhere from two to ten feet from the Project, will skyrocket from 69.8 dBA L_{eq} to 113.9 dBA 9-12

[2] AMDA has been a prominent member of the Hollywood community since 2003 and various principals of Millennium Hollywood LLC (the "Applicant") have been familiar with AMDA for several years, all of which makes the omission very confusing to AMDA. Moreover, since 2010, well before issuance of the DEIR's Notice of Preparation, all of AMDA's 1777 Vine Street Building was being used by the college.

L_{eq}. As DEIR Table IV.H-1 indicates, a dBA of 113.9 L_{eq} would be louder than a jet flying overhead at a height of 100 feet (throughout the entire day) and louder than a rock band in an indoor concert. This is troubling because the DEIR would allow construction next to AMDA at a similar distance from the Pantages Theater. There is no way that AMDA could continue operating in such an environment without specific mitigation that deals with AMDA as a sensitive receptor. Putting aside the fact that no school could teach music in the middle of a rock concert, the Project would be putting AMDA students and faculty in an environment that the DEIR states can cause temporary or permanent hearing loss. ("Frequent exposure to noise levels greater than 85 dBA over time can cause temporary or permanent hearing loss.") (DEIR, p. IV.H-3.) Mitigation of these impacts on AMDA are of the utmost necessity.

9-12 (Cont)

Furthermore, mitigation must address multiple different construction impacts – not just construction machinery. For example, the DEIR notes that "[t]he Yucca street parking curb lane will be retained for construction vehicle waiting and staging for the duration of Project construction during all hours . . ." (DEIR, p. IV.K.2-22.) A revised DEIR should disclose that this truck staging area would literally divide AMDA's main campus area (i.e., the Vine Tower and AMDA's 1777 Vine Street Building) and consider whether the noise impacts from this staging area can be relocated away from a sensitive receptor.

9-13

3. <u>The DEIR's Use of the Equivalent Noise Level (L_{eq}) for Construction-Related Noise Hides the Project's True Noise Impacts.</u>

The DEIR fails to fully disclose Project impacts by only reporting L_{eq} and not the full range of dBA increases that would result from the project. L_{eq}, or the equivalent energy noise level, "is the *average* acoustic energy content of noise for a stated period of time." (DEIR, p. IV.H-2.) The DEIR is required to not only disclose the average dBA over a period of time, but the full range of dBA (i.e., what will be the loudest noises that will be occurring throughout construction). Disclosure of the full range of dBA is important for many reasons. First, the *L.A. CEQA Thresholds Guide* provides that a Project will have a significant impact if construction activities lasting more than a day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise-sensitive use, or 5 dBA or more at a noise-sensitive use for construction activities lasting more than ten days in a three-month period. (DEIR, p. IV.H-20.) The thresholds are not based on L_{eq} – they are based on dBA alone. By only disclosing L_{eq}, the DEIR underreports the true range and magnitude of significant impacts.

9-14

Second, the aforementioned distinction between L_{eq} and dBA is about more than technical legal compliance with the CEQA threshold; the loudest noises that may occur at any given time matter. Particularly loud construction episodes, for example, would undoubtedly interrupt

9-15

courses, recitals, and other AMDA activities to a greater extent than the already high average noise levels. All feasible mitigation must be imposed for these high noise incidents.

9-15 (Cont)

Finally, the L_{eq} reported in the DEIR could be masking the true noise impacts of the Project because the DEIR fails to disclose the period of time over which construction noise is being averaged (e.g., the L_{eq} period may be including nighttime noise when no construction is taking place, break times, or other similar non-representative time periods).

9-16

4. <u>The DEIR's Noise Section Is Rendered Meaningless by Failure to Report Post-Mitigation Noise Impacts and Failure to Define Mitigation Measures with any Precision or Certainty.</u>

Despite reporting Project noise impacts that are clearly unacceptable, the DEIR fails to indicate what the Project's noise impacts will be *after* mitigation. This approach is not only contrary to the approach taken in the DEIR's Air Quality and Traffic sections, it is contrary to the City's practice for other environmental impact reports. (See Exhibit G.) Disclosure of impact levels after mitigation is required, and the Applicant must be required to abide by the post-mitigation noise levels that are set forth in the DEIR. Indeed, without post-mitigation noise projections, community members and stakeholders affected by the Project have no way of knowing with any certainty if the mitigation measures in the DEIR are, in fact, effective in reducing noise levels, and if they are, by how much noise levels will be reduced. The DEIR must disclose the resulting (i.e., post-mitigation) noise levels at the relevant property lines so that AMDA and the public can determine if the mitigation measures truly reduce noise to the maximum extent feasible.

9-17

Part of the reason for the DEIR's failure to provide any information about post-mitigation noise levels may be that many of the noise mitigation measures in the DEIR are illusory. For example, many of the mitigation measures are tempered with phrases like "as far as feasibly possible" or other language that actually has the effect of creating an inordinate amount of flexibility for the Applicant and/or depriving the measure of any certainty. Examples of deficient noise mitigation measures in the DEIR are set forth below, followed by a discussion of how each mitigation measure is legally deficient:

- *Noise and groundborne vibration construction activities whose specific location on the Project may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted* ***as far as feasibly possible*** *from the nearest noise- and vibration- sensitive land uses.* (Mitigation Measure H-3) (Emphasis added.)

9-18

- *Construction activities shall be scheduled so as to avoid **as feasible** operating several pieces of equipment simultaneously, which causes high noise levels.* (Mitigation Measure H-4) (Emphasis added.)

- *The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices **as available**.* (Mitigation Measure H-6) (Emphasis added.)

- *Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the surrounding noise-sensitive receptors **to the maximum extent** feasible during construction.* (Mitigation Measure H-7) (Emphasis added.)

- *All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors **to the extent feasible**.* (Mitigation Measure H-8) (Emphasis added.)

All the bolded language above serves to remove any assurances or standards from the mitigation. For example, relative to Mitigation Measure H-3, there is no reason that the DEIR should not disclose exactly where flexible noise-generating equipment will be located to reduce impacts to AMDA and other sensitive uses (and the resulting post-mitigation noise levels at the property line). A mere representation that the activities will be conducted "as far as feasibly possible" deprives the public of the ability to comment on whether the Applicant truly is mitigating "as far as feasibly possible."

9-18 (Cont)

In fact, when the Applicant's current tenant, EMI, was previously concerned about impacts to Capitol Records from a nearby construction project at 6941 Yucca (the "Yucca Condominium Project"), it secured mitigation measures such as the following:

- No stationary equipment will be operated ***within 40 feet*** of the west project site property line with EMI/Capital [sic] Records. Tower cranes and personnel lifts shall be positioned ***near Argyle on the eastern edge of the project site***. (Mitigation Measure Supp 18) (Emphasis added.)

- Construction materials shall be stock-piled at distant portions of the site, ***at least 40 feet*** from the western project site property line with EMI/Capitol Records. The equipment warm-up areas, water tanks and equipment storage areas described in Mitigation Measure I-5 above shall also be located ***at least 40 feet*** from the western project site property line with EMI/Capitol Records. (Mitigation Measure Supp 19) (Emphasis added.)

- ***Within 40 feet*** of the western project site property line with EMI/Capital [sic] Records, demolition, excavation and construction activities at or below the street level of the project site (including loading of demolition refuse), grading equipment and activities, augured pile driving, vibratory rollers, jumping jack compactors, and other excavation and construction equipment and activities ***shall be prohibited after 10:00 a.m. Mondays through Saturdays***, unless one of the following exceptions apply . . . (Mitigation Measure Supp 12) (Emphasis added.)

9-18 (Cont)

A complete list of mitigation measures for the Yucca Condominium Project is attached as Exhibit H for reference.

The precision that EMI/Capitol Records previously received to protect itself from noise and vibration impacts needs to be reflected in the other mitigation measures for this Project too – not just Measure H-3. For example, Mitigation Measure H-4 must disclose which construction equipment will not be operated simultaneously.[3] The same goes for Mitigation Measure H-6. If state-of-the-art noise shielding and muffling devices are too expensive, or being used at another construction site, does this mean that the noise levels need not be mitigated? With respect to Mitigation Measure H-7, how will an eight-foot noise barrier be enough to mitigate noise impacts to the maximum extent feasible, and why not disclose the full gamut of noise attenuation barriers available given that one can do better than plywood structures? Most importantly, why did the Yucca Condominium Project (112,917 square feet of construction) next door to the Capitol Records Tower require noise barriers of 16 feet in height, whereas this 1,052,667 net square foot project only requires eight-foot barriers? (See Exhibit I.) (The DEIR also needs to consider special mitigation for the Project's high-rise towers, such as sound wall barriers as construction proceeds to the upper floors.) Finally, with respect to Mitigation Measure H-8, aside from it being impermissible deferred mitigation, how can the DEIR state that construction

9-19

[3] The scheduling of different construction activities and their resulting noise levels needs to be disclosed as part of the public review process. Otherwise, how would a decision to stop operating multiple pieces of equipment be made on the construction site after the Project has already been approved, especially if the DEIR has no standards (just vague "as feasible" language)?

truck traffic will avoid sensitive receptors to the maximum extent feasible, and then in another section state that construction truck staging will be right outside AMDA?

Ultimately, the DEIR needs to establish specific mitigation measures and post-mitigation noise standards that can be measured and adhered to. As drafted, the DEIR says nothing about how loud Project noise will be after the imposition of mitigation measures, renders the little mitigation there is meaningless with vague, imprecise language, and does not commit the Applicant to any specific noise standard. 9-19 (Cont)

5. The DEIR's CNEL Baseline Is Not Supported by Substantial Evidence.

The DEIR states that noise measurements were recorded by Parker Environmental Consultants staff on April 19, 2011, at six locations in the vicinity of the Project Site *for a period of 15 minutes per location*, between the hours of 2:50 PM and 4:30 PM. (DEIR, p. IV.H-5.) Somehow, despite only taking measurements for 15 minutes, the DEIR established dBA CNEL baselines for the five studied roadways. CNEL, the Community Noise Equivalent Level, "is a 24-hour average L_{eq}." (DEIR, p. IV.H-3.) The DEIR needs to disclose how a 24-hour average was derived for the baseline from a mere 15 minute measurement. Given the role that the CNEL baseline plays in establishing the Project's operational impacts, coupled with the large scope of this Project, anything less than a true understanding of the Project area's CNEL renders the DEIR's noise analysis meaningless. 9-20

6. The DEIR Fails to Study those Roadways That May Be Most Impacted By Traffic-Related Noise and Masks True Roadway Noise Impacts.

The DEIR's analysis of roadway traffic impacts is highly deficient. As a threshold matter, the DEIR fails to consider whether there are residential streets that may be most impacted by traffic noise, even if those streets will not receive the most Project traffic. The DEIR states that "[t]he roadway segments selected for analysis are considered to be those that are expected to be most directly impacted by project-related traffic, which for the purpose of this analysis, includes the roadways that are nearest to the Project site." (DEIR, p. IV.H-14.) This selection of streets for roadway noise impacts, while appealing at first blush, has the effect of potentially masking significant impacts along nearby residential roadways that may receive lower project-related traffic, but have a lower significance threshold (3 dBA CNEL rather than the 5 dBA CNEL streets studied in the DEIR's noise analysis). As such, further analysis of streets more sensitive to noise is required. 9-21

Moreover, the traffic noise analysis suffers from other methodological problems. In addition to the previously discussed concerns about the CNEL baseline, which appears to be 9-22

based on a 15-minute measurement, the DEIR's traffic analysis grossly underreports the Project's true traffic impacts. Accordingly, it is very likely that the higher traffic impacts will lead to higher, and significant, roadway noise impacts. The DEIR therefore needs to be re-circulated with disclosure of actual noise impacts from Project traffic.

9-22 (Cont)

7. The DEIR Must Analyze and Mitigate Vibration Impacts on AMDA's Building.

The DEIR must be re-circulated with information about the magnitude of the Project's construction and operational vibration impacts to AMDA, as well as all feasible mitigation measures that would reduce those impacts to a level less than significant. The DEIR completely ignores vibration impacts on AMDA's classroom building despite making clear elsewhere that vibration impacts from construction on buildings further away would be significant. Based on Table IV.H-11 and Table IV.H-12, impacts to the Pantages Theater, the Avalon Theater, and the Capitol Records Tower (all of which have similar distances to the Project as AMDA), it appears that construction-related vibration impacts at AMDA's 1777 Vine Street Building would range from approximately 119.9 VdB to 162 VdB and 3.9 PPV to 491.66 PPV – impacts that wildly exceed the significance thresholds of 65 VdB and 0.12 PPV. There is little question that AMDA's 1777 Vine Street Building would suffer significant damage from such high vibration levels. (The DEIR states that 100 VdB is the general threshold where minor damage can occur in a fragile building yet Project-related VdB on AMDA's building is expected to be approximately 120 VdB to 162 VdB.) (DEIR, p. IV.H-4). Likewise, given the types of activities that occur in AMDA's building (e.g., breathing exercises, music classes, ballet), AMDA would be considered a Category 1 Building (65 VdB threshold) more akin with university research operations than a typical school building (75 VdB threshold) with respect to operational vibration annoyance impacts. Irrespective of what threshold is applied, however, the vibration impacts on AMDA's building are significant and must be mitigated.

9-23

8. The DEIR Avoids Required Analysis of the Project's Impacts on the Capitol Records Echo Chambers and Recording Studios.

CEQA does not allow an impact on the environment to be ignored if only the Applicant's property would be directly affected. This is obvious, yet that appears to be the position taken by the DEIR with respect to the Project's noise and vibration impacts on the Capitol Records recording studios and historic echo chambers – a City-designated Historic Cultural Monument ("HCM"). The DEIR states that the Capitol Records underground echo chambers are located approximately 20 feet north of the proposed limits of excavation for the Project and that Capitol Records Recording Studios A, B, and C are approximately 0.08 feet away from the Project. (DEIR, pp. IV.H-16 and IV.H-29.) Despite the proximity of these uses, and the fact that the DEIR identifies vibration impacts as significant, the DEIR brushes off any meaningful impact

9-24

analysis or mitigation on the ground that these sensitive receptors are owned by the Applicant. (DEIR, p. IV.H-29.) The DEIR goes on to state that "[v]ibration-related impacts upon these uses will be addressed through agreements between the owner and the tenant, with the intent of minimizing noise-related impacts on the uses." (*Id.*)

The DEIR's analysis is akin to a statement that no historic resource analysis for the demolition of an HCM is necessary if it is the owner that wishes to demolish the building. Interestingly, the Applicant's tenant has previously stated in connection with other adjacent construction (the aforementioned Yucca Condominium Project) that significant impacts to the echo chambers would "basically render unusable the Echo Chambers at the Capitol Records property." (Exhibit J.) Simply put, the same level of analysis and mitigation that the City has previously required for other projects needs to be imposed here – especially because the Applicant may now have an economic interest in not protecting these historic monuments.

9-24 (Cont)

9. The DEIR's Mitigation for Groundborne Vibration Damage to Adjacent Buildings is Not Supported by Substantial Evidence.

Even though estimated vibration levels from construction of the Project are expected to range from 3.9 PPV to 491.66 PPV and the threshold of significance is 0.12 PPV, the DEIR provides that groundborne vibration damage to adjacent buildings will be reduced to insignificance because Mitigation Measure H-11 "requires the Project Applicant to perform all construction work without damaging or causing the loss of support for on-site and adjacent structures." (DEIR, p. IV.H-31). But is that even possible? Can an impact of 491.66 PPV be reduced to a level below 0.12 PPV? Exactly how will adjacent buildings not be damaged? One would not know from the DEIR because the one proffered mitigation measure to address this impact is completely conclusory.

9-25

10. The DEIR Mentions a Rooftop Observation Deck But Provides No Analysis of its Potential Noise Impacts.

The Project's application and the DEIR mention a rooftop observation deck, but the DEIR does not analyze its noise impacts on the surrounding neighborhood. Oddly enough, even though the application states the rooftop deck will be outdoors, will have alcohol service, and that special events with live entertainment could conceivably occur, the DEIR is completely silent on the noise impacts of that deck. The DEIR does not even disclose that the deck will be outdoors. Likewise, the Project's application makes clear that other outdoor decks may be incorporated into the Project. These decks must be analyzed and their impacts mitigated to the maximum extent feasible in a re-circulated DEIR.

9-26

11. The DEIR Must Fully Analyze Potential Impacts From Above-Ground Parking Structures.

Nothing in the DEIR prevents the construction of an above-ground parking structure adjacent to AMDA's 1777 Vine Street Building or other sensitive receptors. Should this occur, the Project would be raising vehicles from a street-level parking lot to be directly adjacent to AMDA's 1777 Vine Street Building's windows on multiple levels. (The DEIR "envisions" three levels of above-grade parking, but the equivalency program would not prevent above-grade parking structures from being significantly taller.) The DEIR must analyze noise from car alarms, tire squealing, honking, and other loud parking structure noises that might impact AMDA. 9-27

12. The Project Would Expose AMDA to Interior Noise Levels Beyond Regulatory Standards.

The DEIR states that "the Project would result in generally unacceptable exterior noise levels for any proposed residential or open space uses fronting Vine Street . . . . Therefore, future interior noise levels associated with roadway traffic along Vine Street could still exceed the City standard 45.0 dBA for interior residential uses." (DEIR, p. IV.H-37.) To mitigate this impact to a level less than significant, the DEIR requires Project buildings to include sound-proof windows and noise insulation. Therefore, because AMDA's 1777 Vine Street Building is a sensitive receptor fronting Vine Street, the DEIR must provide similar upgrades to AMDA's 1777 Vine Street Building. In addition, because this impact was not disclosed as significant in the DEIR, this is yet another reason the DEIR must be re-circulated. 9-28

C. The DEIR's Traffic Analysis Has Multiple Material Flaws and is Not Supported By Substantial Evidence.

1. The DEIR's Equivalency Program Makes It Impossible to Understand the Full Range of Possible Uses and Configurations, All of Which Would Affect Traffic in Different Ways.

The DEIR provides the impression that CEQA traffic analysis begins and ends at total trips, and that no further analysis is required so long as total trips are maintained below a certain number. This is not the case; the imprecise nature of the DEIR's equivalency program means that the DEIR fails to provide a true understanding of the Project's impacts. Because the DEIR does not disclose precise driveway points and what specific uses those driveways would be serving, the public is not afforded an understanding of the peak hour usage of those driveways, how pedestrian activity at specific project access points may create hazards or create internal 9-29

parking structure queuing, or how driveways at specific access points may back up traffic behind vehicles making a left-hand turn into the Project.[4] (Granted, the DEIR does not even discuss if left-hand turns into the Project will be allowed because of the multiple scenarios that could conceivably result from the equivalency program.) At one point, the DEIR's traffic study provides a glimmer of hope on specificity when it states that "[a] preliminary analysis concludes that the driveways as shown on the conceptual plans (Figure 3) will not introduce any unusual adverse hazards." (Traffic Study, p. 9.) But only a glimmer; a review of the aforementioned Figure 3 does not show a single driveway or Project access lane. (See Exhibit K.) Without an understanding of traffic circulation immediately around the Project, it is impossible to know if turns, queuing, and other vehicular conflicts will create trickle-down impacts to multiple intersections.

9-29 (Cont)

In a similar vein, the traffic analysis takes credits via "internal capture" for Project uses that may never be built. For example, the DEIR claims a separate 15% internal capture reduction in trips for the fitness/sports center, for the retail, and for the restaurants (presumably because of the onsite office and residential uses). But what if the office and residential space that is actually built is significantly less than that analyzed in the DEIR or disappears altogether? What if the Applicant uses the DEIR to pursue a 100% retail project? In this case, the Applicant would obtain a 15% trip reduction for nothing.

9-30

Simply put, the DEIR's traffic analysis is not supported by substantial evidence. As stated earlier, the DEIR's traffic analysis is more consistent with that of a program-level EIR. It cannot legally comport with CEQA's disclosure requirements until greater Project specificity is provided.

9-31

2. <u>The Traffic Study's Trip Distribution Needs to Account for the Separate Project Uses.</u>

As stated previously, the DEIR's equivalency program has the effect of making much of the Project's impact analysis irrelevant. While CEQA does not prohibit equivalency program environmental analysis, the analysis can become highly problematic in connection with complex projects that have several potential uses, all of which can be located in various different locations throughout a large project site. In this case, the equivalency program's broad-strokes description of potential project uses and their location on the Project site makes it impossible to capture and understand the Project's ultimate trip distribution.

9-32

[4] Although the Traffic Study does provide a general discussion of driveway locations, these driveway locations are hypothetical in nature only. (See Traffic Study, p. 38.) As the Project's Development Regulations provide, "parking, open space, and related development requirements for any component of the Project may be developed in any location within the Project Site." (See Development Regulations, p. 10.)

The DEIR's traffic analysis assigns a trip distribution based on one specific project iteration (the Concept Plan) and this trip distribution remains constant irrespective of what uses may ultimately be incorporated into the Project and where on the site they are located. This leads to a highly simplistic and flawed trip distribution. Hotels, for example, have a very different trip distribution than a fitness center or condominiums, yet the DEIR makes no attempt to account for the fact that the project that may ultimately be built will have no resemblance whatsoever to the Concept Plan (e.g., the Project could be almost entirely residential). Likewise, we know that vehicles will choose one route over another based on their points of ingress and egress. The DEIR's trip distributions, which are guided by a completely random allocation for one project iteration that does not have to be built, are therefore highly flawed. 9-33

Indeed, the Applicant's traffic consultant has previously taken the position in connection with other EIRs that a traffic study would be deficient if the trip distribution for individual uses was not specifically assigned. They said:

> . . . recent traffic studies for large mixed-use projects approved by LADOT . . . have used discrete trip distribution patterns and percentages for individual uses in order to more accurately assign trips to study intersections and routes. For example, office, residential, hotel and retail uses generally have different trip distributions, as their origins and destinations are different. Utilizing one generic trip distribution for dissimilar proposed and existing uses can result in project trips and impacts being underestimated at study locations, as well as some locations not being considered for analysis because they have been assigned a low number of trips. (See Exhibit L.)

9-34

Given the fact that the DEIR's own traffic consultant has cautioned against generic trip distribution, it is difficult to understand why this DEIR does not account for all the multiple uses and configurations that could ultimately be built under the equivalency program. Without an appropriate trip distribution, the DEIR cannot be supported by substantial evidence.

3. <u>The DEIR Must Analyze Neighborhood Intrusion Impacts and Construction and Operational Traffic Impacts Arising From AMDA's Location.</u>

The DEIR fails to analyze the Project's neighborhood intrusion impacts. Of particular importance, the DEIR did not analyze the Project's traffic impacts on AMDA and its students and faculty. AMDA's presence adjacent to the Project site creates various specific conditions that have not been analyzed, and which may require a Neighborhood Traffic Management Program. For example, large groups of students cross Yucca Street between the Vine Tower and 9-35

AMDA's 1777 Vine Street Building when classes let out throughout the day, yet the DEIR did not take pedestrian counts to understand how large groups of students might impact left- and right-hand turns on Yucca, or how traffic may create hazards for AMDA students and faculty.[5]

9-35 (Cont)

Likewise, the DEIR neglected to analyze the Project's traffic impacts on various residential street segments. Ivar Avenue between Yucca Street and Franklin Avenue (a great portion of which is lined with AMDA student housing), for example, will no doubt experience significant traffic impacts because northbound travel on Yucca will be one of the most efficient ways of accessing the northbound Hollywood Freeway from the Project's Ivar Avenue access point (Ivar to Franklin and then Franklin to Argyle/the Hollywood Freeway). Several other likely cut-through routes have not been identified and necessitate further study.

9-36

In short, the DEIR needs to critically address cut-through traffic and its impact on residential street segments, analyze AMDA-specific traffic issues, and provide appropriate mitigation for both construction and operational traffic.

4. <u>The DEIR Must Analyze Traffic Impacts During the Hollywood Bowl Summer Season and Performances at the Pantages Theater, As Well As Ascertain Whether the P.M. Peak Hours Are Truly 3:00 P.M.-6:00 P.M.</u>

The DEIR has dramatically underreported traffic impacts by not including manual counts taken on high traffic-volume days. Specifically, the DEIR states that "[t]raffic volumes for existing conditions at the 37 study intersections were obtained from manual traffic counts conducted in March, April, May, September, and October 2011." (DEIR, p. IV.K-1-12.) The three-month break over the months of June, July, and August is highly suspect because it coincides precisely with the Hollywood Bowl summer concert season, which elevates traffic throughout Hollywood quite significantly.[6] (Why else would counts have stopped for three months?) With an occupancy of approximately 18,000, the Hollywood Bowl is the largest

9-37

[5] The DEIR cannot ignore multiple site-specific variables just because the City's thresholds do not address them. See *Mejia v. City of Los Angeles*, (2005) 130 Cal. App. 4th 322, 342. ("We conclude that the city improperly relied on a threshold of significance despite substantial evidence supporting a fair argument that the project may have a significant impact on traffic on Wheatland Avenue. In light of the public comments and absent more careful consideration by city engineers and planners, the evidence supports a fair argument that the increased traffic on Wheatland Avenue as a result of the project would be substantial considering the uses of the road.").

[6] Further elevating our suspicions about the date selection for manual traffic counts is that when manual counts were reinstated in September, a month when there were still a few Hollywood Bowl concerts remaining on calendar, the DEIR's traffic consultant only took manual traffic counts in the morning, not afternoon. (See DEIR, Appendix IV.K.1, Appendix B.)

natural amphitheater in the United States, and summer concert nights (at the tail-end of June and almost every night in July and August) often create traffic havoc throughout the area of Hollywood near the Project site. In fact, the Highland exit from the southbound Hollywood Freeway is often so congested during Hollywood Bowl summer events that traffic is directed to the Cahuenga off-ramp, with ensuing trickle-down impacts in the immediate vicinity of the Project site. The DEIR cannot pick and choose convenient days for manual traffic counts. It is crucial that the Project's traffic baseline include Hollywood Bowl traffic so that Project traffic impacts are understood and mitigated to the maximum extent feasible.

9-37 (Cont)

Likewise, the Project directly abuts the Pantages Theater, which has a seating capacity of almost 3,000. The DEIR needs to analyze the Project's traffic in conjunction with Pantages theater vehicular traffic, the latter of which would be circling the vicinity looking for parking at approximately the same time (i.e., the one hour period before the performance start time).

9-38

Finally, given the scale of the proposed Project, the DEIR should analyze traffic impacts up to 7 p.m., and include this hour as part of the peak hour if conditions warrant. Security guards stationed at the entrance to AMDA's parking lot on Yucca Street have related to us that traffic in this particular area is at its worst from 5 p.m. to 7 p.m. (not necessarily 3 p.m. to 6 p.m.). If this is the case, then the DEIR has failed to analyze the correct peak hour that applies to this particular neighborhood. Los Angeles Department of Transportation ("LADOT") peak hour reporting requirements alone are not substantial evidence unless they are supported by facts specific to the Project's location.

9-39

5. <u>The DEIR Must Analyze Operational Traffic Impacts In Conjunction with Partial Construction Traffic.</u>

The DEIR significantly underreports the Project's construction traffic impacts by ignoring the development phasing allowed by the proposed Development Agreement. The DEIR's construction traffic section assumes that the entire Project will all be built at once purportedly in order to provide a conservative analysis of construction impacts. However, ignoring the much more likely scenario that the Project will be built in phases[7] has the result of severely undercounting total traffic impacts and problems that would be posed by construction traffic *in conjunction* with operational traffic from a half-complete Project. The traffic impacts of a partially built Project, together with construction elsewhere on the site, would create a significant impact that has not been analyzed. CEQA requires that the Project's combined traffic impacts be analyzed.

9-40

[7] "The Project includes a Development Agreement that would allow the long-term phased buildout of the Project." (DEIR, p. II-34.)

6. The DEIR's Trip Cap Erroneously Combines A.M. Trips and P.M. Trips.

As the DEIR's Traffic section demonstrates, the City differentiates between a.m. and p.m. peak hour impacts (e.g., an intersection can be significantly impacted in the a.m. peak hour, but not the p.m. peak hour). Despite the City's requirement of a separate impact analysis for the a.m. and p.m. peak hours, the equivalency program's trip cap of 1,498 *combines* a.m. and p.m. peak hour trips. CEQA requires that one trip cap be created for the a.m. peak hour and that another trip cap be created for the p.m. peak hour to keep impacts consistent with the DEIR's impact envelope. If this is not done, the Applicant will be afforded the ability to create a greater impact than that which the DEIR has disclosed for one of the peak hours. For example, ITE rate 931 (Quality Restaurant) generates virtually no trips in the a.m. peak hour, but has particularly high traffic generation rates in the p.m. peak hour. If the Applicant were to provide a significant amount of restaurant space in the Project, but only measured the resulting restaurant trips against a combined peak hour trip cap, the restaurants' inordinate p.m. peak hour impacts would be masked, and p.m. peak hour impacts on nearby intersections could not be analyzed. As a result, the DEIR may fail to disclose the specific a.m. or p.m. peak hour trip impacts that could result from the Project.

9-41

7. The DEIR Provides No Substantial Evidence in Support of Its Approximately 30% Vehicle Trip Reduction for Public Transit Use.

The DEIR's traffic study assumes an approximately 30% reduction in vehicle trips due to public transit use. First it adjusts the trip generation rates by 15% (Table IV.K.1-4) and then, in what is arguably double-dipping, takes another 15% reduction on the back-end for public transit usage in connection with the Transportation Demand Management ("TDM") program.[8] (DEIR, p. IV.K.1-55.) While TDM programs may be effective in reducing total vehicle trips, the DEIR does not support the high 30% total trip reduction related to public transit with substantial evidence. For a Project that does not include any affordable units (in fact, the views from the proposed 55-story towers will command multi-million dollar prices) and whose office and hotel uses will likely be tied in great part to the entertainment industry, it is not clear how 30% of Project trips will be bus and Metro Red Line trips (the Metro Red Line, while very convenient to the Project, still only covers a very small portion of the sprawling Greater Los Angeles area). The DEIR needs to provide evidence in the form of similar transit-adjacent Los Angeles projects to support the assumptions regarding trip reductions. Likewise, much of the TDM program currently lacks any enforcement mechanisms or objective performance standards by which the

9-42

[8] Some of the 15% reduction from the TDM program would presumably come from bicycle usage and other vehicle trip reduction measures. However, the DEIR has not shown that this particular project could deliver a total 30% reduction either way.

success of the TDM program can be measured. As drafted, the TDM program is impermissible deferred mitigation.

9-42 (Cont)

8. The DEIR's Significance Determination for Construction Traffic Impacts is Not Supported By Substantial Evidence.

The DEIR's significance determination for construction traffic impacts is not supported by substantial evidence. For example, none of the Project's construction trips were assigned to the street system to determine whether construction traffic would exceed LADOT impact thresholds. With respect to the DEIR's trip cap, it cannot be relied upon because construction traffic patterns will bear no resemblance to the Project's operational uses. (And if the trip cap could be used, the DEIR fails to show how construction traffic trips fall under the total trip cap.[9])

9-43

In addition, the construction traffic mitigation measures do not demonstrate how impacts will be reduced to a level less than significant. If anything, Mitigation Measures K.1-1 and K.1-3 impermissibly defer mitigation by leaving determinations on sidewalk closures, haul routes, traffic detours, etc. to a future point in time and by providing that the haul route "shall avoid residential areas and other sensitive receptors *to the extent feasible*." (Emphasis added.) As the Project's haul route requires discretionary approval from the City, the DEIR must analyze now – not later – whether a haul route can be created that will not impact sensitive receptors. If the Project proposes to use a haul route that passes AMDA, then the DEIR must first demonstrate that other routes are infeasible rather than leave that determination to a future point in time. Of course, should the haul route pass AMDA, this would be yet another new significant impact requiring recirculation of the DEIR.

9-44

9. The DEIR Fails to Analyze Cumulative Construction Traffic Impacts.

The DEIR fails to consider that several projects are being built, or will be built, in the immediate vicinity of the Project (e.g., the BLVD 6200 Project, the Yucca Condominium Project). In addition to the combined traffic trips, many of these other development projects require, or will require, the same construction staging areas and haul routes. The DEIR needs to consider contingency plans in the likelihood of concurrent development and analyze total construction impacts accordingly.

9-45

[9] The DEIR points to Table IV.K.1-12 for the proposition that "the level of trip-making activity from the Project Site during the combined peak hours will be 1,068 trips, which is more than one-quarter below the Trip Cap of 1,498 trips." (DEIR, p. IV.K.1-43.) While the DEIR may be correct that total peak hour construction trips would be 1,068, Table IV.K.1-12 does not demonstrate this.

10. The Traffic Study's Use of ITE Code 492 Is Not Supported by Substantial Evidence.

If there ever was an ITE traffic generation rate that should be used with great caution, it is Land Use Code 492 (Health/Fitness Club). This ITE rate, unlike most ITE rates which are based on multiple observations throughout the country and rigorous peer review, was developed based on *one* observation. It is also unclear where this *one* observation was conducted, when it was conducted, and why it would bear any meaningful relationship to the traffic generation rate for a gym in an urban area of the country that has consistently generated higher trip rates for gyms. For Code 492, ITE's *Trip Generation* itself states that "[u]sers are cautioned to use data with care because of the small sample size." (See Exhibit M). Furthermore, each data plot and equation in the traffic manual notes, in bold: "**Caution – Use Carefully – Small Sample Size.**" (Exhibit N). Given this language, it is incumbent on the DEIR's traffic consultant to provide evidence substantiating how the ITE data has been used appropriately and cautiously. If such evidence is unavailing, in order to have a legally defensible document the DEIR must provide a generation rate that is based on traffic counts from existing fitness clubs within the City, or that is otherwise appropriate.

9-46

11. The DEIR Fails to Evaluate the Traffic Impacts of the Rooftop Viewing Platform.

One would not know anything about this from the DEIR, but the Applicant intends to create a major tourist destination at the Project site that has been completely omitted from environmental study. (See Exhibit O.) ("The 8,300 square foot rooftop observation deck [accessed by a dedicated public-accessible elevator] on the East Site will create an open, publicly-accessible attraction that will serve as a new landmark Hollywood experience for area residents and visitors. The observation deck will feature a full service café, outdoor seating, attractive hardscapes and landscaping that will set the feature apart from other observation decks across the country.") If, as the Project's entitlement application notes, this observation deck will be a major draw for tourists and residents alike, how have its impacts been evaluated? The DEIR fails to discuss traffic impacts from this deck, which will include tour bus traffic and parking impacts that must be analyzed.

9-47

12. The DEIR Fails to Evaluate the Project's Traffic Impacts on Weekend Nights.

It is unclear why only weekday a.m. and p.m. peak hours were studied for this Project. Many projects of the scale proposed by the Applicant include weekend impact analysis. In this case, given the high amount of night club, restaurant, retail, hotel, and observation deck uses that may be active in the Project during weekend nights, the DEIR must analyze Friday and Saturday night traffic impacts. This area of Hollywood is literally the center of Los Angeles nightlife on

9-48

weekends, with vehicles creating gridlock from approximately 9 p.m. to 3:00 a.m. (often at levels that by far exceed weekday a.m. and p.m. peak hours). The traffic study cannot be complete until weekend impacts are studied and all feasible mitigation reduces those impacts to a level less than significant. 9-48 (Cont)

13. The DEIR Fails to Evaluate Queuing Impacts on the Hollywood Freeway.

Despite a request from the California Department of Transportation, in response to the DEIR's Notice of Preparation, that the DEIR study the queuing of vehicles using off-ramps that will back into the mainline through lanes of the Hollywood Freeway, the DEIR is completely silent on the Project's potential significant impacts due to queuing. Especially on weekend nights, the exits off the Hollywood Freeway into Hollywood become extremely backed up, creating impacts on mainline segments as well. The DEIR cannot ignore this significant impact. 9-49

14. The DEIR Fails to Impose All Feasible Mitigation for the Project's Significant Traffic Impacts.

Given the major deficiencies identified in practically every component of the DEIR's traffic study, the traffic analysis needs to be redone. The DEIR identified *restriping* at *one* intersection as the only roadway improvement mitigation measure for this massive Project. This cannot possibly be the only feasible road improvement; thus, AMDA may suggest additional feasible mitigation measures once the Project's plans for ingress and egress are disclosed and the traffic study is redone so as to reasonably identify the Project's traffic impacts. One thing is clear at this point, however. Given the Project's significant impacts at multiple intersections, the DEIR needs to identify the mitigation measures that were supposedly discarded and deemed infeasible for the DEIR's conclusions about infeasibility to be supported by substantial evidence. 9-50

D. The DEIR Fails to Completely Analyze the Project's Parking Impacts on the Surrounding Community.

The DEIR concludes that the Project will not have significant operational impacts on parking because the Project will presumably have enough parking for its own internal uses. Assuming this is true, the DEIR still fails to account for the Project's displacement of public parking lots used by Pantages Theater patrons and other area visitors. Furthermore, from a cumulative impacts standpoint, the other parking lots in the area used for Pantages Theater parking have been entitled for other projects, one of which is already under construction. The DEIR needs to analyze the displacement of public parking spaces used for the Pantages (and other nearby uses) and mitigate parking impacts accordingly. The trickle-down impacts from the Pantages lacking parking for approximately 3,000 patrons for any given performance is also likely to create significant traffic congestion on area streets. Other projects in the vicinity, like 9-51

the Hollywood Tower Terrace project at Franklin and Gower, have provided significant public parking components to mitigate such impacts. The proposed Project needs to do the same.

9-51 (Cont)

Likewise, street parking in the area is used by AMDA students and visitors. AMDA is concerned about the street parking displacement that will occur as a result of the Project during construction and operations. The DEIR also needs to disclose whether or not the Project's commercial parking will be free of charge. If parking will not be free of charge, the DEIR needs to analyze parking validation options and off-site parking spillage that will occur as a result of Project visitors who are unable or unwilling to pay for parking.

9-52

E. The DEIR's Analysis of Aesthetics Conceals and Inappropriately Minimizes the Impacts of the Proposed Project.

1. The DEIR Fails to Identify AMDA as a Sensitive Receptor and Fails to Identify Significant Shade-Shadow Impacts to AMDA.

Once again, the DEIR fails to identify AMDA as a sensitive receptor, in the process concealing the Project's significant shade-shadow impacts on AMDA. (See DEIR, Table IV.A.2-1.) Not only would the Project's shade-shadow impacts surpass the threshold for AMDA's buildings, they would create significant shadows in the key outdoor areas of the AMDA campus, such as the AMDA piazza and outdoor stage. (See Figures IV.A.2-1 through IV.A.2-7, demonstrating that AMDA's campus would be shaded by both Project's towers from 9:00 a.m. to 3:00 p.m. during the winter solstice). This is a significant impact not disclosed in the DEIR. Should the Project be constructed as proposed, AMDA students will essentially no longer have any sunlight on their campus. The DEIR needs to identify these impacts and mitigate them to a level less than significant in a re-circulated DEIR.

9-53

2. The DEIR Does Nothing to Mitigate Significant Impacts to Focal Views.

The DEIR states that the impacts to focal view obstruction of the Capitol Records Tower would be significant and unavoidable, but fails to provide any mitigation for this impact. CEQA requires all feasible mitigation to be imposed. A simple solution would be to reduce the floor plate of a 220-foot building adjacent to the Capitol Records Tower and create an absolute minimum setback requirement (there is no reason a 220-foot building must have a floor plate that blocks views of the Capitol Records Tower).[10] A determination that mitigation of impacts to the Capitol Records Tower is infeasible cannot be supported by substantial evidence.

9-54

[10] It should be noted that this mitigation is not to be viewed as an expression of support for a taller tower. The taller towers create their own type of significant impact that must be mitigated.

3. New Visual Simulation Renderings of the Proposed Project and View Impacts on the Capitol Records Tower are Required.

The DEIR's visual simulations improperly obscure views of the Capitol Records Tower and minimize the iconic role that it currently plays in the Hollywood skyline. (See Exhibit P.) For some reason, the DEIR's view simulations are by and large extremely small and the photographs are taken from very great distances that would make it appear that the Capitol Records Tower is not seen from various vantage points. In particular, the view simulations of the Project from the Hollywood Freeway, which currently has one of the most iconic views of the Capitol Records Tower and signal the entrance to Hollywood, appear designed to hide and minimize the building. (The photographs are also taken from the opposite side of the freeway from which views would be experienced.) 9-55

One only need to look at the view simulations in the April, 2007 Draft EIR for the Yucca Street Condominium Project (the last Draft EIR where views of the Capitol Records Tower were at issue) to see that the Capitol Records Tower views are very substantial. (See Exhibit Q.) This Draft EIR for a much smaller project included multiple photographs that actually showed meaningful views of the Capitol Records Tower in full-size photographs, juxtaposed with visual simulations of the proposed project, and subsequent analysis of each photograph. Given how previous environmental impact reports have treated the Capitol Records Tower, this DEIR's exclusion of meaningful and prominent Capital Records Tower views raises serious questions about potential DEIR bias and renders the analysis insufficient to support the DEIR's finding of insignificance. 9-56

4. The DEIR's Equivalency Program Renders Meaningful Aesthetics Analysis Impossible.

For a Project being built directly adjacent to one of the City's most important monuments, near one of the most famous intersections in the world, the vagueness and uncertainty created by the DEIR's equivalency program is completely inappropriate for environmental analysis of aesthetics. The Project's Development Regulations state that "parking, open space and related development requirements for *any* component of the Project may be developed in *any* location within the Project site." (Development Regulations, p. 10.) (Emphasis added.) Thus, the public really has no idea what the ultimate project will look like. 9-57

Likewise, many Project elements do not bear any resemblance to what is described in the DEIR and in many cases the Project could be much more impactful on aesthetics than what was analyzed in the DEIR. For example, the DEIR states that "the Project would include up to three levels of above-grade parking within the podium structures." (DEIR, p. II-31.) But the Project's 9-58

Development Agreement would not commit the Applicant to this. In fact, the Project applications filed with the City state that the Project will have "around seven stories of above-grade parking." (See Exhibit A.) And more importantly, if the Applicant wanted to do all above-ground parking in 15-stories, the Development Regulations would do nothing to prevent this either.

9-58 (Cont)

5. The DEIR's Analysis of Temporary Construction Impacts is Inadequate.

The DEIR's analysis of temporary construction impacts is very cursory. For example, no reference is made whatsoever to truck staging areas, which the DEIR notes elsewhere would be on Yucca Street, in what is essentially the middle of AMDA's campus. The DEIR must analyze the aesthetic impact of construction on student life at AMDA over the course of three years if the Project is built in one phase (longer if it is multi-phased) and mitigate those impacts to a level less than significant. The one mitigation measure that has been provided (a fence) is far from sufficient.

9-59

F. The DEIR's Air Quality Analysis Is Inadequate.

1. Since the Traffic Study Artificially Minimizes Project Trips, the Air Quality Analysis is Similarly Flawed.

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Given all the flaws in the traffic study discussed above, when the traffic study is redone, the air quality impacts must be recalculated with the correct traffic inputs. As presently drafted, by severely underestimating the Project's traffic impacts, the DEIR fails to measure the Project's true air quality impacts.

2. The DEIR Must Analyze the Project's Specific Air Quality Impacts on AMDA, Including Localized CO and Toxic Air Contaminant Impacts.

As stated previously, AMDA is a sensitive receptor adjacent to the Project that has not been identified as such. Furthermore, AMDA's "piazza," an outdoor courtyard that is the central gathering place for AMDA students and a component of AMDA's cafeteria, is at the corner of Yucca Street and Vine Avenue (and closer than 25 feet from the road), yet the DEIR fails to analyze CO hotspot impacts on students at this location. As a sensitive receptor, AMDA must be studied for CO hotspots, toxic air contaminants, and other localized emissions impacts. This analysis must include construction impacts, as well as the potential operational impacts of an above-ground parking structure at the property line with AMDA.

9-61

3. The DEIR Fails to Impose All Feasible Mitigation Measures for ROG, NOx, and PM2.5.

Despite regional significant and unavoidable reactive organic gas ("ROG") and nitrogen oxide ("NO_x") impacts, the DEIR fails to impose all feasible mitigation for these particulates. For example, the DEIR does not consider best practices to reduce construction worker trips, further reductions in construction vehicle idling times, Tier 4 off-road emissions standards, electric powered compressor engines in lieu of fuel combustion sources, alternative fuels, minimization of traffic conflicts during construction, electricity usage from power poles in lieu of diesel or gasoline generators, low-VOC coatings, etc. Simply put, the DEIR has not established that other mitigation measures that would further reduce the significant impacts are infeasible. Finally, with respect to localized on-site daily construction emissions, the DEIR fails to impose all feasible mitigation to further reduce $PM_{2.5}$ levels to a level less than significant. 9-62

G. The DEIR's Climate Change Threshold Is Completely Counter to the Instructions of the California Natural Resources Agency and Violates CEQA.

The DEIR's impact determination is based on a comparison of the Project to "business as usual." (DEIR, p. IV.B.2-16). Such an approach is legally incorrect and goes directly counter to the instructions of the Natural Resources Agency, the State agency that was responsible for amending the CEQA Guidelines to address climate change. As stated in the Natural Resources Agency's Final Statement of Reasons accompanying the amended CEQA Guidelines:

> This section's reference to the "existing environmental setting" reflects existing law requiring that impacts be compared to the environment as it currently exists. (State CEQA Guidelines, § 15125.) This clarification is necessary to avoid a comparison of the project against a "business as usual" scenario as defined by ARB in the Scoping Plan. Such an approach would confuse "business as usual" projections used in ARB's Scoping Plan with CEQA's separate requirement of analyzing project effects in comparison to the environmental baseline. (*Compare* Scoping Plan, at p. 9 ("The foundation of the Proposed Scoping Plan's strategy is a set of measures that will cut greenhouse gas emissions by nearly 30 percent by the year 2020 as compared to business as usual") *with Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278 (existing environmental conditions normally constitute the baseline for environmental analysis); see also *Center for Bio. Diversity v. City of Desert Hot Springs*, Riverside Sup. Ct. Case No. RIC464585 (August 6, 2008) (rejecting argument that a large subdivision project would have a "beneficial impact on CO2 emissions" because the homes would be more energy efficient and located near relatively uncongested

9-63

freeways).) Business as usual may be relevant, however, in the discussion of the "no project alternative" in an EIR. (State CEQA Guidelines, § 15126.6(e)(2) (no project alternative should describe what would reasonably be expected to occur in the future in the absence of the project).) (Exhibit R.)

9-63 (Cont)

By comparing the Project's greenhouse gas ("GHG") emissions to "business as usual," the DEIR completely undercounts GHGs and utilizes the wrong baseline, which is the issuance of the Notice of Preparation.[11] Admittedly, no single development project will create significant climate change impacts on its own. However, the DEIR must analyze Project emissions in accordance with legal requirements, since individual development projects may have a cumulatively significant impact that needs to be seriously analyzed.

H. The DEIR's Analysis of Impacts to Cultural Resources Is Not Supported By Substantial Evidence.

1. <u>The DEIR First Needs to Analyze and Disclose the Significance of the Capitol Records Tower Before Any Meaningful Analysis of Project Impacts Can Be Made.</u>

9-64

One would not know from the DEIR that the Capitol Records Tower was the first round office tower in the world, the first skyscraper built in Hollywood after World War II, that many view the building as "the symbol of recorded music on the West Coast," and perhaps most importantly, that the City of Los Angeles Historic-Cultural Monument ("HCM") application for the building identified the Capitol Records Tower as "literally the beacon of Hollywood." (See Exhibit S.) Whereas the City's HCM file makes clear that the Capitol Records Tower is an iconic and integral facet of the Hollywood (and Los Angeles) skyline – not just any historic building – the DEIR fails to discuss and analyze the cultural resource impacts on the Hollywood and City skyline should over one million square feet of development envelop the Capitol Records Tower and forever change its historic role as the beacon of Hollywood.

One of the key inquiries relative to Cultural Resources is whether a project will reduce the integrity or significance of important resources on the site or in the vicinity. (See CEQA Guidelines Section 15064.5(b)(1)) ("A substantial adverse change in the significance of a historic resource means . . . alteration of the resource *or its immediate surroundings* such that the

[11] The DEIR also does not disclose where the erroneous threshold originated from. Under CEQA, "[t]hresholds of significance to be adopted for general use as part of the lead agency's environmental review *must* be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence" (CEQA Guidelines Section 15064.7)(Emphasis added). To our knowledge, the City has not adopted this erroneous threshold through any public review process, nor is the threshold supported by substantial evidence. The DEIR therefore must be revised to include a discussion of how GHG emission thresholds comply with CEQA Guidelines Section 15064.7.

significance of an historical resource would be materially impaired.") (Emphasis added.) The DEIR must provide an analysis of how the Project can affect the historic nature of a City monument that is literally a "beacon" and symbolizes an entire region and/or idea. Specifically, the DEIR must include a good-faith discussion of when an adjacent development can be so massive in scale relative to a monument of worldwide importance that such a monument is materially impaired. The DEIR appears to take the position that mere visibility is the only thing that matters, such that a ten-foot setback renders impacts less than significant. The CEQA Guidelines indicate otherwise.

9-64 (Cont)

2. <u>The Lack of a Defined Project Renders Analysis of Impacts to the Capitol Records Tower Impossible.</u>

The lack of a specific design (including basic configuration or massing details) for the Project makes it impossible to analyze the Project's consistency with the Secretary of the Interior's Standards and Cultural Resources under CEQA, generally. The DEIR must be revised to include designs that would be used in connection with the proposed equivalency program, which is much too vague to allow for any meaningful environmental review. For example, one of the Secretary of the Interior's Standards requires that for related new construction "new work shall be differentiated from the old . . . ." However, it is impossible to understand the Project's consistency with the Standard given the lack of a Project design and the very broad language in the Development Regulations, which allow innumerable Project permutations that conflict with the Secretary of the Interior's Standards (See Development Regulation 7.1.5.) ("Generally, buildings over 150 feet tall . . . shall not be historicized. They are contemporary forms in the skyline and shall appear as such."). The vagueness (use of the word "generally") and exemption for development lower than 150 feet in height in this instance shows how the Development Regulations fail to provide meaningful historic resource protections.

9-65

The Development Regulations also fail to provide sufficient protections for the Capitol Records Tower from a massing standpoint. For example, the DEIR finds impacts to historic resources less than significant because the Development Regulations "help reduce potential adverse effects of mass and scale by reducing the bulk of buildings as height increases and pushing tower elements toward the center of the block, and away from historic resources. . . . In this way, important views from Vine Street and the Hollywood Freeway are protected." (DEIR, p. IV.C-39.) However, this language from the DEIR assumes a configuration for the Project that does not necessarily have to be built. For example, the DEIR does not disclose that if a building less than 150-feet high is built along the east side of Vine street, then no open space need be provided along Vine. (See Development Regulation 6.1.1). Likewise, the Development Regulations allow parking to be built anywhere on the Project site, without consideration for historic resource impacts. (Development Regulation 4.1.) Several other potential configurations

9-66

for the Project would be completely insensitive to the Capitol Records Tower, the DEIR representations notwithstanding.

9-66 (Cont)

I. The DEIR's Land Use Section Does Not Accurately or Fully Analyze the Project's Impacts.

1. The DEIR Fails to Accurately Identify the Project Site's Applicable Planning and Land Use Regulations.

Starting with the DEIR's Project Description, and carrying through its Land Use Planning environmental impact analysis, there are numerous errors and inconsistencies pertaining to the current planning and land use regulations that apply to the Project site. For example, the DEIR states that all square footage numbers for the Project are calculated using the definition of "net square feet" as defined in LAMC Section 14.5.3. (DEIR, p. II-23, fn. 4.) No such definition appears in the LAMC, and the referenced section of the LAMC pertains to transfers of floor area in Downtown Los Angeles. The DEIR also refers to "net developed floor area," which is also allegedly defined by the LAMC (DEIR, p. II-24, Table II-4, note b), but again, no such defined term exists. The DEIR's erroneous references to purportedly defined terms renders it impossible for the public to assess the true scale and impacts of the proposed Project.

9-67

2. The DEIR Does Not Demonstrate the Project's Conformance with Critical Community Plan Goals and Policies.

(a) *The Project Does Not Provide a Range of Housing Opportunities.*

The Community Plan includes several policies regarding the importance of providing housing opportunities within Hollywood, including the importance of providing housing opportunities for households of all income levels and needs. (Community Plan Policy LU.2.17.) The DEIR asserts that the Project will comply with this policy by including one-, two-, and three bedroom residential units, which "range of units" will provide housing opportunities for a "variety of family sizes and income levels." (DEIR, p. IV.G-39.) This claim is not based in reality – while a one-bedroom unit in a new high-rise development will almost certainly command a lower price than a three-bedroom unit in that same project, there is no rational reason to assume that a lower-income individual or family could afford the rent or purchase price for that one-bedroom unit. Therefore, the Applicant must provide an accurate representation of the Project's consistency in a re-circulated DEIR.

9-68

(b) *The Project Does Not Specify How Pedestrian And Vehicular Traffic Will Be Separated.*

9-69

Community Plan Policies LU.3.4, LU.3.5, and LU.3.6 are intended to ensure that conflicts between pedestrians and vehicles are minimized, in recognition of one of the Community Plan's overall goals of promoting a safe and navigable urban streetscape for pedestrians. These policies require that sidewalks be designed to make pedestrians feel safe, discourage curb cuts near high pedestrian traffic areas, and discourage the siting of parking areas next to busy sidewalks. However, the DEIR only addresses the first of these three policies, and states that by providing straight (or, alternately, "relatively straight") sidewalks, pedestrian safety would be ensured. (DEIR, p. IV.G-40.) The DEIR does not cite or discuss Policies LU.3.5 and LU.3.6 regarding curb cuts and the parking areas, and, as discussed elsewhere in this letter, the DEIR does not disclose *any* precise driveway points for the Project. This lack of information not only precludes an understanding of how pedestrian activity at specific project access points may create hazards, but it also prevents the City from finding that the Project complies with these Community Plan Policies regarding pedestrian safety. An accurate representation of this Community Plan inconsistency must be provided in a re-circulated DEIR.

9-69 (Cont)

(c) *The DEIR Misrepresents the Project's Proposed Open Space and Passageway Development Regulations.*

Community Plan Policy LU.3.23 encourages large commercial projects to be designed with pedestrian connections, plazas, greenspace, and other related design features so as to avoid "superblocks." Community Plan Policy LU.4.19 similarly encourages the construction of public plazas, in addition to greenspace. The DEIR, in affirming the Project's compliance with Community Plan Policy LU.3.23, cites the Project's proposed Development Regulations, and states that "open space will enable important pedestrian linkages and through-block connections for the Project." (DEIR, p. IV.G-42.) The DEIR further states that: "Grade level open space will be designed to showcase the Capitol Records Building and Jazz Mural and will include design features and outdoor furniture to activate the ground floor amenities." (*Id.*) This response appears to demonstrate the Project's compliance with these two Community Plan Policies. However, an examination of the proposed Development Regulations indicates that if the Project is developed so as not to exceed 150 feet in height (i.e., without any "towers" as defined by the Development Regulations), there is no required amount of grade-level open space (Development Regulation 6.1.1) and there is no minimum amount of "publicly accessible passageway area" (Development Regulation 8.3.4 a(i)). This serves to emphasize the difficulty of assessing the environmental impacts of a project with no fixed design – if the Project is built at a height above 150 feet, the DEIR's claims about open space and passageways may be correct, but if a shorter project is built, these claims are no longer accurate. Given the Community Plan's clear recommendation to design projects that provide open space, pedestrian access, and greenspace, the DEIR must provide a more detailed analysis of how the Project will comply with these policies, regardless of the ultimate height that is proposed for the Project.

9-70

J. The DEIR's Public Services Analysis Is Legally Inadequate.

1. The DEIR Improperly Categorizes the Project's Fire Code Land Use for Maximum Response Distance and Fire Flow Requirements.

The City's Fire Code specifies maximum response distances that are allowed between project locations and fire stations, based upon land use and fire-flow requirements. (LAMC Section 57.09.06, Table 9-C.) When response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices and systems deemed necessary by the City. For the Project's proposed high-rise construction, these additional required fire protection devices and systems could include standpipe systems, fire alarm systems with emergency communication system, standby power systems, and an emergency command center.[12]

The DEIR correctly notes that Table 9-C of the Fire Code identifies four types of land uses with corresponding maximum response distances from the nearest fire station –Low Density Residential, High Density Residential/Neighborhood Commercial, Industrial/Commercial, and High Density Industrial/Commercial (Principal Business Districts or Centers). However, despite the Project's proposed location in the center of the Hollywood business center within a Regional Center land use designation, and despite the fact that the Project would contain more than one million square feet of high-rise residential and commercial floor area, the DEIR asserts that the proper land use category for purposes of Table 9-C is High Density Residential/*Neighborhood* Commercial. As a result of this categorization, the DEIR claims that the applicable maximum response distance from the nearest fire station is 1.5 miles, and that two City fire stations are located within this maximum distance (Station No. 27 at 0.7 miles from the Project, and Station No. 82 at 0.8 miles from the Project). 9-71

While the Project, in several of its many configurations, would contain high density residential land uses, there is no configuration that could appropriately be classified as "neighborhood" commercial. The equivalency program would also allow a completely commercial scenario. Given the location and immense size of the Project, the appropriate Table 9-C land use category should unquestionably be High Density Industrial/Commercial (Principal Business Districts or Centers), which has a corresponding maximum response distance of 0.75 miles from the nearest engine company, and 1 mile from the nearest truck company. Only Station No. 27 is within 0.75 miles, and by only 0.05 miles. Moreover, Station No. 27 is a "light

[12] National Fire Protection Association, "High Rise Building Fires," December 2011, p. 17.

force" truck and engine company, with a single aerial ladder truck and a single engine.[13] These details pertaining to response distances must be clarified in the DEIR to properly classify the Project's proposed land uses, and to describe the impacts resulting from the relatively limited availability of fire protection services in the immediate vicinity of the Project.

9-71 (Cont)

In addition to maximum response distances, Table 9-C also sets forth minimum required fire flows for the same four land use categories discussed above. Confusingly, while the DEIR claims that the Project is appropriately categorized as High Density Residential/Neighborhood Commercial for purposes of determining maximum response distances, elsewhere the DEIR claims that the Project only requires a fire flow of 6,000 to 9,000 gallons per minute from four to six hydrants flowing simultaneously, which corresponds to the Industrial/Commercial land use designation. (DEIR p. IV.J.1-11.) Again, given the location and proposed size of the Project, the appropriate Table 9-C land use category should be High Density Industrial/Commercial (Principal Business Districts or Centers). This land use category requires a minimum fire flow of 12,000 gallons per minute, available to any block. This fire flow requirement could be even higher, for Table 9-C requires that, where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 g.p.m. will be required. Given the densely developed nature of the properties surrounding the Project site, the possibility of simultaneous fires seems reasonable. The DEIR must provide more analysis of how the Project is being analyzed for potential impacts to fire protection services, and must not arbitrarily assign the Project to two inappropriate Table 9-C land use categories.

9-72

2. The DEIR Completely Fails to Properly Analyze Fire Department Response Times.

The DEIR contains a cursory, and inaccurate, analysis of average Fire Department response times. The DEIR states that the Fire Department "prefers" to arrive on the scene of *all* types of emergencies (fire and/or medical) within 5 minutes in 90 percent of cases, and to have an advanced life support unit arrive to all high risk medical incidents within 8 minutes in 90 percent of cases. (DEIR, p. IV.J.1-4.) The DEIR then reports that average response times for Station Nos. 27 and 82 are 4:43 and 4:18, respectively, while the average response time for the slightly more distant Station No. 41 is 5:09. (DEIR, Table IV.J.1-3, p. IV.J.1-7.) Given the fact that two of the three discussed fire stations appear to meet the Fire Department's response time goal of 5 minutes, the DEIR concludes that the impact of the Project upon emergency response times would be less than significant.

9-73

However, the DEIR's stated response times, which were reported by the Fire Department to the Applicant's CEQA consultant, cover responses to *structure fires only*, and do not include

[13] DEIR p. IV.J.1-3, City of Los Angeles Fire Department website (http://lafd.org/apparatus/111-fire-a-rescue-resources/294-lafd-truck-company), accessed December 5, 2012.

response times to medical emergencies. This presents an inaccurate picture of what the true Fire Department response times are today, and what they might be in the future if the Project is constructed. In addition, the DEIR itself contains a reference to a broader problem with its analysis of Fire Department response times – in May 2012, the City Controller issued an audit of the Fire Department's claimed response times, and found that the Department had produced inaccurate response time data for a number of years, making it impossible to determine proper emergency response times, as measured against national standards. (City Controller, *Analysis of the Los Angeles Fire Department's Response Times*, May 18, 2012, p. 3.) Furthermore, this audit stated that, to the extent that the Department's data could be properly analyzed, it showed that medical response times had been increasing. (*Id.*)

The DEIR itself refers to the Controller's audit of Fire Department response times – in a footnote, the audit's finding that medical response times had increased is acknowledged. But the footnote goes on to state: "Nevertheless, this audit is presented for informational purposes only, and the written response from the LAFD (dated December 14, 2011) regarding response times is used in the analysis presented in this DEIR." (DEIR, p. IV.J.1-4, fn. 7.) This is completely inadequate analysis – the Controller's audit noted that the Fire Department had been keeping inaccurate response time data for years, which means that any "written response" issued by the Department *prior* to the audit is extremely suspect. Furthermore, even if the response time data provided by the Fire Department could be treated as accurate, it would only be accurate for responses to *structure fires only*, and not for medical responses. And, as the audit demonstrates, recent medical response times have been increasing. The DEIR completely fails to provide any context or analysis of this issue, and this cannot be allowed to occur – any proposal to add over one million square feet of residential and commercial uses in the heart of Hollywood will have a dramatic impact on the demand for fire and medical services. If the DEIR cannot provide an accurate analysis of the Fire Department's ability to meet current demand, there is no substantial evidence for its assertion that the Project will not result in any new significant impacts. This analysis must be completely redone to reflect the current state of affairs regarding the City's Fire Department.

9-73 (Cont)

3. The DEIR's Analysis of Police Services Impacts Fails to Acknowledge the Project's Alcohol-Serving and Entertainment Uses.

The DEIR briefly discusses the Project's potential impacts on existing police protection services, proposes minimal mitigation measures to be implemented during the construction and operation of the Project, and concludes that the Project would not create any significant environmental impacts. However, this analysis fails to accurately portray the uses proposed for the Project, some of which will produce additional impacts which must be analyzed in the DEIR. Specifically, the DEIR's Project Description notes that the Applicant will be seeking conditional

9-74

use approvals for on-site consumption of alcohol *and* live entertainment at the Project, including a night-club. However, despite being included in the Project Description, these proposed uses are not discussed anywhere else in the DEIR. Moreover, given the Project's proposed equivalency program, there is no way of knowing if one bar/restaurant will be developed, or if ten will be proposed. The proposed live entertainment use could include a small jazz club, or a sprawling nightclub with events seven nights a week. Regardless of the specific mix of uses that the Applicant eventually decides upon, alcohol and entertainment uses will have a direct impact on police services in the community, and without providing more information and analysis regarding these uses, the DEIR's conclusion that no significant impacts will exist is conclusory and not supported by substantial evidence.

9-74 (Cont)

K. The DEIR's Utilities and Service Systems Analysis Does Not Correctly Account for the Equivalency Program and Cumulative Impacts.

The DEIR's Utilities and Service Systems section analyzes the DEIR's Concept Plan, Commercial Scenario, and/or Residential Scenario to determine the Project's total potential impacts on utilities and service systems. In doing so, the DEIR neglects to analyze the true intensity of uses that could conceivably be developed at the Project site. For example, although the DEIR's Residential Scenario has more residential units than either the Concept Plan and Commercial Scenario, nothing prevents the Applicant from building even more residential units than the amount set forth in the Residential Scenario because of the Project's equivalency program. If the Applicant were to build more residential units than that in the Residential Scenario, then total Project impacts to those areas where residential uses are more impactful (like solid waste generation) have not been disclosed. This applies to every use, across every impact area (restaurants have greater water usage, for example, yet nothing in the DEIR or proposed Development Agreement creates a cap on restaurant space). Accordingly, all of the numbers in the DEIR's Utilities and Service Systems section are misleadingly low.

9-75

The DEIR also states that "the potential need for the related projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, relationship between the development of the Project and the related projects in relation to this issue as none of the related projects within the LADWP service area are located in proximity to the Project Site." (DEIR, p. IV.L.-1-20.) This is false. Immediately *adjacent* to the Project are the BLVD 6200 Project and the Yucca Condominium Project, for example. The DEIR must analyze the immediate impacts of these projects and other related projects in close proximity.

9-76

L. The DEIR's Alternatives Analysis Fails to Comply with CEQA.

1. The DEIR Does Not Provide a Reasonable and Legally Sufficient Range of Alternatives.

The DEIR's Alternatives section provides several alternative projects, but all of them (with the obvious exception of the required "No Project" alternative) appear to have been provided as part of a pro forma attempt to *appear* compliant with CEQA rather than to *actually* comply with CEQA. In practice, the DEIR does not provide a reasonable range of alternatives to comply with CEQA's minimum requirements for alternatives analysis. *Four out of the five* development alternatives provide for 875,228 net square feet of development (reduced from the proposed Project's 1,166,970 net square feet). In other words, four out of the five development alternatives provide *exactly* the same development square footage, with almost *exactly* the same, if not worse, impacts to aesthetics, air quality (construction), cultural resources (had it been correctly identified as significant), and noise (construction) – key significant impacts of the Project.[14] With respects to AMDA's concerns about noise and vibration, for example, the DEIR has provided four alternatives that would not alleviate impacts on AMDA in the slightest. This is not a reasonable range of alternatives in legal compliance with CEQA. 9-77

Likewise, all five of the development alternatives fail to either significantly reduce or eliminate the Project's significant impacts to areas such as aesthetics, transportation, and air quality. In fact, none of the alternatives completely eliminate a single significant impact. (As Table VI-70 of the DEIR demonstrates, despite the DEIR's identification of multiple significant and unavoidable impacts, not one impact was reduced to insignificance by a single alternative.) The DEIR's failure to eliminate a single significant impact makes little sense. For example, in connection with the reduced FAR alternative of 3:1, the DEIR provides that "impacts related to focal view obstruction under Alternative 3 would be significant and unavoidable, similar to the impact identified under the Project." (DEIR, p. VI-44.) However, this alternative, which has 583,485 less square feet than the Project, and is on the same approximately 4.5 acres, should have no difficulty reducing the focal view impact to a level less than significant. The DEIR could not conceivably provide substantial evidence in support of the proposition that there is no other place on the site to build, but on Vine Street, so as to block the view of the Capitol Records Tower from the intersection of Hollywood and Vine. Obviously, it is feasible to push a building 9-78

[14] Although the DEIR does not identify the impacts as worse, the impacts are in actuality worse in some cases because the DEIR purposefully removed public benefits from the Alternatives to make them appear unattractive. The removal of public benefits from the alternatives in and of itself makes them completely unrealistic. The Applicant would be hard-put to find another 583,485 square foot-plus project with a 20-plus year development agreement that has previously been approved by the City and has not been required to provide public benefits similar to those that magically disappear from the various alternatives.

back a bit after the total development envelope has shrunk by 583,485 square feet. AMDA can (and will, if necessary) provide several 583,485 square foot concept plans that would satisfy all the Project objectives and avoid significant impacts to focal views.

9-78 (Cont)

2. The DEIR Has Not, And Cannot, Show that A Further Reduced FAR Alternative is Infeasible.

The DEIR states that development of the Project site at a density lower than a 3:1 FAR was rejected for further review as an alternative to the Project because it would be economically infeasible and would not satisfy the project objectives. Given that the lowest FAR alternative evaluated in the DEIR is a large 583,485 square foot project, yet City discretionary review would be triggered by Los Angeles Municipal Code Section 16.05 at a mere 50,000 square feet of nonresidential floor area (or 50 residential units), the DEIR's range of alternatives is far from reasonable. The DEIR has to evaluate a significantly reduced Project. This is especially so because, as stated above, the DEIR's alternatives fail to eliminate or significantly reduce the Project's significant impacts. With respect to a 3:1 FAR project being infeasible in this area of Hollywood, this finding cannot be supported by substantial evidence. Several other projects in the area have been built at less than 3:1 FAR (e.g., the Jefferson at Hollywood Project on Highland and Yucca, the Hollywood Tower Terrace Project at Franklin and Gower).

9-79

Given the presence of multiple buildings in the area built at less than a 3:1 FAR, some of them quite recent, the DEIR must provide financial data to support its finding of infeasibility. Financial data is critical to evaluate whether an alternative is truly infeasible or merely less profitable, since CEQA does not permit an alternative to be rejected on profitability grounds. See *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1181 ("The fact that an alternative may be. . . less profitable is not sufficient to show that the alternative is financially infeasible."). The DEIR must provide specific evidence to support its finding of infeasibility. For example, in vacating an inadequate EIR and requiring the University of California to re-start the CEQA process, the Court stated that the University must "explain in meaningful detail in a new EIR a range of alternatives to the project and, if [found] to be infeasible, the reasons and facts that...support its conclusion." *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 406. In short, the DEIR's statement that anything less than 3:1 would be infeasible is completely conclusory, and must be supported with specific evidence and financial information.

3. The DEIR Must Include Footprint-Based Alternatives.

Given the significant noise, air quality, and shade-shadow impacts on AMDA due in great part to the Project's footprint, which places the Project's most intensive construction directly adjacent to AMDA, the DEIR must consider footprint alternatives that would have the

9-80

ability to significantly reduce, if not eliminate, many of the Project's significant impacts. None of the alternatives consider a setback from AMDA or less intense development around AMDA. There is little question that the Project site is large enough to permit flexibility for buffer areas and/or the relocation of the most intense development to other sections of the Project site. As none of the DEIR's alternatives mitigate noise, air quality, and shade-shadow impacts to AMDA, revised Project footprints that would significantly mitigate those impacts must be incorporated into the DEIR.

9-80 (Cont)

4. The Analysis of Each of the Alternatives is Highly Flawed.

The critique of the DEIR's Project analysis is hereby applied by reference to all of the alternatives, which suffer from the same analytical problems. Since the alternative *scenarios* need to be redone in their entirety, there is no need to individually discuss the analysis for each of them.

9-81

III. CONCLUSION.

We hope you agree that a project of this magnitude requires a thorough vetting of the issues with accurate information, thoughtful responses, and compliance with basic CEQA requirements. For the reasons set forth above, the numerous inadequacies in the DEIR require significant revisions and re-circulation of the DEIR.

Once again, we appreciate the opportunity to comment on the DEIR.

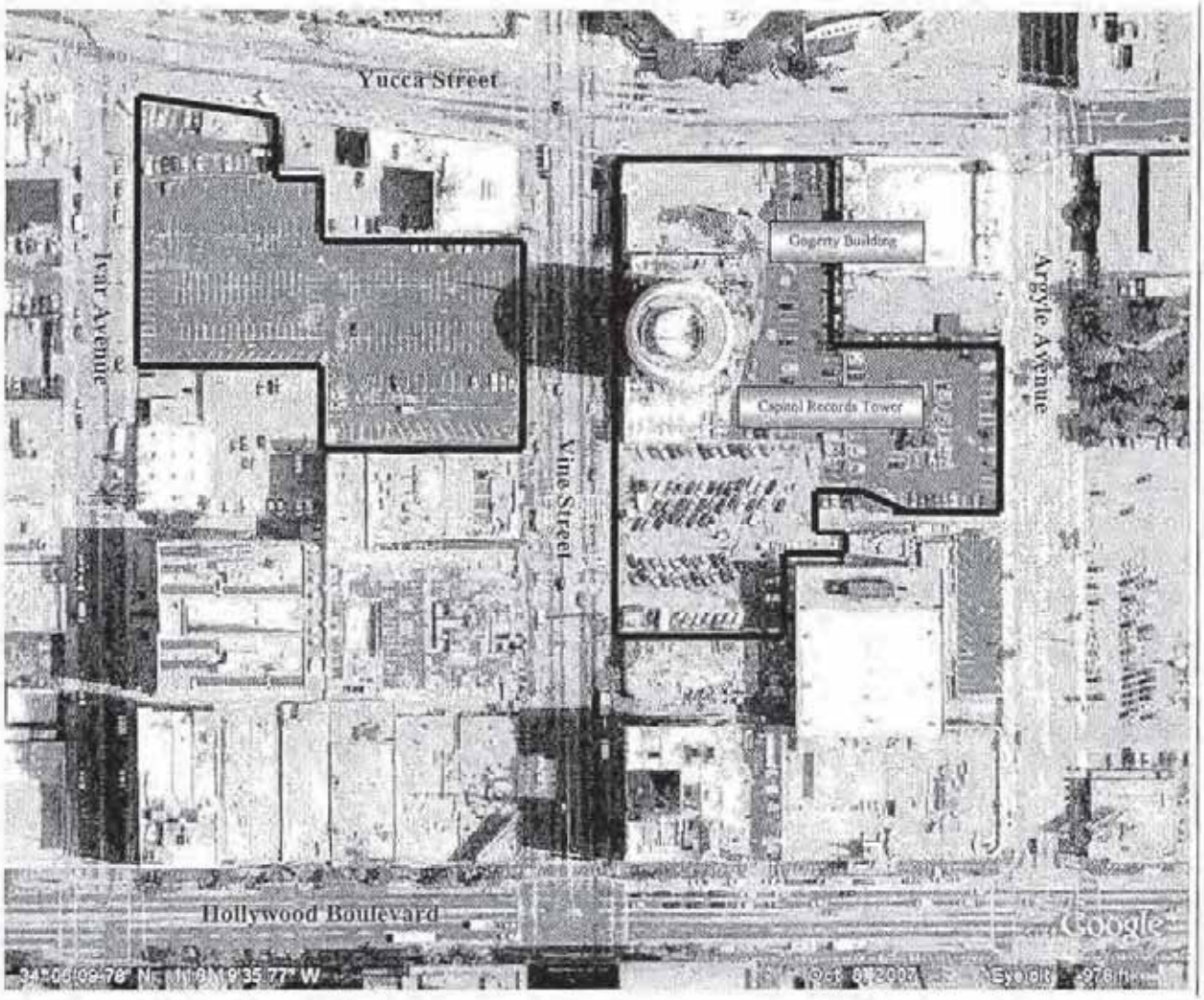
9-82

Very truly yours,

Victor De la Cruz
Manatt, Phelps & Phillips, LLP

Exhibit A

FIGURE 1



Project Description

The proposed Project consists of limited demolition and extensive new construction. The historic Capitol Records Tower will continue use as office space and as internationally-famous recording studios with underground sound recording facilities. The Gogerty Building at the corner of Yucca and Vine Streets will also continue as office space and will be incorporated into the Project. Existing surface parking, an 1,800-square foot rental car outlet near the northwest corner of the West Site, and two buildings at the southwest portion of the East Site, a vacant 100-square foot, significantly dilapidated building formerly operated as a photographic processing shop and a vacant 500-square foot, significantly dilapidated former convenience store, will be demolished and the Applicant will develop approximately 1,048,776 square feet of new floor area and 1918 parking spaces. New construction will consist of three multi-story buildings on two low-rise structures located on either side of Vine Street.

On the East Site, new construction will consist of a 12-story low-rise building comprised of residential, office and commercial uses partially wrapped around seven stories of above-grade

parking, on top of five stories of subterranean parking. Because the topography of the East Site slopes gently from East to West, the East Site will have two ground floor levels, one fronting Argyle Avenue and the other fronting Vine Street. The Project is designed to integrate the two ground floors with functional linkages and a consistent mix of uses and a pedestrian outdoor passage running east-west through the length of the East Site. A 33-story residential tower will rise out of the low-rise building to approximately 554 feet above street level at the roof of the highest habitable floor, creating a 45-story, 578,575 square foot structure that will be 584 feet above ground at the top of the roof-top parapet, the highest point of the building. A public observation deck with a food and beverage use will be located on the roof of the residential tower. An additional food and beverage use will be located on the 12th floor of the residential tower. The residential tower will consist of 250 condominium units, and an additional 67 loft-condominium units will be located in the low-rise building. The low-rise portion of the building on the East Site also will support over 100,000 square feet of new office uses. Commercial and food and beverage uses, including full-service restaurants and bars, will be located along a series of public courtyards and an outdoor pedestrian walkway connecting Vine Street to Argyle Avenue. The pedestrian plaza will provide a connection to the Little Country Church gardens and a variety of vantage points from which to view the world-famous Capitol Records Tower. As discussed above, the Capitol Records Tower and Gogerty Building will be preserved for continued office and recording studio use.

On the West Site, a four-story, two-tier low-rise structure comprised of a sports club with spa and child activity center, commercial and food and beverage uses as well as a hotel lobby will support two towers with four subterranean levels of parking, creating a 470,201 square foot building. Because the topography of the West Site slopes gently from West to East, the West Site will have two ground floor levels, one fronting Ivar Avenue and the other fronting Vine Street. The Project is designed to integrate the two ground floors with a mezzanine level. The larger high-rise tower, fronting Vine Street but offset at an angle, will consist of 34 stories of residential uses, creating a 38-story structure that will be approximately 482 feet above street level at the roof of the highest habitable floor and 511 feet above street level at the top of the roof-top parapet. The smaller second tower, also situated at an offset angle and located at the corner of Yucca and Ivar Streets, will be a 14-story 200-room luxury hotel, creating a 15-story structure that will be 218 feet above street level at the top of the roof, the highest point of the building. The residential tower will consist of 175 condominium units. The low-rise building will include a variety of food and beverage uses, an upscale sports club and ground floor commercial fronting Ivar Avenue.

West Site food and beverage uses will be located on the ground floor fronting Vine Street, on the mezzanine, and on the third floor. The ground floor food and beverage uses will be set back from the street by a public plaza that will have tables and accessory amenities for outdoor eating and will include a full-service restaurant and bar as well as a café. The mezzanine-level food and beverage use will be a nightclub. The third floor food and beverage use will service the general public, hotel guests and Project residents, including service at two outdoor eating areas demarcated for use by hotel guests and restaurant patrons on the western side and Project residents on the eastern side.

Consistent with the 2007 principles set forth in the City's "Do Real Planning," the Project is designed with walkability and pedestrian access as an organizing principle. The Project

Exhibit B

activity center for the benefit of members visiting the facility. The spa would include a full menu of services including massage, manicure and pedicure services, among other services. The fitness center/sports club would be accessible to residents of the Project and hotel guests, and a membership program will be available to the general public.

Under the proposed Equivalency Program, the amount of fitness center/sports club uses could be increased or decreased with corresponding changes to other land uses that, when evaluated against the trip cap would not generate, in the aggregate, more than 1,498 peak hour trips, which is the trip cap, or more than the maximum impact in any other issue area studied in either the Concept Plan, the Commercial Scenario or the Residential Scenario. Under the Commercial Scenario, the amount of fitness center/sports club uses would be approximately 80,000 square feet of floor area. Under the Residential Scenario, the amount of fitness center/sports club uses would be approximately 30,000 square feet of floor area. The total amount of fitness center/sports club development built could further increase or decrease in the ultimate development program built pursuant to the Development Agreement as long as the maximum impacts in each issue area are not exceeded and the total FAR cap is not exceeded.

f. Parking

The Project would provide on-site parking in accordance with the parking requirements of the LAMC, and as otherwise permitted through the discretionary actions for the Project. The actual number of parking spaces required for the Project will be dependent upon the land uses constructed in accordance with the Equivalency Program. For the commercial office, retail, and restaurant uses the Project would provide at least two (2) parking spaces for every 1,000 square feet. For the fitness center/sports club use, subject to the requested variance, two (2) parking spaces would be provided for every 1,000 square feet of floor area for the building. For the residential uses the Project would provide one (1) parking space for dwelling units of less than three (3) habitable rooms, one-and-a-half (1.5) parking spaces for dwelling units of three (3) habitable rooms and two (2) parking spaces for dwelling unit of three (3) or more habitable rooms.

Consistent with the policies of the Redevelopment Plan, a shared parking program may be applied on the Project Site when the uses have different parking requirements and different demand patterns in a 24-hour cycle. The intent for a shared parking program is to maximize efficient use of the Project Site by matching parking demand with complementary uses. In addition, the terms of the shared parking program would ensure that parking for each land use is provided either on the same lot as the use for which they are intended to serve or on another lot not more than a 750 foot distance therefrom. Under this program, the Project's conservative peak hour parking demands would be accommodated on-site. The parking program would also provide priority placement for alternative modes of transportation including bike parking and car-share parking.

Based on the Code required parking standards and the implementation of a shared parking program, it is envisioned that the Project would include up to three levels of above-grade parking within the podium structures, up to six levels of below grade parking on the East Site, and up to four levels of below grade parking on the West Site.

Exhibit C

E. Intended Uses Of The EIR

The intended uses of the Draft EIR include providing environmental clearance through CEQA for all discretionary actions that may be required for the development of the Project. Pursuant to CEQA, as a project-level EIR, the analysis contained in this report is detailed and specific enough to provide the decision makers and the community the information necessary to understand the environmental impacts of the Project. It also identifies effective and necessary mitigation measures to mitigate the potentially adverse impacts of the Project. This EIR contemplates implementation of the Development Agreement, which affords the Project Applicant the flexibility to develop the Project Site over a multi-year period in response to market demands. The specific discretionary actions that the lead and responsible agencies will be considering are as follows:

A. Lead Agency

The Project would require several discretionary actions by the City as the designated Lead Agency. Thus, implementation of the Project would require approval of the following:

- Development Agreement to establish development parameters on the Site.
- Vesting Tentative Tract Map for development mixed-use development components.
- Vesting Zoning Change from C4 Zone to the C2 Zone (to permit Fitness Center/Sports Club use).
- Height District Change to remove the D Development limitation.
- Conditional Use Permit for limited sale and on-site consumption of alcoholic beverages, live entertainment, and floor area ratio averaging in a unified development.
- Vesting Conditional Use Permit for a hotel within 500 feet of an R Zone.
- Variance for sports club parking, and for restaurants with outdoor eating areas above the ground floor.
- Demolition, grading, excavation, and foundation permits.
- Haul Route Approval.
- Any other discretionary actions or approvals that may be requested to implement the Project.

Other reviewing departments within the City may include:

- Los Angeles Police Department (Site Plan Review).

City of Los Angeles Planning and Zoning Code

Permitted Uses

Pursuant to LAMC Sections 12.14(A)(1)(a), 12.13.5, 12.13(A)(1), 12.13(A)(2)(a), 12.12.2(A)(1), 12.12.2(A)(1)(h), and 12.16(A)(2), the proposed land uses of the Project (residential, office, and commercial/retail) are permitted by-right in the C4 zone. The health club use, however, requires a zone change from C4 to C2. The other proposed uses of the Project, residential, office, commercial/retail, and restaurant, are also permitted in the C2 zone. Therefore, with the approval of a zone change, the proposed land uses of the Project would be consistent with the LAMC.

The Project Applicant is also requesting a CUP for limited sale and on-site consumption of alcoholic beverages and live entertainment and a CUP for a hotel within 500 feet of an R Zone. While these uses require entitlements, they are conditionally permitted by the LAMC.

Further, the Project Applicant is requesting a variance for restaurants with outdoor eating areas above the ground floor. With approval of the variance, restaurants with outdoor eating areas above the ground floor will be permitted.

Setback Requirements

Pursuant to LAMC Section 12.16(C), front yards are not required for buildings erected in a C4 zone. In addition, side and rear yards are not required for buildings used exclusively for commercial purposes. Moreover, pursuant to LAMC Section 12.16(C)(3), the lot area requirements of the R4 zone apply to all portions of buildings erected and utilized for residential purposes in a C4 zone. To that end, pursuant to LAMC Section 12.11(C)(1), front yards in the R4 zone shall conform to the front yard requirements in the R3 zone. Therefore, for the residential portions of the Project, front yards shall be no less than 15 feet; provided, however, that on key lots the minimum front yard shall be at least 10 feet. For side yards, pursuant to LAMC Section 12.11(C)(2), all residential buildings more than two stories in height must have a minimum five foot side yard, with one foot added to width for each additional story above the second story, but in no event shall a side yard be more than 16 feet in width. For rear yards, pursuant to LAMC Section 12.11(C)(3), there shall be a rear yard of not less than 15 feet in depth. For a building more than three stories in height, one foot shall be added to the depth of such rear yard for each additional story above the third story, but such rear yard need not exceed 20 feet.

Consistent with the above mentioned PDFs in the Development Regulations, proposed residential rear yards would be no less than 15 feet and for a building more than three stories in height, one foot shall be added to the depth of such rear yard for each additional story above the third story, but such rear yard need not exceed 20 feet. This is consistent with the LAMC. However, no residential front yards will be required which is a deviation from the LAMC. Additionally, all residential buildings proposed that are more than two stories in height, would have a minimum 5 feet side yard, with one foot added to width for each additional story. This is also consistent with the LAMC. All commercial setbacks are also consistent with the LAMC.

parking, on top of five stories of subterranean parking. Because the topography of the East Site slopes gently from East to West, the East Site will have two ground floor levels, one fronting Argyle Avenue and the other fronting Vine Street. The Project is designed to integrate the two ground floors with functional linkages and a consistent mix of uses and a pedestrian outdoor passage running east-west through the length of the East Site. A 33-story residential tower will rise out of the low-rise building to approximately 554 feet above street level at the roof of the highest habitable floor, creating a 45-story, 578,575 square foot structure that will be 584 feet above ground at the top of the roof-top parapet, the highest point of the building. A public observation deck with a food and beverage use will be located on the roof of the residential tower. An additional food and beverage use will be located on the 12th floor of the residential tower. The residential tower will consist of 250 condominium units, and an additional 67 loft-condominium units will be located in the low-rise building. The low-rise portion of the building on the East Site also will support over 100,000 square feet of new office uses. Commercial and food and beverage uses, including full-service restaurants and bars, will be located along a series of public courtyards and an outdoor pedestrian walkway connecting Vine Street to Argyle Avenue. The pedestrian plaza will provide a connection to the Little Country Church gardens and a variety of vantage points from which to view the world-famous Capitol Records Tower. As discussed above, the Capitol Records Tower and Gogerty Building will be preserved for continued office and recording studio use.

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Consistent with the 2007 principles set forth in the City's "Do Real Planning," the Project is designed with walkability and pedestrian access as an organizing principle. The Project

Hotel

The hotel portion of the Project will be located on the West Site in a 14-story tower rising out of the four-story low-rise building and offset at an angle from the corner of Ivar Avenue and Yucca Street. The 200 room luxury hotel will consist of approximately 151,958 square feet of floor area, including ancillary uses such as the lobby, registration area, hotel office and back of the house areas. The hotel will consist of approximately 12 to 15 rooms per floor. The main hotel lobby will be located on the Vine Street ground floor, and a secondary lobby, which will also serve as the main pedestrian entrance, will be located on the Ivar Avenue ground floor at the corner of Ivar Avenue and Yucca Street. Pedestrians will also be able to access the hotel from Vine Street by using the pathway through the West Site from Vine Street. Vehicular access to the hotel will be via a driveway on Vine Street leading into the subterranean parking garage. A secondary vehicular access for the hotel will be on Ivar Avenue.

Office

Approximately 100,471 square feet of new office uses will be located on five levels of the East Site structure fronting Vine Street. The approximately 114,000 square feet of existing office and recording studio uses at the Capitol Records Tower and Gogerty Building will be maintained, and no tenants will be displaced by the Project. The historic Capitol Records recording studio will also be preserved. Vehicular ingress and egress to the Capitol Records Tower and Gogerty Building office space will be through its existing Yucca entrance. Pedestrian access to the new office uses on the East Site will also be from Vine Street. Some office workers may park in the West Site garage, which they will access via the Ivar Avenue garage entrance.

Commercial/Restaurant/Bars

Commercial uses will occupy approximately 10,388 square feet on the West Site and 1,124 square feet on the East Site. On the West Site, commercial uses will front Ivar Avenue on the ground level, which, together with the hotel entrance at the corner of Yucca Street and Ivar Avenue, will activate the sidewalk on the Project's western street frontage. Commercial uses on the East Site will be along the pedestrian plaza connecting Vine Street to Argyle Avenue and fronting Argyle Avenue, activating both the ground floor pedestrian passage and the Project's eastern street frontage.

Food and beverage uses on the ground and third floors of the West Site and in the rooftop observation deck on the East Site will be neighborhood-serving and pedestrian friendly. The West Site food and beverage uses will be approximately 17,000 square feet and include full service restaurants, a café and a nightclub. A full service restaurant and bar and a full service café will be located adjacent to the pedestrian plaza fronting Vine Street, and the nightclub will be located on the mezzanine level with ingress and egress through an entry on the pedestrian plaza. The third floor food and beverage uses will include a full service restaurant that will also service outdoor dining areas on the lower tier or rooftop of the low-rise building. The outdoor dining areas will be located at the east and west ends of the low-rise building, with the west outdoor dining area dedicated to the hotel, and the east area dedicated to Project tenants. The rooftop observation deck and café will be accessible via a dedicated, non-stop elevator located adjacent to the pedestrian plaza connecting Vine Street and Argyle Avenue. A food and

dynamic mix of uses includes Class-A office space, residences, a high-end hotel, a high-end sports club and commercial and restaurant uses to serve residents and employees at the site and in the surrounding neighborhood. Averaging FAR across the unified development also enables the Project to be designed to preserve and complement the historic Capitol Records Tower and Gogerty Building and protect scenic views to these historic structures throughout the site. Moreover, the Project is located in the heart of Hollywood's tourist and entertainment district and in an area earmarked by the Community Plan to be a major center of population, employment, retail services, and entertainment. The Project's carefully selected mix of uses furthers the Community Plan's vision for Hollywood while their distribution on two sites across Vine Street ensures that opportunities for open space and walkability are maximized. Indeed, the Project includes a total of more than 109,000 square feet of private and common open space, including the City's first publicly-accessible high-rise observation deck. Further, FAR averaging ensures the flexibility to make adjustments in the design and massing of the Project as the Applicant engages in the community input process. Therefore, FAR averaging across the unified Project development is proper in relation to adjacent uses or the development of the community.

Alcohol Use

The Applicant seeks a blanket conditional use permit to permit the onsite sales and consumption and sale for offsite consumption of a full line of alcoholic beverages. A blanket conditional use permit accomplishes the following: (1) establishes the maximum number of alcohol-serving establishments and locations within the Project; (2) establishes the types of alcohol-serving establishments within the Project; and (3) establishes certain permitted activities within those establishments, such as live entertainment and dancing. Because none of the specific operators of the alcohol-serving establishments can be known until after the Project is built, a blanket conditional use would require that each operator seek and obtain plan approval from the Zoning Administrator before the operator is authorized to serve alcohol within the Project. The purpose of the plan approval is to ensure that each operator proposes a use that is consistent and compatible with the blanket conditional use.

The Applicant proposes that the blanket conditional use would consist of ten alcohol related uses within the Project as follows:

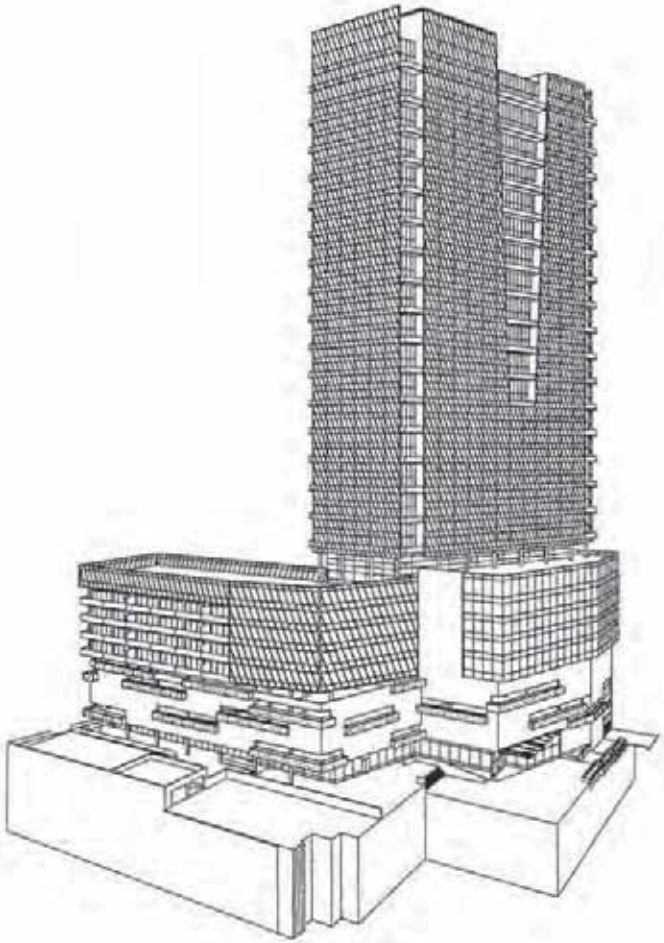
- Five sit-down restaurants or cafes with a full line of alcoholic beverages for onsite sales and consumption with food (Type 47 - bona fide public eating place), including hotel restaurant that may feature live music and dancing.

- One café on the East Site rooftop observation deck with a full-line of alcoholic beverages for onsite sales and consumption with food (Type 47 – bona fide public eating place).

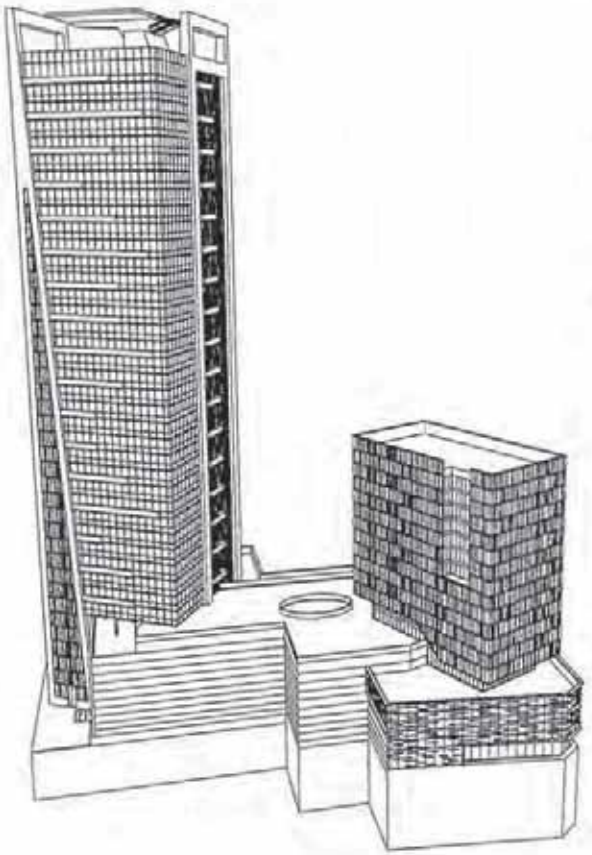
- One nightclub lounge with a full line of alcoholic beverages for onsite sales and consumption. While the nightclub lounge may serve food, it is intended to be a Type 48 stand-alone bar establishment and will include bottle service. The nightclub lounge may also feature live entertainment and dancing.

CPC 2008 3440

Exhibit D



EAST (CAPITOL) SITE



WEST (FRANKLIN) SITE

CPC 2008 3440

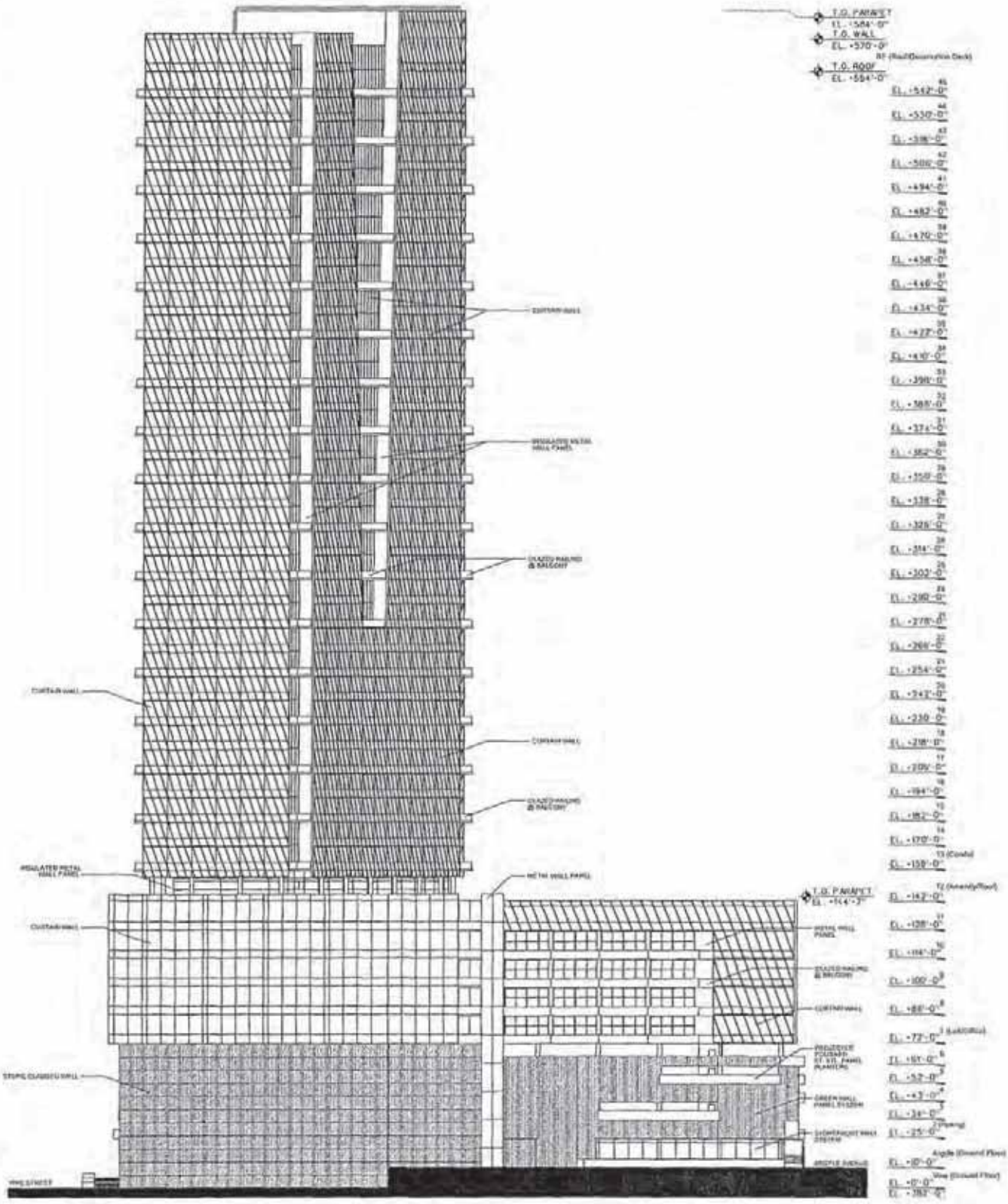
MILLENNIUM HOLLYWOOD DEVELOPMENT

LOS ANGELES, CA

ENTITLEMENT SUBMISSION
AUGUST 18, 2008

PROJECT TEAM:
MILLENNIUM PARTNERS LLC
ARGENT VENTURES LLC
HANDEL ARCHITECTS LLP
ROSCHEN VAN CLEVE ARCHITECTS
RIOS CLEMENTI HALE STUDIOS

ENTITLEMENT SUBMISSION
DATE: AUGUST 16
HANDEL ARCHITECTS



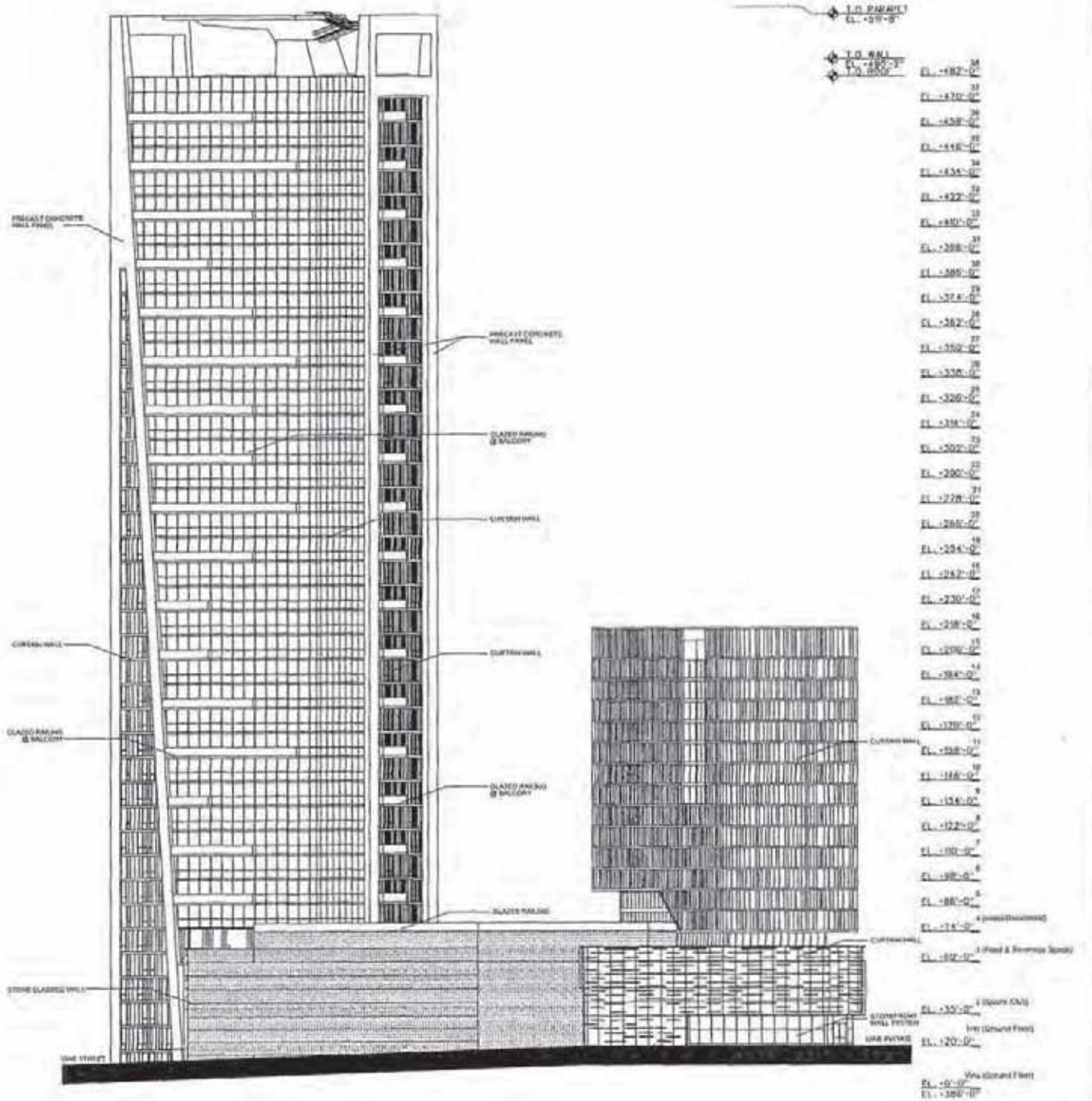
0 40' 60'
SCALE 1/16" = 1'-0"

MILLENNIUM HOLLYWOOD DEVELOPMENT

A203

EASTSIDE - SOUTH ELEVATION

ENTITLEMENT SUBMISSION
DATE AUGUST 17
HANDEL ARCHITE



A205

MILLENNIUM HOLLYWOOD DEVELOPMENT

Exhibit E

the period of the enforced delay, or longer as may be mutually agreed upon; in the event no such notice is given, such claim of delay from that cause shall be deemed waived and no extension shall be granted on that basis.

6.5. Legal Action. Subject to the limitation on remedies imposed by this Agreement, either Party may, in addition to any other rights or remedies, institute legal action to cure, correct, or remedy any default, enforce any covenant or agreement herein, enjoin any threatened or attempted violation, or enforce by specific performance the obligations and rights of the Parties hereto or seek declaratory relief with respect to its rights, obligations or interpretations of this Agreement or pursue other remedies under applicable law.

6.6. Applicable Law. This Agreement shall be construed and enforced in accordance with the laws of the State of California, and the venue for any legal actions brought by any Party with respect to this Agreement shall be the County of Los Angeles, State of California for state actions and the Central District of California for any federal actions.

6.7. Amendments. This Agreement may be amended from time to time by mutual consent in writing of the Parties to this Agreement in accordance with Government Code Section 65868. Any amendment to this Agreement which relates to the Term, permitted uses, density or intensity of use, height, or size of buildings, provisions for reservation and dedication of land, or any conditions or covenants relating to the use of the Development Site shall require notice and public hearing before the Parties may execute an amendment thereto.

6.8. Assignment.

6.8.1. Right to Assign. Without any independent consent of the City, Developer shall have the right to sell, transfer, or assign the Developer Property or any portion thereof (provided that no such partial transfer shall violate the Subdivision Map Act, Government Code Section 66410, *et seq.*) to any person, partnership, limited liability company, joint venture, firm, or corporation, at any time during the Term of this Agreement, together with the rights granted to and obligations imposed upon the Developer Property or such Improvement pursuant to this Agreement (including the right to further allocate density and other development rights). Notwithstanding the foregoing or anything else to the contrary set forth in this Agreement, if Developer enters into any joint venture, partnership, or other business combination or conveys any portion of the Developer Property in violation of this Section 6.8, the City shall not be entitled to prohibit or block, by specific performance or otherwise, any such venture, partnership, combination or conveyance. The foregoing limitation on City's remedies in the event of a violation of this Section 6.8 shall not impair or diminish any other City right or remedy with respect to Developer's noncompliance with any provision of this Section 6.8. The Developer's right to sell, transfer, or assign the Developer Property shall include all rights to the Developer Property including without any limitation any subdivisions of the Developer Property by Developer into surface parcels, air rights parcels and subsurface parcels as may be permitted on or following the Effective Date.

6.8.2. Release of Developer. With respect to a sale, transfer, or assignment of all or substantially all of Developer Property and the related rights hereunder to a purchaser, transferee, or assignee permitted under this Agreement, upon the effective date of any such sale,

Exhibit F

3.1.5. Subsequent Development Review. The City shall not require Developer to obtain any approvals or permits for the development of the Project in accordance with this Agreement other than those permits or approvals which are required by the Applicable Rules or the Reserved Powers.

3.1.6. Effective Development Standards. The City agrees that it is bound to permit the uses, intensities of use and densities on this Property which are permitted by this Agreement and the Project Approvals, insofar as this Agreement and the Project Approvals so provide or as otherwise set forth in the Applicable Rules or the Reserves Powers. The City hereby agrees that it will not unreasonably withhold or unreasonably condition any Discretionary Action which must be issued by the City in order for the Project to proceeds, provided that Developer reasonably and satisfactorily complies with all City-wide standard procedures for processing applications for Discretionary Action.

3.1.7. Public Infrastructure Improvements. Developer shall construct, or cause to be constructed, in accordance with all the requirements set forth in the OPA and this Agreement, the elements of the Public Infrastructure Improvements further described on Exhibit "C", if required in connection with the construction of a Phase the impacts of which such Public Infrastructure Improvements are intended to mitigate, generally concurrently with the construction of such Phase. Therefore, until such time as building permits are issued for those particular Private Improvements the impacts of which such Public Infrastructure Improvements are intended to mitigate, the City shall require neither (a) construction of any elements of the Public Infrastructure Improvements nor (b) any Performance Bond to be posted for the completion of such Public Infrastructure Improvements.

3.2. Agreement and Assurance on the Part of Developer. In consideration for the City entering into this Agreement, and as an inducement for the City to obligate itself to carry out the covenants and conditions set forth in this Agreement, and in order to effectuate the premises, purposes and intentions set forth in Section 2 of this Agreement, Developer hereby agrees as follows:

3.2.1. Project Development. Developer may construct the Project in any number of phases (each a "**Phase**") as Developer determines on the Property, consistent with the EIR. Developer shall construct each Phase of the Project in substantial conformance with the Scope of Development. In connection with construction of the Project, Developer shall comply with Applicable Rules, Mitigation Measures and Conditions of Approval. Nothing in this Agreement shall limit or restrict Developer's right to challenge any interpretation by the City of any Mitigation Measure and Conditions of Approval or the way or method the City directs the implementation of such Mitigation Measures and Conditions of Approval. Developer may in its discretion, design, configure and construct elements of the Project, consistent with the description of the Project and the Scope of Development.

3.2.2. Timing of Development. The parties acknowledge that Developer cannot at this time predict specific phases of Development, when such Phases will occur, or the rate at which Phases of the Project will be developed. Such decisions depend upon numerous factors that are not within the control of Developer, such as market orientation and demand, capital availability, interest rates, absorption, completion and other similar factors. Because the

Exhibit G

IV. ENVIRONMENTAL IMPACT ANALYSIS

G. NOISE

The following analysis of noise impacts is based primarily upon the *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates LLC and dated February 26, 2008. Noise calculation sheets are provided in Appendix D: Noise of this DEIR.

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

The following discussion focuses on providing noise and ground-borne vibration background information. In addition, existing noise and ground-borne conditions are characterized.

(1) Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately three to 140 dBA. *Figure 40: A-Weighted Decibel Scale* provides examples of A-weighted noise levels from common sounds.

(a) Noise

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (Leq).

Community Noise Equivalent Level. CNEL is a 24-hour continuous Leq with five dBA added to noise occurring between 7:00 p.m. and 10:00 p.m. and ten dBA added to noise levels occurring between 10:00 p.m. to 7:00 a.m. The added values are used to account for added sensitivity during evening and typical nighttime sleeping hours.[1]

Equivalent Noise Level. Leq is the average noise level on an energy basis for any specific time period. The Leq, if constant over a specified time period, would contain the same sound energy as the actual sound that varies in level with time.[2]

(i) Effects of Noise

Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment range from levels that interfere with speech and sleep (annoyance and nuisance) to

[1] Cowan, James P. 1994. *Handbook of Environmental Acoustics.* Wiley, John & Sons, Inc. 6 June 2008 <http://www.wiley.com/WileyCDA/WileyTitle/productCd-0471285846.html>.
[2] *Ibid*

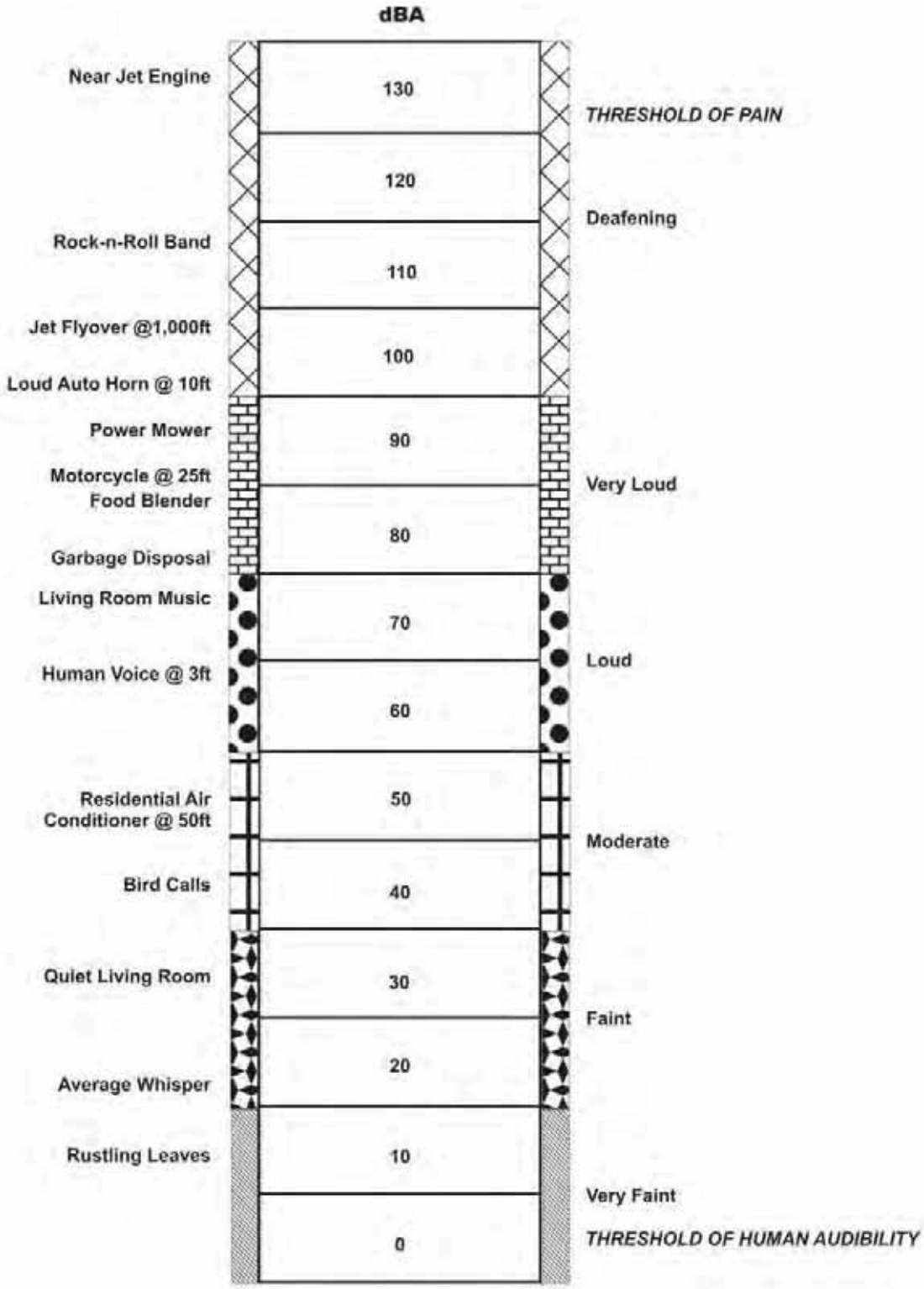


FIGURE 40
A-WEIGHTED DECIBEL SCALE

SOURCE: COWAN, JAMES P.,
HANDBOOK OF ENVIRONMENTAL ACOUSTICS

levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately three dBA. A change of at least five dBA would be noticeable and would likely evoke a community reaction. A ten-dBA increase is subjectively heard as a doubling in loudness and would most certainly cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately six dBA over hard surfaces and 7.5 dBA over soft surfaces for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on.

Generally, noise is most audible when traveling by direct line-of-sight[3]. Barriers, such as walls, berms, or buildings, that break the line-of-sight between the source and the receiver greatly reduces noise levels from the source since sound can only reach the receiver by bending over the top of the barrier (diffraction). Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

(b) Ground-borne Vibration

(i) Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

(ii) Vibration Definitions

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV in inches per second is often used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the affect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal.

[3] Line-of-sight is an unobstructed visual path between the noise source and the noise receptor.

Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration[4].

(iii) Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes).

To counter the effects of ground-borne vibration, the Federal Railway Administration (FRA) has published guidance relative to vibration impacts. According to the FRA, fragile buildings can be exposed to ground-borne vibration levels of 0.5 inches per second PPV without experiencing structural damage.[5]

In contrast to noise, ground-borne vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 Vdb RMS or lower, well below the threshold of perception for humans, which is around 65 Vdb RMS.[6] Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

(2) Existing Local Noise Conditions

The existing noise environment of the project area is characterized by vehicular traffic and noises typical to a dense urban area (e.g., people conversing). Vehicular traffic is the primary source of noise in the project vicinity.

(a) Ambient Noise Levels

Two sets of ambient sound readings were taken at the project site and the surrounding area using a Quest Q-400 Noise Dosimeter. Noise monitoring, for 15 minute intervals, was completed along Riverside Drive between 8:45 a.m. and 12:10 p.m. on December 5, 2006. This monitoring period represented the peak season at Westfield Fashion Square and, as such, ambient noise levels in the project vicinity were higher than the typical daily ambient noise level. Noise monitoring was also completed between 11:00 a.m. and 2:30 p.m. on August 15, 2007. This monitoring period represented the off-peak season at the Westfield Fashion Square and, as such, ambient noise levels in the project vicinity were similar to the typical daily ambient noise level.

[4] U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 6 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.
[5] U.S. Department of Transportation, Federal Railroad Administration. 1998 (December). *High-Speed Ground Transportation Noise and Vibration Impact Assessment*. Washington D.C.: Parsons Transportation Group. 6 June 2008 <http://www.fra.dot.gov/downloads/RRDev/nvman.pdf >.
[6] U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 6 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.

These readings were used to establish existing ambient noise conditions and to provide a baseline for evaluating construction and operational noise impacts. Noise monitoring locations are shown in *Figure 41: Noise Monitoring Locations*. As shown in *Table 23: Existing Noise Measurements*, existing ambient sound levels range between 72.0 to 75.7 dBA (Leq) during the peak season and between 65.5 and 68.4 dBA (Leq) during the off-peak season.

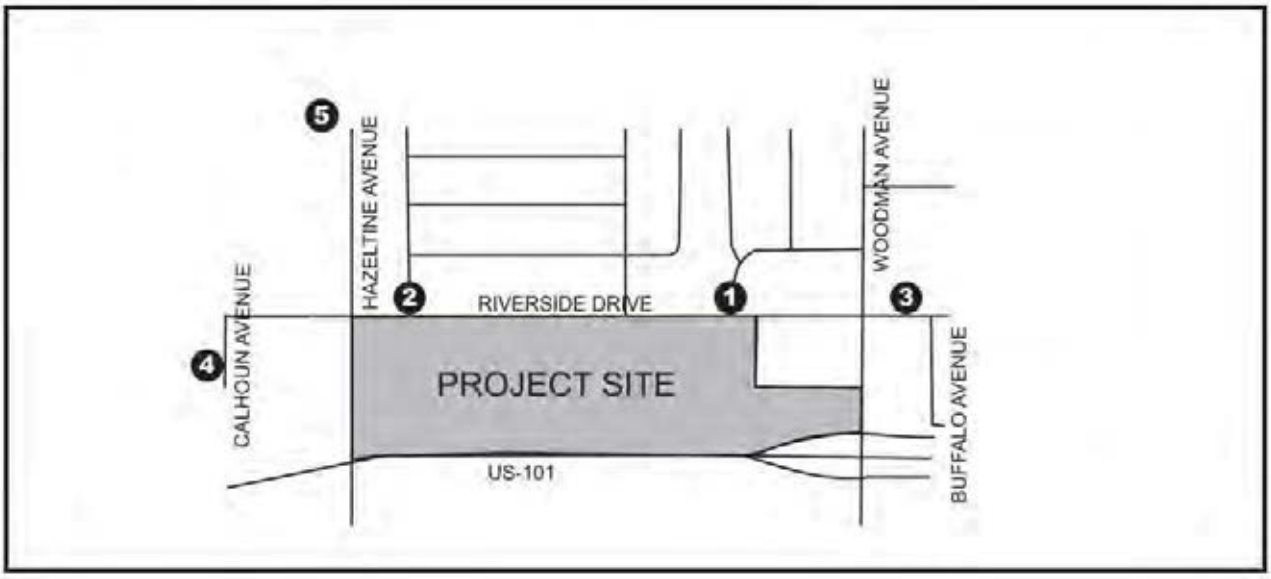
(b) Roadway Noise

As stated earlier, vehicular traffic is the predominant noise source in the project vicinity. Using existing traffic volumes (Year 2007) provided by the project traffic consultant and the Federal Highway Administration (FHWA) RD-77-108 noise calculation formulas, CNEL was calculated for various roadway segments near the project site. Existing weekday and weekend mobile noise levels are shown in *Table 24: Existing Estimated Community Noise Equivalent Level –Weekday* and *Table 25: Existing Estimated Community Noise Equivalent Level –Weekend*, respectively. As shown in *Table 24: Existing Estimated Community Noise Equivalent Level –Weekday*, weekday mobile noise levels in the project area range from 71.0 to 74.1 dBA CNEL. As shown in *Table 25: Existing Estimated Community Noise Equivalent Level –Weekend*, weekend noise levels in the project area range from 70.5 to 73.6 dBA CNEL.

TABLE 23
EXISTING NOISE MEASUREMENTS [1]

KEY TO *FIGURE 41: NOISE MONITORING LOCATIONS*	NOISE MONITORING LOCATION	DURATION (MINUTES)	SOUND LEVEL (DBA, LEQ)			
			TIME	PEAK SEASON	TIME	OFF-PEAK SEASON
1	Multi-Family Residence on Riverside Drive	15	9:27 a.m.	75.7	11:53 a.m.	66.2
2	Multi-Family Residence on Riverside Drive	15	9:07 a.m.	72.0	12:15 p.m.	68.3
3	Notre Dame High School	15		-	11:26 a.m.	67.1
4	Single-Family Residence on Calhoun Avenue and Riverside Drive	15		-	1:30 p.m.	65.5
5	Van Nuys Sherman Oaks Park on Hazeltine Avenue	15		-	12:55 p.m.	68.4

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.



LEGEND:

Noise Monitoring Locations

1. Multi-Family Residence on Riverside Drive
2. Multi-Family Residence on Riverside Drive
3. Notre Dame High School
4. Single-Family Residence on Calhoun Avenue
5. Van Nuys Sherman Oaks Park

FIGURE 41
NOISE MONITORING LOCATIONS

SOURCE: TAHA, 2007

NORTH

TABLE 24
EXISTING ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKDAY [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]
Riverside Drive between Van Nuys Boulevard and Hazeltine Avenue	71.2
Riverside Drive between Hazeltine Avenue and Woodman Avenue	73.3
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	73.3
Woodman Avenue between Magnolia Boulevard and Riverside Drive	74.1
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	74.1
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	73.1
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.8

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

TABLE 25
EXISTING ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKEND [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]
Riverside Drive between Van Nuys Boulevard and Hazeltine Avenue	70.5
Riverside Drive between Hazeltine Avenue and Woodman Avenue	72.7
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	72.1
Woodman Avenue between Magnolia Boulevard and Riverside Drive	73.5
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	73.6
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	72.3
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.0

[1] Source: Terry A Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

(c) Ambient Vibration Levels

Similar to the environmental setting for noise, the vibration environment is dominated by traffic from nearby roadways. Heavy trucks can generate ground-borne vibrations that vary depending on vehicle type, weight, and pavement conditions. According to the Federal Transit Administration, heavy-duty vehicles do not typically generate perceptible ground-borne vibration because rubber tires and suspension systems provide vibration isolation on smooth roadways.[7] Roadways surrounding the project site are typical urban roadways and vibration is not perceptible at the project site.

[7] U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 6 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.

(d) Noise-Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors near the project site include:

- Multi-family residences located approximately 120 feet north of the project site, across Riverside Drive
- Single-family residences located approximately 250 feet east of the project site, across Woodman Avenue
- Notre Dame High School located approximately 575 feet northeast of the project site, across Riverside Drive
- Single-family residences located approximately 700 feet west of the project site on Calhoun Avenue and Riverside Drive
- Van Nuys Sherman Oaks Park located approximately 800 feet northeast of the project site, along Hazeltine Avenue

Noise measurements at nearby sensitive receptors were taken as part of this Noise Assessment and those locations are shown on *Figure 41: Noise Monitoring Locations* and existing noise measurements at these locations are reflected on *Table 24: Existing Estimated Community Noise Equivalent Level – Weekday*.

The above sensitive receptors represent the nearest sensitive land uses with the potential to be impacted by the Proposed Project. Additional single-family and multi-family residences are located in the surrounding community, within one-quarter mile of the project site.

b. Regulatory and Policy Setting

(1) City of Los Angeles Standards and Guidelines

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the Los Angeles Municipal Code (LAMC) indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence[8]. No person, other than an

[8] Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

The LAMC also specifies the maximum noise level of powered equipment.[9] Any powered equipment that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

The City of Los Angeles has published the L.A. CEQA Thresholds Guide (2006), which includes significance thresholds for construction and operational noise. For construction noise, the significance thresholds apply if activity occurs within 500 feet of a noise sensitive use or between the hours identified in the Noise Ordinance. For operational noise, the significance thresholds apply if the Proposed Project introduces a stationary noise source likely to be audible beyond the property line of the project site or if the project includes 75 or more dwelling units, 100,000 square feet or greater of nonresidential development, or has the potential to generate 1,000 or more average daily vehicle trips.

(2) Vibration Guidelines

There are no adopted City standards for ground-borne vibration.

2. THRESHOLDS OF SIGNIFICANCE

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses.

Construction Noise

A significant construction noise impact would result if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a sensitive receptor;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a sensitive receptor; or

[9]Chapter XI, Article 2, Section 112.05, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

- Construction activities would exceed the ambient noise level by 5 dBA at a noise receptor between the hours of 9:00 p.m. and 7:00 a.m., Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

Operational Noise

A significant operational noise impact would result if:

- Project-related mobile noise causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (*Table 26: Land Use Compatibility for Community Noise Environments*), or any 5 dBA or greater noise increase.

- Stationary noise sources increase ambient noise levels by 5 dBA or greater.

TABLE 26
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS [1]

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE (DBA, CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging - Motels Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Business Commercial and Professional						
Industrial, Manufacturing, Utilities, Agriculture						

TABLE 26
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS [1]

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE (DBA, CNEL)					
	55	60	65	70	75	80
Normally Acceptable Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.						
Conditionally Acceptable New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditionally will normally suffice.						
Normally Unacceptable New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.						
Clearly Unacceptable New construction or development should generally not be undertaken.						

[1] Source: California Office of Noise Control, Department of Health Services

Ground-borne Vibration

There are no adopted State or City of Los Angeles ground-borne vibration standards. Based on federal guidelines, the Proposed Project would result in a significant construction or operational vibration impact if:

- The Proposed Project would expose buildings to the Federal Railway Administration building damage threshold level of 0.5 inches per second PPV.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project would involve the construction and operation of approximately 280,000 GLSF of retail and restaurant uses, as well as associated parking facilities (including both surface lots and multi-level structures). The proposed retail expansion (two-levels of shopping plus one subterranean parking level) and the main six-level parking structure (one-level at grade plus five-levels above grade) will be constructed primarily in the space between the existing shopping center (located immediately adjacent to the Riverside Drive frontage) and the Ventura (US 101) Freeway that is currently occupied by a portion of the existing mall parking structure and surface parking. A second four-level parking structure (one-level at grade plus three-levels above grade) will be constructed on the eastern portion of the project site (adjacent to Woodman Avenue) on an area currently developed with surface parking. The new parking structures would be designed

with openings between the parking levels. Also, two new loading docks will be constructed along the south side of the new mall buildings. One existing loading dock, currently along Riverside Drive at the proposed tunnel entrance, would be relocated south the mall structure.

The Proposed Project would involve the construction and operation of a typical retail shopping mall. The Proposed Project would not include any unusual sources of noise relative to an urban area or unusual project characteristics during its operation phase. During the construction phase, the Proposed Project would utilize sonic pile driving equipment to construct some of the proposed structures (i.e., the six-level parking structure). The Proposed Project includes a request to extend the length of its allowable hours of operation from 7:00 a.m. - 11:00 p.m. to permit hours between 5:30 a.m. - 12 midnight in order to facilitate mall operations.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project would include certain features to reduce exposure of sensitive receptors to operational noise. For example, mechanical equipment would be enclosed or located on roofs, and mechanical equipment noise would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptor. In addition, the new loading docks would be located behind mall structures and away from sensitive receptors. As a result, activity associated with the new loading docks would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptors (e.g. residences on Riverside Drive).

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The City of Los Angeles Noise Ordinance has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence.[10] No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

- The LAMC also specifies the maximum noise level of powered equipment or powered hand tools.[11] Any powered equipment or hand tool that produces a maximum noise

[10] Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.
[11] Chapter XI, Article 2, Section 112.05, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

b. Project Impacts

An Initial Study (IS) was prepared for the Proposed Project. Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the Notice of Preparation (NOP) and IS process to have a potential significant environmental effect. Issues related to Noise that were determined to be less than significant, and are not addressed further, include: airport noise and railroad noise. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant.

(1) Construction (Short-Term) Noise

Construction of the Proposed Project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. The increase in noise would likely result in a temporary annoyance to nearby residents during the construction activity. Noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Construction activities require the use of noise-generating equipment, such as jackhammers, pneumatic impact equipment, saws, and tractors. Typical noise levels from various types of equipment that may be used during construction are listed in *Table 27: Maximum Noise Levels of Common Construction Machines*. The table shows noise levels at distances of 50 and 100 feet from the construction noise source.

TABLE 27
MAXIMUM NOISE LEVELS OF COMMON CONSTRUCTION MACHINES [1]

NOISE SOURCE	NOISE LEVEL (DBA, LEQ) [2]	
	50 FEET	100 FEET
Front Loader	80	74
Cranes (moveable)	82	76
Jackhammers	90	84
Generators	77	71
Concrete Pumps	83	77
Back Hoe	84	78
Pile Driving (Peaks)	101	95
Scraper/Grader	87	81
Paver	87	81

[1] Source: City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006.
[2] Assumes a 6-dBA drop-off rate for noise generated by a "point source" and traveling over hard surfaces.

Whereas *Table 27: Maximum Noise Levels of Common Construction Machines* shows the noise level of each equipment, the noise levels shown in *Table 28: Outdoor Construction Noise Levels* take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for each phase of construction. These noise levels are based on surveys conducted by the USEPA in the early 1970s. Since 1970, regulations have been enforced to improve noise generated by certain types of construction equipment to meet worker noise exposure standards. However, many older pieces of equipment are still in use. Thus, the construction phase noise levels indicated in *Table 28: Outdoor Construction Noise Levels* represent worst-case conditions. As the table shows, the highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. The noise source is assumed to be active for 40 percent of the eight-hour workday (consistent with the USEPA studies of construction noise), generating a noise level of 89 dBA at a reference distance of 50 feet.

TABLE 28
OUTDOOR CONSTRUCTION NOISE LEVELS [1]

CONSTRUCTION PHASE	NOISE LEVEL AT 50 FEET (DBA)
Ground Clearing	84
Excavation	89
Foundations	78
Erection	85
Finishing	89
[1] Source: City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006..	

The noise level during the construction period at each receptor location was calculated by (1) making a distance adjustment to the construction source sound level and (2) logarithmically adding the adjusted construction noise source level to the ambient noise level. The estimated construction noise levels at sensitive receptors are shown in *Table 29: Construction Noise Impact-Unmitigated*. Noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. As shown in *Table 29: Construction Noise Impact-Unmitigated*, noise generated by construction activity would exceed the 5-dBA incremental increase significance threshold at residential land uses along Riverside Drive during the peak and off-peak season at Westfield Fashion Square. It is important to note that construction activity would occur intermittently during the day and would not occur within noise-sensitive hours (10:00 p.m. to 7:00 a.m.). Regardless, the Proposed Project would result in a significant construction impact without implementation of mitigation measures.

TABLE 29
CONSTRUCTION NOISE IMPACT – UNMITIGATED [1]

KEY TO *FIGURE 41: NOISE MONITORING LOCATIONS*	DISTANCE (FEET) [2]	MAXIMUM CONSTRUCTION NOISE LEVEL (DBA, LEQ) [3]	EXISTING AMBIENT (DBA, LEQ) [4]	NEW AMBIENT (DBA, LEQ) [5]	INCREASE	IMPACT
OFF-PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	81.4	66.2	81.5	15.3	Yes
#2 Multi-Family Residence on Riverside Drive	120	81.4	68.3	81.6	13.3	Yes
#3 Notre Dame High School	575	67.8	67.1	70.5	3.4	No
#4 Single-Family Residence on Calhoun Avenue	750	65.5	65.5	68.5	3.0	No
#5 Van Nuys Sherman Oaks Park on Hazeltine Avenue	800	65	68.4	70.0	1.6	No
PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	81.4	69.3	81.7	12.4	Yes
#2 Multi-Family Residence on Riverside Drive	120	81.4	70.3	81.7	11.4	Yes

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] Distance of noise source from receptor.
[3] Construction noise source's sound level at receptor location, with distance and building adjustment.
[4] Pre-construction activity ambient sound level at receptor location.
[5] New sound level at receptor location during the construction period, including noise from construction activity.

The Proposed Project would utilize sonic pile driving to construct the six-level parking structure. Pile driving would potentially generate a noise level of 101 dBA Leq. The nearest sensitive receptor would be approximately 400 feet north of pile driving activity. The ambient noise level at this sensitive receptor is approximately 66.2 dBA Leq. At 400 feet, sonic pile driving would generate a maximum noise level of approximately 83 dBA Leq. This noise level would be reduced by 5 dBA to 78 dBA Leq by intervening structures that block the line-of-site between pile driving and the sensitive receptor. When added to the existing ambient noise level, pile driving activity would increase the ambient noise level by approximately 12.1 dBA. This would exceed the 5-dBA Leq incremental increase significance threshold and, as such, pile driving would result in a significant impact without implementation of mitigation measures.

In addition to on-site construction noise, haul trucks would require access to the project site during construction activity. Trucks would likely travel along Riverside Drive to reach the project site. As a result, residential land uses along Riverside Drive would potentially experience increased noise levels from haul trucks. Adding ten truck trips per hour along Riverside Drive would increase the CNEL by approximately 0.2 dBA. This increase would be less than the 3-dBA CNEL incremental increase significance threshold and, as such, haul truck noise would result in a less than significant impact.

Additional sensitive receptors are located north, east, and west of the project site. These sensitive receptors would also experience increases in ambient noise levels due to construction activity. However, these increases would be less than those presented for the multi-family residences along Riverside Drive due to distance and building attenuation (the multi-family residences along Riverside Drive would act as a noise barrier to the residential buildings behind them).

(2) Operational (Long-Term) Noise

The predominant operational noise source for the Proposed Project is vehicular traffic. According to the traffic report prepared by Linscott, Law & Greenspan, Engineers, the Proposed Project would generate 4,964 net weekday daily vehicle trips and 6,252 net weekend daily vehicle trips[12].

To ascertain off-site noise impacts, traffic was modeled under future year (2012) no project and with project conditions utilizing FHWA RD-77-108 noise calculation formulas. Results of the weekday analysis are summarized in *Table 30: Existing and Future Estimated Community Noise Equivalent Level – Weekday*. The greatest project-related noise increase would be 0.4 dBA CNEL and would occur along Riverside Drive between Hazeltine and Woodman Avenues. Weekday roadway noise levels attributed to the Proposed Project would increase by less than 3 dBA CNEL at all analyzed segments.

TABLE 30
EXISTING AND FUTURE ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKDAY [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]				
	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)	PROJECT IMPACT	CUMULATIVE IMPACT
Riverside Drive between Woodman Avenue and Hazeltine Avenue	73.3	73.9	74.3	0.4	1.0
Riverside Drive between Hazeltine Avenue and Van Nuys Boulevard	71.2	71.7	71.9	0.2	0.7
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	73.3	74.2	74.2	0.0	0.9
Woodman Avenue between Magnolia Boulevard and Riverside Drive	74.1	74.5	74.6	0.1	0.5
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	74.1	74.7	74.7	0.0	06
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	73.1	73.6	73.7	0.1	0.6
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.8	74.3	74.5	0.2	0.7

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

[12] Linscott, Law & Greenspan, Engineers. 2008 (August 5). *Traffic Impact, Parking, and Site Access Study for the Westfield Fashion Square Expansion Project*. Pasadena, CA: Author. [See Appendix I of this Draft EIR]

Results of the weekend analysis are summarized in *Table 31: Existing and Future Estimated Community Noise Equivalent Level – Weekend*. The greatest project-related noise increase would be 0.5 dBA CNEL and would also occur along Riverside Drive between Hazeltine and Woodman Avenues. Weekend roadway noise levels attributed to the Proposed Project would increase by less than 3 dBA CNEL at all analyzed segments.

Mobile noise generated by the Proposed Project would not cause the ambient noise level measured at the property line of the affected uses to increase by three decibels CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (*Table 26: Land Use Compatibility for Community Noise Environments*) or any five- decibel or more increase in noise level. The Proposed Project would result in a less than significant mobile noise impact.

TABLE 31
EXISTING AND FUTURE ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKEND [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]				
	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)	PROJECT IMPACT	CUMULATIVE IMPACT
Riverside Drive between Woodman Avenue and Hazeltine Avenue	72.7	73.3	73.8	0.5	1.1
Riverside Drive between Hazeltine Avenue and Van Nuys Boulevard	70.5	71.2	71.5	0.3	0.1
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	72.1	72.9	73.1	0.2	0.1
Woodman Avenue between Magnolia Boulevard and Riverside Drive	73.5	74.1	74.2	0.1	0.7
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	73.6	74.3	74.4	0.1	0.8
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	72.3	72.8	73.0	0.2	0.7
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.0	73.6	73.8	0.2	0.8

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

(a) Roof-Top and Mechanical Equipment

Potential stationary noise sources related to the long-term operations of the Proposed Project includes mechanical equipment (e.g., parking structure air vents and heating, ventilation, and air conditioning (HVAC) equipment.) Mechanical equipment would be designed so as to be located within an enclosure or confined to the rooftop of the proposed structure. In addition, mechanical equipment would be screened from view as necessary to comply with the City of Los Angeles Noise Ordinance requirements for both daytime (50 dBA) and nighttime (40 dBA) noise levels at residential land uses. Operation of mechanical equipment would not be anticipated to increase ambient noise levels by 5 dBA or more. Stationary noise would result in a less than significant impact with mitigation construction screen.

(b) Parking Facilities

Project-related parking would include a subterranean parking structure under the proposed shopping mall, a six-level parking structure south of the existing Macy's parking structure, and a four-level parking structure located off of Woodman Avenue at the eastern end of the project site. Noise generated by activity associated with the subterranean parking structure would not exceed an increase of 5 dBA (and therefore would not be audible) at locations off the project site and would not increase ambient noise levels.

The four-level parking structure would be located off of Woodman Avenue at the eastern end of the project site. This area is currently utilized for surface parking. The nearest sensitive receptors to the parking structure would be located approximately 250 feet east of the project site. Noise sources associated with the parking structure include vehicle movement, slamming doors, and car alarms. Parking activity typically generates a noise level of 63 dBA Leq at 50 feet, including rooftop noise.[13] Based on distance attenuation, the parking-related noise levels would be approximately 52.5 dBA Leq. Mobile-source related noise levels are approximately 73.2 dBA along Woodman Avenue, North of Highway 101. When added to this noise level, parking-related noise would increase the ambient noise level by less than 0.1 dBA. This level is less than the 5-dBA significance threshold, which would result in a less than significant impact.

The Proposed Project would include a six-level parking structure located south of the existing Macy's parking lot. This parking structure would be located approximately 300 feet south of the nearest sensitive receptor (i.e. residences on Riverside Drive). As shown in *Table 23: Existing Noise Measurements*, the monitored noise levels along the portion of Riverside Drive in front of the residential land uses are 66.2 and 68.3 dBA Leq. Adding parking-related noise (i.e., 63 dBA Leq) to the existing noise level along Riverside Drive would increase the existing noise levels by less than 0.1 dBA. This is less than the 5-dBA significance threshold and, as such, parking activity noise would not significantly impact sensitive receptors north of the project site.

The Proposed Project would increase vehicle access to the project site. The current vehicular traffic on Riverside Drive, Hazeltine Avenue, Woodman Avenue and the nearby Ventura Freeway (US 101) generates the majority of the ambient noise in the project area. Under the Proposed Project access scheme, vehicles would enter/exit the new parking structure at a new signalized driveway with direct access to the structure. This access would be located at the existing driveway between Macy's and Woodman Avenue. There will be a dual turn lane for westbound traffic as well as a dedicated right-turn lane for eastbound traffic. The driveway will consist of three outbound lanes and two inbound lanes. Five cars occupying each access lane and traveling at 25 miles per hour would produce a cumulative noise level of 67.0 dBA Leq at 50 feet. The nearest sensitive receptor to the new access point is located 75 feet to the north. Based on distance attenuation and the existing ambient noise level at the nearest sensitive receptor, the resulting noise level would be 68.1 dBA Leq. This would be an increase of 1.9 dBA. This level is less than the 5-dBA significance threshold, which would result in a less than significant impact with mitigation incorporated.

[13] Terry A. Hayes Associates, LLC. 2008 (February 26). *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report.* Culver City, CA: Author. [See Appendix D of this Draft EIR]

The Proposed Project would change the hours of operation from 7:00 a.m. to 11:00 p.m. to 5:30 a.m. to 12:00 a.m. According to the traffic analysis, the shared parking demand at 6:00 a.m. and 12:00 a.m. would be 110 and 32 vehicles, respectively. A doubling of traffic volumes is typically needed to audibly increase ambient noise levels. The extended hours of operation would not double traffic volumes along any roadway segment. The increase in ambient noise levels would be less than the 5-dBA significance threshold, which would result in a less than significant parking and circulation impact.

(c) Loading Docks and Truck Access Areas

Two existing loading docks are located along Riverside Drive. These loading docks would continue to operate between the same hours and under their existing parameters (approximately two large trucks operating simultaneously on a daily basis). The Proposed Project would include construction of two new loading docks on the south side of the property to accommodate expanded retail and restaurant uses. These loading docks would be shielded from sensitive receptors by mall structures. The structures would act as a noise barrier and would prevent increased ambient noise levels by more than 5 dBA from the proposed loading docks at off-site sensitive receptors. The Proposed Project would not result in additional noise sources due to the operation of the loading docks. Operational noise levels would not change substantially along the Riverside Drive frontage. The Proposed Project would result in a less than significant operational noise impact due to loading dock operations.

(3) Vibration

(a) Construction

As shown in *Table 32: Vibration Velocities for Construction Equipment*, use of heavy equipment (e.g., a sonic pile driver) generates vibration levels of 0.170 inches per second PPV at a distance of 25 feet. The nearest structure to the pile driving activity would be approximately 50 feet east of the project site and could experience vibration levels of 0.06 inches per second PPV. Vibration levels would not exceed the potential building damage thresholds of 0.5 inches per second PPV. Construction activity associated with the Proposed Project would comply with the standards established in the Noise Ordinance. Construction activity would be prohibited between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, or between the hours of 6:00 p.m. and 8:00 a.m. on Saturday, Sunday, or public holiday. As such, construction-related vibration associated with the Proposed Project would result in a less than significant impact.

TABLE 32
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT [1]

EQUIPMENT	PPV AT 25 FEET (INCHES/SECOND) [2]
Sonic Pile Driver	0.170
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076

[1] Source: Federal Transit Authority, Transit Noise and Vibration Impact Assessment, April 1995.
[2] Fragile buildings can be exposed to ground-borne vibration levels of 0.5 inches per second PPV without experiencing structural damage.

(b) Operational

The Proposed Project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less than significant impact.

(4) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address noise, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

(5) Cumulative Impacts

Due to the distance between the Proposed Project and the nearest related project, approximately 1,000 feet north of the site, no cumulative noise impacts are anticipated.
When calculating future traffic impacts, the traffic study took 17 related projects into consideration. Thus, the future traffic results without and with the Proposed Project already account for the cumulative impacts from these other projects. Accordingly, the noise impacts are generated directly from the traffic analysis results, the future without project and future with project noise impacts described in this report already reflect cumulative impacts.

Table 30: Existing and Future Estimated Community Noise Equivalent Level – Weekday and *Table 31: Existing and Future Estimated Community Noise Equivalent Level – Weekend* present the cumulative increase in future traffic noise levels at various intersections (i.e., 2010 "No Project" conditions plus Proposed Project traffic) for the weekday and weekend conditions, respectively. Regarding weekdays, the maximum cumulative roadway noise increase would be would be 1.0 dBA CNEL and would occur along Riverside Drive between Woodman and Hazeltine Avenues. As such, cumulative weekday roadway noise levels would not exceed the 3-dBA threshold and would not result in a perceptible change in noise level. The Proposed Project would not result in a cumulatively considerable impact with respect to roadway noise.

Regarding weekends, the maximum cumulative roadway noise increase would be 1.1 dBA CNEL and would occur along Riverside Drive between Woodman Avenue and Van Nuys Boulevard. As such, cumulative weekend roadway noise levels would not exceed the 3-dBA threshold and would not result in a perceptible change in noise level. The Proposed Project would not result in a cumulatively considerable impact with respect to roadway noise and thus, mobile noise would result in a less than significant impact.

The predominant vibration source near the project site is heavy trucks traveling on the local roadways. Neither the project nor related projects would substantially increase heavy-duty vehicle traffic near the project site and would not cause a substantial increase in heavy-duty

trucks on local roadways. As such, the Proposed Project would not add to a cumulative vibration impact.

4. MITIGATION PROGRAM

MM N-1: The City of Los Angeles Noise Ordinance has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence.[14] No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

The LAMC also specifies the maximum noise level of powered equipment or powered hand tools.[15] Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

MM N-2: The Proposed Project will include certain features to reduce exposure of sensitive receptors to operational noise. For example, mechanical equipment would be enclosed or located on roofs, and mechanical equipment noise would not increase ambient noise levels by more than 5 dBA at off-site locations. In addition, the new loading docks would be located behind mall structures and away from sensitive receptors. As a result, activity associated with the new loading docks would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptors (e.g. residences on Riverside Drive).

MM N-3: All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.

MM N-4: Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

[14] Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.
[15] Chapter XI, Article 2, Section 112.05, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

MM N-5: Equipment staging areas shall be located on the southern portion of the project site, as far as possible from multi-family residences on.

MM N-6: During phase 2 parking structure construction and phase 3 demolition and excavation of the tunnel area, temporary sound barriers (not to exceed a maximum height of ten feet) capable of achieving sound attenuation of at least 10 dBA (e.g., sound attenuation blanket) shall be constructed, such that the line-of-sight is blocked from active construction areas to residential land uses on Riverside Drive.

MM N-7: Construction workers shall be required to park at designated locations and shall be prohibited from parking on nearby residential streets.

MM N-8: Pile drivers shall be shrouded with acoustically absorptive shields capable of reducing noise by at least 9 dBA at all times during pile driving operations.

MM N-9: Pile driving activity shall be scheduled for times that have the least impact on adjacent sensitive receptors.

MM N-10: Consistent with previous Conditions of Approval, all residential units located within 2,000 feet of the construction site shall be sent a notice regarding the construction schedule of the Proposed Project. A sign, legible at a minimum distance of 50 feet, shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

MM N-11: A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, posted at the construction site shall list the telephone number for the disturbance coordinator.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

a. Construction

Mitigation Measure N-3 would reduce construction noise levels by 3 dBA, and Mitigation Measure N-6 would reduce construction noise levels by approximately 10 dBA. The noise disturbance coordinator (Mitigation Measure N-11) would ensure that noise complaints would be resolved. The other Mitigation Measures (N-4, N-5, and N-10) would assist in attenuating construction noise levels. Should pile driving be necessary, Mitigation Measures N-8 and N-9 would reduce pile driving noise by at least 9 dBA. The resulting incremental increase in ambient

noise levels due to pile driving at the nearest sensitive receptor would be 4.6 dBA. *Table 33: Construction Noise Impact-Mitigated*, displays the construction noise impacts taking into consideration the 15 dBA of noise reduction from Mitigation Measures N-3 and N-6. As shown on *Table 33: Construction Noise Impact-Mitigated*, the construction noise level increase with mitigation at the multi-family residences on Riverside Drive would be less than 5 dBA. As such, construction noise would result in a less than significant impact with mitigation incorporated.

TABLE 33
CONSTRUCTION NOISE IMPACT – MITIGATED [1]

KEY TO *FIGURE 41: NOISE MONITORING LOCATIONS*	DISTANCE (FEET) [2]	MAXIMUM CONSTRUCTION NOISE LEVEL (DBA, LEQ) [3]	EXISTING AMBIENT (DBA, LEQ) [4]	NEW AMBIENT (DBA, LEQ) [5]	INCREASE	IMPACT
OFF-PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	69.4	66.2	71.1	4.9	No
#2 Multi-Family Residence on Riverside Drive	120	69.4	68.3	71.9	3.6	No
#3 Notre Dame High School	575	64.8	67.1	69.1	2.0	No
#4 Single-Family Residence on Calhoun Avenue	750	62.5	65.5	67.3	1.8	No
#5 Van Nuys Sherman Oaks Park on Hazeltine Avenue	800	61.9	68.4	69.3	0.9	No
PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	69.4	69.3	72.4	3.1	No
#2 Multi-Family Residence on Riverside Drive	120	69.4	70.3	72.9	2.6	No

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] Distance of noise source from receptor.
[3] Construction noise source's sound level at receptor location, with distance and building adjustment.
[4] Pre-construction activity ambient sound level at receptor location.
[5] New sound level at receptor location during the construction period, including noise from construction activity.

b. Operational

The project-related operational noise would result in a less than significant impact and no mitigation is necessary.

c. Vibration

The project-related operational ground-borne vibration would result in a less than significant impact.

Exhibit H

IV. MITIGATION MONITORING PROGRAM

The Mitigation Monitoring Plan (MMP) has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." The City of Los Angeles is the Lead Agency for the proposed project.

The MMP is designed to monitor implementation of all feasible mitigation measures as identified in the Draft and Final EIRs for the proposed project. Mitigation measures are indicated below and are numbered consistent with the relevant section numbering provided in the Draft EIR. Each mitigation measure is listed and categorized by topic with an accompanying discussion of the following:

- The phase of the project during which the mitigation measure should be monitored (i.e., prior to issuance of building permit, construction, or occupancy);
- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure); and
- The monitoring agency (i.e., the agency which monitors compliance and implementation of the required mitigation measure).

The project applicant shall be obligated to provide certification prior to the issuance of site or building plans that compliance with the required mitigation measures has been achieved. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the project applicant unless otherwise noted.

Air Quality

Construction

C-1 The project developer shall implement the following measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the project site throughout the project construction phases. The project developer shall include in construction contracts the control measures as may required under Rule 403, at the time of development, including the following:

- Keep all construction equipment in proper tune in accordance with manufacturer's specifications.

- Use late model heavy-duty diesel-powered equipment at the project site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more than two weeks.

- Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the project site to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment. (This measure does not apply to diesel-powered trucks traveling to and from the site.)

- Utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment.

- Limit truck and equipment idling time to five minutes or less.

- Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.

- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Monitoring Phase: Construction

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Department of Building and Safety

C-2 The project developer shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The project developer shall include in construction contracts the control measures as may required under Rule 403 at the time of development, including the following

- Use watering to control dust generation during demolition of structures or break-up of pavement. The construction area and vicinity (500-foot radius) must be swept (preferably with water sweepers) and watered at least twice daily. Site wetting must occur often enough to maintain a 10 percent surface soil moisture content throughout all earth moving activities. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- Water active grading/excavation sites and unpaved surfaces at least three times daily.
- All paved roads, parking and staging areas must be watered at least once every two hours of active operations.
- Site access points must be swept/washed within thirty minutes of visible dirt deposition.
- Sweep daily (with water sweepers) all paved parking areas and staging areas.
- Onsite stockpiles of debris, dirt or rusty material must be covered or watered at least twice daily.
- Cover stockpiles with tarps or apply non-toxic chemical soil binders.
- All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard.
- At least 80 percent of all inactive disturbed surface areas must be watered on a daily basis when there is evidence of wind drive fugitive dust.
- Install wind breaks at the windward sides of construction areas.
- Operations on any unpaved surfaces must be suspended when winds

exceed 25 mph.

- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more, so as to prevent excessive amounts of dust.
- All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard.
- All haul trucks must have a capacity of no less than twelve and three-quarter (12.75) cubic yards.
- All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- Traffic speeds on unpaved roads must be limited to 15 miles per hour.
- Provide daily clean-up of mud and dirt carried onto paved streets from the site.
- Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- Operations on any unpaved surfaces must be suspended during first and second stage smog alerts.

An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Monitoring Phase: Construction

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Department of Building and Safety

CULTURAL RESOURCES

D-1 If any archaeological materials are encountered during the course of the project development, construction shall be halted. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the UCLA Archaeological Information Center. A covenant and agreement shall be recorded prior to obtaining a grading permit.

Monitoring Phase: During grading/excavation

Enforcement Agency: Native American Heritage Commission/ Office of Historic Preservation/ Department of Building and Safety

Monitoring Agency: Department of Building and Safety

D-2 If any paleontological materials are encountered during the course of the project development, construction shall be halted. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. A covenant and agreement shall be recorded prior to obtaining a grading permit. Mitigation Measure.

Monitoring Phase: During grading/excavation

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

D-3 If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

Monitoring Phase: During grading/excavation

Enforcement Agency: Native American Heritage Commission/Department of Building and Safety

Monitoring Agency: Department of Building and Safety/Tribal Contacts

GEOLOGY AND SOILS

E-1 Further evaluation of the potential for liquefaction to occur at the project site during strong ground shaking shall be performed as part of the design-level geotechnical investigation, using data developed from Cone Penetration Test (CPT) probes, which should be performed in addition to additional borings.

Monitoring Phase: Prior to issuance of grading and building permits

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

E-2 The project shall comply with the recommendations listed on pages 6 through 13 in the Preliminary Geotechnical Report, Proposed High Rise Residential Development, 6230 Yucca Street, Hollywood, California, (which is incorporated herein by reference), prepared by Group Delta Consultants, Inc., dated November 17, 2006. Non-design related structural methods are presented below. The report contains additional specific design requirements that the contractor must implement:

- Earthwork

  All grading should also conform to the requirements of the City of Los Angeles Grading Division and the following general grading recommendations:

  - The grading contractor is responsible for notifying the project geotechnical engineer of a pre-grading meeting prior to the start of grading operations and anytime the operations are resumed after an interruption.

  - Prior to the start of earthwork the existing improvements will require demolition, as discussed in Section 5.2. Existing utilities should be

removed, relocated or protected, as appropriate.

- As discussed in Section 5.3, any existing fill is uncertified, but will be removed during the planned basement excavation.

- The sides of the basement excavation will require shoring with one to two rows of tie-back anchors, as discussed in Section 5.5.

- The bottom of the completed excavation should be observed by the project geotechnical engineer, while it is proofrolled with loaded equipment. Any loose or yielding soils should be overexcavated and recompacted to the limits determined by the project geotechnical engineer.

- The bottom of the excavation should then be scarified to a depth of 6 inches, moisture conditioned between 0 to 2 percent wet of the optimum moisture content, and compacted to at lease 95 percent relative compaction as determined by ASTM Test D1557.

- Any fill placed under structures or pavement and any backfill placed adjacent to buried walls is defined as "structural fill." All structural fill should consist of predominantly sandy soils and should be free of expansive clay, rock greater than 3 inches in maximum size, debris and other deleterious materials. All structural fill should be compacted to at least 95 percent of the maximum dry density determined bye ASTM D1557. Fill placed in non-structural and landscape areas should be compacted to at least 90 percent.

- In general, the sandy layers encountered in our borings may be used as structural fill. However, the clayey and silty soils encountered in our explorations will not be acceptable for reuse as fill or backfill. All fill sols shall be approved by the project geotechnical engineer.

- All earthwork and grading should be performed under the observation of the project geotechnical engineer. Compaction testing of the fill soils shall be performed at the discretion of the project geotechnical engineer. Testing should be performed for approximately every 2 feet in fill thickness or 500 cubic yards of fill placed, whichever occurs first. If specified compaction is not achieved, addition compactive effort, moisture conditioning, and/or removal and recompaction of the fills soils will be required.

- All materials used for asphalt concrete and base shall conform to the 2006 "Green Book" or the equivalent, and shall be compacted to at least 95 percent relative compaction.

- If, in the opinion of the geotechnical engineer, contractor, or owner, an unsafe condition is created or encountered during grading, all work in the area shall be stopped until measures can be taken to mitigate the unsafe condition. An unsafe condition shall be considered any condition that creates a danger to workers, on-site structures, on-site construction, or any off-site properties or persons.

- Temporary Excavations - General

  - All excavation slopes should meet the minimum requirements of the Occupational Safety and Health Association (OSHA) Standards. Maintaining safe and stable slopes on excavations is the responsibility of the contractor and will depend on the nature of the soils and groundwater conditions encountered and his method of excavation. Excavations during construction should be carried out in such a manner that failure or ground movement will not occur.

- Temporary Excavations – Dewatering

  - During construction, it is anticipated that ground water can be controlled using shallow trenches, sumps and pumps. To provide further definition of the ground water conditions at the site, one or more monitoring wells are recommended to be installed during the design-level geotechnical investigation. If it is necessary to dispose of water during construction, a discharge permit will be required from the Regional Water Quality Review Board. This will require testing of the ground water for contaminants, and should be planned for the project schedule.

- Temporary Excavations – Shoring

  - A soldier pile and tied-back shoring system will be required to protect adjacent property adjacent property and streets. The design of the shoring system will be the responsibility of the shoring designer. Since the tied-back anchors will extend offsite, approval will be required from the City the adjacent property owners. This should be planned for in the project schedule. The design of the soldier piles and anchors are specified in the Preliminary Geotechnical Report.

- Temporary Excavations – Monitoring of Shoring

  - A survey-monitoring program should be implemented to monitor shoring displacements during construction. In addition, nearby improvements should also be surveyed and photographs and/or video taken to document baseline conditions. The deflection at the top of the shoring should be limited to 1 inch. If the shoring exceeds 1 inch or if distress or settlement is noted adjacent to the top of shoring, an evaluation should be performed and corrective measures taken.

Monitoring Phase: During grading and construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

E-3 All structural elements shall be designed and built to resist strong ground motions in accordance with the requirements of the City of Los Angeles Building Code and the California Building Standards Code. These measures shall be reviewed and approved by the City of Los Angeles Department of Building and Safety prior to issuance of building permits.

Monitoring Phase: Prior to issuance of grading and building permits

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

E-4 All grading activities require grading permits from the Department of Building and Safety which include requirements and standards designed to limit potential impacts to acceptable levels.

Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

- Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures

include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

- Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

Monitoring Phase: During grading and construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

E-5 Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets.

Monitoring Phase: During grading and construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

HAZARDS AND HAZARDOUS MATERIALS

F-1 Prior to the issuance of demolition permits, the applicant shall have the pole-mounted transformers located along the alley transecting the project site tested for the presence of PCB-containing dielectric fluids. If PCBs are identified, the dielectric fluid shall be collected and properly disposed of as hazardous waste at an appropriate disposal facility in accordance with applicable federal, state and local regulations. The transformers shall also be disposed of as hazardous waste in accordance with applicable federal, state and local regulations.

Monitoring Phase: Prior to issuance of demolition permits

Enforcement Agency: Fire Department

Monitoring Agency: Department of Public Works - Bureau of Street Services

F-2 Prior to the issuance of demolition permits, the applicant shall identify PCB-containing light ballasts in each building throughout the project site. These ballasts shall be recycled through a reputable company to prevent environmental contamination upon renovation, demolition or change-out.

Monitoring Phase: Prior to issuance of demolition permits

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

F-3 Prior to the issuance of demolition permits, the applicant shall identify all mercury-containing fluorescent bulbs used in light fixtures throughout the buildings on the project site. These bulbs shall be recycled through a reputable company to prevent environmental contamination upon renovation, demolition or change-out.

Monitoring Phase: Prior to issuance of demolition permits

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

F-4 Prior to the issuance of the demolition/renovation permits, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403, as well as other state and federal regulations. Specific requirements of Rule 1403 include:

- Implementation of a thorough survey of the affected facility prior to issuance of permits for any demolition or renovation activity, including inspection, identification, and quantification of all friable and certain non-friable asbestos-containing materials.
- Surveys which include collection and analyses of representative asbestos building material samples, and quantification of these materials for asbestos abatement purposes prior to or during demolition/renovation.
- Notification of the SCAQMD of the intent to demolish or renovate any facility at least ten days prior to commencing with the activity.
- Removal of all asbestos-containing materials prior to any demolition or renovation activity that would break up, dislodge, or similarly disturb the material.
- Use of legally required procedures when removing asbestos-containing materials.
- Placement of all collected asbestos-containing materials in leak-tight containers or wrapping.

Disposal of asbestos-containing materials as required by applicable regulations.

Monitoring Phase: Prior to issuance of demolition permits

Enforcement Agency: Air Quality Management District/ Department of Building and Safety

Monitoring Agency: Department of Building and Safety

F-5 Prior to issuance of permits for any demolition/renovation activity involving a particular structure, a lead-based paint assessment of each existing apartment structure shall be conducted. Lead-based paint found in any buildings shall be removed and disposed of as a hazardous waste in accordance with all applicable regulations. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

Monitoring Phase: Prior to issuance of demolition permits

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

F-6 Prior to the issuance demolition permits, a No Further Action letter shall be obtained from the Los Angeles Fire Department Bureau of Fire Prevention (LAFDBFP) in order to verify that the second former UST is no longer an environmental issue.

Monitoring Phase: Prior to issuance of demolition permits

Enforcement Agency: Fire Department/Department of Building and Safety

Monitoring Agency: Fire Department/Department of Building and Safety

F-7 Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.

- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic waste shall be discarded at a

licensed regulated disposal site.

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- Shall not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting.
- Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets.

All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills.

Monitoring Phase: During demolition

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

Hydrology and Water Quality

G-1 Compliance with all applicable requirements associated with NPDES Permit No. CA0061654 and all relevant storm water quality management regulations.

Monitoring Phase: Construction

Enforcement Agency: Regional Water Quality Control Board, Los Angeles Region

Monitoring Agency: Department of Public Works – Watershed Protection Division

G-2 All grading activities require grading permits from the Department of Building and Safety which include requirements and standards designed to limit potential

impacts to acceptable levels.

Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

- Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

- Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

Monitoring Phase: Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

G-3 To reduce the sediment that carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life the following mitigation measures shall be implemented

- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

- Do not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible.

- Dumpsters shall be covered and maintained. Place uncovered dumpsters

under a roof or cover with tarps or plastic sheeting.

- Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets.

All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills.

Monitoring Phase: Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

Noise

I-1 All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Monitoring Phase: Pre-Construction, Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

I-2 Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers. (*Former Measures I-2 and I-3 were combined into one measure in the CPC Decision*).

Monitoring Phase: Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

I-3 Barriers such as plywood structures or flexible sound control curtains shall be erected along Argyle Avenue between the project site and the multi-family residential units and along the western project site boundary between the project site and the Capitol Records Tower to minimize the amount of noise the residential units shall be subject to. The barrier or curtain shall be at least 16 feet in height.

Monitoring Phase: Pre-construction/Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

I-4 Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 150 feet from the multi-family residential units.

Monitoring Phase: Pre-construction/Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

I-5 Flexible sound control curtains shall be placed around and drilling apparatuses and drill rigs, if used.

Monitoring Phase: Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

I-6 Noticing of the scheduling of various phases of construction shall be submitted to the Capitol Records Tower.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

I-7 Demolition and construction activities that generate noise shall be prohibited between the hours of 4:00 p.m. and 7:00 a.m. Monday through Friday. All such activity at the project site shall cease by 4:00 p.m. ~~Construction related activities which promote excessive noise shall be prohibited on Saturdays.~~ (*modified by CPC in response to EMI; Saturday restriction superceded by more specific additional Mitigation Measures volunteered after CPC decision in consultation with EMI/Capitol Records*).

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

I-8 The project shall comply with the City of Los Angeles Noise Ordinance No. 144, 331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

I-9 Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

I-10 The project contractor shall use power construction equipment with state-of-the art noise shielding and muffling devices. (*added after CPC decision*)

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

I-11 The project shall comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

MM-1 The project applicant shall perform pre- and post-construction surveys of the Capitol Records echo chambers and pay for the cost of any repairs proximately caused by the construction.

Monitoring Phase: Pre-construction/Post-construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

MM-2 The project applicant shall meet with representatives of EMI regularly during construction and use reasonable efforts to schedule use of the echo chamber and the most disruptive construction activity at different times.

Monitoring Phase: Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

Supp-12 Within 40 feet of the western project site property line with EMI/Capitol Records, demolition, excavation and construction activities at or below the street level of the project site (including loading of demolition refuse), grading equipment and activities, augured pile drilling, vibratory rollers, jumping jack compactors, and other excavation and construction equipment and activities shall be prohibited after

10:00 a.m. Mondays through Saturdays, unless one of the following exceptions apply:

a. The EMI/Capitol Records recording studios and echo chambers are not in use; or
b. It can be demonstrated (in coordination with EMI/Capitol Records) that any such demolition, grading, excavation, or construction activity or equipment will not result in sound within the echo chambers of more than 20 dBA energy averaged over any 5 minute period and a maximum of 25 dBA slow meter response.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

Supp-13 Within 40 feet of the western project site property line with EMI/Capitol Records, demolition, excavation, and construction activities at or below the street level of the project site (including loading of demolition refuse), grading equipment and activities, augured pile drilling, vibratory rollers, jumping jack compactors, and other excavation and construction equipment and activities shall be prohibited during the one-week period leading up to and including the Grammy, Emmy, and Oscar awards, unless one of the following exceptions apply:

a. The EMI/Capitol Records recording studios and echo chambers are not in use; or
b. It can be demonstrated (in coordination with EMI) that any such demolition, grading, or excavation activity or equipment will not result in sound within the echo chambers of more than 20 dBA energy averaged over any 5 minute period and a maximum of 25 dBA slow meter response.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of

City Planning

Supp-14 Loading of refuse will be accomplished through the use of rubber tired equipment. Every effort will be made during the loading and removal operation to reduce noise from any operated equipment. Trucks will be staged and loaded at the Argyle Street curb and driveway.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-15 Driven soldier piles are prohibited; augured piles are permitted. (subject to the conditions set forth in Supplemental Mitigation Measures 12 and 13 above).

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-16 Tracked loaders and dozers are other similar tracked equipment are prohibited; wheeled loaders and dozers other similar wheeled equipment are permitted. (subject to the conditions set forth in Supplemental Mitigation Measures 12 and 13 above).

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-17 Rubber tired equipment will be used during excavation, with the possible exception of a tracked "back-hoe-type" excavator (with rubber track pads and/or sound deadening blankets utilized) which may speed excavation and cause less vibration. Any tracked excavator would be operated at lowest possible gear at lowest possible speed. (All equipment is subject to the conditions set forth in Supplemental

Mitigation Measures 12 and 13 above).

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-18 No stationary equipment will be operated within 40 feet of the western project site property line with EMI/Capitol Records. Tower cranes and personnel lifts shall be positioned near Argyle on the eastern edge of the project site.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-19 Construction materials shall be stock-piled at distant portions of the site, at least 40 feet from the western project site property line with EMI/Capitol Records. The equipment warm-up areas, water tanks and equipment storage areas described in Mitigation Measure I-5 above shall also be located at least 40 feet from the western project site property line with EMI/Capitol Records.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-20 All plans and specifications and construction means and methods (including plans and specifications submitted to the City of Los Angeles Department of Building & Safety regarding the neoprene foam liner and miradrain system referenced in Mitigation Measure Supp 26) shall be provided to EMI/Capitol Records for review concurrently with their submission to the City of Los Angeles Department of Building & Safety.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

Supp-21 The Applicant shall secure a "Noise/Vibration" expert and notify EMI/Capitol Records of the name and contact information for such expert. The "Noise/Vibration" expert shall review the construction plans and specifications and shall prepare a "best practices" report with regards to demolition and construction activities as they relate to noise and vibration. The expert shall also review the construction schedule and inform the contractor of activities and equipment likely to cause excessive ground borne noise and/or vibration during construction. The "best practices" report shall be provided to the City of Los Angeles Department of Building & Safety, EMI/Capitol Records, and the construction manager prior to initiation of any demolition, excavation or construction of the project, and the recommendations in the report shall be followed. The duties required of the "Noise/Vibration" expert in this measure shall not require the "Noise/Vibration" expert to be present on-site at all times so long as the duties herein required.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

Supp-22 Prior to initiation of demolition, excavation or construction activities on the project site, the Applicant shall designate in writing to EMI/Capitol Records a contact person with the contractor, including such person's cell phone number, that will be on-site, available and have the authority to control construction activities, and who is the person that EMI/Capitol Records shall contact if there is interference with recording activities at EMI/Capitol Records studios or echo chambers. If at any time during demolition, excavation or construction of the project EMI/Capitol Records notifies such contact person that construction activity is interfering with a recording session, the contractor shall promptly take all necessary measures to identify and modify the activity causing the interference so that the interference ceases and the recording session may continue without further delay and the

interference does not recur.

If there are two documented incidents of interference that are not satisfactorily resolved with the Applicant's construction contact in such a manner that recording operations at EMI/Capitol Records can continue, and such documentation is provided by EMI/Capitol Records to the Applicant, the City of Los Angeles Department of Building & Safety and Council Office for District 13, then the City of Los Angeles Department of Building & Safety shall immediately respond by going to the project site to identify and instruct the contractor to modify the activity causing the interference so that interference ceases and develop an action plan for moving forward with construction in a manner that will not interfere with recording operations at EMI/Capitol Records.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

Supp-23 In addition to the measures provided in Mitigation Measure Supp 22 above, in the event that recording activities at EMI/Capitol Records are interrupted during demolition, excavation or construction and a resolution cannot be reached between the contractor and EMI/Capitol Records, the "Noise/Vibration" expert shall be immediately contacted and shall first verify if the interruption is caused by construction activity and then make additional recommendations regarding how to further reduce or eliminate interruption to EMI/Capitol Records' recording operations. These recommendations shall be provided to and discussed with the City of Los Angeles Department of Building & Safety and EMI/Capitol Records.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-24 All mitigation measures restricting construction activity will be posted at the Site and all construction personnel will be instructed as to the nature of the noise and vibration mitigation measures.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety

Enforcement Agency: Department of Building and Safety

Supp-25 The Applicant, its contractor and noise/vibration expert shall coordinate with EMI/Capitol Records relative to recording and construction activity schedules. During the construction period, the applicant shall establish a schedule to meet with EMI/Capitol Records at least once per week during construction. The applicant shall provide EMI/Capitol Records a detailed construction schedule, including scheduled construction equipment, and the applicant shall request the recording schedule of EMI/Capitol Records' use of the studios and echo chambers during the same period. Without in any manner limiting the scope of other Supplemental Mitigation Measures, the applicant shall use best efforts to coordinate in good faith with EMI/Capitol Records to avoid use of construction equipment and avoid construction activities that cause significant noise and vibration impacts during hours shown on the schedule provided by EMI/Capitol Records and during EMI/Capitol Records' special events.

Monitoring Phase: Preconstruction/Construction

Enforcement Agency: Department of Building and Safety/Department of City Planning

Monitoring Agency: Department of Building and Safety/Department of City Planning

Supp-26 A not less than two-inch thick closed cell neoprene foam liner will be applied to exposed excavation or lagging at the west project site property line with EMI/Capitol Records provided that: (1) the liner is approved for this use by the City of Los Angeles Department of Building & Safety (if not so approved, then an equivalent product approved for this use by the City of Los Angeles Department of Building and Safety shall be applied) and (2) a Miradrain system (or equivalent product) for drainage and waterproofing will be installed per manufacturer recommendations. A 10 to 12 inch thick shotcrete basement wall will then be built. If operation of the project, including normal traffic in the underground garage exceeds the threshold of 1) 20 dBA energy averaged over any 5 minute period and 2) a maximum of 25 dBA slow meter response, then the applicant shall take such

measures to reduce the impact below the above thresholds.

Monitoring Phase: Prior to issuance of a certificate of occupancy

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

Supp-27 Noise and vibration generating equipment such as cooling towers and HVAC systems shall either be located on the roof of the structure or shall be located at a distance of not less than 40 feet from the EMI/Capitol Records property line, unless it can be demonstrated (in coordination with EMI/Capitol Records) that any such equipment will not result in sound within the echo chambers of more than 20 dBA energy averaged over any 5 minute period and a maximum of 25 dBA slow meter response.

Monitoring Phase: Prior to issuance of a certificate of occupancy

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

PUBLIC SERVICES

Fire

K.1-1 In accordance with LAMC Section 57.09.07, the applicant shall equip the proposed structure with automatic sprinkler systems.

Monitoring Phase: Prior to issuance of a certificate of occupancy

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

K.1-2 The Applicant shall submit the plot plan for review and approval by the Fire Department prior to recordation of a final map or the approval of a building permit.

Monitoring Phase: Prior to issuance of building permits

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

K.1-3 Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

Monitoring Phase: Prior to issuance of building permits

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

K.1-4 No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

K.1-5 No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

K.1-6 Access for Fire Department apparatus and personnel to and into all structures, including the subterranean parking structures, shall be required.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

K.1-7 The Proposed Project shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan for the City of Los Angeles C.P.C. 19708.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

Police

K.2-1 During construction activities, the Project developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, be secured to prevent trespass.

Monitoring Phase: Construction

Enforcement Agency: Police Department

Monitoring Agency: Police Department

K.2-2 The building and layout design of the Proposed Project shall include crime prevention features, such as nighttime security lighting, full-time onsite professional security, building security systems, and secure parking facilities.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Police Department

Monitoring Agency: Police Department

K.2-3 The project developer shall submit a plot plan for the proposed development to the LAPD's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Police Department

Monitoring Agency: Police Department

Schools

K.3-1 The Project Applicant shall pay all applicable school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the Project area.

Monitoring Phase: Prior to certificate of occupancy

Enforcement Agency: Los Angeles Unified School District

Monitoring Agency: Los Angeles Unified School District

Parks

K.4-1 The Applicant shall pay the required $200 per dwelling unit fee paid to the Department of Building and Safety in accordance to the Dwelling Unit Construction Tax required by the Los Angeles Municipal Code Section 21.10.3(b).

Monitoring Phase: Prior to issuance of a certificate of occupancy

Enforcement Agency: Department of Building and Safety

Monitoring Agency: Department of Building and Safety

K.4-2 The project applicant shall comply with the obligation to pay Quimby/Park fees as required by Los Angeles Municipal Code Section 17.12.

Monitoring Phase: Prior to issuance of building permits

Enforcement Agency: Department of City Planning/ Department of Recreation and Parks

Monitoring Agency: Department of City Planning/ Department of Recreation and Parks

Library

K.5-1 The project applicant shall pay a mitigation fee of $200 per capita based on the projected population of the development to the Los Angeles Public Library to offset the impact of additional library facility demand in the project area.

Monitoring Phase: Prior to issuance of building permits

Enforcement Agency: Los Angeles Public Library

Monitoring Agency: Los Angeles Public Library

UTILITIES

Water

M.2-1 The Project developer shall ensure that the landscape irrigation system be designed, installed and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets.

Monitoring Phase: Prior to issuance of certificate of occupancy

Enforcement Agency: Department of Water and Power/ Department of Building and Safety

Monitoring Agency: Department of Water and Power/ Department of Building and Safety

M.2-2 The Project developer shall install either a "smart sprinkler" system to provide irrigation for the landscaped areas or, at a minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.

Monitoring Phase: Prior to issuance of certificate of occupancy

Enforcement Agency: Department of Water and Power/ Department of Building and Safety

Monitoring Agency: Department of Water and Power/ Department of

Building and Safety

M.2-3 The Project developer shall select and use drought-tolerant, low-water-consuming plant varieties to reduce irrigation water consumption.

Monitoring Phase: Prior to issuance of certificate of occupancy

Enforcement Agency: Department of Water and Power

Monitoring Agency: Department of Building and Safety

M.2-4 The Project developer shall install low-flush water toilets and water-saving showerheads in new construction. Low-flow faucet aerators should be installed on all sink faucets.

Monitoring Phase: Prior to issuance of building permits

Enforcement Agency: Department of Water and Power

Monitoring Agency: Department of Building and Safety

M.2-5 The availability of recycled water should be investigated as a source to irrigate large landscaped areas.

Monitoring Phase: Prior to issuance of building permits

Enforcement Agency: Department of Water and Power

Monitoring Agency: Department of Building and Safety/ Department of Public Works – Bureau of Sanitation

M.2-6 Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). LADWP should be contacted for specific information on appropriate measures.

Monitoring Phase: Prior to issuance of building permits

Enforcement Agency: Department of Water and Power

Monitoring Agency: Department of Building and Safety

Solid Waste

M.3-1 In compliance with AB 939, the construction contractor shall only contract for waste disposal services with a company that recycles construction-related wastes.

Monitoring Phase: Prior to issuance of certificate of occupancy

Enforcement Agency: Bureau of Sanitation

Monitoring Agency: Bureau of Sanitation

M.3-2 In compliance with AB 939, to facilitate the onsite separation and recycling of construction-related wastes, the construction contractor should provide temporary waste separation bins onsite during construction.

Monitoring Phase: Construction

Enforcement Agency: Bureau of Sanitation

Monitoring Agency: Bureau of Sanitation

Electricity

M.4-1 Title 24 of the California Code of Regulations establishes energy conservation standards for new construction, including residential and non-residential buildings. The proposed project would be required to comply with Title 24 energy conservation standards for insulation, glazing, lighting, shading, water and space heating systems in all new construction.

Monitoring Phase: Prior to issuance of a certificate of occupancy

Enforcement Agency: Department of Water and Power

Monitoring Agency: Department of Water and Power

Exhibit I

H-6 The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices as available.

H-7 Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the surrounding noise-sensitive receptors to the maximum extent feasible during construction.

H-8 All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.

H-9 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety.

H-10 Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

H-11 All new construction work shall be performed so as not to adversely impact or cause loss of support to on-site and neighboring/bordering structures. Preconstruction conditions documentation will be performed to document conditions of the on-site and neighboring/bordering buildings, including the Pantages Theater, the Avalon Theater, the Art Deco Storefronts on Yucca Street, and the Capitol Records Complex, prior to construction activities. The structure monitoring program will be developed for implementation and monitoring during construction.

The performance standards of the adjacent structure monitoring plan will including the following. All new construction work will be performed so as not to adversely impact or cause loss of support to neighboring/bordering structures. Preconstruction conditions documentation will be performed to document conditions of the neighboring/bordering buildings, including the historic structures that are on or adjacent to the Project Site, prior to initiating construction activities. As a minimum, the documentation will consist of video and photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings immediately bordering the Project Site. A registered civil engineer or certified engineering geologist will develop recommendations for the adjacent structure monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program will include vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, work will stop in the area of the

Exhibit J

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June 23, 2008

Via Hand Delivery

City Council Planning and Land Use Management Committee
Office of the City Clerk
City Hall, Room 395
200 North Spring Street
Los Angeles, CA 90012

Re: Yucca Street Condominiums Project; Case Nos. CPC-2006-7068-HD-ZAA-SPR/ENV-2006-6941-EIR

Dear Honorable Chairperson and Members of the City Council:

On behalf of our client Capitol Records LLC ("Capitol Records"), former owner and current long-term lessee of the Capitol Records tower and related property located at 1740-50 N. Vine, we are writing to urge you to grant the appeal by EMI Music North America ("EMI"), and its affiliate Capitol Records, of the Planning Commission's certification of an environmental impact report ("EIR") for and approval of the Yucca Street Condominiums Project ("Project").

As detailed in the Capitol Records Studios Economic Impact of Closure study dated April 2008 prepared by the Los Angeles County Economic Development Corporation ("LAEDC"), a copy of which study is attached as Exhibit "A" ("LAEDC Report"), and in the appeal filed by EMI, the Project will have admittedly significant unavoidable impacts that will be directly felt at the next door Capitol Records property. These adverse environmental impacts will also result in serious economic consequences not just for Capitol Records, but for the larger Hollywood and Los Angeles community as well. The Project's EIR has failed to adequately analyze the potential impacts of the Project, by among other things, completely ignoring long-term operational impacts of the Project on the neighboring Capitol Records site. It also fails to analyze potentially feasible mitigation measures and alternatives that could lessen or avoid these significant impacts. Finally, given the severe economic consequences that would result from the Project, adoption of the Statement of Overriding Considerations is inappropriate. The approval of the Project should be denied.

EMI's letter to the Planning Commission, dated December 4, 2007, details the cultural importance of the Capitol Records tower and the uniqueness and importance of the Les Paul-designed Echo Chambers that sit underground beneath the Capitol Records tower parking lot, The Capitol Records tower and the Echo Chambers are both City-designated historic monuments. In addition to the letters from recording artists previously submitted, Capitol Records has submitted letters from additional artists attesting to the

DLA PIPER

importance of the Echo Chambers and the need for them to remain available to recording artists and we understand that other interested parties have submitted their own letters directly to the Committee and to other City Councilmembers to this same effect.

Following the filing of the appeal, the Project's developer agreed to certain additional testing which has resulted in several supplemental Mitigation Measures agreed to by the parties. Unfortunately, however, certain other Mitigation Measures which are important to Capitol Records to maintain the on-going integrity of its recording studios and Echo Chambers have not been agreed to by Second Street. Recording studios like the studios at Capitol Records operate on very slim margins and this construction threatens its ongoing operations since the mere presence of construction may deter artists from coming to the Capitol Records studios in the first place, regardless what mitigation is in place. Moreover, the Capitol Records studios, even with mitigation, will operate in a risky climate where one disrupted recording session could expose it to large consequential damages from recording artists. It is therefore imperative that a third party escrow account or a comparable arrangement be in place with Second Street's lender or general contractor so that Capitol Records will have access to funds in the event Second Street and its contactor are unable or unwilling to modify the activity causing an interference so that the interference ceases and the recording session may continue without further delay. Second Street has refused to compensate Capitol Records for anticipated interference with its normal business relationships with recording artists resulting from the development of the Project and potential loss of business due to clients' and potential clients' concerns about likely interruption.

Inadequate Assessment of Noise/Vibration Impacts

As noted by the attorneys for the applicant in their letter dated April 7, 2008, the EIR admits that the construction of the Project will result in significant and unavoidable adverse impacts on the Capitol Records property and Echo Chambers. Because the EIR incorrectly assumed that the Echo Chambers are located 30-40 feet from the Project's property line, rather than approximately 19 feet as is actually the case, the applicant has now submitted additional analysis to correct this defect which discloses even more serious impacts than indicated in the EIR. That new report discloses that the vibration impact of the Project would actually be 32% higher than previously disclosed in the EIR and that the ground-borne noise from Project construction would be "clearly above levels that would be acceptable for a recording studio."

Because of the defective analysis in the EIR and the critical importance of the impacts, EMI also had an acoustical expert analyze the existing conditions in the Echo Chambers and assess the likely impact of the Project. Attached hereto as Exhibit "B" is the letter report prepared by Hooshang Khosrovani, Ph.D., P.E., of the firm Veneklasen Associates. The report details the prevailing ambient sound conditions in the Echo Chambers, which at about 17 dBA are much quieter than typical ambient sound conditions in an

ordinary building and are even quieter than conditions in typical Foley studios that are used for sensitive recordings. The expected sound and vibration levels caused by Project construction will be in the 80-90 VdB level range which, as the report also explains, would translate into 40-50 decibels above the existing ambient conditions. The City of Los Angeles considers a 5 decibel increase to be a significant impact and a ten decibel increase is generally perceived as twice as loud under normal conditions. A 40-50 decibel increase, in the context of the impact on the Echo Chambers, would be even greater.

Dr. Khosrovani's report also explains that the long-term operation of the next door underground garage would also have similar potential impacts as would occur during construction. Significantly, neither the EIR nor the applicant's new noise/vibration report addresses this long-term impact at all. Thus, it is undisputed in the record before the City that the Project will have significant unavoidable noise and vibration impacts on the Capitol Records property, both during construction and operation, that are substantially greater than disclosed in the Project's EIR or that were ever fully and completely analyzed in the Project's EIR or in the additional testing which has taken place. The EIR cannot be certified as complete until these deficiencies and omissions are remedied.

Potential Mitigation/Alternatives Ignored by the EIR that Could Avoid/Lessen Significant Impacts

Capitol Records believes mitigation measures and alternatives are available that could avoid the significant and unavoidable impacts on the Capitol Records recoding studios and Echo Chambers but which the EIR, applicant and City have failed to consider. One obvious alternative that could substantially lessen and perhaps even completely avoid the significant construction and operational impacts of the Project with respect to noise and vibration would be eliminating the underground garage and instead building the Project with an above-ground garage. None of the alternatives included in the EIR considered this as an option. While this alternative would increase the overall height of the building and could potentially increase the cumulative aesthetic impacts of the Project, such impacts which are considered significant and unavoidable, are due less to the height of the Project (which is already substantially taller than the Capitol Records tower) than the location of the Project and number and location of related structures. An alternative without an underground garage would be feasible, would achieve the Project objectives and would avoid the significant noise and vibration impacts of the Project; it should have been considered and analyzed in the EIR.

In addition, as discussed in previous comments from Capitol Records, there has been no assessment as an alternative of the Community Redevelopment Agency's proposal to master plan and develop the undeveloped and under utilized parcels within the block surrounded by Yucca, Argyle, Hollywood and Vine. The applicant's representative has ridiculed this suggested alternative because it would potentially permit development at a higher density than that sought by the Project. However, consideration of such an alternative would provide an opportunity for the City to ensure that any new development is sensitive

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to existing uses, such as those at Capitol Records, while achieving CRA's goal of redeveloping the area and could, for example, allow for the location of any underground parking structures further away from the Echo Chambers. This alternative would also have the potential ability to lessen other significant impacts of the Project related to historic resources impacts, aesthetics/views, traffic and security/privacy, which were discussed in Capitol Records' earlier letters. This alternative should have been examined in the EIR so that the Council would have a reasonable range of alternatives to choose from that would avoid or lessen some of the most serious impacts of the Project.

If the Project with the underground garage is pursued, there are also additional potential mitigation measures that could avoid or substantially lessen the operational impacts of the Project with respect to noise and vibration. As explained in the May 1, 2008 letter from Dr. Khosrovani, attached hereto as Exhibit "C", the underground garage could be designed in such a way as to minimize the potential for use of the garage to create noise and vibration impacts. In addition, such impacts could potentially be avoided by construction of a physical separation between the garage and the property line.

The EIR Must Be Revised and Recirculated

The new information produced by the applicant's acoustical consultant, as well as the new information provided by EMI's expert, is significant new information demonstrating that the Project will have substantially more severe noise and vibration impacts than previously disclosed in the EIR. In addition, as discussed above, there are feasible alternatives and mitigation measures that could substantially lessen or avoid this and other significant impacts which have yet to be fully explored. CEQA requires that the certification of the EIR and approval of the Project not occur until this additional work is completed and a revised EIR is prepared and circulated for public review and comment. CEQA Guidelines § 15088.5.

Economic Implications of Overriding the Project's Significant Impacts

The need to further examine potential alternatives and mitigation measures to the Project in order to avoid the significant noise and vibration impacts to the Capitol Records property is crucial not only to comply with CEQA requirements, but also because of the serious economic consequences to the City as well as Capitol Records if the Project is approved as currently proposed. As noted above and in Capitol Records' prior comment letters on the Project, the impacts of the Project will basically render unusable the Echo Chambers at the Capitol Records property. These are the only Echo Chambers of their kind in the world, and they are critical to the operation of the studios. If artists are even temporarily precluded from using the Echo Chambers due to Project construction, it could lead to the permanent demise of recording operations at Capitol Records.

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As more fully set forth and documented in the attached LAEDC Report, if Capitol Records is forced to cease operations as a result of the Project, this would not only be economically damaging to Capitol Records, but would be damaging to the larger community as well. The recording industry generates significant economic benefits for the Hollywood area and the City of Los Angeles generally. When a major artist records at Capitol Records, this generates income not just in terms of studio rental for Capitol Records, but also in terms of employment for local musicians and singers, sound technicians, and engineers. The people involved in such recording sessions also generate income and employment for local car rental services, hotels and restaurants and caterers. Just as an example, an estimate for a major recording artist planning to record 12-15 tracks at Capitol Records over the course of a five-six week period was budgeted to generate approximately $600,000 in local revenues.

Because of the many significant and unavoidable impacts of the proposed Project, the City will be required to adopt a Statement of Overriding Considerations in order to approve the Project. The loss of jobs, revenue to the City, not to mention financial damage to Capitol Records caused by the Project over the course of the construction period and potentially forever, is significant and should be seriously considered by the City before approving the Project. The historic Capitol Records tower and its world-renowned Echo Chambers are iconic landmarks that have been a key element to the success of the music business in Los Angeles since 1956. The City should not sacrifice all this in the interest of a new high rise condominium development without first fully exploring all potential ways of avoiding the serious economic and environmental consequences of the Project.

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The Project would cause irreparable damage to a designated historic monument, deprive recording artists of the only Echo Chambers of their kind in the world, and make future redevelopment of the area more expensive or infeasible. Therefore, Capitol Records respectfully requests that its appeal of the Planning Commission's decision be granted and that the certification of the EIR and approval of the Project be denied.

Very truly yours,

DLA Piper US LLP

John W. Whitaker
Partner

Admitted to practice in California

Enclosures

cc: Mr. Eric Garcetti, Council District 13
Mr. Bud Ovrom, Deputy Mayor for Housing and Economic Development
Ms. Cecilia Estolano, CRA Chief Executive Officer
Ms. Leslie Lambert, CRA/Hollywood
Mr. Brian Curran Jr., Hollywood Heritage
Mr. Ken Bernstein, L. A. Office of Historic Resources
Ms. Maureen B. Schultz, EMI
Mr. James Kuha, EMI
R. J. Comer, Esq.

Exhibit K

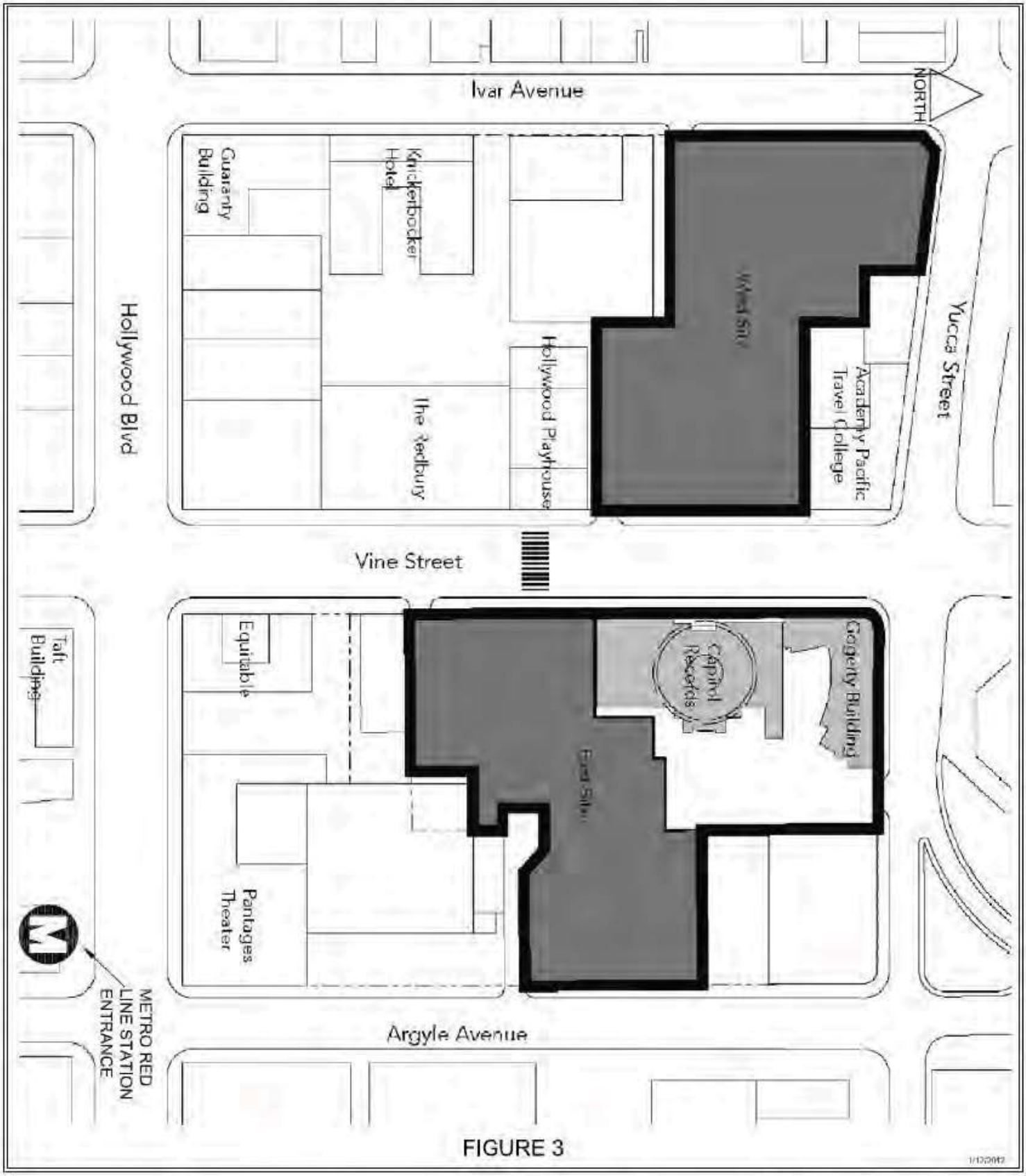

FIGURE 3

1/12/2012

H:\E CAPITOL RECORDS\2012-06 MAIN REPORTS\SITEPLAN

CONCEPTUAL PROJECT SITE PLAN

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Exhibit L

CRAIN & ASSOCIATES

VIA E-MAIL

December 14, 2010

Mr. Mark Phillips
Vice President, Regional Counsel
Brookfield Properties Management LLC
U.S. Commercial Operations
601 S. Figueroa Street, Suite 2200
Los Angeles, CA 90017

RE: Wilshire Grand Redevelopment Project: CPC-2009-3416-DA-TDR-CUB-CU-CUW-ZV-SN-ZAD-SPR-GB; ENV-2009-1577-EIR-GB, SCH No. 2009071035

Dear Mr. Phillips,

As requested, Crain & Associates has reviewed the environmental documents regarding the traffic and parking analyses for the Wilshire Grand Redevelopment Project (the "Project"). The Project site is the block bounded by Wilshire Boulevard, Figueroa Street, 7th Street and Francisco Street in Downtown Los Angeles. Brookfield Properties has existing buildings immediately to the north and south of the Project site, which are, respectively, the office building at 601 S. Figueroa Street and the 7+Fig shopping center. Our review of these documents has found several inadequacies, which are discussed in more detail below.

Impact on 601 S. Figueroa Street Building Access

The office building at 601 S. Figueroa Street is served by only one driveway, which is located approximately 200 feet west of the west curb of Figueroa Street. This driveway operates with left- and right-turn movements for both ingress and egress. Eastbound motorists on Wilshire Boulevard use the two-way left-turn lane to make left turns into the driveway. Left-turning motorists exiting the driveway also use the two-way left-turn lane to merge into the eastbound dual left-turn lanes on Wilshire Boulevard or as a refuge area before merging with eastbound through traffic on Wilshire Boulevard.

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The current LADOT striping plan shows that the eastbound dual left-turn lanes on Wilshire Boulevard have approximate lengths of 107 feet and 149 feet west of Figueroa Street, for a total of 256 feet of storage length. Immediately west of the dual left-turn lanes is the two-way left-turn lane referenced above.

The traffic study shows the existing left-turn volume using the dual left-turn lanes to be 510 vehicles during the PM peak hour. This left-turn volume sometimes extends out of the dual left-turn lanes and into the two-way left-turn lane or the number one eastbound through lane on Wilshire Boulevard. Based on level of service calculation worksheets appended to the traffic study, the Project will add 237 vehicles, after TDM mitigation, to the dual left-turn lanes during the PM peak hour. This addition of Project trips is expected to result in a queue of vehicles regularly extending well beyond the 601 Figueroa Street driveway. This queuing would block and significantly impede and delay the left-turning traffic exiting this driveway during the PM peak hour.

Project Trip Distribution

The traffic study assumed one general trip distribution pattern for the Project, even though the Project is comprised of several uses. This is contrary to recent traffic studies for large mixed-use projects approved by LADOT that have used discrete trip distribution patterns and percentages for individual uses in order to more accurately assign trips to study intersections and routes. For example, office, residential, hotel and retail uses generally have different trip distributions, as their origins and destinations are different. Utilizing one generic trip distribution for dissimilar proposed and existing uses can result in project trips and impacts being underestimated at study locations, as well as some locations not being considered for analysis because they have been assigned a low number of trips. In our opinion, a more accurate and inclusive traffic analysis would have included discrete trip distributions for the proposed Project uses and the existing uses being removed.

Use of Project Pass-By Trips

Per LADOT traffic study policies and procedures, pass-by trip credits are "not applicable to review of impacts at project driveways and the intersection(s) immediately adjacent to the project site." Therefore, project traffic impacts at site-adjacent intersections should be determined without the application of pass-by trip credit.

In the Project trip generation analysis, adjustments were made to the proposed and existing use trips in order to account for transit/HOV, walk, Central Business District (CBD) and internal capture factors. The CBD adjustment factor was applied to the fitness facility and retail/restaurant use trips, and was described as accounting for walk-in trips, pass-by trips, and trips captured from neighboring developments. The CBD adjustment factor, which includes

Exhibit M

Land Use: 492
Health/Fitness Club
Independent Variables with One Observation

The following trip generation data are for independent variables with only one observation. This information is shown in this table only; there are no related plots for these data.

Users are cautioned to use data with care because of the small sample size.

Independent Variable	Trip Generation Rate	Size of Independent Variable	Number of Studies	Directional Distribution
1,000 Square Feet Gross Floor Area				
Weekday	32.93	15	1	50% entering, 50% exiting
Saturday	20.87	15	1	50% entering, 50% exiting
Sunday	26.73	15	1	50% entering, 50% exiting
Sunday Peak Hour of Generator	2.47	15	1	Not available

Exhibit N

Health/Fitness Club
(492)

Average Vehicle Trip Ends vs: **1000 Sq. Feet Gross Floor Area**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.

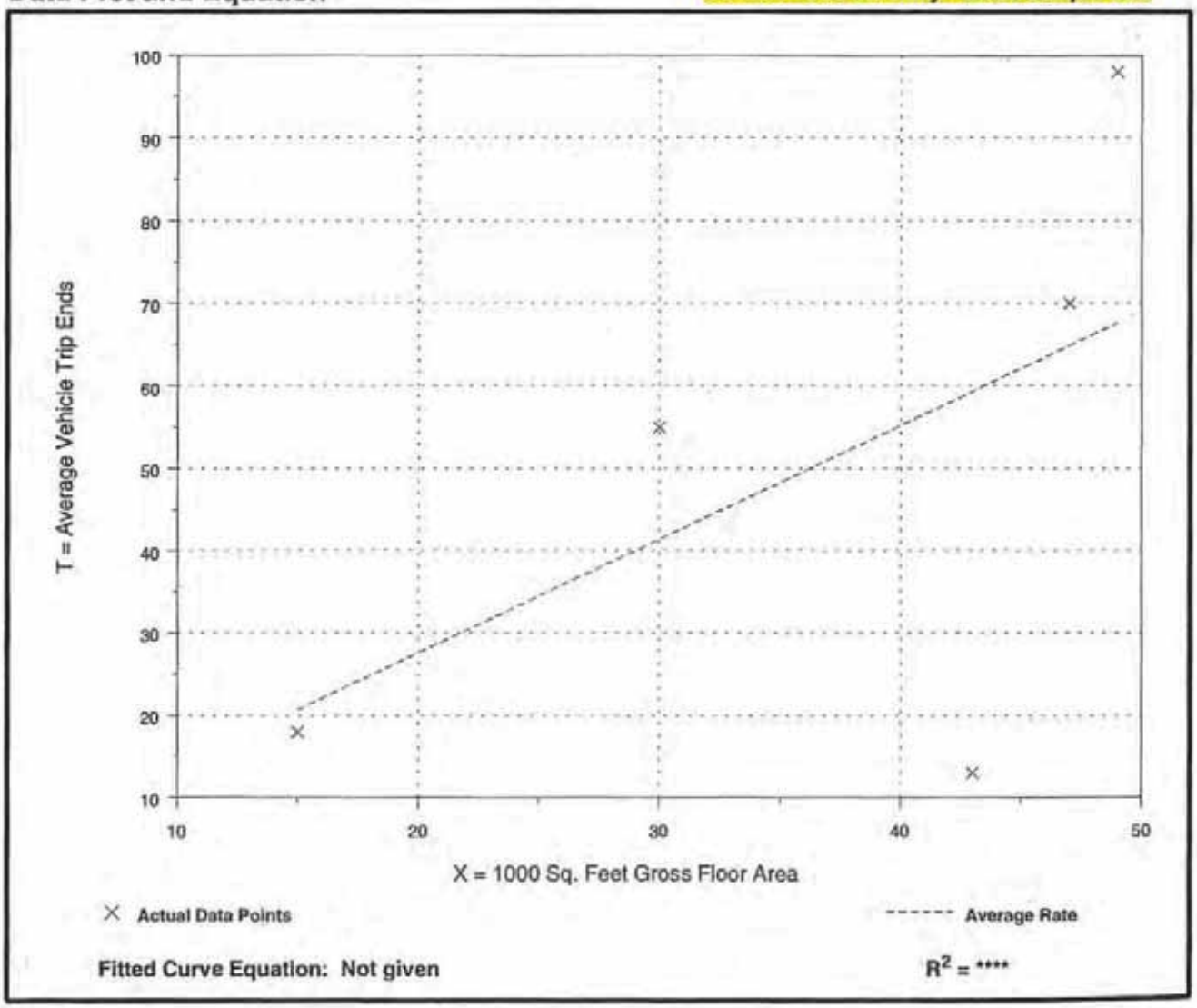
Number of Studies: 5
Average 1000 Sq. Feet GFA: 37
Directional Distribution: 45% entering, 55% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
1.38	0.30 - 2.00	1.33

Data Plot and Equation

Caution - Use Carefully - Small Sample Size



Fitted Curve Equation: Not given

R^2 = ****

Health/Fitness Club
(492)

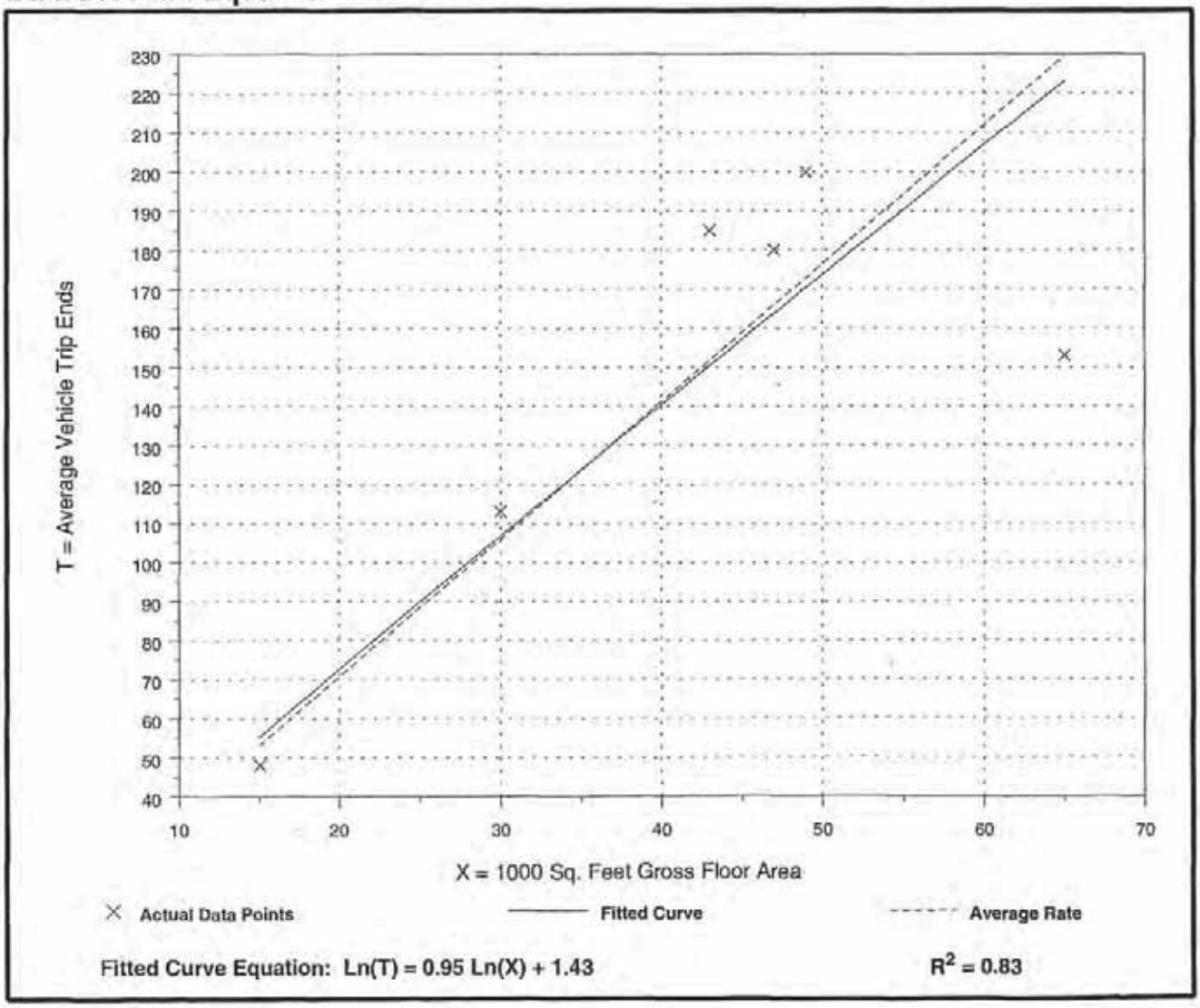
Average Vehicle Trip Ends vs: **1000 Sq. Feet Gross Floor Area**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.

Number of Studies: 6
Average 1000 Sq. Feet GFA: 42
Directional Distribution: 57% entering, 43% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
3.53	2.35 - 4.30	2.00

Data Plot and Equation



Fitted Curve Equation: $Ln(T) = 0.95\ Ln(X) + 1.43$ $R^2 = 0.83$

Health/Fitness Club
(492)

Average Vehicle Trip Ends vs: 1000 Sq. Feet Gross Floor Area
On a: Weekday,
A.M. Peak Hour of Generator

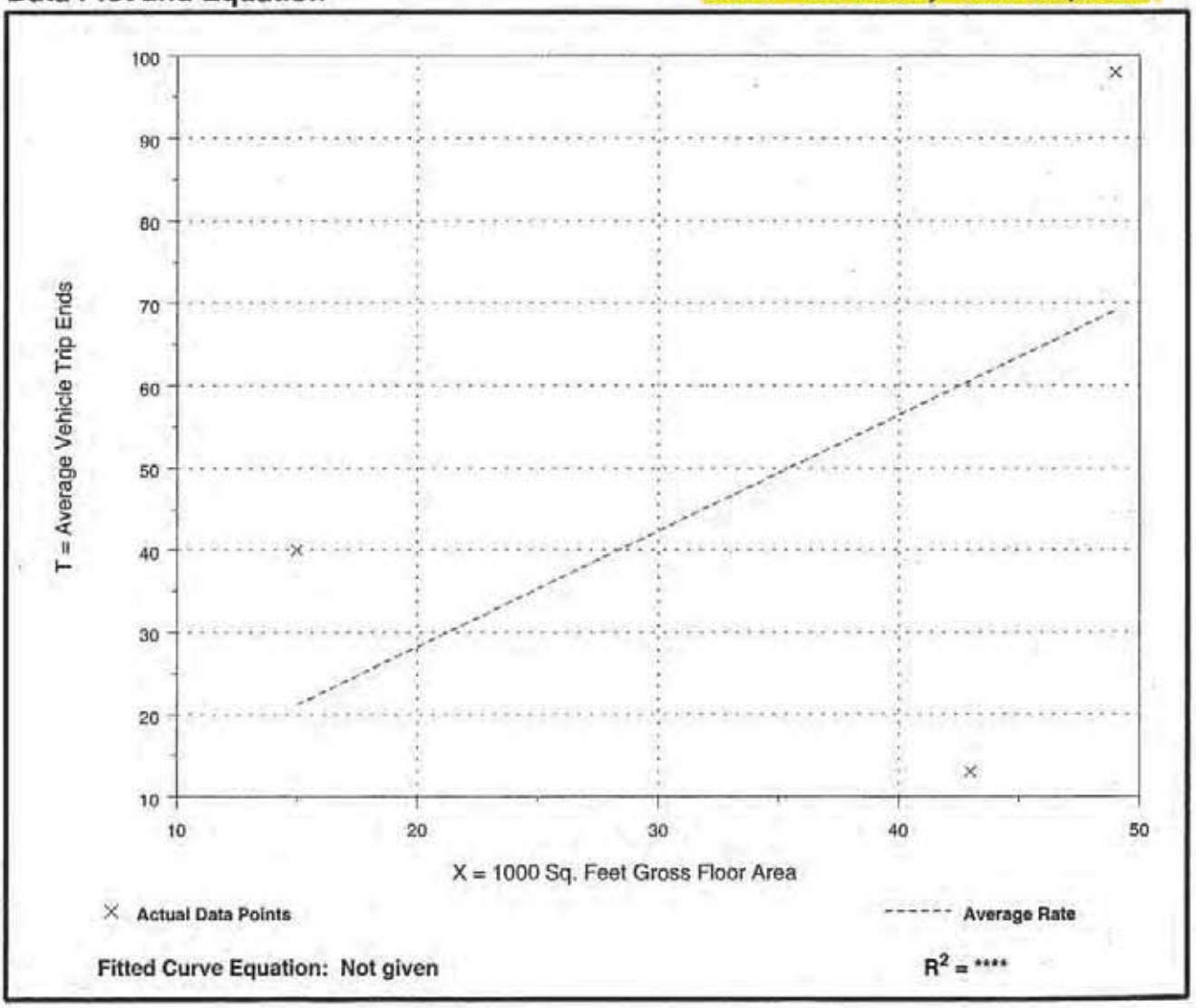
Number of Studies: 3
Average 1000 Sq. Feet GFA: 36
Directional Distribution: 42% entering, 58% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
1.41	0.30 - 2.67	1.50

Data Plot and Equation

Caution - Use Carefully - Small Sample Size



Fitted Curve Equation: Not given

R^2 = ****

Health/Fitness Club
(492)

Average Vehicle Trip Ends vs: **1000 Sq. Feet Gross Floor Area**
On a: **Weekday,**
P.M. Peak Hour of Generator

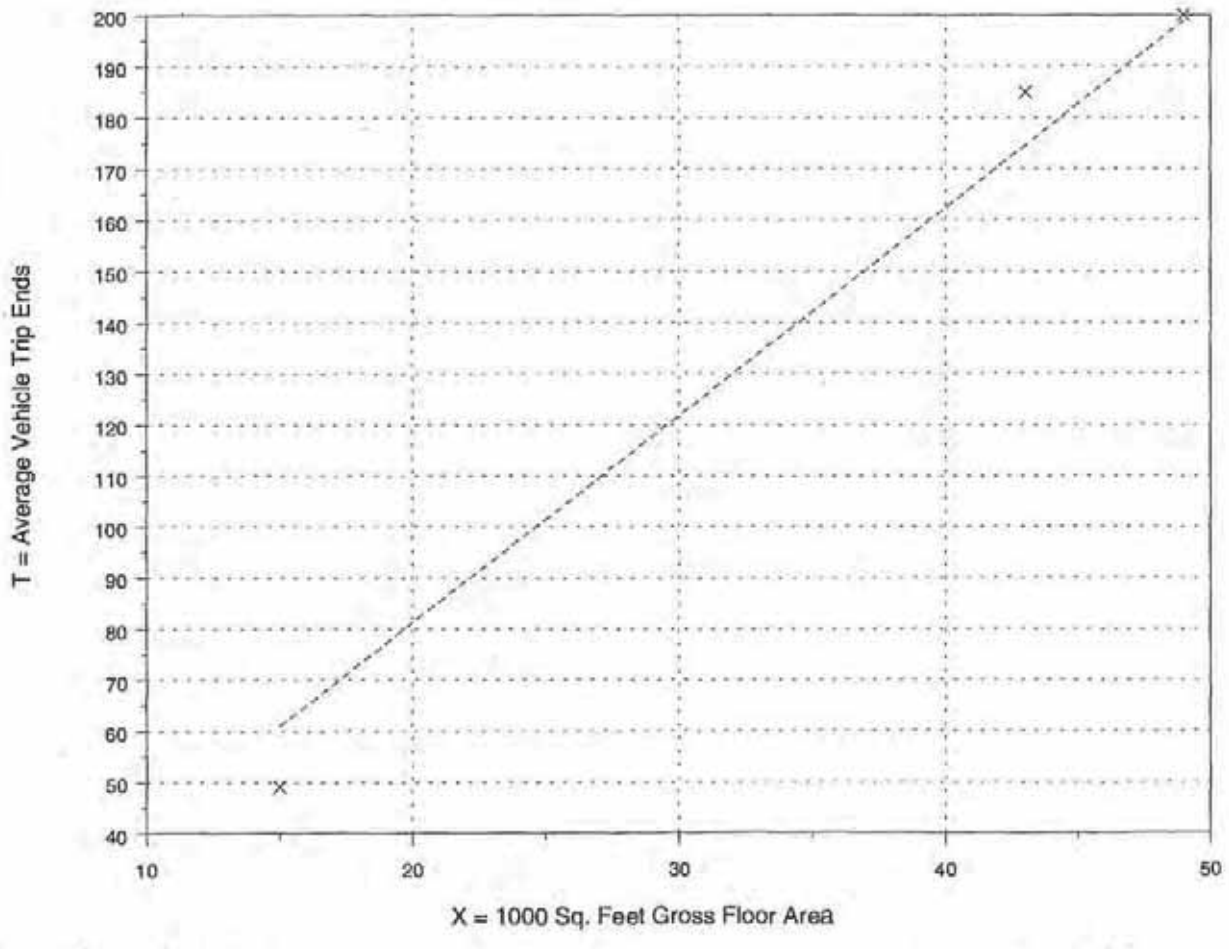
Number of Studies: 3
Average 1000 Sq. Feet GFA: 36
Directional Distribution: 51% entering, 49% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
4.06	3.27 - 4.30	2.02

Data Plot and Equation

Caution - Use Carefully - Small Sample Size



Fitted Curve Equation: Not given

R^2 = ****

Health/Fitness Club
(492)

Average Vehicle Trip Ends vs: **1000 Sq. Feet Gross Floor Area**
On a: **Saturday,**
Peak Hour of Generator

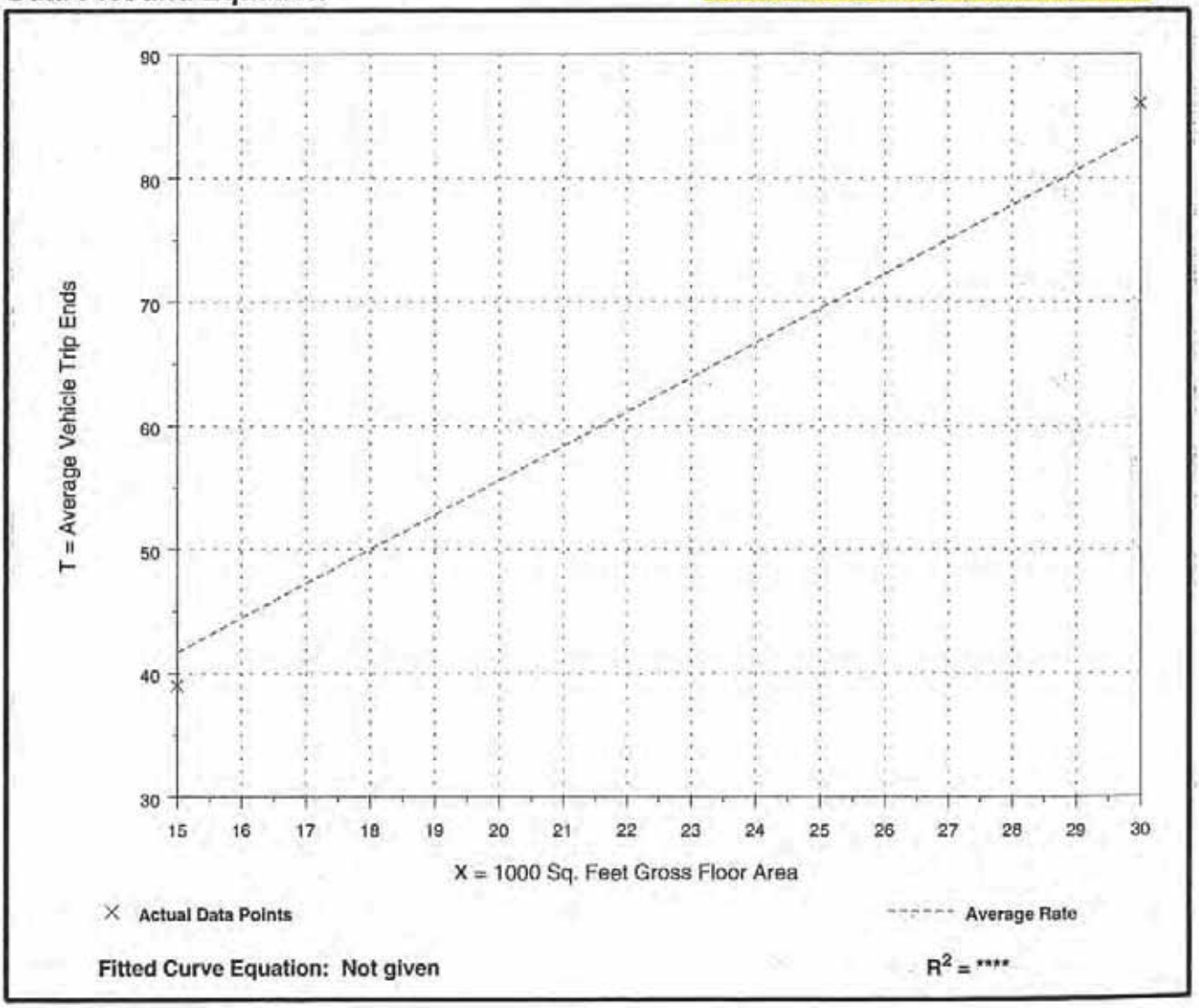
Number of Studies: 2
Average 1000 Sq. Feet GFA: 23
Directional Distribution: 45% entering, 55% exiting

Trip Generation per 1000 Sq. Feet Gross Floor Area

Average Rate	Range of Rates	Standard Deviation
2.78	2.60 - 2.87	*

Data Plot and Equation

Caution - Use Carefully - Small Sample Size



Fitted Curve Equation: Not given

R^2 = ****

Exhibit O

ATTACHMENT A

PROJECT BACKGROUND

MILLENNIUM HOLLYWOOD DEVELOPMENT

1750 Vine Street
Los Angeles, California 90028

PROJECT OVERVIEW/REQUEST

The Applicant, Millennium Hollywood LLC, proposes to construct, use and maintain a dynamic, mixed-use development that will transform a series of under-utilized parcels into a transit-oriented, pedestrian-friendly development central to the resurgence of Vine Street as a business and high-rise corridor and will further support historic downtown Hollywood. The Millennium Hollywood Development (the "**Project**") will be a true mixed-use development consisting of approximately 492 residential units, a 200-key luxury hotel, more than 100,000 square feet of new Class-A office space, an approximately 35,000-square foot sports club with spa, more than 11,000 square feet of commercial uses and approximately 34,000 square feet of food and beverage uses. The historic Capitol Records Tower and Gogerty Building are within the Project and will be preserved and maintained as office and music recording facilities. The completed Project will be 1,163,079 square feet of floor area, which includes more than 1,048,776 square feet of new construction and 114,303 square feet of existing floor area in the Capitol Records Tower and Gogerty Building. The Project also will include a publicly-accessible observation deck, including a café and outdoor seating, which will provide unique panoramic views of Los Angeles to Project residents, tenants, the Hollywood community, the general public and tourists.

The Project will span Vine Street in an area south of Yucca Street that, apart from the historic Capitol Records Tower and Gogerty Building, is improved largely with surface parking lots. The Project will consist of three separate towers rising out of two low-rise buildings situated on the east and west sides of Vine Street. New construction will frame the Capitol Records Tower while preserving views of the landmark from the Vine Street corridor and the Hollywood Freeway. The Project's central design objectives will be to complement and highlight the Capitol Records Tower, incorporate extensive and inviting open spaces and enhance the walkability of the area while creating a development that will serve local residents and the region. Extensive areas of open space will include public plazas on each side of the development, terraces located on the multi-tier low-rise buildings and the first publicly-accessible high-rise observation deck in the City of Los Angeles, to be located at the top of the tallest tower in the Project. Additionally, the subterranean and above-grade parking will be almost entirely hidden from pedestrian view, including from along Vine Street and Hollywood Boulevard.

The Applicant is requesting a zone change to permit a sports club and allow a greater development density (6:1 FAR) for the Project, as permitted by the Hollywood Community Plan and Hollywood Redevelopment Plan. Conditional use approval is requested to allow: (1) a hotel within 500 feet of a residential zone; (2) onsite and offsite sale and consumption of a full-line of alcoholic beverages along with patron dancing and live entertainment; and (3) averaging of floor area ratio in a unified development. In addition, the Applicant is seeking variances to permit outdoor eating areas above ground level, including a café use on the observation deck, and reduced parking for the sports club.

BACKGROUND

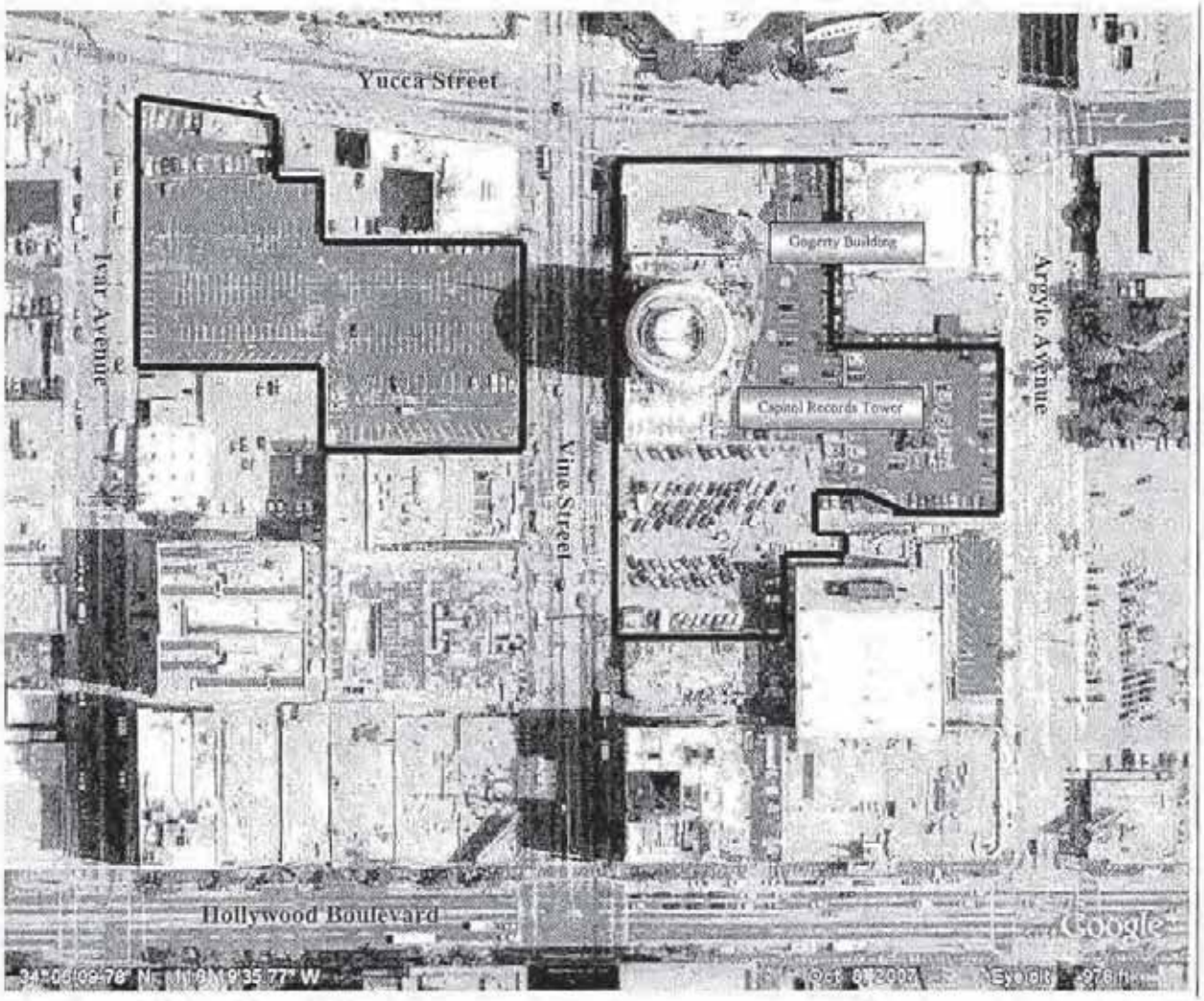
Subject Property

As shown on Figure 1 below, the subject property occupies two distinct sites, both bounded by Yucca Street to the north and separated by Vine Street. The area bounded by Ivar Avenue, Vine Street and Yucca Street occupies approximately 78,629 square feet (the "**West Site**"). The area bounded by Yucca Street, Vine Street and Argyle Avenue contains the historic Capitol Records Tower and Gogerty Building, and occupies approximately 115,866 square feet (the "**East Site**"). Cumulatively, the Project site is approximately 194,495 square feet (the "**Property**"). The Property is located less than 300 feet from the corner of Hollywood Boulevard and Vine Street, one of the most famous intersections in Los Angeles and the location of a Los Angeles County Metropolitan Transit Association Red Line subway station.

The Property is presently improved with only five structures, and the majority of the Property is improved with surface parking lots. Of the five structures, the Capitol Records Tower and Gogerty Building will be retained and incorporated in the development. The three buildings to be demolished are an 1,800-square foot rental car outlet near the northwest corner of the West Site, a vacant 100-square foot, significantly dilapidated building formerly operated as a photographic processing shop and a vacant 500-square foot, significantly dilapidated former convenience store at the southwest portion of the East Site. The rental car use will be incorporated into the proposed Project, and the Project will therefore not permanently displace any businesses or tenants. Apart from minimal landscaping at the Vine Street entrance of the Capitol Records Tower and the Gogerty Building, none of the publicly accessible current improvements are landscaped. The Property lies within the C4-2D-SN Zone and is generally flat, but slopes gently down from the north to the south and towards Vine Street from both East and West.

CPC 2008 3440

FIGURE 1



Project Description

The proposed Project consists of limited demolition and extensive new construction. The historic Capitol Records Tower will continue use as office space and as internationally-famous recording studios with underground sound recording facilities. The Gogerty Building at the corner of Yucca and Vine Streets will also continue as office space and will be incorporated into the Project. Existing surface parking, an 1,800-square foot rental car outlet near the northwest corner of the West Site, and two buildings at the southwest portion of the East Site, a vacant 100-square foot, significantly dilapidated building formerly operated as a photographic processing shop and a vacant 500-square foot, significantly dilapidated former convenience store, will be demolished and the Applicant will develop approximately 1,048,776 square feet of new floor area and 1918 parking spaces. New construction will consist of three multi-story buildings on two low-rise structures located on either side of Vine Street.

On the East Site, new construction will consist of a 12-story low-rise building comprised of residential, office and commercial uses partially wrapped around seven stories of above-grade

parking, on top of five stories of subterranean parking. Because the topography of the East Site slopes gently from East to West, the East Site will have two ground floor levels, one fronting Argyle Avenue and the other fronting Vine Street. The Project is designed to integrate the two ground floors with functional linkages and a consistent mix of uses and a pedestrian outdoor passage running east-west through the length of the East Site. A 33-story residential tower will rise out of the low-rise building to approximately 554 feet above street level at the roof of the highest habitable floor, creating a 45-story, 578,575 square foot structure that will be 584 feet above ground at the top of the roof-top parapet, the highest point of the building. A public observation deck with a food and beverage use will be located on the roof of the residential tower. An additional food and beverage use will be located on the 12th floor of the residential tower. The residential tower will consist of 250 condominium units, and an additional 67 loft-condominium units will be located in the low-rise building. The low-rise portion of the building on the East Site also will support over 100,000 square feet of new office uses. Commercial and food and beverage uses, including full-service restaurants and bars, will be located along a series of public courtyards and an outdoor pedestrian walkway connecting Vine Street to Argyle Avenue. The pedestrian plaza will provide a connection to the Little Country Church gardens and a variety of vantage points from which to view the world-famous Capitol Records Tower. As discussed above, the Capitol Records Tower and Gogerty Building will be preserved for continued office and recording studio use.

On the West Site, a four-story, two-tier low-rise structure comprised of a sports club with spa and child activity center, commercial and food and beverage uses as well as a hotel lobby will support two towers with four subterranean levels of parking, creating a 470,201 square foot building. Because the topography of the West Site slopes gently from West to East, the West Site will have two ground floor levels, one fronting Ivar Avenue and the other fronting Vine Street. The Project is designed to integrate the two ground floors with a mezzanine level. The larger high-rise tower, fronting Vine Street but offset at an angle, will consist of 34 stories of residential uses, creating a 38-story structure that will be approximately 482 feet above street level at the roof of the highest habitable floor and 511 feet above street level at the top of the roof-top parapet. The smaller second tower, also situated at an offset angle and located at the corner of Yucca and Ivar Streets, will be a 14-story 200-room luxury hotel, creating a 15-story structure that will be 218 feet above street level at the top of the roof, the highest point of the building. The residential tower will consist of 175 condominium units. The low-rise building will include a variety of food and beverage uses, an upscale sports club and ground floor commercial fronting Ivar Avenue.

West Site food and beverage uses will be located on the ground floor fronting Vine Street, on the mezzanine, and on the third floor. The ground floor food and beverage uses will be set back from the street by a public plaza that will have tables and accessory amenities for outdoor eating and will include a full-service restaurant and bar as well as a café. The mezzanine-level food and beverage use will be a nightclub. The third floor food and beverage use will service the general public, hotel guests and Project residents, including service at two outdoor eating areas demarcated for use by hotel guests and restaurant patrons on the western side and Project residents on the eastern side.

Consistent with the 2007 principles set forth in the City's "Do Real Planning," the Project is designed with walkability and pedestrian access as an organizing principle. The Project

features multiple access points at the ground level for residents, office employees, hotel guests and the general public. The design creates public areas (indoor corridors and outdoor areas) that enable pedestrians to walk through the entire Project from Ivar Avenue across Vine Street to Argyle Avenue. The Project's emphasis on walkability will enhance the Hollywood Walk of Fame, which runs along both sides of Vine Street between the East and West Sites, and encourages visitors to explore the surrounding area on foot. Passage into and through the Project will occur mostly along open-air, attractively-landscaped pathways and plazas open to the sky. Additionally, ground floor commercial uses along Ivar and Argyle Avenues and the open-air pedestrian plaza connecting Vine Street to Argyle Avenue will be enhanced with landscaping, water features and public areas along Vine Street to ensure a vibrant network of pedestrian-friendly, activated sidewalks.

The West Site Vine Street frontage will feature a partially-landscaped public plaza with outdoor seating adjacent to food and beverage uses, including a casual café and full service restaurant and bar. A water feature will welcome pedestrians into the residential lobby and a landscaped, open-air path will provide pedestrian access to commercial and hotel uses located on Ivar Avenue and Yucca Street. The East Site Vine Street frontage will feature an attractively-paved entry to a landscaped pedestrian plaza that traverses the site to Argyle Avenue. The entryway will be accented by an additional water feature and decorative ornamental planting, including trees. Native trees and commercial and food and beverage uses in the pedestrian plaza will also activate the passageway.

The Project will include extensive open spaces consisting of pedestrian plazas, open-air walkways, terraces and an observation deck. The Project will feature two pedestrian plazas on Vine Street adjacent to the Walk of Fame. As noted above, the outdoor plaza on the West Site will provide public seating and outdoor dining with views of the Capitol Records Tower. The larger plaza, located on the East Site, will connect Vine Street to Argyle Avenue with an attractively landscaped public pathways and courtyards to enjoy the postcard views of the Capitol Records Tower as well as new retail amenities on the ground floor.

Extensive open space will also be located above ground on the East and West Site structures. The third floor of the West Site – the roof-top for the low-rise structure – will feature outdoor dining areas, lounge seating, a sun deck and a pool servicing the hotel. The fourth floor of the West Site – also on the roof top of the low-rise structure – will feature similar amenities dedicated to Project residents. On the East Site, a landscaped terrace on the sixth floor will provide green space while the 12th floor (the Amenities Floor) will provide Project residents with outdoor dining areas, lounge seating, a sun deck and pool similar to the amenities provided on the West Site. The landscaped observation deck located at the top level of the residential tower on the East Site and accessed by a dedicated public-accessible elevator, will provide unparalleled panoramic views. Strategically-located scenic overlooks will provide views of the Capitol Records Tower, Hollywood and the Hollywood Hills.

There will be multiple points of pedestrian and vehicular ingress and egress to and from the Project, including from Vine Street as well as Ivar and Argyle Avenues. Pedestrians will have access to the West Site through the lower hotel lobby on the corner of Ivar Avenue and Yucca Street and the public plaza fronting Vine Street. The public plaza along Vine Street will be designed to engage pedestrians and activate the sidewalk along the West Site. The plaza will

be designed with distinct courtyards designating separate entryways for the residential uses, the sports club and restaurant. The restaurant will include an outdoor dining area to further activate Vine Street with outdoor amenities that are framed with attractive views of the Capitol Records Tower. Pedestrians will enter the East Site through the pedestrian plaza, which has points of ingress and egress on both Vine Street and Argyle Avenue. Vehicular access will be through four driveways on three streets, Vine Street and Ivar and Argyle Avenues, to avoid traffic congestion at any one garage entrance.

Parking will be provided for onsite uses in two multi-level garages, one on each side of the Project. The East Site garage will include 1,209 parking spaces and consist of five subterranean and seven above-grade levels of parking. The above-grade parking will be visible only from Ivar Avenue. The parking garage on the West Site will consist of four subterranean levels and no above-grade levels with 709 parking spaces. In total, the Project will provide 1,918 parking spaces. The vehicular entrance and exit for residents of the East Site will be from Argyle Avenue, while the points of vehicular ingress and egress for residents of the West Site will be from Vine Street. Parking for the hotel, food and beverage, sports club and commercial uses on the West Site will be primarily via a driveway located on Vine Street, with a secondary driveway on Ivar Avenue. Office employees and food and beverage and commercial patrons will enter and exit the East Site from a driveway located on Vine Street, but situated to the south of the driveway for residents of the West Site. Some parking for East Site office uses will be provided on the West Site, and office employees utilizing the West Site parking garage will enter and exit through the Ivar Street driveway.

The total floor area of existing commercial development to be retained and proposed new construction will be 1,163,079 square feet, resulting in a FAR of approximately 6:1.

The following describes the major components of the Project in greater detail:

Residential Condominiums

The residential portion of the proposed Project consists of 492 condominium units, including 67 loft-style units and 425 studio, one-, two- and three-bedroom units. The dwelling units will be located in high-rise towers fronting Vine Street on both the East and West Sites. On the East Site, five stories of residential loft-condominiums will be located in the low-rise structure and 33 stories of condominium units will be located in a tower that will stand approximately 554 feet above street level to the roof of the highest habitable floor and 584 feet above street level to the top of the parapet, the highest point of the building. Both vehicular and pedestrian ingress and egress for residents of the East Site will be located on Argyle Avenue. On the West Site, 35 floors of residential uses will be located in a tower that will stand approximately 482 feet above street level to the roof of the highest habitable floor and 511 feet above street level to the top of the parapet, the highest point of the building. Both vehicular and pedestrian ingress and egress for residents of the West Site will be located on Vine Street. In total, the residential uses will be approximately 680,000 square feet of floor area, with approximately 445,282 and 234,280 square feet located on the East and West Sites, respectively.

CPC 2008 0245

Hotel

The hotel portion of the Project will be located on the West Site in a 14-story tower rising out of the four-story low-rise building and offset at an angle from the corner of Ivar Avenue and Yucca Street. The 200 room luxury hotel will consist of approximately 151,958 square feet of floor area, including ancillary uses such as the lobby, registration area, hotel office and back of the house areas. The hotel will consist of approximately 12 to 15 rooms per floor. The main hotel lobby will be located on the Vine Street ground floor, and a secondary lobby, which will also serve as the main pedestrian entrance, will be located on the Ivar Avenue ground floor at the corner of Ivar Avenue and Yucca Street. Pedestrians will also be able to access the hotel from Vine Street by using the pathway through the West Site from Vine Street. Vehicular access to the hotel will be via a driveway on Vine Street leading into the subterranean parking garage. A secondary vehicular access for the hotel will be on Ivar Avenue.

Office

Approximately 100,471 square feet of new office uses will be located on five levels of the East Site structure fronting Vine Street. The approximately 114,000 square feet of existing office and recording studio uses at the Capitol Records Tower and Gogerty Building will be maintained, and no tenants will be displaced by the Project. The historic Capitol Records recording studio will also be preserved. Vehicular ingress and egress to the Capitol Records Tower and Gogerty Building office space will be through its existing Yucca entrance. Pedestrian access to the new office uses on the East Site will also be from Vine Street. Some office workers may park in the West Site garage, which they will access via the Ivar Avenue garage entrance.

Commercial/Restaurant/Bars

Commercial uses will occupy approximately 10,388 square feet on the West Site and 1,124 square feet on the East Site. On the West Site, commercial uses will front Ivar Avenue on the ground level, which, together with the hotel entrance at the corner of Yucca Street and Ivar Avenue, will activate the sidewalk on the Project's western street frontage. Commercial uses on the East Site will be along the pedestrian plaza connecting Vine Street to Argyle Avenue and fronting Argyle Avenue, activating both the ground floor pedestrian passage and the Project's eastern street frontage.

Food and beverage uses on the ground and third floors of the West Site and in the rooftop observation deck on the East Site will be neighborhood-serving and pedestrian friendly. The West Site food and beverage uses will be approximately 17,000 square feet and include full service restaurants, a café and a nightclub. A full service restaurant and bar and a full service café will be located adjacent to the pedestrian plaza fronting Vine Street, and the nightclub will be located on the mezzanine level with ingress and egress through an entry on the pedestrian plaza. The third floor food and beverage uses will include a full service restaurant that will also service outdoor dining areas on the lower tier or rooftop of the low-rise building. The outdoor dining areas will be located at the east and west ends of the low-rise building, with the west outdoor dining area dedicated to the hotel, and the east area dedicated to Project tenants. The rooftop observation deck and café will be accessible via a dedicated, non-stop elevator located adjacent to the pedestrian plaza connecting Vine Street and Argyle Avenue. A food and

beverage use will also be located on the 12th floor of the West Site (the Amenity Floor) and will be dedicated to Project residents.

Sports Club

An approximately 35,154 square foot sports club will be located on the second level of the East Site. Amenities at the sports club will include a spa that is open to the public and will likely include a child activity center for the benefit of members visiting the facility. The spa will include a full menu of services including massage, manicure and pedicure services, among other services. The sports club will be accessible to residents of the Project and hotel guests, and a membership program will be available to the general public.

Transit

The Project will be designed as a transit-oriented development. The Project will be located within 500 feet of the Los Angeles County Metropolitan Transportation Authority Red Line subway station at the corner of Hollywood Boulevard and Vine Street. The southeast corner of the Project – along Argyle Avenue – is closest to the entrance to the subway station, which is located just east of Vine Street on Hollywood Boulevard approximately 430 feet from the Project. Hollywood Boulevard and Vine Street are also major arterial thoroughfares serviced by numerous bus lines. The Project site is also accessible from the Hollywood Freeway (U.S. 101). An off-ramp from the southbound Hollywood Freeway is located less than one block from the Project just south of the intersection of Franklin Avenue and Vine Street, and on-ramps to the northbound and southbound Hollywood Freeway are located at the corner of Franklin and Argyle Avenues and just north of the intersection of Yucca Street and Argyle Avenue, respectively. In addition to the site's proximity to a variety of transportation options, the Project will include a comprehensive transportation management plan. The plan will encourage the use of public transportation with special incentives including providing a free 6-month MTA pass to each residential unit.

Surrounding Properties

The majority of the surrounding property is in the C4-2D-SN Zone, with the exception of property across the street from the Capitol Site on the corner of Argyle Avenue and Yucca Street, which is zoned PF-1XL. The traditional Hollywood neighborhood is populated by the same mix of uses that will be included in the Project: multi-family housing, restaurants and bars, commercial, hotel and office space. The closest street improved with single-family dwellings (Carlos Avenue) does not intersect with any streets that surround the site. The Project is less than 500 feet from the historic intersection of Hollywood Boulevard and Vine Street, which is in the midst of a revitalization that includes high density commercial redevelopment such as the W Hotel mixed-use project. The surrounding commercial and office uses and the proximity to public transit near a historic commercial intersection make the site a unique and appropriate location for a large scale mixed use development.

RECREATION/OPEN SPACE/LANDSCAPING:

Project residents, office employees, hotel guests and the general public will have access to significant open space, both on the ground floor and above ground in the terraces designed to accommodate the residential, hotel and restaurant uses. The Project will feature 109,520 square feet of common and private open space as defined by the Los Angeles Municipal Code ("LAMC"), including 90,878 square feet of common open space. The Project provides 20,010 square feet of private balconies and terraces for residents, of which 18,642 square feet qualify as usable private open space per the LAMC. The Project includes over 22,500 square feet of publicly accessible open space on the ground floor and over 68,000 square feet of open space above the ground floor on the West and East Sites for the benefit of guests, residents and visitors as described in greater detail below.

On the West Site, the third floor – the lower tier of the low-rise building – will feature approximately 29,158 square feet of landscaped open space that will include native trees and attractive landscaping as well as water features. Approximately 9,500 square feet of the third floor open space will be common open space accessible to Project residents. The fourth floor of the low-rise building will provide approximately 18,206 square feet of landscaped, common open space that will also include native trees and attractive hardscapes. Eight strategically-placed scenic overlook areas throughout the Project's open space will provide views across the Project to the Capitol Records Tower as well as north to the Hollywood Hills and south to Hollywood Boulevard and Hollywood.

Two main plazas and open space areas will be located on the ground level. On the East Site, a 17,206 square-foot pedestrian plaza, activated with commercial and food and beverage uses, will be designed with extensive open-air seating on steps located on the Argyle Avenue end of the passageway. On the West Site, a 5,547 square-foot public plaza along Vine Street adjacent to food and beverage uses, the residential lobby and sport club entrance will provide another outdoor gathering place easily accessible to pedestrians as well as Project tenants and guests.

The 8,300 square foot rooftop observation deck on the East Site will create an open, publicly-accessible attraction that will serve as a new landmark Hollywood experience for area residents and visitors. The observation deck will feature a full service café, outdoor seating, attractive hardscapes and landscaping that will set the feature apart from other observation decks across the country. Panoramic views from the observation deck will provide visitors with a 360-degree view of all of Los Angeles from the Pacific Ocean to downtown Los Angeles to sweeping views of the Hollywood Hills and Hollywood.

Public and common open space will feature extensive landscaping, decorative paving and numerous trees. In total, the Project will feature more than 200 trees of various types and sizes located on various levels throughout the Project. Project residents will enjoy multiple pools, scenic overlooks, outdoor lounge areas, sun decks and lawn areas on top of the low-rise buildings on both the East and West Sites. Project residents will also have access to a café, outdoor eating area and recreation room located on the Amenities Floor of the East Site as well as a dining area on the third floor of the West Site. Select residential units will also feature balconies providing additional private open space to some Project residents. Overall, private

Exhibit P

View 1: Existing view from the Hollywood Hills looking south towards the Project Site.

View 1(a): Conceptual rendering of the Project with a 220-foot high massing envelope.

View 1(b): Conceptual rendering of the Project with a 400-foot high massing envelope.

View Location Map

View 1(c): Conceptual rendering of the Project with a 550-foot high massing envelope.

View 1(d): Conceptual rendering of the Project with a 585-foot high massing envelope.

Source: Scott A. Johnson, January 13, 2012. Note: Project renderings and building design are conceptual and represent a potential development configuration on the Project Site. Other options are possible.

CAJA Environmental Services, LLC

Figure IV.A.1-11
Conceptual Visual Simulation Renderings
View 1

View 2: Existing view from the residential neighborhood north of the Hollywood Freeway on Argyle Avenue, looking south towards the Project Site.

View 2(a): Conceptual rendering of the Project with a 220-foot high massing envelope.

View 2(b): Conceptual rendering of the Project with a 400-foot high massing envelope.

View Location Map

View 2(c): Conceptual rendering of the Project with a 550-foot high massing envelope.

View 2(d): Conceptual rendering of the Project with a 585-foot high massing envelope.

Source: Scott A. Johnson, January 13, 2012. Note: Project renderings and building design are conceptual and represent a potential development configuration on the Project Site. Other options are possible.

CAJA Environmental Services, LLC

Figure IV.A.1-12
Conceptual Visual Simulation Renderings
View 2

View 3: Existing southbound freeway view from the Hollywood Freeway looking southeast towards the Project Site.

View 3(a): Conceptual rendering of the Project with a 220-foot high massing envelope.

View 3(b): Conceptual rendering of the Project with a 400-foot high massing envelope.

View Location Map

View 3(c): Conceptual rendering of the Project with a 550-foot high massing envelope.

View 3(d): Conceptual rendering of the Project with a 585-foot high massing envelope.

Source: Scott A. Johnson, January 13, 2012. Note: Project renderings and building design are conceptual and represent a potential development configuration on the Project Site. Other options are possible.

CAJA Environmental Services, LLC

Figure IV.A.1-13
Conceptual Visual Simulation Renderings
View 3

View 4: Existing northbound freeway view from the Hollywood Freeway looking west towards the Project Site.

View 4(a): Conceptual rendering of the Project with a 220-foot high massing envelope.

View 4(b): Conceptual rendering of the Project with a 400-foot high massing envelope.

View Location Map

View 4(c): Conceptual rendering of the Project with a 550-foot high massing envelope.

View 4(d): Conceptual rendering of the Project with a 585-foot high massing envelope.

Source: Scott A. Johnson, January 13, 2012. Note: Project renderings and building design are conceptual and represent a potential development configuration on the Project Site. Other options are possible.

CAJA Environmental Services, LLC

Figure IV.A.1-14
Conceptual Visual Simulation Renderings
View 4

Exhibit Q

Source: Stephen Ehrlich Architects, 2006.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.B-6
View Simulation 5

Source: Stephen Ehrlich Architects, 2006.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.B-7
View Simulation 6

Exhibit R

CALIFORNIA NATURAL RESOURCES AGENCY

FINAL STATEMENT OF REASONS FOR REGULATORY ACTION

Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97

December 2009

find it difficult to demonstrate a good faith effort through a purely qualitative analysis. (See, e.g., *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm*. (2001) 91 Cal.App.4th 1344, 1370.)

In the context of Project 1, however, a qualitative analysis would likely be appropriate. Project 1's emissions are not easily modeled, and the Project is small in scale. While it may be technically possible, quantification of the emissions may not reveal any additional information that indicates the significance of those emissions or how they may be reduced that could not be provided in a qualitative assessment of emissions sources. (See, e.g., Public Resources Code, § 21003(f) (~~"~~public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment").)

Factors Potentially Indicating Significance

The qualitative factors listed in the proposed section 15064.4(b) are intended to assist lead agencies in collecting and considering information relevant to a project's incremental contribution of GHG emissions and the overall context of such emissions. Notably, while subdivision (b) provides a list of factors that should be considered by public agencies in determining the significance of a project's GHG emissions, other factors can and should be considered as appropriate.

Determine Whether Emissions Will Increase or Decrease

The first factor in subdivision (b), for example, asks lead agencies to consider whether the project will result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting. All project components, including construction and operation, equipment and energy use, and development phases must be considered in this analysis. (State CEQA Guidelines, § 15378 (project includes ~~"~~the whole of the action").) For example, a mass transit project may involve GHG emissions during its construction phase, but substantial evidence may also indicate that it will cause existing commuters to switch from single-occupant vehicles to mass transit use. Operation of such a project may ultimately result in a decrease in GHG emissions. Such analysis, provided that it is supported with substantial evidence and fully accounts for all project emissions, may support a lead agency's determination that GHG emissions associated with a project are not cumulatively considerable.

This section's reference to the "existing environmental setting" reflects existing law requiring that impacts be compared to the environment as it currently exists. (State CEQA Guidelines, § 15125.) This clarification is necessary to avoid a comparison of the project against a "business as usual" scenario as defined by ARB in the Scoping Plan. Such an approach would confuse "business as usual" projections used in ARB's Scoping Plan with CEQA's separate requirement of analyzing project effects in

comparison to the environmental baseline. (*Compare* Scoping Plan, at p. 9 (—The foundation of the Proposed Scoping Plan's strategy is a set of measures that will cut greenhouse gas emissions by nearly 30 percent by the year 2020 as compared to business as usual") *with Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278 (existing environmental conditions normally constitute the baseline for environmental analysis); see also *Center for Bio. Diversity v. City of Desert Hot Springs*, Riverside Sup. Ct. Case No. RIC464585 (August 6, 2008) (rejecting argument that a large subdivision project would have a ~~"b~~eneficial impact on CO2 emissions" because the homes would be more energy efficient and located near relatively uncongested freeways).) Business as usual may be relevant, however, in the discussion of the ~~"n~~o project alternative" in an EIR. (State CEQA Guidelines, § 15126.6(e)(2) (no project alternative should describe what would reasonably be expected to occur in the future in the absence of the project).)

Notably, section 15064.4(b)(1) is not intended to imply a zero net emissions threshold of significance. As case law makes clear, there is no —one molecule rule" in CEQA. (CBE, *supra*, 103 Cal.App.4th at 120.)

Thresholds of Significance

The second factor in subdivision (b) asks whether a project exceeds a threshold of significance for GHG emissions. Section 21000(d) of the Public Resources Code expressly directs public agencies to identify whether there are any critical thresholds for health and safety to identify those areas where the capacity of the environment is limited. A threshold is an ~~"i~~dentifiable quantitative, qualitative or performance level" at which impacts are normally less than significant. (State CEQA Guidelines, § 15064.7(a); *see also Protect the Historic Amador Waterways*, *supra*, 116 Cal.App.4th at 1107.) Lead agencies may rely on thresholds developed by other agencies that have particular expertise in the subject matter under consideration. (*See*, *e.g.*, State CEQA Guidelines, Appendix G, Sample Question III (—[w]here available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make" a significance determination).) For example, a lead agency may look to standards included in a Basin Plan to assist in the determination of whether water quality impacts are significant. (*Protect the Historic Amador Waterways*, *supra*, 116 Cal.App.4th at 1107 (—[s]uch thresholds can be drawn from existing environmental standards, such as other statutes or regulations").)

Several agencies have developed, or are in the process of developing, thresholds of significance for GHG emissions.[3] For example, thresholds are currently being developed, or have already been adopted by the Bay Area Air Quality Management District for operations and construction,[4] the City of Davis for residential

[3] Reference to these thresholds and proposed thresholds does not reflect an endorsement of those thresholds; rather, they are cited solely for the purpose of demonstrating that agencies are developing such thresholds.
[4] BAAQMD CEQA Guidelines Update: work in progress - http://www.baaqmd.gov/pln/ ceqa/index.htm.

Exhibit S

CITY OF LOS ANGELES
SIGNIFICANCE WORK SHEET

TYPE OR HAND PRINT IN ALL CAPITAL BLOCK LETTERS

COMPLETE ONE OR BOTH OF THE UPPER AND LOWER PORTIONS OF THIS PAGE

ARCHITECTURAL SIGNIFICANCE

THE CAPITOL TOWER IS AN IMPORTANT EXAMPLE OF MID-CENTURY MODERN ARCHITECTURE, THE WORLD'S FIRST ROUND OFFICE TOWER, AND THE FIRST SKYSCRAPER BUILT IN HOLLYWOOD AFTER WORLD WAR II. IT MEETS THE CULTURAL HERITAGE ORDINANCE BECAUSE OF THE HIGH QUALITY OF ITS DESIGN AND THE RETENTION OF ITS ORIGINAL FORM, DETAILING AND INTEGRITY.

THE CAPITOL TOWER ROOFTOP SIGNAGE IS SIGNIFICANT FOR ITS STRONG HISTORICAL ASSOCIATION TO CAPITOL RECORDS INC, THE PRIMARY TENANT OF THE CAPITOL TOWER SINCE 1956.

AND/OR

HISTORICAL SIGNIFICANCE

THE CAPITOL TOWER: WAS BUILT IN 1955-1956

CAPITOL RECORDS: WAS IMPORTANT TO THE DEVELOPMENT OF LOS ANGELES BECAUSE:
THE COMPANY WAS THE FIRST MAJOR RECORDING LABEL ON THE WEST COAST AND THE BUILDING WAS THE SITE OF PIONEERING RECORDINGS MADE BY ARTISTS SUCH AS FRANK SINATRA AND NAT "KING" COLE.

ARCHITECT WELTON BECKET: WAS IMPORTANT TO THE DEVELOPMENT OF LOS ANGELES BECAUSE HIS LOCAL FIRM IS RESPONSIBLE FOR INNOVATIVE STRUCTURES THAT SUCCESSFULLY MELDED THE MODERN STYLE WITH RATIONAL DESIGN PRINCIPLES, AS EXEMPLIFIED IN THE CAPITOL TOWER, ONE OF HOLLYWOOD'S BEST KNOWN ICONS.

ATTACHEMENT A: DESCRIPTION.
THE CAPITOL TOWER AND ROOFTOP SIGNAGE

OVERVIEW

The Capitol Tower is a Mid-Century Modern structure incorporating office space, three recording studios, and various related facilities. The structure is located mid-block facing Vine St. between Hollywood and Yucca Blvds in Central Hollywood. The Capitol Tower is also near the 101 freeway, from where its iconic, circular tower and signage are highly visible. The multi-story, circular tower rests upon a rectangular base accommodating the site's southward-sloping grade. The structure is built on the western side of a 210' x 180' lot. Behind the building is a fenced, 60'x180' elevated parking lot with a burnished metal, c.2001 Post-Moderne style parking kiosk at its north end. On a gateway above this kiosk in large polished metal letters are the words "Capitol Records," added c. 2001. The 1930s former headquarters of KFWB radio is northeast of the property and partially encloses the parking lot. In the lot adjacent north of the Tower is a two story 1929 Deco-style former animation studio designed by H.L. Gogerty. A 2001 tax credit reuse project preserved its façade and assimilated this building into the Capitol campus. The two buildings are now connected by a Modern rectangular addition. The reuse project and the addition were both conducted in 2001 by M2A Architects, a preservation-oriented architecture firm. Directly in front of the Capitol Tower is the Hollywood Walk of Fame, and the stars of various Capitol artists including John Lennon, Tina Turner, Natalie Cole, Garth Brooks, Helen Reddy, Bonnie Raitt and Duran Duran. The Capitol Tower is thirteen stories, or 150' high; the City height limit in 1955, when the original building permits were pulled.

BASE EXTERIOR

The rectangular, monolithic base is one tall story, and is a plinth for the circular tower upon it. The centered front entrance to the complex is located within the base and faces west onto Vine St. This plaza-style entry is recessed in a low, rectangular-shaped space and is bordered by planters. The entryway floor is paved with a black and white terrazzo similar to that on the Hollywood Walk of Fame. The words "The Capitol Tower" are inset in large white block font in the entryway floor. A round column is present at either end of the entry. Between these columns is an exposed metal leg and beam framework overhang. Attached to it are cylindrical light fixtures that shine light from top and bottom, and conical light fixtures above the planters. The entry door is framed on either side by large vertical window panes. The entryway planters step with the sloping grade and continue in a recessed strip running north to the building's edge. The running planter was a gesture to the residential neighborhoods that once had a greater presence north of the building. Within these planters are mature palm and eucalyptus specimens, fern, and large lava rock boulders. Palm specimens are also present at the front elevation south of the entry.

Suspended by metal bar and cable above the entrance is a 13-section rectangular screen of expanded metal. In a row across the front elevation are light fixtures consisting of a small, protruding metal bar that suspend can shaped lights of a slotted, black painted metal.

The north elevation of the base is now connected to the 2001 addition, which straddles it and the front elevation, leaving the base intact. Where the addition's Vine St. elevation meets the original base, its walls are composed of a light green fiberglass material with a continuous white grid upon it. The east-facing rear elevation of the base contains a shipping entrance remodeled in 2001 with a recessed glass wall of aluminum mullion and large multi-glazed units. A convex, burnished metal "Capitol Records" sign is suspended above the rear entry. Vertical scoring is present across the rest of the rear elevation. The entire south elevation of the base is covered with a wall mural titled "Hollywood Jazz: 1945-1972" painted in 1990 by Richard Watt Jr. The base roof due south of the tower doubles as an outdoor patio and sitting terrace.

BASE INTERIOR AND UNDERGROUND CHAMBERS:

A small lobby is just inside the west-facing front entry. The lobby space is framed by two large octagonal columns. A desk is located in front of the lobby's south wall. Framed gold and platinum records cover the north and south walls of the lobby. The overhanging steel framework present in front of the entrance continues through the glass transom across the lobby, where it is covered with material from a recent remodeling. Hanging saucer lamps, which also appear to be from a recent remodeling, are affixed to the framework. The lobby floor features an abstract black pattern of three rays emanating from a circle design present at the front door. The ray pattern ends at three metal elevators located at the rear of the lobby. The marble flooring around this pattern appears to be from a recent remodeling.

In addition to the lobby, the base of the Capitol Tower contains three recording studios, recording department offices, two mastering rooms, and six production rooms. The larger recording studios "A" and "B" are adjacent one another inside the base's southern portion. The smaller studio "C" is located in the base due north of the Tower. The floors of each recording studio feature a layer of concrete that "floats" upon a layer of cork to provides better insulation from sound vibration. Aside from resting upon this specially designed floor, the interiors of the studios themselves are their own enclosures, separated from rest of the building by a one-inch gap with ten-inch thick concrete walls on the other side of it. Movable Birchwood and fiberglass acoustical panels were installed to control soft and hard sounds for recording purposes. The studio ceilings were of a shaped zig-zag pattern to better modulate sound travel.

ATTACHEMENT A: DESCRIPTION.
THE CAPITOL TOWER AND ROOFTOP SIGNAGE

Roughly 75' east of the building and located 25' beneath the parking lot are four reverberation chambers attached in a trapezoidal form around a vestibule. The chambers are accessible by a subterranean tunnel from the Capitol Tower. Such chambers allow for the use of sound reverberation to add depth, texture and "space" to recorded music. The earliest music recordings often had a "flat" affect that reverberation chambers mitigate. The trapezoidal form combined with the sloped ceilings of the chambers present no parallel surfaces, which prevents the occurrence of echoes or sound flutter. The chambers are shock mounted to 10" thick concrete outer walls and like the studios, have concrete and cork floors to insulate them from outside sounds.

THE CIRCULAR TOWER AND ROOFTOP SIGNAGE

Visually, the rectangular base serves as a plinth for the circular tower component that comprises 12 levels. Set back and off-center due north of the centered entry, the tower appears to float above the base itself. This effect is conveyed by the round tower's first exposed story being 78' in diameter, compared to the larger 92' diameter for the remaining levels above that. Twelve continuous concrete piers that run the height of the tower visually unite all of the circular levels. Each floor of the tower is comprised of reinforced concrete spandrels surmounted by a band of fixed double-glazed window units set into aluminum mullions. Each semi-circular arc between the piers contains six windows. A horizontal concrete awning rings each floor of the tower, projecting beyond the plane of the vertical piers to visually create the sense of "stacked" circular floors raised up on the piers. Porcelain-enameled "eyelid" sunshades project at a 40-degree angle from the perimeter of each ring, further enhancing the building's circular form while also shading the office windows. The paint scheme of the tower's exterior is currently light gray with white awnings and a gray colored crown.

Inside the tower, the office spaces correspond to the round plan, and abut most of the windows of each floor. In addition to the twelve columns at the perimeter of the tower, each floor contains six square structural columns in a circular formation, just as the lobby does. The center of each floor is a continuous vertical concrete core that houses elevators, two sets of stairs, restrooms, and storage spaces. On each floor between this core and the offices themselves is a circular walkway.

Atop the roof is a semi-circular equipment tower with a low-pitched conical roof. This equipment tower is enclosed by a circular, 30' tall gray-painted metal screen of slotted vertical bar, similar in style to the light fixtures across the base at the front elevation. Suspended via cable and bar from it is a floating, 9' tall circular metal drum. Upon it are individual, white,

internally lit block font letters that spell out "Capitol Records" three times. At the northwest quadrant of the roof is an 82' tall perforated metal trilon spire that is supported at its back by two small metal posts. Attached atop this spire is a red aviation beacon light that in international Morse Code repeatedly blinks "H-O-L-L-Y-W-O-O-D." A 50' metal flagpole added in 1989 is present upon the roof's south side.

ATTACHMENT B: SIGNIFICANCE
THE CAPITOL TOWER AND ROOFTOP SIGNAGE

ARCHITECTURAL SIGNIFICANCE

The Capitol Tower, commonly known as the Capitol Records Building, was seen as a landmark the day it opened and is now, unarguably, a Hollywood and entertainment industry icon. Such revered status is due to its architecture, the social significance of the company itself, and the various legendary artists who have recorded world-famous music at the on-site studios.

The Capitol Tower was designed in 1954 by the firm of Welton Becket and Associates, with Louis Naidorf as the Project Designer. Naidorf was 24 years old when he first conceived the round tower design. Led by founder Welton Becket (1902-1969), Welton Becket Associates was responsible for other iconic local buildings including the Pan Pacific Auditorium (Wurdeman and Becket, 1935, destroyed 1989), the Theme Building at LAX (1962, with Pereira & Luckman and Paul R. Williams), the Cinerama Dome (1963), the Santa Monica Civic Auditorium (1959), and the Los Angeles Music Center (1964-1969). By the 1960s, Welton Becket & Associates was the largest architectural firm in the Country, and Becket's work extended around the world including a US embassy in Warsaw, numerous Hilton Hotels, plus the Ford and General Electric Pavilions at the 1964 New York World's Fair.

As expressed in many of the above listed buildings, the Becket firm was known for buildings that were distinct and technologically innovative in their design, amenities and construction. Efficiency, from a highly standardized in-house design process to a proven ability for final cost savings, was a major goal of the Becket firm that created many, and often large-scale buildings. The output, order, and scale of Becket's firm matched the scale and needs of post World War II Los Angeles: a vast city with a rapidly growing population. For the combination of all the above traits, Author Alan Hess has written of Welton Becket Associates as designing the City of Tomorrow (Nichols, Ed. Built by Becket: 7).

The Capitol Tower is the first high-rise in Hollywood's post World War II era. Furthermore, the Capitol Tower was cited upon its completion as the first round office building in the history of architecture (Time Magazine, 16 Apr. 1956: 96,98; Architectural Forum Mar. 1955: 147). The Capitol Tower included the highest technical amenities of its time including an automated elevator system, Hollywood's first fully air-conditioned office tower, and a very early use of backlit signage that is now the region's earliest remaining example of such signage atop a corporate high-rise. The three studios were the first anywhere designed for the purpose of high-fidelity recording. The underground reverberation chambers, designed with help from guitar pioneer Les Paul, are relatively rare, and have remained in high demand.

ATTACHMENT B: SIGNIFICANCE
THE CAPITOL TOWER AND ROOFTOP SIGNAGE

During the years after World War II, wholly new architectural forms, often influenced by the local aerospace industry, were not uncommon within the Los Angeles region. This era's local coffee shop architecture is one example, in which architects used futuristic designs to catch the attention of motorists. John Entenza's Case Study House program, originally conceived to provide efficient but well-designed mass housing of common industrial materials, is another. Lagging behind in this regard was Modern high-rise architecture, which typically employed the standard rectangle that was seen by architect Mies van der Rohe as a "universal" form.

In the popular press and even in Los Angeles architectural guidebooks, the Capitol Tower is described as a stack of records topped by a needle. The reference is compared to programmatic architecture on a giant scale in the earlier regional tradition of food stands shaped like oversized hot dogs or giant chili bowls. According to all past and present statements by architects associated with the design, the round office tower was not intended to represent a stack of records topped by a needle. Naidorf did not know the identity of the client when he proposed his circular design, and the spire was a redesign of what was to be a derrick-like antenna that Capitol wanted placed atop the tower. Initially, Capitol had hoped to have its own radio station broadcast from the facility– the FCC rejected this idea. Upon viewing the round-towered model, Capitol Founder Glenn Wallichs, fearing the "stack of records" jokes to come, demanded a rectangular design, which Becket provided. After accepting Becket's cost arguments and after Wallichs' own insurance company recommended the round tower over the rectangular model, only then did Wallichs endorse the unique yet highly efficient shape.

The circular shape of the office tower was not just highly unique and experimental, but was primarily intended to achieve unabashed cost-efficiency. The shape required 13%-20% less outer wall than a rectangular structure, which saved on construction costs. Because of reduced heat loss and gain through the glass, less wall space made climate control easier and more affordable. In addition, light was more evenly distributed in a round building. The 92' diameter circular floorplan provided the optimum amount of space needed for the work occurring within the tower. The circular shape allowed for a smaller central core. Not including the studio chambers which were built as separate enclosures, the Capitol Tower was constructed for $15.00 a square foot.

> "(Welton) convinced me it would be the best possible design for our purposes. And it has turned out beautifully. Making the building round has not been more expensive; in fact, we may have saved some money on the final cost. And we've got a building that will be a real landmark."
> —— Capitol Records Co-Founder Glenn Wallichs, 1956.

ATTACHMENT B: SIGNIFICANCE
THE CAPITOL TOWER AND ROOFTOP SIGNAGE

SOCIAL SIGNIFICANCE

Capitol Records was founded in 1942 by nationally known singer and songwriter Johnny Mercer ("That Old Black Magic," "Hooray for Hollywood"), Glenn Wallichs, who owned "Wallichs Music City": the largest music store in Los Angeles, and songwriter/ Paramount Producer Buddy DeSylva ("Califomia Here I Come"), who fronted the initial $25,000 to fund the endeavor. Capitol was the first major record label on the west coast and early on was seen as competition to the "big three" record labels: RCA-Victor, Columbia, and Decca, all based in Manhattan. Capitol's first offices were located at 1483 Vine St. and in 1946 were moved above Wallichs Music City at 1507 Vine St. This area was the hub of 1940s Hollywood nightclub life.

Early recordings were conducted at rented studios until 1948, when Capitol purchased its first studios at 5515 Melrose Avenue; now occupied by KCAL channel 9. During this period the company became a leader in sound technology. Capitol was the first label to use tape machines rather than acetate disks, allowing for higher recording quality. Capitol was also the first of the major labels to fully exploit echo chambers: specially designed rooms that in correspondence with the microphone and speaker placement within them captured a richer sound. The company grew rapidly, and signed popular early acts in the 1940s such as Stan Kenton, Jo Stafford, Louis Prima & Keely Smith, Les Baxter, Alan Livingston (creator of "Bozo the Clown"), Mel Torme and Nat "King" Cole. Having sold 15 million records by 1952, Cole's success is credited with vaulting Capitol Records into the same pantheon of the above-mentioned labels. In 1955, the British company EMI Inc. purchased Capitol Records Inc., an 8.5 million dollar purchase that was at the time the most expensive transaction in the history of the recording industry. EMI remains the parent company.

On April 6, 1956, the Capitol Tower opened to great fanfare, including a Time Magazine article (which called the building a "smogscraper"), and the appearance of Leila Morse, the granddaughter of Samuel Morse, who activated the "Hollywood" beacon via telegraph. The site was located in the heart of the entertainment industry. Nearby studios included ABC, NBC, CBS, Warner Bros, RKO, Columbia, Paramount, Universal, and Disney.

During these early years Capitol Records executives signed a variety of artists whom others had perceived as in decline. These included Judy Garland, Bing Crosby, Peggy Lee, and perhaps most notably of all, Frank Sinatra. On April 22, 1956, it was Sinatra who conducted the first recording in the Capitol Tower Studios. In Studio A, Sinatra conducted Nelson Riddle's 56-piece orchestra through "Tone Poems in Color." In this same studio, Sinatra would go on to record some of his most memorable songs and albums, including "The Lady is A Tramp," "Night and Day," "Witchcraft", "Chicago," "Something's Gotta Give" (written by Johnny Mercer),

"Embraceable You", and "Nice N' Easy," among many, many others. During this period, Sinatra's friend Dean Martin would record at these facilities, as would Nat "King" Cole himself. Capitol's three studios: A, B, and C, located at the base of the tower, were the first in the industry designed specifically for high fidelity recording.

By the mid-1960s, Capitol Records became a powerhouse in the music industry. Though founded with a focus on a smooth, melodic, pre-rock n' roll style sensibility, Capitol shifted with the trends of the decade, and hired music producers who often were younger than 21 years old. In part as a result of this, its label included two of the truly stratospheric pop bands of the decade: The Beatles and The Beach Boys. Based out of Hawthorne, CA., the Beach Boys were the first youth-oriented rock band signed with Capitol. By their third album, *Surfer Girl*, the Beach Boys would become the first self-produced group in rock. Brian Wilson would become the first rock musician from a group to release a solo single, titled "Caroline, No," in 1966. The group would also become the first rock band to get their own custom label– Brother Records—distributed by Capitol. For the Beatles, Capitol was the primary American distributor and marketer of their music from December 1963 until the band's breakup in 1970 (In the early 1960s however, Capitol initially passed on the band). By 1965, the Beatles and the Beach Boys provided 56% of Capitol Records' entire revenue.

Since the 1960s, among the acts that have recorded within the Capitol Studios are Bobby Darin, Lou Rawls, Natalie Cole, Linda Ronstadt, Nancy Wilson, Whitney Houston, MC Hammer, and Prince. In addition, Capitol has continued to sign other significant, platinum-selling pop acts including The Band, Pink Floyd, Duran Duran, Tina Turner, Garth Brooks, Bonnie Raitt, The Beastie Boys, and Radiohead.

The Capitol Tower is literally the beacon of Hollywood. As architecture, it is thoughtful, innovative, and expresses the optimism and ambition of post-WWII Los Angeles and its entertainment entrepreneurs. The design of the rooftop signage is unchanged from opening day, and is significant for its strong association to Capitol Records Inc., which has occupied the Tower since 1956. The Capitol Tower has become the very symbol of the company itself, displayed prominently in publications, and on the company website. The talent represented by Capitol Records includes legendary figures of the pop music genre. Among the music recorded within the in-house studios are songs instantly recognizable and iconic, much like the Capitol Tower itself.

ATTACHEMENT C: SOURCES
THE CAPITOL TOWER AND ROOFTOP SIGNAGE

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ATTACHEMENT C: SOURCES
THE CAPITOL TOWER AND ROOFTOP SIGNAGE

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Beachwood Canyon
NEIGHBORHOOD ASSOCIATION

November 1, 2012

To: Michael LoGrande
cc: Srimal Hewawitharana

Re: ENV-2011-675-EIR - Millennium Hollywood Project

We respectfully request an extension of public comments regarding the Millennium DEIR. This report took a long time to construct with various professionals involved. It's not realistic to ask the average citizens to study and present meaningful comments on this huge proposal within a matter of weeks. Also, before and during the holidays, people have many family events and needs that compete for their attention.

Neighborhood Councils are breaking in new boards. Many neighborhood organizations, including ours, don't even have meetings during the holiday season. With NCs and neighborhood organizations dark or unprepared to do the kind of work necessary to appropriately respond to this EIR, it's only reasonable to grant our request for an extention of time within which to respond to this huge and dense EIR. 10-1

We are formally requesting the fullest extension possible under article 15105 of CEQA guidelines, to December 25. Since that falls on Christmas, we suggest that you extend the deadline until the **second week of the New Year**, when all parties are likely to be able to more completely address this project.

While developers of this project are requesting all kinds of entitlements, it would be a demonstration of profound public courtesy for you to grant an extention up to and through the second week of the New Year 2013.

Ve

Fran Reichenbach, President

cc: Tom Labonge

GREATER GRIFFITH PARK NEIGHBORHOOD COUNCIL
"Your Neighborhood. Your Voice. Your Council"

CERTIFIED COUNCIL #36

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Srimal Hewawitharana
Environmental Review Unit
City of Los Angeles Planning Department
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

November 21, 2012

Re: ENV-2011-675-EIR Millennium Hollywood Project and Draft Environmental Impact Project

Dear Ms. Hewawitharana,

The Greater Griffith Park Neighborhood Council respectfully requests an extension of the period for public comment regarding the Millennium DEIR. The report is voluminous and took a long time to construct with professionals. It is unrealistic to ask average citizens to study and present constructive comments in such a short amount of time.

It is before and during Holiday Season, and with a newly seated board and executive committee, we are unprepared to respond in a responsible manner. We are therefore requesting the longest time possible, until after the Holidays to January 16, 2013. Under article 15l05 of CEQA guidelines, the latest deadline would be December 25, 2012 obviously an unrealistic time. 11-1

This project has so many entitlements that your Department should extend the courtesy to the public so they can do their due diligence to help make this project a welcome addition to the city.

The GGPNC requests that the Millennium Project and DEIR applicant apply all applicable provisions from the Hollywood Community Plan and Final Environmental Impact Report (FEIR), adopted June 19, 2012 by the Los Angeles City Council, to this project and DEIR. Those provisions are expressed in the goals, policies and programs, standards, and guidelines found in Chapters 1 through 7 of the Hollywood Community Plan and the Final Environmental Impact Report, including mitigation measures. 11-2 We also recommend the development fees to be part of the Nexus Study provided for in the implementation program of the Hollywood Community Plan. 11-3

Once again, we respectfully request an extension for public comment to January 16, 2013. 11-4

Linda Demmers

Linda Demmers
President, Greater Griffith Park Neighborhood Council

Cc: Sergio.Ibarra@lacity.org, Councilman LaBonge, Councilman Garcetti, Councilman Koretz, Mayor Villaraigosa, Srimal Hewawitharana, Councilman Parks, Michael LoGrande

From: <poonsy6603@aol.com>
Date: Thu, Dec 6, 2012 at 11:51 AM
Subject: Fwd: HUNC & HUNC PLUM Special Meeting Tonight.. re: Millennium Skyscraper Projects
To: poonsy6603@aol.com

Title: From The Hollywood Dell

Details:
Please spread the word to your communities..
Thank you!

~~~~~~
Hollywood Dell Civic Association
Neighborhood News & Upcoming Events
~~~~~~
Dear neighbors, as most of you know there is a very large proposed project called the Millennium Project right at the base of our neighborhood surrounding the Capitol Records building.

I believe this project will efffect our Dell neighborhood more than any other neighborhood since it is right at our two main entrances.
There is a special meeting at HUNC (Hollywood United Neighborhood Council) this Thursday.
It would be great if we could attend in full force! 12-1

Please attend if you can!

Special Board Meeting for review of Millennium Project
Special Board Meeting and PLUM Committee Presentation

Thursday December 6th, 2012; 7:00pm

Seventh-day Adventist Church of Hollywood,1711 N Van Ness Ave, Hollywood, CA 90028

(On site parking available within the Church compound)

(Whitley Heights NC (Hollywood Hills West NC) and HHWNC Plum Committee rejected The Millennium Skyscraper Projects.)

Regards,

Whitley Heights

December 6, 2012

Srimal Hewawitharana
Environmental Specialist, LA Dept. of City Planning
201 North Figeuroa Street, #4
Los Angeles CA 90012

Re: Request for Extension - Millennium Development DEIR Review & Response

Dear Ms. Hewawitharana,

We are writing to request an extension of the Public Review/Comment Period for the Millennium Draft Environmental Impact Report ("DEIR") until January 31, 2013.

The Hollywood Dell Community Association, representing approximately 1,500 residents in the Hollywood Dell neighborhood, and in concert with other Community Associations and Councils in the Hollywood area, is in the process of reviewing the recently released DEIR. This two-volume report, the work product of paid professional architects, draftsmen, consultants, attorneys, investors, and city staff that took over 2-years to research and develop, is dense, technical, filled with complex calculations and numerous acronyms and references that require multi-page appendices and cross referencing on the slow responding City Planning and Zoning web site.

We are not professional planners, but are concerned residents and business owners located within 500' of the proposed development who need additional time to properly review the DEIR. Many residents are away for the Holidays, others have escalated work schedules, and some neighborhood councils do not have scheduled meetings until after the first of the year while others are trying to get up to speed after recent officer elections. 13-1

No project in Hollywood is more ambitious, larger or likely to create indelible change to our Community than the Millennium development. We want that change to be positive. We want and need sound development in Hollywood which demands adequate time to review a DEIR of this magnitude.

We trust that the City will grant an extension of the public comment period to the DEIR as requested to January 31, 2013. It will allow us to comment proactively and help us guide the Millennium Project to be one we can all support, use and point to with pride.

Sincerely,

Patti Negri
President, Hollywood Dell Civic Association

Cc:
Eric Garcetti
Tom LaBonge
Michael LoGrande
Mayor Antonio Villaraigosa
Millennium Partners
Argent Development Group
Hollywood United Neighborhood Council (HUNC)
Hollywood Studio District
Neighborhood Council
Beachwood Canyon Association
Argyle Civic Association
Hollywood Hills West Neighborhood Council
East Hollywood Neighborhood Council
Hollywoodland Homeowners Association
Los Feliz Improvement Association
The Oaks Homeowners Association
Franklin Hills Residents Association
Yucca Corridor Coalition
Whitely Heights Civic Association
Lake Hollywood Homeowners Association
Laughlin Park Homeowners Association

HOLLYWOOD HERITAGE, INC.
P.O. Box 2586
Hollywood, CA 90078
(323) 874-4005 • FAX (323) 465-5993

December 10, 2012

Submitted via email:
Srimal Hewawitharana
Environmental Specialist II
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Millennium Hollywood Project, ENV-2011-675-EIR

Dear Ms. Hewawitharana:

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members, thank you for the opportunity to review and comment on the Millennium Hollywood Project, and the accompanying Draft Environmental Impact Report (DEIR).

For three decades Hollywood Heritage has been an advocate of the preservation and protection of Hollywood's historic resources. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development. Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in public policy discussions through the formulation of the Community Redevelopment Plan of 1986 and subsequent urban design plans, specific plans and in property entitlement discussion involving historic resources. These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood. 14-1

Our expertise in this area has led us to the conclusion that the Millennium Hollywood project has significant and adverse impacts on a number of Hollywood's historic resources.

CEQA guidelines define a project as having a significant environmental impact when the project causes a substantial adverse change in the significance of a historical resource as defined by the California 14-2

Environmental Quality Act (CEQA), Section 15064. The City of Los Angeles CEQA Thresholds Guide (2006, p. D.3-3) maintains that a project would have a signi□cant impact on historic resources if the project results in a substantial adverse change in the signi□cance of a historic resource by construction that reduces the integrity or signi□cance of important resources on the site or in the vicinity via alteration of the resource's immediate surroundings.

14-2 (Cont)

We appreciate some of the mitigation measures designed to preserve the historic Capitol Records and Gogerty Building, however we believe that the proposed project would substantively alter the context in which these buildings gained their signi□cance by compromising the immediate surroundings. Portions of the project are grossly out of proportion with the identi□ed resources, thereby minimizing them and irretrievably altering their setting. Additionally, while we applaud the inclusion of open space, the current design signi□cantly challenges the pedestrian environment of Hollywood. Like many previous developments, it draws pedestrians away from the street and irrevocably alters the historic street wall along Vine and Argyle.

14-3

We also □nd the current version of the Millennium Hollywood Draft EIR to be de□cient in its assessment that the project would not cause an adverse change in signi□cance for the Hollywood Boulevard Commercial and Entertainment Historic District.

The heart of Hollywood is listed in the National Register of Historic Places and functions as one of the City of Los Angeles' major tourist destinations and economic engines. The Hollywood Boulevard Commercial and Entertainment Historic District is a 12 block area of the commercial core. The district contains 103 of the most important buildings in Hollywood, listed at the national level of signi□cance in the National Register of Historic Places. The development pattern of the 1920s and 1930s was characterized by the construction of buildings of generally 12 stories at major intersections, □anked by one and two-story retail structures.

14-4

The District was formally designated by the National Park Service on behalf of the Secretary of the Interior in 1985. At the time, there were over 60 contributors and approximately 40 non-contributors which all dated from the 1905-1935 period of signi□cance. Since its listing, the District has seen signi□cant and positive restorations, now having the largest collection of restored historic theaters in use in the nation. The District can count the bene□cial reuse of the Broadway and Equitable Buildings, the Hollywood Professional Building, and the Nash Building, and many restorations, spurring the renaissance of Hollywood. But the District has su□ered the loss of several contributors, and has seen the addition of overly-large developments such as Hollywood and Highland, the W Hotel and Madame Tussaud's.

The current Millennium Hollywood project fails to signi□cantly address the negative impact created by the mass and height of the proposed development in regards to the existing structures in the vicinity. This will be the largest tower in the area and will be visible throughout the Hollywood Boulevard Commercial and Entertainment District, irrevocably altering the character of this national landmark. In addition, while creating opportunities to see landmarks such as the Hollywood Sign from areas within the development, the project fails to address the fact that these new view lines will alter views that have, to date been publicly available.

14-5

In the "Related Projects" section of the DEIR, which compares this project with other projects nearby, unapproved, proposed developments are used alongside existing structures, allowing the square footage increase that this project suggests to be seen as more reasonable. However, the structures included on the comparative chart are all less than one-third the size of the proposed Millennium tower. The only project that is as large is the proposed redevelopment of the Paramount Studios Lot. At 1,385,700 sq. ft., the Paramount Lot is a much larger property and does not have any single building of a comparative

14-6

height as proposed by Millennium. We believe that the addition of the proposed tower(s) will overwhelm contributing properties in the district and the proposed “separation” of new and old construction is simply not an adequate mitigation measure.

14-6 (Cont)

Hollywood Heritage appreciates the e□orts of the project’s developers and will work diligently with them to ensure the preservation and protection of all of Hollywood’s historic resources. Please feel free to contact us at (323) 874-4005 should you have any questions.

14-7

Sincerely,

Bryan Cooper
President, Hollywood Heritage, Inc.

Cc: Bill Roschen, President, Los Angeles City Planning Commission
Ken Bernstein, Manager, O□ce of Historic Resources, Los Angeles Department of City Planning
Adrian Scott Fine, Director of Advocacy, Los Angeles Conservancy

HOLLYWOOD UNITED
NEIGHBORHOOD COUNCIL
Certified Council #52
P.O. Box 3272 Los Angeles, CA 90078
www.HollywoodUnitedNC.org
E Mail: HUNCoffice@gmail.com

November 30, 2012

Srimal Hewawitharana
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Request for Extension of Public Comment Period for Millennium DEIR

Dear Ms. Hewawitharana:

The Board of the Hollywood United Neighborhood Council (HUNC) voted 10-0 at its regularly scheduled meeting on Monday, November 19, 2012 to formally request an extension on the review period for the Millennium project in our area. While we have been tracking this development for years, the timing of the release of the DEIR right before the start of the holiday season has not allowed us as much time as we feel is needed to properly analyze and comment on a project of this size and impact. We join with numerous other community organizations to ask that the December 10, 2012 deadline be extended by an additional 30 or 45 days. 15-1

HUNC only just received the DEIR, which is sizable in length and heavy on details, in early November. While we were able to convene one meeting of our Planning & Land Use Committee to hear a presentation from the developer on the proposal, many questions remain among our committee members and the public. Also, as noted by the Hollywood Dell Civic Association and others, it is very difficult to respond to a project that does not include a specific proposal, but instead a matrix of options that range between FARs of 4.5 to 6. HUNC has gone on record opposing any kind of skyscraper, and would prefer lower heights generally. 15-2

Reference was made at our Board meeting by a Millennium representative to certain undetermined community benefits, but these are to be negotiated between the developer and the City, which makes it difficult for our Board to see what the final package might be for the project. We are underwhelmed by what we have heard so far, showers for bike riders for example, and curious whether the City will ask for tangible improvements that will help mitigate not just the impact that the project will have on the intersections deemed by a traffic consultant to be impacted, but more generally across Hollywood to help improve overall vehicle mobility. 15-3

Our Board is holding a special meeting, in conjunction with our PLUM Committee, on December 6 to further discuss the issues around this project and prepare a list of issues we would like to see the Planning Department address before Millennium goes before the City Council. Given how long we have waited to engage in this conversation and how incomplete and at the same time overwhelming the information about this project is, we ask for an extended Public Comment period until mid- to late January so that we and other interested community groups can fully consider the potential impacts to local small businesses and residents. 15-4

Sincerely,

SUSAN SWAN	ERIK SANJURJO	SCOTT LARSON	JIM VAN DUSEN
President	Vice President	PLUM Co-Chair	PLUM Co-Chair

NOTE- signed electronically.

HOLLYWOOD UNITED
NEIGHBORHOOD COUNCIL
Certified Council #52
P.O. Box 3272 Los Angeles, CA 90078
www.HollywoodUnitedNC.org
E Mail: HUNCoffice@gmail.com

December 10, 2012

Srimal Hewawitharana
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Follow-up letter with further comments about Millennium DEIR

Dear Ms. Hewawitharana:

On December 6, 2012, at a special joint meeting of its PLUM Committee and Board, HUNC voted 9-0-2, with input from a number of different community groups and dozens of individual stakeholders, to request that the following suggestions be considered as part of the consideration of the DEIR for the Hollywood Millennium Project, which is located within our area: 16-1

1) Consider a new expanded traffic study, to be paid for by HUNC and the community, which will cover all of the different neighborhoods impacted by the project, from the Hollywood Dell and the rest of the Hollywood Hills east to Western Avenue. 16-2

2) Reject the variance to increase the FAR for the project from 4.5 to 6. HUNC has long been opposed to allowing high rises in the greater Hollywood area. The new Hollywood Community Plan has height limits along the Vine corridor, among other area.There also has been a recent proposal before City Council for general heights limits across Hollywood (see motion Garcetti-LaBonge). 16-3

3) Support expenditure of roughly $5 Million in Quimby fees for parks all around the vicinity of the project, including the lot in development at Ivar and Franklin, the Gateway to Hollywood monument on Cahuenga and the Hollywood Freeway Cap Park. 16-4

4) Require that infrastructure improvements (sidewalks, lighting, etc.) be done around the various intersections near the project, including Franklin and Vine, Ivar and Yucca, and Yucca and Argyle. This should also include new pedestrian improvements, including the north side of Franklin and at intersection with Argyle. 16-5

5) Support for a right turn lane at the intersection of Cahuenga and Franklin (northbound traffic), as proposed by developer. 16-6

6) Oppose variance for reducing parking for health club from 10 spaces for every 1,000 ft^2 to 2 spaces for every 1,000 ft^2. The nearby Gold's Gym has severe parking problems and usage would likely be at a level greater than 2 spaces for every 1,000 ft^2. 16-7

7) Support fixes proposed for Argyle/Franklin at 101/DOT connection. Have Hollywood Dell and HUNC representatives included in all future discussions about specifics as we are stakeholders of both local and State governments and can serve as a bridge. 16-8

8) Limit the number and size of concerts to be held outdoors at facility and coordinate all proposed events through CD13 Hollywood Boulevard Street Closure Committee to ensure proper notification and minimal disruption to local traffic patterns. 16-9

9) Require that developers pay for left turn signals for all directions of the intersection of Hollywood and Vine that do not have them now as a general traffic mitigation. This intersection has been listed as one of two that will be impacted within the first five years. 16-10

10) Return a portion of the nearly $6 Million in additional General Fund revenue expected to be generated by the project to the Hollywood Community to pay for additional police and fire services that will be needed by the new residents of the project. 16-11

11) Oppose the waiver of D limitation status for the parcels proposed for development to ensure that, even though the CRA is defunct, there will still be a review of how the project would impact the Hollywood redevelopment zone area. Section V 506.2.1 of the CRA Hollywood Community Redevelopment Plan, under the title of "Hollywood Boulevard District," states that: 16-12

"The objectives of the District are to: …..2) Assure that new development is sympathetic to and complements the existing scale of development."

12) The height of the new towers could be nearly as high comparatively as the downtown skyline and more than twice as tall as any existing structure in Hollywood. This would largely obscure the view of the Hollywood sign, a historic resource, which needs to be addressed. Section V 506.2.2 of the CRA Hollywood Community Redevelopment Plan, under the title of "Hollywood Core Transition District," states that properties along Hollywood Boulevard, which is deemed to be a hillside/flats transition area: 16-13

"shall be given special consideration due to the low density of the adjacent residential areas. The objective of this District is to provide for a transition in the scale and intensity of development between Regional Center Commercial uses and residential neighborhoods. The Agency shall review all building permits in this District to ensure that circulation patterns, landscaping, parking and scale of new construction is not detrimental to the adjacent residential neighborhoods. Development guidelines shall be prepared for this District to ensure that new development is compatible with adjacent residential areas."

Sincerely,

SUSAN SWAN	ERIK SANJURJO	SCOTT LARSON	JIM VAN DUSEN
President	Vice President	PLUM Co-Chair	PLUM Co-Chair

NOTE- signed electronically.

From: <sschw56079@aol.com>
Date: Mon, Dec 10, 2012 at 12:10 PM
Subject: Important Millennium extension
To: srimal.hewawitharana@lacity.org
Cc: mayor@lacity.org, councilmember.garcetti@lacity.org, councilmember.labonge@lacity.org

HOLLYWOODLAND HOMEOWNERS ASSOCIATION

2700 N Beachwood Drive

Los Angeles, CA. 90068

December 8, 2012

Dear Ms. Hewawitharana,

I am president of the Hollywoodland Homeowners Association, and we are writing to strongly urge you to extend the Public Review/Comment Period for the Millennium Draft Environmental Impact Report (DEIR) until January 31st 2013. We join the many other HOAs, neighborhood councils, and other organizations in asking for this extension.

This two tower major project, unprecedented in its size and scope in the history of Hollywood, will forever change the very character and nature of Hollywood in irreparable ways. It is therefore a very reasonable request to give our community adequate time to study this very large and complicated two volume report that has taken years to put together.

Hollywoodland , consisting of almost 600 homes, sits at the foot of the Hollywood Sign for which it was built. It was the first canyon development in Los Angeles, and we'll be celebrating our 90th anniversary in 2013. We have witnessed a lot of history in Hollywood, and have waited for decades for its proper revitalization. Surely the parties involved in this development can wait a few additional weeks to make sure things are done properly.

17-1

We have many concerns regarding this project—the major one being the most important consideration for any development---safety. For example, Millennium borders and greatly impacts the "very high fire hazard zone" in which Hollywoodland is located. Apart from the acute problem of slow response times of emergency vehicles caused by already gridlocked streets in Hollywood that will become even more congested with these skyscrapers, is the nightmare scenario of trying to evacuate our neighborhood or any other area in the Hollywood Hills because of a fire on to these paralyzed streets. The results would be catastrophic.

17-2

In the end, one would hope that we all want the same thing—the successful redevelopment of Hollywood. This is best achieved when all of the parties are able to work together. In order to facilitate this process we need an extension of the public review/comment period on the DEIR. It is an extremely reasonable request considering the scope of the project, the limited amount of time for us to study it and the unfortunate holiday time of year. We hope that you will wisely and responsibly grant our request.

17-3

Thank you for your consideration.

Sincerely,

Sarajane Schwartz

President of the Hollywoodland Homeowners Association

From: <sschw56079@aol.com>
Date: Mon, Dec 10, 2012 at 3:40 PM
Subject: Millennium DEIR Response Letter
To: srimal.hewawitharana@lacity.org
Cc: mayor@lacity.org, councilmember.labonge@lacity.org, councilmember.garcetti@lacity.org

HOLLYWOODLAND HOMEOWNERS ASSOCIATION

2700 N Beachwood Drive

Los Angeles, CA. 90068

December 9, 2012

Dear Ms Hewawitharana,

The Hollywoodland Homeowners Association has already sent you a letter stating that the best course of action for the Millennium Project would be to extend the DEIR public comment period to January 31, 2013. If that responsible decision is not made, and the deadline for review remains December 10, 2012, we want to add our comments. This is a preliminary reaction as we have not had adequate time to carefully study this very large document. 18-1

Hollywood is a world famous location with aging and very limited infrastructure. It is an inappropriate location for this unprecedented massive development that will permanently and negatively change the very special character and nature of Hollywood. 18-2

Traffic/Safety

The most important consideration for any project is safety, and because of this project's location, traffic cannot be separated from safety. Hollywood sits at the base of the Hollywood Hills that cuts off north and south traffic. Franklin is the last artery to the north that runs east and west. This is just a block from this project. Many of the canyon streets are cut off at the south by the Hollywood Freeway and dead end at Franklin Ave. Franklin is already gridlocked for miles several hours a day. To the south many of the intersections and streets in Hollywood are already gridlocked with over capacity traffic. In addition the vast majority of streets in Hollywood are quite narrow and extremely limited particularly when compared to other areas that host skyscrapers. To approach the Millennium project from the northeast one has to make two left turns. One is at Franklin and the other at Argyle. Hollywoodland sits in a vulnerable bottleneck surrounded by Griffith Park on three sides. Millennium borders and greatly impacts this "very high fire hazard zone" of the Hollywood Hills in which Hollywoodland is located. Apart from the acute problem of slow response times of emergency vehicles caused by already gridlocked streets in Hollywood that will become even more congested with these skyscrapers, is the nightmare scenario of trying to evacuate our neighborhood or any other area in the Hollywood Hills because of a fire on to these paralyzed streets. The results would be catastrophic. This is not a totally hypothetical situation with us. In Hollywoodland we have had dozens of homes destroyed and damaged by fire. Several years ago, a resident died in a fire in his home because traffic impeded the response time of LAFD. In recent years within a period of several months there was a fire behind the Hollywood 18-3 18-4

Sign and a major fire slightly to the east of us in Griffith Park. Just this year we had a fire in our area on a fortunately no wind day. We do not want a worst case scenario of residents being burned in their trapped cars while trying to escape. In addition,we have not even focused on the not unimportant issue of how all of this traffic impacts quality of life.

We see no evidence that the traffic specifics mentioned in the DEIR adequately address these problems.

18-4 (Cont)

Utilities

We are concerned about the massive additional population this project will bring to Hollywood. The utilities are aging and currently inadequate for the present levels of population. We are still rationing water. Also with this added proposed load would our system be adequate to fight a large fire? We currently lose power several times a year because of our antiquated power lines. Shouldn't the current infrastructure be updated to adequately deal with its current users before more are added?

We see nothing in the DEIR that mitigates these issues.

18-5

Parking

Adequate parking is already an issue in Hollywood. This project adds to the problem. It will bring in huge numbers of people. The vast majority of them will be using cars. Also, the project's proximity to mass transit will actually add to the capacity needed. If in the 'fortunate' case many of the project's residents decide to use mass transit---which by the way has not been the case so far with the buildings already built by the metro—more parking spaces are needed—not less. Spaces are needed for the residents' cars that they're leaving behind—they still will own cars—in addition to spaces needed for the cars of those coming to visit, work, or shop in the area.

We see nothing in the details of the DEIR concerning parking that will adequately deal with the proper capacity that will be needed.

18-6

Hollywood's Identity

Hollywood is one of the world's most famous and unique cities and acts as a magnate for tourists while being a home for its residents. Tourists come to view such sites as the Capitol Records Building that will be overpowered by this project. They want to see Los Angeles' most iconic symbol, The Hollywood Sign. Its view will also be blocked by this project. They want to see this historic area of Los Angles that sits surrounded by the fabled Hollywood Hills. Its view will also be blocked by this project. They do not come to see skyscrapers. They want to see Hollywood's unique identity. This project is not only not part of that but works to destroy it. In addition, there are frequent street closures in Hollywood to accommodate the many premieres and entertainment related events. These closures can go on for days particularly in the case, for example, of the Academy Awards. Residents accommodate these frequent occurrences because it's part of Hollywood's identity and life's blood. These events are on borrowed time if this massive project comes. How can streets be blocked off with all of this additional traffic? Also, Hollywood, an area developed in the 20's is home to many residents. It's our Bedford Falls—the mythical location of Frank Capra's "It's A Wonderful Life." It is ironic that here it is Christmas time, and this project can turn Hollywood into Pottersville.

18-7

We see nothing in the details of the current DEIR that can mitigate these issues.

18-7 (Cont)

These are just some of the very important issues that we feel the current DEIR does not properly address. We urge that more planning and review be done before the Millennium Project progresses.

18-8

Thank you for your consideration.

Sincerely,

Sarajane Schwartz

President of the Hollywoodland Homeowners Association.

LOS ANGELES CONSERVANCY

December 10, 2012

Submitted by email

Srimal Hewawitharana , Environmental Specialist II
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012
Email: srimal.hewawitharana@lacity.org

RE: Millennium Hollywood Project Draft EIR (ENV-2011-675 EIR)

Dear Srimal:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Millennium Hollywood Project which, through its inclusion, directly impacts the iconic 1956 Capitol Records building.

The Conservancy, along with Hollywood Heritage, has long been active in protecting and advocating for the historic resources in Hollywood, particularly in and around the National Register-listed Hollywood Boulevard Commercial and Entertainment District immediately south of the project site. In 2006, the Conservancy's Modern Committee successfully nominated Capitol Records for designation as a City of Los Angeles Historic-Cultural Monument (HCM). The Conservancy commends the project applicant, Millennium Partners and Argent Ventures, for placing and sensitively considering the preservation of Capitol Records and the Gogerty Building at the core of the proposed development. We are encouraged by the direction of this project to date, however we do have some questions and think additional safeguards are necessary to address the larger preservation goals. 19-1

I. Scale new construction appropriately to ensure compatibility with historic resources

The Conservancy appreciates the efforts of the project team to incorporate new construction carefully and respectfully around Capitol Records. Areas for new buildings are located to the west and south to avoid impacts to several character-defining features of Capitol Records called out in its Historic-Cultural Monument (HCM) nomination. Specifically, proposed new construction would generally avoid obstructing significant views of Capitol Records from the 101 Freeway and be sited away from Capitol Records' famed underground recording studios and reverberation chambers. 19-2

While these efforts are commendable, we remain concerned the allowable scale and massing threatens to overwhelm Capitol Records and the surrounding historic buildings, immediately adjacent and nearby along Hollywood Boulevard Two of the four proposed height zones in the Development Regulations allow for towers up to 585 feet, significantly taller than the adjacent 165-foot Capitol Records on the East Site as well as the two-story theatre built in 1926 (Hollywood Playhouse) just south of the West Site. The buildings along Hollywood Boulevard are also generally below 150 feet, including the low-scaled 1930 Pantages Theater, built in 1930 and directly abutting the southern edge of the East Site. 19-3

Historic buildings can often coexist with taller buildings, but the project's maximum allowable height would dwarf its immediate neighbors and compete for status with the already iconic circular tower of Capitol Records. We urge the applicant to consider lower height maximums or allocating available square footage more evenly across the project site to be more compatible with the lower scaled historic properties and the National Register-listed historic district in this area of Hollywood. This may be addressed to some degree already yet the preferred project and Development Regulations, as currently outlined in the Draft EIR, do not necessarily provide this level of detail and clarity. 19-4

II. Incorporate precise preservation-oriented standards and guidelines in the Development Regulations

Despite the placement and siting of new construction on the West and East Sites, significant impacts to Capitol Records may still occur. The draft Development Regulations, which will be attached to and enforceable through a Development Agreement, aims to ensure compatibility with historic resources by establishing required standards and recommended guidelines for new design elements. However, the existing draft document lacks sufficient detail to mitigate impacts and provide surety in a reliable and predicable manner. 19-5

For instance, the figures in section 6.1.2 appear to require 10-foot setbacks at the south and east edges of Capitol Records' base and an additional 50-foot setback east of the tower curve. However, these standards are not articulated in the text of the Development Regulations. If these setbacks are to protect the underground recording studios and reverb chambers, the location of these features should be referenced and clearly labeled in the Development Regulations and the required setbacks established. Additional open space or other appropriate uses may also be encouraged to increase the buffer between these areas and any new structures. 19-6

Similarly, another significant view of Capitol Records, the one from the corner of Hollywood and Vine, may be impacted by the location and design of new construction on the project site. The Draft EIR identifies significant adverse impacts to this view for building envelops built to the maximum heights of 220 and 400 feet. In theory, the Development Regulations would narrow the floor plates as towers extend higher to avoid obstructing this view. However, the regulations fail to provide standards or guidelines that direct siting of any portion of new construction away from this view corridor. 19-7

Additionally, the required 10-foot setback from Vine Street for any portion of the building up to 150 feet, and an additional 10-foot setback for towers above 150 feet are insufficient to maintain even partial views of the 165-foot tall Capitol Records. More specific and detailed setbacks, massing, angles or other elements of the Development Regulations should be established to protect the integrity of Capitol Records and the nearby historic resources. 19-8

III. Modify the Development Agreement and mitigation measures with additional safeguards

a. Design review and approval by the Cultural Heritage Commission

While the buildable area overlaps only a portion of the HCM-designated Capitol Records parcel, it seems appropriate that the city's Cultural Heritage Commission review and comment on the ultimate design of new elements at the project site given the importance of Capitol Records and the likelihood of adverse impacts of new construction. This review should occur prior to any issuance of building permits for all phases of development to ensure final details of design, siting, cladding materials, and other elements of compatibility are adequately considered. 19-9

b. Post-construction noise and vibration monitoring

We appreciate the proposed monitoring of vibration and differential settlement impacts on sensitive historic resources during construction. Such monitoring can identify potential impacts during construction and mitigate issues before major damage can occur. In the event that substantial damage results due to the project construction, we urge the applicant to commit to repairing any damage, conforming to the Secretary of the Interior's Standards. All work shall be overseen by a qualified architectural historian or preservation professional. 19-10

In addition, we urge the project applicant to commit to ongoing noise and vibration monitoring of the Capitol Records recording studios and reverb chambers following construction and during the initial operation of new uses surrounding the historic building. While the applicant currently owns all of the parcels and has a vested interest in protecting the operation of Capitol Records, ownership may change in the future necessitating the need for a process to address operational impacts.. 19-11

c. Revise the exceeding long development period

The Conservancy remains concerned about long-term implications of the twenty-five year development term requested by the project application. Projects of a similar scope and scale have been approved in the City with development terms ranging from ten to fifteen years. Approval of the proposed development term would severely limit consideration of other opportunities that may arise in the future, including new development that may be more appropriate for the site in the future. The ownership, economic and social circumstances, as well as the design and land use priorities will 19-12

change greatly during the twenty-five year period currently requested by the project applicant.

The proposed project does not appear to warrant this exceptionally long development term, therefore we urge a time period more in line with similar projects approved by the City.

19-12 (Cont)

Interests of the Los Angeles Conservancy:
The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education. Since 1984, the Conservancy's all-volunteer Modern Committee has worked to raise awareness about Los Angeles' unique collection of mid-twentieth century modernist structures that shaped the tastes and architectural trends of the entire nation.

19-13

Thank you for the opportunity to comment on the Draft EIR for the Millennium Hollywood Project. Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine
Director of Advocacy

cc: Hollywood Heritage
Council President Eric Garcitti, Council District 13
Office of Historic Resources, City of Los Angeles

THE MONTALBÁN FOUNDATION
1615 NORTH VINE STREET, HOLLYWOOD CA 90028

December 4, 2012

Srimal Hewawitharana
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Srimal:

As stakeholders in the heart of the Hollywood Entertainment District, we are voicing our support of the Millennium Hollywood project. This project will anchor our historic neighborhood with a 21st-Century mixed-use addition that embodies architectural beauty, urban infill dynamics, and public tourist, shopping, and entertainment business opportunities.

We believe that the developers have a vision that will compliment Capitol Records, and our important music industry and are including cultural expressions that capture our rich history and leadership in the entertainment community. With the construction phase Hollywood will see nearly 3,000 construction-related jobs. The completed project will provide nearly 1,300 permanent jobs. As a transit-oriented development project, it will also encourage the use of our Metro and other public transportation services. 20-1

We have seen an ocean of positive change with the opening of the W Hotel and the Legacy Mixed Use projects. The Millennium Hollywood project will bring together business, residents, and our entertainment venues and serve as a beacon to the entire Los Angeles community.

Sincerely,

Gilbert Smith
Chair
Ricardo Montalbán Foundation

From: **Caroline Schweich** <cschweich@sbcglobal.net>
Date: Mon, Dec 10, 2012 at 2:56 PM
Subject: DEIR Hollywood Millenium Project - Oaks Homeowners Association
To: srimal.hewawitharana@lacity.org
Cc: Tom LaBonge <tom.labonge@lacity.org>, Mary Rodriguez <mary.d.rodriguez@lacity.org>, Susan <sswanla@aol.com>

PO Box 29155
Los Angeles, CA 90029-0155

Srimal Hewawitharana, Environmental Specialist II

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Re: DEIR Hollywood Millenium Project

Dear Ms. Hewawitharana,

The Oaks Homeowners Association asks that the comment period for the above mention DEIR be extended by 60 days for these reasons:

1. The DEIR is so long that one could not be expected to read it all and formulate comments within the short period.
2. Awareness of the DEIR has not adequately been made to the community
3. A comprehensive parking plan for Hollywood must be developed and proposed prior to the comment period for the DEIR. The goal should be to minimize the number of new car trips to the Hollywood area, and maximize the efficiency, frequency and diversity of transit options.
4. Various homeowners associations and NCs can not be expected to agendize for both the respective committee meeting and the full Board meeting, and officially act in such a short time frame.
5. The community should be given the opportunity and time to conduct an independent traffic study.

21-1

Oaks Homeowners Association would like to comment on the DEIR. However, at this date can simply not do so in complete and official manner.

21-1 (Cont)

Sincerely,

Caroline Schweich

President, Oaks Homeowners Association

Tel: 323 957-2326

cc: Councilmember Tom LaBonge, Susan Swan

From: Beth Fogarty
Sent: Tuesday, December 11, 2012 12:27 PM
To: 'Srimial.hewawitharana@lacity.org'; 'councilmember.garcetti@lacity.org'; 'councilmember.Labonge@lacity.org'
Cc: 'patti@hollywooddell.com'; 'Marian Dodge'; 'Beth Fogarty'
Subject: millenium development

Please make note of our comments as per below 22-1

Please do not allow the following to be approved:

1. Increasing the present zoning from a 4.5:1 ratio to a 6:1 ratio would allow the developer to increase the project size from 825,000SF to 1.1Million SF.

2. Allowing a reduction in the City's parking requirement for the proposed 35,000SF health club from 10-spaces/1000 to 2-spaces/1000. The reduction in parking spaces would have 280 health club users looking for parking on Hollywood's streets.

3. The Community Redevelopment Agency's development requirements were put in place to maintain Hollywood's historic core and Unallow for redevelopment to enhance and compliment existing development and the livability of the surrounding residential communities. Allowing Millennium/Argent to eliminate their development's adherence to the CRA guidelines creates a massive project totally out of scale with the Hollywood area.

22-2

thank you

Beth Fogarty for

SUNSET HILLS HOMEOWNERS ASSOC.

Srimal Hewawitharana

Los Angeles City Planning Department

200 Spring Street, Room 750

Los Angeles, CA 90012

Email address: Srimial.hewawitharana@lacity.org

Eric Garcetti, Councilmember

Los Angeles City Council-District 13

200 N. Spring Street, Room 475

Los Angeles, CA 90012

(213)-473-7013

councilmember.garcetti@lacity.org

Tom LaBonge, Councilmember

Los Angeles City Council-District 4

200 N. Spring Street, Room 480

Los Angeles, CA 90012

(213)-473-7004

councilmember.Labonge@lacity.org

SUNSET HILLS HOMEOWNERS ASSOCIATION P.O.Box 15201, Beverly Hills, CA 90209
Contact: BETH FOGARTY, LYNN ROTH, SID SMILOVE(R.I.P.) (Email: BETHFOGARTY@YMAIL.COM)

From: ggg@copper.net <ggg@copper.net>
Subject: ENV-2011-675-EIR
To: srimal.hewawitharana@lacity.org
Cc: michael.logrande@lacity.org
Date: Tuesday, December 4, 2012, 8:20 PM

Hi Srimal,

The December 10, 2012 close of public comment period for the draft EIR for project ENV-2011-675-EIR is too short to prepare a traffic analysis of the project. I have asked several traffic consultants and they all have replied that they have other work scheduled currently and that the time to prepare an analysis is greater than the comment period. The comment period should be extended at least 120 days so that we can hire a traffic planner to do the necessary study. Please add this comment to the ENV-2011-675-EIR case file. 23-1

George Abrahams
3150 Durand Drive
Los Angeles, CA 90068

323 463 9209

SaveHollywood.org

From: **Robert Anderson** <r47@pacbell.net>
Date: Mon, Dec 10, 2012 at 12:55 PM
Subject: Re: The Millennium Project / Vine & Yucca / Hollydood, CA
To: Srimal.Hewawitharana@lacity.org

Re: The Millennium Project, (Two high rise buildings near Vine & Yucca)

To Whom It May Concern,

I have lived and worked in the Hollywood area off and on for forty-five years.

I believe more time is needed to make this decision. 24-1

Currently there is insufficient infrastructure to support this proposal. The traffic in this area is already chronically heavily congested. 24-2

The land mark Capitol Records Building is a historic building. The proposal is not practical. It would be a disastrous environmental eyesore. 24-3

These buildings would not be appropriate for this earthquake prone neighborhood. The Sunset and Vine Tower was unsafe, unoccupied and boarded up with a fence around it for years after the 1994 earthquake. This has exactly the same potential. 24-4

Those who forget the mistakes of the past are doomed to repeat them.

As presented, The Millennium Project appears to be an ill conceived, just plain bad idea. 24-5

Sincerely,

Robert Anderson

From: Ted Baumgart <baumgartstudio@att.net>
Date: Mon, 10 Dec 2012 21:27:23 -0800
To: <Srimal.Hewatharana@lacity.org>
Conversation: The Millennium Project / Vine & Yucca / Hollywood, CA
Subject: Re: The Millennium Project / Vine & Yucca / Hollywood, CA

Re: The Millennium Project, (Two high rise buildings near Vine & Yucca)

To whom it may concern,

I grew up in Laurel Canyon, attended Wonderland Avenue School and Bancroft Junior High, this is my backyard. My friends attended Hollywood High, and so did many of their parents. My uncle's house was up Beachwood with a prominent view of the city. By looking at the renderings of this ghastly project idea I notice at least one of the two is a bold faced lie! I'm an architectural/film set designer and illustrator, and I know how to cheat the eye. It shows the Hollywood Hills miles in the distance, when in fact they are very close to this site and these monstrosities will be looking right into the windows of the homes in the hills. Not only that, but built these two ugly behemoths would be precedents that give legality to more tall buildings to be built, and soon there won't be a view but tall buildings looking into Hollywood Hills homes windows and homes looking into building windows. There will be no ridgeline of 'The Hills' looking over Hollywood seen through palm trees, the very icon known around the world. The problem exists already west above the Strip. We were next door to a famous and well respected artist's home looking out of big floor-to-ceiling glass windows across a swimming pool at dusk to the jeweled city below, working on a new show concept, and low and behold some skyscrapers in front of us were looking right back into our windows. Not the cozy hills anymore. Not the jeweled city below. You get walls in Manhattan or any dense big city, but no one has the Hollywood Hills as the predominantly horizontal jewel with city below, and visa versa. This proposal would unleash a wall of buildings that dwarf the hills. Be very aware of the essence, soul, and character of Hollywood known around the world. It is worth more per square foot developed intelligently than these monuments to shorter term profit and quick tax base increase. LA is not any other city and Hollywood defines LA, so let's keep it, use it, and develop it intelligently. This is not just any "Run-of-the-Mill-ennium Project", this proposal is insane.

25-1
25-2
25-3
25-4
25-5

Sincerely,
Ted Baumgart

2425 Mountain Av
La Crescenta, CA 91214
818-957-1071

On Mon, Oct 29, 2012 at 11:33 PM, laurie becklund <laurie.becklund@gmail.com> wrote:

Hi --

Thank you for remembering to send me the CD of the DEIR for Millennium. Really appreciate the attempt to visualize this project with photos and graphics. An enormous amount of work. I'm puzzled by one thing: i thought the MOU signed by LADOT with the developer required a change in the intersection at Argyle and Franklin, the one I talked to you about briefly when i was in your office. the traffic study had all southbound access on Argyle being closed from franklin, which would have landlocked our whole neighborhood. the DEIR seems to suggest otherwise. did this change? 26-1 26-2

laurie

From: **ALAN BRACKETT** <alan_brackett@sbcglobal.net>
Date: Mon, Dec 10, 2012 at 11:16 AM
Subject: Millinium Capitol
To: srimal.hewawitharana@lacity.org

I am a homeowner resident in Hollywoodland directly above where this project is intended. I am concerned about infrastructure that I do not see being addressed. Are the city's sewer lines being upgraded along with other utilities? I don't see how there is enough parking being provided in the new proposed sites to handle the amount of traffic and cars and the streets already are lacking parking. Why are such tall sky-scrapers being allowed and if they are why are they not required to provide tourist viewing sites at their tops for viewing the Hollywood Sign, etc.? This project will cause much more traffic to my area with people wanting to get to a "green" place with their dogs and families and none is being provided for this onslaught. What happened to the idea that new development needs to also provide "green" space (parks) for the new population they attract? 27-1 27-2 27-3 27-4

I bank at what is now the Chase bank on the corner of Sunset and Vine and when the big "W" hotel was built I noticed that the nice view of the Hollywood Sign was blocked from view from the bank parking lot where it had been visible for ~90 years. These new highrises will block the view of the sign for tourists as well as residents from anywhere south of their location for quite a distance. This I am afraid will cause more disturbance to my neighborhood with people wanting to see or touch the sign. Our neighborhood cannot handle and was not built to handle this kind of onslaught of traffic. Also, looking south from the hills theses buildings will block the view from many homes that have paid a premium for this view. There are rules - written and unwritten - in the hills about blocking your neighbor's view with new houses or with trees and now I cannot understand why these highrises can get away with this when we have always had the understanding that this is an understood right of ownership in the hills that you respect your neighbor and try to get along and not block their views. Obviously, this respect is not there with this project. 27-5

I am against this project continuing until big changes come to fruition. There needs to be a huge height restriction, more consideration for the surrounding area and respect for the people living and working for years in the area. Utilities and sewer and parking and traffic and lack of a "green" area need to be addressed. This is not downtown Los Angeles or New York or any other of the large cities and should not become one. This is Hollywood, where people from all over the world come to see something unique - not another big city filled with highrises and traffic and pollution. My neighborhood which is right up the street is the nearest "green" area and where do you think all the residents in these new buildings are going to go? They won't want to drive the extra mile to get to Griffith Park - they will head straight up the hill and past my house with their noise, congestion and danger of burning down our neighborhood with their cigarettes. 27-6

Stop this project and put more thought into what it means to the area - have some respect! Big money should not be allowed to get away with whatever it wants in America! There is already too much of this happening and this is one place where the line should be drawn in the sand. Postpone and take a deep breath and let's talk and try and work things out! 27-7

I will be glad to help in any way that I can - Please don't hesitate to call on me to represent our area.

27-7
(Cont)

Alan Brackett
Safety Committee member of Hollywoodland Homeowners Association

From: Fairchild66@aol.com
Date: Mon, Nov 12, 2012 at 11:04 AM
Subject: DEIR NO. ENV-2011-675-EIR
To: srimal.hewawitharana@lacity.org

Thank you for sending the report and detailed information about this project. I am vehemently opposed to the Millennium Project and disgusted by the impacts delineated in the report. 28-1

Please keep me posted on any opportunities to publicly and privately express this opposition. 28-2

Sincerely,
Deborah Brosseau
323.467.7633

From: **Randi Caplan** <Randi.Caplan@farient.com>
Date: Sun, Dec 9, 2012 at 6:14 PM
Subject: Extension for ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org
Cc: randicaplan@hotmail.com

To Whom it May Concern,

The public comment period for the Millennium Hollywood Project did not allow sufficient time for a traffic study to be prepared by an independent consultant. To protect the people who live in the community from runaway development that severely impacts our infrastructure and services, the comment period should be extended [at a minimum] to allow for a traffic study (and any other needed studies) to be included.

29-1

Best regards,

Randi Caplan

Beachwood Canyon Property Owner

From: **S C** <sabeemer@me.com>
Date: Mon, Dec 10, 2012 at 12:55 PM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org

Dear Sir/Madam,

I am herewith informing you of my concerns for 40+ story tall high risers in the Hollywood area. They would be out of proportion, absolute eye-sores (from all directions), and most of all, causing a complete traffic chaos,
way beyond what is already becoming a very congested area.
In my past 18 years in Hollywood I have seen the traffic going from easy to an absolute nightmare. I can't imagine any more
traffic being added to this area. 30-1

I am not opposed to adding several high structures in Hollywood but they should stay within proximity of the current high risers in Hollywood.

Please do not allow a "Manhattanfication of Hollywood"!!!! 30-2

Sincerely,

Sabine Carey
2442 Cheremoya Ave.
Los Angeles, CA 90068

From: **George Clark** <gclark8505@sbcglobal.net>
Date: Sun, Dec 9, 2012 at 8:44 AM
Subject: enviro impact
To: Srimal.Hewawitharana@lacity.org

Srimal,

This continues to be something that boggles the mind.

The city council is in cahoots with developers with no regard for public support, quality of life or safety. 31-1

It now takes up to 45 minutes at rush hour to drive from Vermont to the 101 along Franklin. We are already jammed in here. Now they want to seriously increase the amount of traffic? Can't wait until a fire in thew hills breaks out at rush hour. Scores will die and the the hills left in ashes. 31-2

On it's face it cannot work and will become a living nightmare.

Can't this be stopped by lawsuits including enviro impact? No one will be able to see the Hollywood Hills except those living in the high rises which will topple in the strong earthquake that is coming at some point. 31-3

The city planners are obviously in the pocket of developers and on it's face is immoral. If dug into deeply enough no doubt illegality is going on as well. The Rico act is probably being violated as well.

Shame on the city council. It is disgusting. We must mount a petition and throw all of them out of office is this proceeds. Of course they'll end up on developers boards but at least they will be out of offcie and we'll have politicians who care about the city and the people not just their own financial gain. 31-4

Sincerely,

George Clark
gclark8505@sbcglobal.net
323 466-6776

From: **Bryan Clark** <sevenc7c@gmail.com>
Date: Sat, Dec 8, 2012 at 5:02 PM
Subject: Millennium/Hollywood Community Plan
To: srimal.hewawitharana@lacity.org

This so-called "Plan" is totally inadequate.....a monstrosity of a building.....
and creates traffic problems that will choke this area of Hollywood to death.....

32-1

Josephine & Bryan Clark
Holly Hill Terrace
Hollywood, CA 90068

--
Please use seven7c@gmail.com, roadrunner discontinued.
Bryan

From: **Chip Clements** <wsclements@aol.com>
Date: Mon, Dec 10, 2012 at 2:16 PM
Subject: Outsized Millenium Project
To: srimal.hewawitharana@lacity.org

Dear Ms. Hewawitharana,

I'm a resident of the Hollywood Hills above Vine Street and have just, at this late date, become aware of plans to build two 500-foot-tall skyscrapers on Vine St. near Hollywood Blvd. To me the prospect of adding these gigantic structures to our neighborhood sounds insanely inappropriate.

I'm writing to express my displeasure at the prospect of your permitting these giant structures to tower over our community. I'm not against development. I love that Hollywood is evolving as a destination for entertainment and tourism. But why two 50-story buildings? It's more appropriate for Manhattan than for Hollywood. 33-1

Please send these developers back to the drawing board and have them plan structures more appropriate for this part of town. With the W hotel complex and the Hollywood/Highland complex and a score of other projects, you guys hit just the right note in terms of planning an expansion of our community. These mega-skyscrapers don't fit in.

Thanks,

Chip Clements
6284 Mulholland Hwy.
Los Angeles, CA 90068

From: **Jack Conrad** <phatjaxx@gmail.com>
Date: Sat, Dec 8, 2012 at 9:41 PM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org

Are you kidding me?
The traffic in Hollywood is already a joke. How much infrastructure are these totally out of scale monstrosities going to add to our already overburdened city? 34-1
Have your artist draw in a reasonable representation of the traffic! 34-2

--
Jack Conrad

From: **Jack Conrad** <phatjaxx@gmail.com>
Date: Tue, Dec 11, 2012 at 5:13 PM
Subject: Re: ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

Thank you for your very kind reply.
From what I've been reading it looks like Garcetti has already sold us out.
Disgraceful!!

35-1

Best wishes, jc

fabiolus
CUCINA ITALIANA VERONA

Fabiolus
6270 W. Sunset Blvd.,
Hollywood, CA 90028
T.323.467.2882
F.323.467.2883
fabiolus.com
facebook.com/fabiolusLA

December 4, 2012

Srimal Hewawitharana
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Millennium Hollywood ENV-2011-675-EIR

Dear Ms. Hewawitharana:

As a longtime resident of the Hollywood Hills and a small business owner near the intersection of Sunset and Vine, I have seen the Hollywood community change for the better over the years.

The most positive change has come through the construction of more residential developments as it has brought a stable population to the area. The Sunset and Vine project by the CIM Group, for example, has interjected a new level of activity that has benefited many local businesses like my restaurant Fabiolus.

I support the Millennium Hollywood project because I am confident it will have the same beneficial impact on the community as a whole. The fears that this project will create gridlock on area streets are completely unfounded because people who will move here will be doing so to live an urban lifestyle that involves a lot of walking and taking the subway to get around, not sitting in their cars. 36-1

It's time that Hollywood grew up. The parking lots around Capitol Records are the perfect place for density because the site is close to the subway, the Hollywood Freeway and all kinds of excitement that people want to be a part of, meaning this development can be absorbed without placing too big of a burden on the community.

Moreover, by proposing taller buildings, this project would open up the streetscape for more open space. As one of the densest neighborhoods in Los Angeles, Hollywood desperately needs more open space for young people like my two sons.

Millennium Hollywood is an exciting project that will be positive for the Hollywood community, and I am excited to support it.

Sincerely,

Fabio Conti

Owner
Fabio Conti

Email
fabio@fabiolus.com

From: **Gail Silver** <gailsilveractress@yahoo.com>
Date: Sat, Dec 8, 2012 at 11:03 PM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org

Gentlemen and Ladies,

The public comment period did not allow sufficient time for a traffic study to be prepared by an independent consultant. Please extend the public comment period to allow for this traffic study to be included. I think it is crucial to this project. Thank you! 37-1

Gail Coviello

323.856.4746

From: **jodantonio@aol.com** <jodantonio@aol.com>
Date: Sun, Dec 9, 2012 at 2:53 PM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org

The Millennium Hollywood Project is the most irresponsible disaster to ever hit Hollywood. These super high-rises are unsafe (no mitigation for fire, roads and emergency services) and unsightly because they dwarfs the historical City of Hollywood and the iconic Capitol Records Building. 38-1 38-2

The public comment period did not allow time for an independent traffic study. This must be done. And where are the plans to upgrade the very old infrastructure for these buildings? The utilities cannot take this additional burden. Imagine how much more sewage must go through these old pipes? 38-3 38-4

I will not vote for a single politician that is currently in office if this goes through. And I will campaign aggressively against all of them. It is unconscionable to sell out historic Hollywood to developers from another state. They will make our community look grotesque. And it will be prone to safety hazards. 38-5

Up until now the subway helped our area, but now it is attracting greedy outsiders who do not care about destroying the community. You must have an independent study before City officials make am irreparable mistake by allowing these buildings to be built and set a precedent for more of the same. Height limits really need to be set for the entire community, not just certain streets, to retain a pleasing look in a safe, responsible environment. 38-6

Joanne D'Antonio, Safety Chair
Hollywoodland Homeowners Association

From: <Phillymm@aol.com>
Date: Sun, Dec 9, 2012 at 8:52 PM
Subject: Millennium Project
To: Srimal.Hewawitharana@lacity.org

As futile as this message no doubt is, I feel compelled to write it. I've lived within walking distance of the Capitol Records building, in apartments and houses, for 37 years; I look out at it from my kitchen window (and, no, the proposed project will not block my view). I've raised my kids in this neighborhood; it's my home. I'm not an enemy of change -- in fact, I welcome it -- but I have reservations about the Millennium Project on two counts. 39-1

The first is practical. There are so many large developments springing up in Hollywood at the moment -- it seems wrong-headed to greenlight something this gargantuan before measuring the impact of the new buildings on traffic, antiquated systems, and services. 39-2

The second objection is aesthetic. The proposed buildings look handsome (though I've been fooled by renderings before), but they are far too tall, making the iconic Capitol Records building look Lilliputian and absurd. Something closer to the scale of existing buildings would be far less objectionable. 39-3

Many thanks,
Monique de Varennes

www.moniquedevarennes.com

THE JEWEL BOX BALLERINAS (ages 4-8)
Schwartz & Wade Books
Random House Children's Books

An Association of Booksellers for Children Best Book
A Bank Street College Best Book
Special Recognition, Paterson Prize for Books for Young People
Finalist, ReadBoston Best Read Aloud Book
A NAPPA Honors Book

From: **Joyce Dillard** <dillardjoyce@yahoo.com>
Date: Mon, Dec 10, 2012 at 4:01 PM
Subject: Comments to ENV-2011-675-EIR Millennium Hollywood Project due 12.10.2012
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

You may cover part of the Watershed issues, but have not adapted this document to the requirements of the MS4 permitting, the Greater Los Angeles County Integrated Regional Water Management Plan, the LA County Sediment Plan and the 200-year floodplain planning by the State Department of Water Resources. 40-1

We need to know the pollutant loads created for the project and the expected traffic congestion into the project area. 40-2

How is the capacity of the sewers being address on maintenance as well as a capital basis. Other than scenarios, what are the estimated usages and loads. 40-3

Will the Tillman Plant diminished capacity affect this project. The diminished capacity is not approved in the LA Integrated Water Resources Plan. 40-4

We are attached the Final MS4 permit. How will this project be in compliance? 40-5

What is the continued mitigation measures for trash and bacteria issues. 40-6

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

320 W. 4th Street, Suite 200, Los Angeles, California 90013

Phone (213) 576 - 6600 • Fax (213) 576 - 6640

http://www.waterboards.ca.gov/losangeles

ORDER NO. R4-2012-0175
NPDES PERMIT NO. CAS004001

WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE COASTAL WATERSHEDS OF LOS ANGELES COUNTY, EXCEPT THOSE DISCHARGES ORIGINATING FROM THE CITY OF LONG BEACH MS4

The municipal discharges of storm water and non-storm water by the Los Angeles County Flood Control District, the County of Los Angeles, and 84 incorporated cities within the coastal watersheds of Los Angeles County with the exception of the City of Long Beach (hereinafter referred to separately as Permittees and jointly as the Dischargers) from the discharge points identified below are subject to waste discharge requirements as set forth in this Order.

I. FACILITY INFORMATION

Table 1. Discharger Information

Dischargers	The Los Angeles County Flood Control District, the County of Los Angeles, and 84 incorporated cities within the coastal watersheds of Los Angeles County with the exception of the City of Long Beach (See Table 4)
Name of Facility	Municipal Separate Storm Sewer Systems (MS4s) within the coastal watersheds of Los Angeles County with the exception of the City of Long Beach MS4
Facility Address	Various (see Table 2)
The U.S. Environmental Protection Agency (USEPA) and the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) have classified the Greater Los Angeles County MS4 as a large municipal separate storm sewer system (MS4) pursuant to 40 CFR section 122.26(b)(4) and a major facility pursuant to 40 CFR section 122.2.	

Table 2. Facility Information

Permittee (WDID)	**Contact Information**	
Agoura Hills (*4B190147001*)	**Mailing Address**	30001 Ladyface Court
		Agoura Hills, CA 91301
	Facility Contact, Title, and E-mail	Ken Berkman, City Engineer kberkman@agoura-hills.ca.us

Permittee (WDID)	Contact Information	
Alhambra (*4B190148001*)	**Mailing Address**	111 South First Street
		Alhambra, CA 91801-3796
	Facility Contact and E-mail	David Dolphin ddolphin@cityofalhambra.org
Arcadia (*4B190149001*)	**Mailing Address**	11800 Goldring Road
		Arcadia, CA 91006-5879
	Facility Contact, Title, Phone, and E-mail	Vanessa Hevener, Environmental Services Officer (626) 305-5327 vhevener@ci.arcadia.ca.us
Artesia (*4B190150001*)	**Mailing Address**	18747 Clarkdale Avenue
		Artesia, CA 90701-5899
	Facility Contact, Title, and E-mail	Maria Dadian, Director of Public Works mdadian@cityofartesia.ci.us
Azusa (*4B190151001*)	**Mailing Address**	213 East Foothill Boulevard
		Azusa, CA 91702
	Facility Contact, Title, and E-mail	Carl Hassel, City Engineer chassel@ci.azusa.ca.us
Baldwin Park (*4B190152001*)	**Mailing Address**	14403 East Pacific Avenue
		Baldwin Park, CA 91706-4297
	Facility Contact, Title, and E-mail	David Lopez, Associate Engineer dlopez@baldwinpark.com
Bell (*4B190153001*)	**Mailing Address**	6330 Pine Avenue
		Bell, CA 90201-1291
	Facility Contact, Title, and E-mail	Terri Rodrigue, City Engineer trodrigue@cityofbell.org
Bell Gardens (*4B190139002*)	**Mailing Address**	7100 South Garfield Avenue
		Bell Gardens, CA 90201-3293
	Facility Contact, Title, and Phone	John Oropeza, Director of Public Works (562) 806-7700
Bellflower (*4B190154001*)	**Mailing Address**	16600 Civic Center Drive
		Bellflower, CA 90706-5494
	Facility Contact, Title, and E-mail	Bernie Iniguez, Environmental Services Manager biniguez@bellflower.org
Beverly Hills (*4B190132002*)	**Mailing Address**	455 North Rexford Drive
		Beverly Hills, CA 90210
	Facility Contact, Title, and E-mail	Vincent Chee, Project Civil Engineer kgettler@beverlyhills.org
Bradbury (*4B190155001*)	**Mailing Address**	600 Winston Avenue
		Bradbury, CA 91010-1199
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El Monte (*4B190169001*)	**Mailing Address**	P.O. Box 6008
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Permittee (WDID)	Contact Information	
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	Facility Contact, Title, and Phone	Andre Dupret, Project Manager (323) 562-5721
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	Facility Contact, Title, and E-mail	Neal Shapiro, Urban Runoff Coordinator nshapiro@smgov.net
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	Facility Contact, Title, and Phone	James Carlson, Management Analyst (626) 355-7135 ext. 803
Signal Hill (*4B190210001*)	**Mailing Address**	2175 Cherry Avenue
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Permittee (WDID)	Contact Information	
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		Torrance, CA 90503-5059
	Facility Contact and Title	Leslie Cortez, Senior Administrative Assistant
Vernon (*4B190216001*)	**Mailing Address**	4305 Santa Fe Avenue
		Vernon, CA 90058-1786
	Facility Contact and Phone	Claudia Arellano (323) 583-8811
Walnut (*4B190217001*)	**Mailing Address**	P.O. Box 682
		Walnut, CA 91788
	Facility Contact and Title	Jack Yoshino, Senior Management Assistant
West Covina (*4B190218001*)	**Mailing Address**	P.O. Box 1440
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	Facility Contact, Title, and E-mail	Samuel Gutierrez, Engineering Technician sam.gutierrez@westcovina.org
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	Facility Contact, Title, and E-mail	David Mochizuki, Director of Public Works dmochizuki@cityofwhittier.org
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Los Angeles County Flood Control District (*4B190107101*)	**Mailing Address**	900 South Fremont Avenue
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Table 3. Discharge Location

Discharge Point	Effluent Description	Discharge Point Latitude	Discharge Point Longitude	Receiving Water
All Municipal Separate Storm Sewer System discharge points within Los Angeles County with the exception of the City of Long Beach	Storm Water and Non-Storm Water	Numerous	Numerous	Surface waters identified in Tables 2-1, 2-1a, 2-3, and 2-4, and Appendix 1, Table 1 of the *Water Quality Control Plan - Los Angeles Region* (*Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*), and other unidentified tributaries to these surface waters within the following Watershed Management Areas: (1) Santa Clara River Watershed; (2) Santa Monica Bay Watershed Management Area, including Malibu Creek Watershed and Ballona Creek Watershed; (3) Los Angeles River Watershed; (4) Dominguez Channel and Greater Los Angeles/Long Beach Harbors Watershed Management Area; (5) Los Cerritos Channel and Alamitos Bay Watershed Management Area; (6) San Gabriel River Watershed; and (7) Santa Ana River Watershed.[1]

Table 4. Administrative Information

This Order was adopted by the California Regional Water Quality Control Board, Los Angeles Region on:	**November 8, 2012**
This Order becomes effective on:	**December 28, 2012**
This Order expires on:	**December 28, 2017**
In accordance with Title 23, Division 3, Chapter 9 of the California Code of Regulations and Title 40, Part 122 of the Code of Federal Regulations, each Discharger shall file a Report of Waste Discharge as application for issuance of new waste discharge requirements no later than:	**180 days prior to the Order expiration date above**

[1] Note that the Santa Ana River Watershed lies primarily within the boundaries of the Santa Ana Regional Water Quality Control Board. However, a portion of the Chino Basin subwatershed lies within the jurisdictions of Pomona and Claremont in Los Angeles County. The primary receiving waters within the Los Angeles County portion of the Chino Basin subwatershed are San Antonio Creek and Chino Creek.

In accordance with section 2235.4 of Title 23 of the California Code of Regulations, the terms and conditions of an expired permit are automatically continued pending issuance of a new permit if all requirements of the federal NPDES regulations on continuation of expired permits are complied with. Accordingly, if a new order is not adopted by the expiration date above, then the Permittees shall continue to implement the requirements of this Order until a new one is adopted.

I, Samuel Unger, Executive Officer, do hereby certify that this Order with all attachments is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on November 8, 2012.

Samuel Unger

Samuel Unger, Executive Officer

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II. FINDINGS

The California Regional Water Quality Control Board, Los Angeles Region (hereinafter Regional Water Board) finds:

A. Nature of Discharges and Sources of Pollutants

Storm water and non-storm water discharges consist of surface runoff generated from various land uses, which are conveyed via the municipal separate storm sewer system and ultimately discharged into surface waters throughout the region. Discharges of storm water and non-storm water from the Municipal Separate Storm Sewer Systems (MS4s) within the Coastal Watersheds of Los Angeles County convey pollutants to surface waters throughout the Los Angeles Region. In general, the primary pollutants of concern in these discharges identified by the Los Angeles County Flood Control District Integrated Receiving Water Impacts Report (1994-2005) are indicator bacteria, total aluminum, copper, lead, zinc, diazinon, and cyanide. Aquatic toxicity, particularly during wet weather, is also a concern based on a review of Annual Monitoring Reports from 2005-10. Storm water and non-storm water discharges of debris and trash are also a pervasive water quality problem in the Los Angeles Region though significant strides have been made by a number of Permittees in addressing this problem through the implementation of control measures to achieve wasteload allocations established in trash TMDLs.

Pollutants in storm water and non-storm water have damaging effects on both human health and aquatic ecosystems. Water quality assessments conducted by the Regional Water Board have identified impairment of beneficial uses of water bodies in the Los Angeles Region caused or contributed to by pollutant loading from municipal storm water and non-storm water discharges. As a result of these impairments, there are beach postings and closures, fish consumption advisories, local and global ecosystem and aesthetic impacts from trash and debris, reduced habitat for threatened and endangered species, among others. The Regional Water Board and USEPA have established 33 total maximum daily loads (TMDLs) that identify Los Angeles County MS4 discharges as one of the pollutant sources causing or contributing to these water quality impairments.

B. Permit History

Prior to the issuance of this Order, Regional Water Board Order No. 01-182 served as the NPDES Permit for MS4 storm water and non-storm water discharges within the Coastal Watersheds of the County of Los Angeles. The requirements of Order No. 01-182 applied to the Los Angeles County Flood Control District, the unincorporated areas of Los Angeles County under County jurisdiction, and 84 Cities within the Los Angeles County Flood Control District with the exception of the City of Long Beach. The first county-wide MS4 permit for the County of Los Angeles and the incorporated areas therein was Order No. 90-079, adopted by the Regional Water Board on June 18, 1990.

Under Order No. 01-182, the Los Angeles County Flood Control District was designated the Principal Permittee, and the County of Los Angeles and 84 incorporated Cities were each designated Permittees. The Principal Permittee coordinated and facilitated activities necessary to comply with the requirements of Order No. 01-182, but was not responsible for ensuring compliance of any of the other Permittees. The designation of a Principal Permittee has not been carried over from Order No. 01-182.

Order No. 01-182 was subsequently amended by the Regional Water Board on September 14, 2006 by Order No. R4-2006-0074 to incorporate provisions consistent with the assumptions and requirements of the Santa Monica Bay Beaches Dry Weather Bacteria TMDL (SMB Dry Weather Bacteria TMDL) waste load allocations (WLAs). As a result of a legal challenge to Order No. R4-2006-0074, the Los Angeles County Superior Court issued a peremptory writ of mandate on July 23, 2010 requiring the Regional Water Board to void and set aside the amendments adopted through Order No. R4-2006-0074 in Order No. 01-182. The Court concluded that the permit proceeding at which Order No. R4-2006-0074 was adopted was procedurally deficient. The Court did not address the substantive merits of the amendments themselves, and thus made no determination about the substantive validity of Order No. R4-2006-0074. In compliance with the writ of mandate, the Regional Water Board voided and set aside the amendments adopted through Order No. R4-2006-0074 on April 14, 2011. This Order reincorporates requirements equivalent to the 2006 provisions to implement the SMB Dry Weather Bacteria TMDL.

In addition, Order No. 01-182 was amended on August 9, 2007 by Order No. R4-2007-0042 to incorporate provisions consistent with the assumptions and requirements of the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL, and was again amended on December 10, 2009 by Order No. R4-2009-0130 to incorporate provisions consistent with the assumptions and requirements of the Los Angeles River Watershed Trash TMDL.

C. Permit Application

On June 12, 2006, prior to the expiration date of Order No. 01-182, all of the Permittees filed Reports of Waste Discharge (ROWD) applying for renewal of their waste discharge requirements that serve as an NPDES permit to discharge storm water and authorized and conditionally exempt non-storm water through their MS4 to surface waters. Specifically, the Los Angeles County Flood Control District (LACFCD) submitted an ROWD application on behalf of itself, the County of Los Angeles, and 78 other Permittees. Several Permittees under Order No. 01-182 elected to not be included as part of the Los Angeles County Flood Control District's ROWD. On June 12, 2006, the Cities of Downey and Signal Hill each submitted an individual ROWD application requesting a separate MS4 Permit; and the Upper San Gabriel River Watershed Coalition, comprised of the cities of Azusa, Claremont, Glendora, Irwindale, and Whittier also submitted an individual ROWD application requesting a separate MS4 Permit for these cities. In 2010, the LACFCD withdrew from its participation in the 2006 ROWD submitted in conjunction with the County and 78 other co-permittees, and submitted a new ROWD also requesting an individual MS4 permit. The LACFCD also requested that, if an individual MS4 permit was not issued to it, it no longer be designated as the

Principal Permittee and it be relieved of Principal Permittee responsibilities. The Regional Water Board evaluated each of the 2006 ROWDs and notified all of the Permittees that their ROWDs did not satisfy federal storm water regulations contained in the USEPA Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule, August 9, 1996 (61 *Fed Reg.* 41697). Because each ROWD did not satisfy federal requirements, the Regional Water Board deemed all four 2006 ROWDs incomplete. The Regional Water Board also evaluated the LACFCD's 2010 ROWD and found that it too did not satisfy federal requirements for MS4s.

Though five separate ROWDs were submitted, the Regional Water Board retains discretion as the permitting authority to determine whether to issue permits for discharges from MS4s on a system-wide or jurisdiction-wide basis (Clean Water Act (CWA) § 402(p)(3)(B)(i); 40 CFR section 122.26, subdivisions (a)(1)(v) and (a)(3)(ii)). Because of the complexity and networking of the MS4 within Los Angeles County, which often results in commingled discharges, the Regional Water Board has previously adopted a system-wide approach to permitting MS4 discharges within Los Angeles County.

In evaluating the five separate ROWDs, the Regional Water Board considered the appropriateness of permitting discharges from MS4s within Los Angeles County on a system-wide or jurisdiction-wide basis or a combination of both. Based on that evaluation, the Regional Water Board again determined that, because of the complexity and networking of the MS4 within Los Angeles County, that one system-wide permit is appropriate. In order to provide individual Permittees with more specific requirements, certain provisions of this Order are organized by watershed management area, which is appropriate given the requirements to implement 33 watershed-based TMDLs. The Regional Water Board also determined that because the LACFCD owns and operates large portions of the MS4 infrastructure, including but not limited to catch basins, storm drains, outfalls and open channels, in each coastal watershed management area within Los Angeles County, the LACFCD should remain a Permittee in the single system-wide permit; however, this Order relieves the LACFCD of its role as "Principal Permittee."

D. Permit Coverage and Facility Description

The Los Angeles County Flood Control District, the County of Los Angeles, and 84 incorporated cities within the Los Angeles County Flood Control District with the exception of the City of Long Beach (see Table 5, List of Permittees), hereinafter referred to separately as Permittees and jointly as the Dischargers, discharge storm water and non-storm water from municipal separate storm sewer systems (MS4s), also called storm drain systems. For the purposes of this Order, references to the "Discharger" or "Permittee" in applicable federal and state laws, regulations, plans, or policy are held to be equivalent to references to the Discharger, or Permittees herein.

The area covered under this Order encompasses more than 3,000 square miles. This area contains a vast drainage network that serves incorporated and unincorporated areas in every Watershed Management Area within the Los Angeles Region. Maps

depicting the major drainage infrastructure within the area covered under this Order are included in Attachment C of this Order.

Table 5. List of Permittees

Agoura Hills	Hawaiian Gardens	Pomona
Alhambra	Hawthorne	Rancho Palos Verdes
Arcadia	Hermosa Beach	Redondo Beach
Artesia	Hidden Hills	Rolling Hills
Azusa	Huntington Park	Rolling Hills Estates
Baldwin Park	Industry	Rosemead
Bell	Inglewood	San Dimas
Bell Gardens	Irwindale	San Fernando
Bellflower	La Canada Flintridge	San Gabriel
Beverly Hills	La Habra Heights	San Marino
Bradbury	La Mirada	Santa Clarita
Burbank	La Puente	Santa Fe Springs
Calabasas	La Verne	Santa Monica
Carson	Lakewood	Sierra Madre
Cerritos	Lawndale	Signal Hill
Claremont	Lomita	South El Monte
Commerce	Los Angeles	South Gate
Compton	Lynwood	South Pasadena
Covina	Malibu	Temple City
Cudahy	Manhattan Beach	Torrance
Culver City	Maywood	Vernon
Diamond Bar	Monrovia	Walnut
Downey	Montebello	West Covina
Duarte	Monterey Park	West Hollywood
El Monte	Norwalk	Westlake Village
El Segundo	Palos Verdes Estates	Whittier
Gardena	Paramount	County of Los Angeles
Glendale	Pasadena	Los Angeles County Flood Control District
Glendora	Pico Rivera	

E. Los Angeles County Flood Control District

In 1915, the California Legislature enacted the Los Angeles County Flood Control Act, establishing the Los Angeles County Flood Control District (LACFCD). The objects and purposes of the Act are to provide for the control and conservation of the flood, storm and other waste waters within the flood control district. Among its other powers, the LACFCD also has the power to preserve, enhance, and add recreational features to lands or interests in lands contiguous to its properties for the protection, preservation, and use of the scenic beauty and natural environment for the properties or the lands. The LACFCD is governed, as a separate entity, by the County of Los Angeles Board of Supervisors.

The LACFCD's system includes the majority of drainage infrastructure within incorporated and unincorporated areas in every watershed, including approximately 500 miles of open channel, 3,500 miles of underground drains, and an estimated 88,000 catch basins, and several dams. Portions of the LACFCD's current system were originally unmodified natural rivers and water courses.

The LACFCD's system conveys both storm and non-storm water throughout the Los Angeles basin. Other Permittees' MS4s connect and discharge to the LACFCD's system.

The waters and pollutants discharged from the LACFCD's system come from various sources. These sources can include storm water and non-storm water from the Permittees under this permit and other NPDES and non-NPDES Permittees discharging into the LACFCD's system, including industrial waste water dischargers, waste water treatment facilities, industrial and construction stormwater Permittees, water suppliers, government entities, CERCLA potentially responsible parties, and Caltrans. Sources can also include discharges from school districts that do not operate large or medium-sized municipal storm sewers and discharges from entities that have waste discharge requirements or waivers of waste discharge requirements.

Unlike other Permittees, including the County of Los Angeles, the LACFCD does not own or operate any municipal sanitary sewer systems, public streets, roads, or highways.

The LACFCD in contrast to the County of Los Angeles has no planning, zoning, development permitting or other land use authority over industrial or commercial facilities, new developments or re-development projects, or development construction sites located in any incorporated or unincorporated areas within its service area. The Permittees that have such land use authority are responsible for implementing a storm water management program to inspect and control pollutants from industrial and commercial facilities, new development and re-development projects, and development construction sites within their jurisdictional boundaries. Nonetheless, as an owner and operator of MS4s, the LACFCD is required by federal regulations to control pollutant discharges into and from its MS4, including the ability to control through interagency agreements among co-Permittees and other owners of a MS4 the contribution of pollutants from one portion of the MS4 to another portion of the MS4.

F. Permit Scope

This Order regulates municipal discharges of storm water and non-storm water from the Permittees' MS4s. Section 122.26(b)(8) of title 40 of the Code of Federal Regulations (CFR) defines an MS4 as "a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) [o]wned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian

tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States; (ii) [d]esigned or used for collecting or conveying storm water; (iii) [w]hich is not a combined sewer; and (iv) [w]hich is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2."

Storm water discharges consist of those discharges that originate from precipitation events. Federal regulations define "storm water" as "storm water runoff, snow melt runoff, and surface runoff and drainage." (40 CFR § 122.26(b)(13).) While "surface runoff and drainage" is not defined in federal law, USEPA's preamble to its final storm water regulations demonstrates that the term is related to precipitation events such as rain and/or snowmelt. (55 *Fed. Reg.* 47990, 47995-96 (Nov. 16, 1990)).

Non-storm water discharges consist of all discharges through an MS4 that do not originate from precipitation events. Non-storm water discharges through an MS4 are prohibited unless authorized under a separate NPDES permit; authorized by USEPA pursuant to Sections 104(a) or 104(b) of the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); composed of natural flows; the result of emergency fire fighting activities; or conditionally exempted in this Order.

A permit issued to more than one Permittee for MS4 discharges may contain separate storm water management programs for particular Permittees or groups of Permittees. 40 CFR § 122.26(d)(2)(iv). Given the LACFCD's limited land use authority, it is appropriate for the LACFCD to have a separate and uniquely-tailored storm water management program. Accordingly, the storm water management program minimum control measures imposed on the LACFCD in Part VI.D of this Order differ in some ways from the minimum control measures imposed on other Permittees. Namely, aside from its own properties and facilities, the LACFCD is not subject to the Industrial/Commercial Facilities Program, the Planning and Land Development Program, and the Development Construction Program. However, as a discharger of storm and non-storm water, the LACFCD remains subject to the Public Information and Participation Program and the Illicit Connections and Illicit Discharges Elimination Program. Further, as the owner and operator of certain properties, facilities and infrastructure, the LACFCD remains subject to requirements of a Public Agency Activities Program.

G. Geographic Coverage and Watershed Management Areas

The municipal storm water and non-storm water discharges flow into receiving waters in the Watershed Management Areas of the Santa Clara River Watershed; Santa Monica Bay Watershed Management Area, including Malibu Creek Watershed and Ballona Creek Watershed; Los Angeles River Watershed; Dominguez Channel and Greater Los Angeles/Long Beach Harbors Watershed Management Area; Los Cerritos Channel and Alamitos Bay Watershed Management Area; San Gabriel River Watershed; and Santa Ana River Watershed.

This Order redefines Watershed Management Areas (WMAs) consistent with the delineations used in the Regional Water Board's Watershed Management Initiative. Permittees included in each of the WMAs are listed in Attachment K.

Maps depicting each WMA, its subwatersheds, and the major receiving waters therein are included in Attachment B.

Federal, state, regional or local entities in jurisdictions outside the Los Angeles County Flood Control District, and not currently named as Permittee to this Order, may operate MS4 facilities and/or discharge to the MS4 and water bodies covered by this Order. Pursuant to 40 CFR sections 122.26(d)(1)(ii) and 122.26(d)(2)(iv), each Permittee shall maintain the necessary legal authority to control the contribution of pollutants to its MS4 and shall include in its storm water management program a comprehensive planning process that includes intergovernmental coordination, where necessary.

Sources of MS4 discharges into receiving waters in the County of Los Angeles but not covered by this Order include the following:

- About 34 square miles of unincorporated area in Ventura County, which drain into Malibu Creek and then to Santa Monica Bay,
- About 9 square miles of the City of Thousand Oaks, which also drain into Malibu Creek and then to Santa Monica Bay, and
- About 86 square miles of area in Orange County, which drain into Coyote Creek and then into the San Gabriel River.

Specifically, the Orange County Flood Control District (OCFCD) owns and operates the Los Alamitos Retarding Basin and Pumping Station (Los Alamitos Retarding Basin). The Los Alamitos Retarding Basin is within the San Gabriel River Watershed, and is located adjacent to the Los Angeles and Orange County boundary. The majority of the 30-acre Los Alamitos Retarding Basin is in Orange County; however, the northwest corner of the facility is located in the County of Los Angeles. Storm water and non-storm water discharges, which drain to the Los Alamitos Retarding Basin, are pumped to the San Gabriel River Estuary (SGR Estuary) through pumps and subterranean piping. The pumps and discharge point are located in the County of Los Angeles.

The OCFCD pumps the water within the Los Alamitos Retarding Basin to the San Gabriel River Estuary through four discharge pipes, which are covered by tide gates. The discharge point is located approximately 700 feet downstream from the 2nd Street Bridge in Long Beach. The total pumping capacity of the four pumps is 800 cubic feet per second (cfs). There is also a 5 cfs sump pump that discharges nuisance flow continuously to the Estuary though a smaller diameter uncovered pipe.

The discharge from the Los Alamitos Retarding Basin is covered under the Orange County Municipal NPDES Storm Water Permit (NPDES Permit No. CAS618030, Santa Ana Regional Water Quality Control Board Order No. R8-2010-0062), which was issued to the County of Orange, Orange County Flood Control District and Incorporated Cities on May 22, 2009. The Orange County MS4 Permit references the San Gabriel River Metals and Selenium TMDL (Metals TMDL). The waste load allocations listed in the

Metals TMDL for Coyote Creek are included in the Orange County MS4 Permit. However, the Orange County MS4 Permit does not contain the dry weather copper waste load allocations assigned to the Estuary.

H. Legal Authorities

This Order is issued pursuant to CWA section 402 and implementing regulations adopted by the USEPA and chapter 5.5, division 7 of the California Water Code (commencing with section 13370). This Order serves as an NPDES permit for point source discharges from the Permittees' MS4s to surface waters. This Order also serves as waste discharge requirements (WDRs) pursuant to article 4, chapter 4, division 7 of the California Water Code (commencing with Section 13260).

I. Municipal Separate Storm Sewer System Requirements. The 1972 Clean Water Act[2] established the NPDES Program to regulate the discharge of pollutants from point sources to waters of the United States. However, pollution from storm water and dry-weather urban runoff was largely unabated for over a decade. In response to the 1987 Amendments to the Clean Water Act, USEPA developed Phase I of the NPDES Storm Water Permitting Program in 1990, which established a framework for regulating municipal and industrial discharges of storm water and non-storm water. The Phase I program addressed sources of storm water and dry-weather urban runoff that had the greatest potential to negatively impact water quality. In particular, under Phase I, USEPA required NPDES Permit coverage for discharges from medium and large MS4 with populations of 100,000 or more. Operators of MS4s regulated under the Phase I NPDES Storm Water Program were required to obtain permit coverage for municipal discharges of storm water and non-storm water to waters of the United States

Early in the history of this MS4 Permit, the Regional Water Board designated the MS4s owned and/or operated by the incorporated cities and Los Angeles County unincorporated areas within the Coastal Watersheds of Los Angeles County as a large MS4 due to the total population of Los Angeles County, including that of unincorporated and incorporated areas, and the interrelationship between the Permittees' MS4s, pursuant to 40 CFR section 122.26(b)(4). The total population of the cities and County unincorporated areas covered by this Order was 9,519,338 in 2000 and has increased by approximately 300,000 to 9,818,605 in 2010, according to the United States Census.

This Order implements the federal Phase I NPDES Storm Water Program requirements. These requirements include three fundamental elements: (i) a requirement to effectively prohibit non-storm water discharges through the MS4, (ii) requirements to implement controls to reduce the discharge of pollutants to the maximum extent practicable, and (iii) other provisions the Regional Water Board has determined appropriate for the control of such pollutants.

J. Background and Rationale for Requirements. The Regional Water Board developed the requirements in this Order based on information submitted as part of the Permittees' applications, through monitoring and reporting programs, and other available

[2] Federal Water Pollution Control Act; 33 U.S.C. § 1251 et seq., which, as amended in 1977, is commonly known as the Clean Water Act.

information. In accordance with federal regulations at 40 CFR section 124.8, a Fact Sheet (Attachment F) has been prepared to explain the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing this Order. The Fact Sheet is hereby incorporated into this Order and also constitutes part of the Findings of the Regional Water Board for this Order. Attachments A through E and G through R are also incorporated into this Order.

K. Water Quality Control Plans. The Clean Water Act requires the Regional Water Board to establish water quality standards for each water body in its region. Water quality standards include beneficial uses, water quality objectives and criteria that are established at levels sufficient to protect those beneficial uses, and an antidegradation policy to prevent degrading waters. The Regional Water Board adopted a *Water Quality Control Plan - Los Angeles Region* (hereinafter Basin Plan) on June 13, 1994 and has amended it on multiple occasions since 1994. The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters in the Los Angeles Region. Pursuant to California Water Code section 13263(a), the requirements of this Order implement the Basin Plan. Beneficial uses applicable to the surface water bodies that receive discharges from the Los Angeles County MS4 generally include those listed below.

Table 6. Basin Plan Beneficial Uses

Discharge Point	Receiving Water Name	Beneficial Uses
All Municipal Separate Storm Sewer Systems (MS4s) discharge points within Los Angeles County coastal watersheds with the exception of the City of Long Beach	Multiple surface water bodies of the Los Angeles Region	Municipal and Domestic Supply (MUN); Agricultural Supply (AGR); Industrial Service Supply (IND); Industrial Process Supply (PROC); Ground Water Recharge (GWR); Freshwater Replenishment (FRSH); Navigation (NAV); Hydropower Generation (POW); Water Contact Recreation (REC-1); Limited Contact Recreation (LREC-1); Non-Contact Water Recreation (REC-2); Commercial and Sport Fishing (COMM); Warm Freshwater Habitat (WARM); Cold Freshwater Habitat (COLD); Preservation of Areas of Special Biological Significance (BIOL); Wildlife Habitat (WILD); Preservation of Rare and Endangered Species (RARE); Marine Habitat (MAR); Wetland Habitat (WET); Migration of Aquatic Organisms (MIGR); Spawning, Reproduction, and/or Early Development (SPWN); Shellfish Harvesting (SHELL)

1. Total Maximum Daily Loads (TMDLs)

Clean Water Act section 303(d)(1) requires each state to identify the waters within its boundaries that do not meet water quality standards. Water bodies that do not meet water quality standards are considered impaired and are placed on the state's "CWA Section 303(d) List". For each listed water body, the state is required to establish a TMDL of each pollutant impairing the water quality standards in that water body. A TMDL is a tool for implementing water quality standards and is based on the relationship between pollution sources and in-stream water quality conditions. The

TMDL establishes the allowable pollutant loadings for a water body and thereby provides the basis to establish water quality-based controls. These controls should provide the pollution reduction necessary for a water body to meet water quality standards. A TMDL is the sum of the allowable pollutant loads of a single pollutant from all contributing point sources (the waste load allocations or WLAs) and non-point sources (load allocations or LAs), plus the contribution from background sources and a margin of safety. (40 CFR section 130.2(i).) MS4 discharges are considered point source discharges.

Numerous receiving waters within Los Angeles County do not meet water quality standards or fully support beneficial uses and therefore have been classified as impaired on the State's 303(d) List. The Regional Water Board and USEPA have each established TMDLs to address many of these water quality impairments. Pursuant to CWA section 402(p)(B)(3)(iii) and 40 CFR section 122.44(d)(1)(vii)(B), this Order includes requirements that are consistent with and implement WLAs that are assigned to discharges from the Los Angeles County MS4 from 33 State-adopted and USEPA established TMDLs. This Order requires Permittees to comply with the TMDL Provisions in Part VI.E and Attachments L through R, which are consistent with the assumptions and requirements of the TMDL WLAs assigned to discharges from the Los Angeles County MS4. A comprehensive list of TMDLs by watershed management area and the Permittees subject to each TMDL is included in Attachment K.

Waste load allocations in these TMDLs are expressed in several ways depending on the nature of the pollutant and its impacts on receiving waters and beneficial uses. Bacteria WLAs assigned to MS4 discharges are expressed as the number of allowable exceedance days that a water body may exceed the Basin Plan water quality objectives for protection of the REC-1 beneficial use. Since the TMDLs and the WLAs contained therein are expressed as receiving water conditions, receiving water limitations have been included in this Order that are consistent with and implement the allowable exceedance day WLAs. Water quality-based effluent limitations are also included equivalent to the Basin Plan water quality objectives to allow the opportunity for Permittees to individually demonstrate compliance at an outfall or jurisdictional boundary, thus isolating the Permittee's pollutant contributions from those of other Permittees and from other pollutant sources to the receiving water.

WLAs for trash are expressed as progressively decreasing allowable amounts of trash discharges from a Permittee's jurisdictional area within the drainage area to the impaired water body. The Trash TMDLs require each Permittee to make annual reductions of its discharges of trash over a set period, until the numeric target of zero trash discharged from the MS4 is achieved. The Trash TMDLs specify a specific formula for calculating and allocating annual reductions in trash discharges from each jurisdictional area within a watershed. The formula results in specified annual amounts of trash that may be discharged from each jurisdiction into the receiving waters. Translation of the WLAs or compliance points described in the TMDLs into jurisdiction-specific load reductions from the baseline levels, as specified

in the TMDL, logically results in the articulation of an annual limitation on the amount of a pollutant that may be discharged. The specification of allowable annual trash discharge amounts meets the definition of an "effluent limitation", as that term is defined in subdivision (c) of section 13385.1 of the California Water Code. Specifically, the trash discharge limitations constitute a "numeric restriction … on the quantity [or] discharge rate … of a pollutant or pollutants that may be discharged from an authorized location."

TMDL WLAs for other pollutants (e.g., metals and toxics) are expressed as concentration and/or mass and water quality-based effluent limitations have been specified consistent with the expression of the WLA, including any applicable averaging periods. Some TMDLs specify that, if certain receiving water conditions are achieved, such achievement constitutes attainment of the WLA. In these cases, receiving water limitations and/or provisions outlining these alternate means of demonstrating compliance are included in the TMDL provisions in Part VI.E of this Order.

The inclusion of water quality-based effluent limitations and receiving water limitations to implement applicable WLAs provides a clear means of identifying required water quality outcomes within the permit and ensures accountability by Permittees to implement actions necessary to achieve the limitations.

A number of the TMDLs for bacteria, metals, and toxics establish WLAs that are assigned jointly to a group of Permittees whose storm water and/or non-storm water discharges are or may be commingled in the MS4 prior to discharge to the receiving water subject to the TMDL. TMDLs address commingled MS4 discharges by assigning a WLA to a group of MS4 Permittees based on co-location within the same subwatershed. Permittees with co-mingled MS4 discharges are jointly responsible for meeting the water quality-based effluent limitations and receiving water limitations assigned to MS4 discharges in this Order. "Joint responsibility" means that the Permittees that have commingled MS4 discharges are responsible for implementing programs in their respective jurisdictions, or within the MS4 for which they are an owner and/or operator, to meet the water quality-based effluent limitations and/or receiving water limitations assigned to such commingled MS4 discharges.

In these cases, federal regulations state that co-permittees need only comply with permit conditions relating to discharges from the MS4 for which they are owners or operators (40 CFR § 122.26(a)(3)(vi)). Individual co-permittees are only responsible for their contributions to the commingled MS4 discharge. This Order does not require a Permittee to individually ensure that a commingled MS4 discharge meets the applicable water quality-based effluent limitations included in this Order, unless such Permittee is shown to be solely responsible for an exceedance.

Additionally, this Order allows a Permittee to clarify and distinguish their individual contributions and demonstrate that its MS4 discharge did not cause or contribute to exceedances of applicable water quality-based effluent limitations and/or receiving

water limitations. If such a demonstration is made, though the Permittee's discharge may commingle with that of other Permittees, the Permittee would not be held jointly responsible for the exceedance of the water quality-based effluent limitation or receiving water limitation. Individual co-permittees who demonstrate compliance with the water quality-based effluent limitations will not be held responsible for violations by non-compliant co-permittees.

Given the interconnected nature of the Permittees' MS4s, however, the Regional Water Board expects Permittees to work cooperatively to control the contribution of pollutants from one portion of the MS4 to another portion of the system through inter-agency agreements or other formal arrangements.

L. Ocean Plan. In 1972, the State Water Resources Control Board (State Water Board) adopted the Water Quality Control Plan for Ocean Waters of California, California Ocean Plan (hereinafter Ocean Plan). The State Water Board adopted the most recent amended Ocean Plan on September 15, 2009. The Office of Administration Law approved it on March 10, 2010. On October 8, 2010, USEPA approved the 2009 Ocean Plan. The Ocean Plan is applicable, in its entirety, to the ocean waters of the State. In order to protect beneficial uses, the Ocean Plan establishes water quality objectives and a program of implementation. Pursuant to California Water Code section 13263(a), the requirements of this Order implement the Ocean Plan. The Ocean Plan identifies beneficial uses of ocean waters of the State to be protected as summarized in the table below.

Table 7. Ocean Plan Beneficial Uses

Discharge Point	Receiving Water Name	Beneficial Uses
All Municipal Separate Storm Sewer Systems (MS4s) discharge points within Los Angeles County coastal watersheds with the exception of the City of Long Beach	Pacific Ocean	Industrial Water Supply (IND); Water Contact (REC-1) and Non-Contact Recreation (REC-2), including aesthetic enjoyment; Navigation (NAV); Commercial and Sport Fishing (COMM); Mariculture; Preservation and Enhancement of Designated Areas of Special Biological Significance (ASBS); Rare and Endangered Species (RARE); Marine Habitat (MAR); Fish Migration (MIGR); Fish Spawning (SPWN) and Shellfish Harvesting (SHELL)

M. Antidegradation Policy

40 CFR section 131.12 requires that state water quality standards include an antidegradation policy consistent with the federal antidegradation policy. The State Water Board established California's antidegradation policy in State Water Board Resolution No. 68-16 ("Statement of Policy with Respect to Maintaining the Quality of the Waters of the State"). Resolution No. 68-16 incorporates the federal antidegradation policy where the federal policy applies under federal law. Resolution No. 68-16 requires that existing water quality be maintained unless degradation is

justified based on specific findings. The Regional Water Board's Basin Plan implements, and incorporates by reference, both the state and federal antidegradation policies. The permitted discharge is consistent with the antidegradation provision of section 131.12 and State Water Board Resolution No. 68-16.

N. Anti-Backsliding Requirements. Section 402(o)(2) of the CWA and federal regulations at 40 CFR section 122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require effluent limitations in a reissued permit to be as stringent as those in the previous permit, with some exceptions where limitations may be relaxed. All effluent limitations in this Order are at least as stringent as the effluent limitations in the previous permit.

O. Endangered Species Act. This Order does not authorize any act that results in the taking of a threatened or endangered species or any act that is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish and Game Code, §§ 2050 to 2115.5) or the Federal Endangered Species Act (16 U.S.C.A., §§ 1531 to 1544). This Order requires compliance with requirements to protect the beneficial uses of waters of the United States. Permittees are responsible for meeting all requirements of the applicable Endangered Species Act.

P. Monitoring and Reporting. Section 308(a) of the federal Clean Water Act, and 40 CFR sections 122.41(h), (j)-(l), 122.41(i), and 122.48, require that all NPDES permits specify monitoring and reporting requirements. Federal regulations applicable to large and medium MS4s also specify additional monitoring and reporting requirements. (40 C.F.R. §§ 122.26(d)(2)(i)(F) & (d)(2)(iii)(D), 122.42(c).) California Water Code section 13383 authorizes the Regional Water Board to establish monitoring, inspection, entry, reporting, and recordkeeping requirements. The Monitoring and Reporting Program establishes monitoring, reporting, and recordkeeping requirements that implement the federal and State laws and/or regulations. This Monitoring and Reporting Program is provided in Attachment E.

Q. Standard and Special Provisions. Standard Provisions, which apply to all NPDES permits in accordance with 40 CFR section 122.41, and additional conditions applicable to specified categories of permits in accordance with 40 CFR section 122.42, are provided in Attachment D. Dischargers must comply with all standard provisions and with those additional conditions that are applicable under 40 CFR section 122.42 provided in Attachment D. The Regional Water Board has also included in Part VI of this Order various special provisions applicable to the Dischargers. A rationale for the various special provisions contained in this Order is provided in the attached Fact Sheet (Attachment F).

R. State Mandates

Article XIII B, Section 6(a) of the California Constitution provides that whenever "any state agency mandates a new program or higher level of service on any local government, the state shall provide a subvention of funds to reimburse that local government for the costs of the program or increased level of service." The requirements of this Order do not constitute state mandates that are subject to a

subvention of funds for several reasons as described in detail in the attached Fact Sheet (Attachment F).

S. California Water Code Section 13241. The California Supreme Court has ruled that although California Water Code section 13263 requires the State and Regional Water Boards (collectively, Water Boards) to consider the factors set forth in California Water Code section 13241 when issuing an NPDES permit, the Water Boards may not consider the factors to justify imposing pollutant restriction that are less stringent than the applicable federal regulations require. (*City of Burbank v. State Water Resources Control Bd.* (2005) 35 Cal.4th 613, 618, 626-627). However, when the pollutant restrictions in an NPDES permit are more stringent than federal law requires, California Water Code section 13263 requires that the Water Boards consider the factors described in section 13241 as they apply to those specific restrictions. As noted in the preceding finding, the Regional Water Board finds that the requirements in this permit are not more stringent than the minimum federal requirements. Therefore, a 13241 analysis is not required for permit requirements that implement the effective prohibition on the discharge of non-storm water discharges into the MS4, or for controls to reduce the discharge of pollutants in storm water to the maximum extent practicable, or other provisions that the Regional Water Board has determined appropriate to control such pollutants, as those requirements are mandated by federal law. Notwithstanding the above, the Regional Water Board has developed an economic analysis of the permit's requirements, consistent with California Water Code section 13241. That analysis is provided in the Fact Sheet (Attachment F of this Order).

T. California Environmental Quality Act (CEQA). This action to adopt an NPDES Permit is exempt from the provisions of Chapter 3 of the California Environmental Quality Act (CEQA) (Public Resources Code, § 21100, et seq.) pursuant to California Water Code section 13389. (*County of Los Angeles v. Cal. Water Boards* (2006) 143 Cal.App.4th 985.)

U. Notification of Interested Parties. In accordance with State and federal laws and regulations, the Regional Water Board has notified the Permittees and interested agencies and persons of its intent to prescribe waste discharge requirements for the discharges authorized by this Order and has provided them with an opportunity to provide written and oral comments. Details of notification, as well as the meetings and workshops held on drafts of the permit, are provided in the Fact Sheet of this Order.

V. Consideration of Public Comment. The Regional Water Board, in a public meeting, heard and considered all oral and written comments pertaining to the discharges authorized by this Order and the requirements contained herein. The Regional Water Board has prepared written responses to all timely comments, which are incorporated by reference as part of this Order.

W. This Order serves as an NPDES permit pursuant to CWA section 402 or amendments thereto, and becomes effective fifty (50) days after the date of its adoption, provided that the Regional Administrator, USEPA, Region IX, expresses no objections.

X. This Order supersedes Order No. 01-182 as amended, except for enforcement purposes.

Y. Review by the State Water Board. Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the Regional Water Board action, except that if the thirtieth day following the action falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED, that the Dischargers, in order to meet the provisions contained in Division 7 of the California Water Code (commencing with section 13000), and regulations, plans, and policies adopted thereunder, and the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, shall comply with the following requirements:

III. DISCHARGE PROHIBITIONS

A. Prohibitions – Non-Storm Water Discharges

1. Prohibition of Non-Storm Water Discharges. Each Permittee shall, for the portion of the MS4 for which it is an owner or operator, prohibit non-storm water discharges through the MS4 to receiving waters except where such discharges are either:

a. Authorized non-storm water discharges separately regulated by an individual or general NPDES permit;

b. Temporary non-storm water discharges authorized by USEPA[3] pursuant to sections 104(a) or 104(b) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) that either: (i) will comply with water quality standards as applicable or relevant and appropriate requirements ("ARARs") under section 121(d)(2) of CERCLA; or (ii) are subject to either (a) a written waiver of ARARs by USEPA pursuant to section 121(d)(4) of CERCLA or (b) a written determination by USEPA that compliance with ARARs is not practicable considering the exigencies of the situation pursuant to 40 CFR. section 300.415(j);

c. Authorized non-storm water discharges from emergency fire fighting activities (i.e., flows necessary for the protection of life or property)[4];

d. Natural flows, including:

i. Natural springs;

[3] These typically include short-term, high volume discharges resulting from the development or redevelopment of groundwater extraction wells, or USEPA or State-required compliance testing of potable water treatment plants, as part of a USEPA authorized groundwater remediation action under CERCLA.

[4] Discharges from vehicle washing, building fire suppression system maintenance and testing (e.g., sprinkler line flushing), fire hydrant maintenance and testing, and other routine maintenance activities are not considered emergency fire fighting activities.

ii. Flows from riparian habitats and wetlands;

iii. Diverted stream flows, authorized by the State or Regional Water Board;

iv. Uncontaminated ground water infiltration[5];

v. Rising ground waters, where ground water seepage is not otherwise covered by a NPDES permit[6]; or

e. Conditionally exempt non-storm water discharges in accordance with Parts III.A.2 and III.A.3 below.

2. Conditional Exemptions from Non-Storm Water Discharge Prohibition. The following categories of non-storm water discharges are conditionally exempt from the non-storm water discharge prohibition, provided they meet all required conditions specified below, or as otherwise approved by the Regional Water Board Executive Officer, in all areas regulated by this Order with the exception of direct discharges to Areas of Special Biological Significance (ASBS) within Los Angeles County. Conditional exemptions from the prohibition on non-storm water discharges through the MS4 to an ASBS are identified in Part III.A.3 below.

a. Conditionally Exempt Essential Non-Storm Water Discharges: These consist of those discharges that fall within one of the categories below; meet all required best management practices (BMPs) as specified in i. and ii. below, including those enumerated in the referenced BMP manuals; are essential public services discharge activities; and are directly or indirectly required by other state or federal statute and/or regulation:

i. Discharges from essential *non-emergency* fire fighting activities[7] provided appropriate BMPs are implemented based on the CAL FIRE, Office of the State Fire Marshal's *Water-Based Fire Protection Systems Discharge Best Management Practices Manual* (September 2011) for water-based fire protection system discharges, and based on Riverside County's *Best Management Practices Plan for Urban Runoff Management* (May 1, 2004) or equivalent BMP manual for fire training activities and post-emergency fire fighting activities;

ii. Discharges from drinking water supplier distribution systems, where not otherwise regulated by an individual or general NPDES permit[8], provided

[5] Uncontaminated ground water infiltration is water other than waste water that enters the MS4 (including foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow. (See 40 CFR § 35.2005(20).)

[6] A NPDES permit for discharges associated with ground water dewatering is required within the Los Angeles Region.

[7] This includes fire fighting training activities, which simulate emergency responses, and routine maintenance and testing activities necessary for the protection of life and property, including building fire suppression system maintenance and testing (e.g. sprinkler line flushing) and fire hydrant testing and maintenance. Discharges from vehicle washing are not considered essential and as such are not conditionally exempt from the non-storm water discharge prohibition.

[8] Drinking water supplier distribution system releases means sources of flows from drinking water storage, supply and distribution systems (including flows from system failures), pressure releases, system maintenance, distribution line testing, and flushing and dewatering of pipes, reservoirs, and vaults, and minor non-invasive well maintenance activities not involving chemical addition(s) where not otherwise regulated by NPDES Permit No. CAG674001, NPDES Permit No. CAG994005, or another separate NPDES permit.

appropriate BMPs are implemented based on the American Water Works Association (California-Nevada Section) *Guidelines for the Development of Your Best Management Practices (BMP) Manual for Drinking Water System Releases* (2005) or equivalent industry standard BMP manual. Additionally, each Permittee shall work with drinking water suppliers that may discharge to the Permittee's MS4 to ensure for all discharges greater than 100,000 gallons: (1) notification at least 72 hours prior to a planned discharge and as soon as possible after an unplanned discharge; (2) monitoring of any pollutants of concern[9] in the drinking water supplier distribution system release; and (3) record keeping by the drinking water supplier. Permittees shall require that the following information is maintained by the drinking water supplier(s) for all discharges to the MS4 (planned and unplanned) greater than 100,000 gallons: name of discharger, date and time of notification (for planned discharges), method of notification, location of discharge, discharge pathway, receiving water, date of discharge, time of the beginning and end of the discharge, duration of the discharge, flow rate or velocity, total number of gallons discharged, type of dechlorination equipment used, type of dechlorination chemicals used, concentration of residual chlorine, type(s) of sediment controls used, pH of discharge, type(s) of volumetric and velocity controls used, and field and laboratory monitoring data. Records shall be retained for five years and made available upon request by the Permittee or Regional Water Board.

b. Those discharges that fall within one of the categories below, provided that the discharge itself is not a source of pollutants and meets all required conditions specified in Table 8 or as otherwise specified or approved by the Regional Water Board Executive Officer:

i. Dewatering of lakes[10];

ii. Landscape irrigation;

iii. Dechlorinated/debrominated swimming pool/spa discharges[11], where not otherwise regulated by a separate NPDES permit;

iv. Dewatering of decorative fountains[12];

v. Non-commercial car washing by residents or by non-profit organizations;

[9] Pollutants of concern from drinking water supplier distribution system releases may include trash and debris, including organic matter, total suspended solids (TSS), residual chlorine, pH, and any pollutant for which there is a water quality-based effluent limitation (WQBEL) in Part VI.E applicable to discharges from the MS4 to the receiving water. Determination of the pollutants of concern for a particular discharge shall be based on an evaluation of the potential for the constituent(s) to be present in the discharge at levels that may cause or contribute to exceedances of applicable WQBELs or receiving water limitations.

[10] Dewatering of lakes does not include dewatering of drinking water reservoirs. Dewatering of drinking water reservoirs is addressed in Part III.A.2.a.ii.

[11] Conditionally exempt dechlorinated/debrominated swimming pool/spa discharges do not include swimming pool/spa filter backwash or swimming pool/spa water containing bacteria, detergents, wastes, or algaecides, or any other chemicals including salts from pools commonly referred to as "salt water pools" in excess of applicable water quality objectives.

[12] Conditionally exempt discharges from dewatering of decorative fountains do not include fountain water containing bacteria, detergents, wastes, or algaecides, or any other chemicals in excess of applicable water quality objectives.

vi. Street/sidewalk wash water[13].

3. Conditional Exemptions from Non-Storm Water Discharge Prohibition within an ASBS. The following non-storm water discharges from the MS4 directly to an ASBS are conditionally exempt pursuant to the California Ocean Plan as specified below, provided that:

a. The discharges are essential for emergency response purposes, structural stability, slope stability or occur naturally, including the following discharges:

i. Discharges associated with emergency fire fighting activities (i.e., flows necessary for the protection of life or property)[14];

ii. Foundation and footing drains;

iii. Water from crawl space or basement pumps;

iv. Hillside dewatering;

v. Naturally occurring ground water seepage via a MS4; and

vi. Non-anthropogenic flows from a naturally occurring stream via a culvert or MS4, as long as there are no contributions of anthropogenic runoff.

b. The discharges fall within one of the conditionally exempt essential non-storm water discharge categories in Part III.A.2.a. above.

c. Conditionally exempt non-storm water discharges shall not cause or contribute[15] to an exceedance of applicable receiving water limitations and/or water quality-based effluent limitations in this Order or the water quality objectives in Chapter II of the Ocean Plan, or alter natural ocean water quality in an ASBS.

4. Permittee Requirements. Each Permittee shall:

a. Develop and implement procedures to ensure that a discharger, if not a named Permittee in this Order, fulfills the following for non-storm water discharges to the Permittee's MS4:

i. Notifies the Permittee of the planned discharge in advance, consistent with requirements in Table 8 or recommendations pursuant to the applicable BMP manual;

ii. Obtains any local permits required by the MS4 owner(s) and/or operator(s);

[13] Conditionally exempt non-storm water discharges of street/sidewalk wash water only include those discharges resulting from use of high pressure, low volume spray washing using only potable water with no cleaning agents at an average usage of 0.006 gallons per square feet of sidewalk area in accordance with Regional Water Board Resolution No. 98-08. Conditionally exempt non-storm water discharges of street/sidewalk wash water do not include hosing of any sidewalk or street with a garden hose with a pressure nozzle.
[14] See note 4.
[15] Based on the water quality characteristics of the conditionally exempt non-storm water discharge itself.

iii. Provides documentation that it has obtained any other necessary permits or water quality certifications[16] for the discharge;

iv. Conducts monitoring of the discharge, if required by the Permittee;

v. Implements BMPs and/or control measures as specified in Table 8 or in the applicable BMP manual(s) as a condition of the approval to discharge into the Permittee's MS4; and

vi. Maintains records of its discharge to the MS4, consistent with requirements in Table 8 or recommendations pursuant to the applicable BMP manual. For lake dewatering, Permittees shall require that the following information is maintained by the lake owner / operator: name of discharger, date and time of notification, method of notification, location of discharge, discharge pathway, receiving water, date of discharge, time of the beginning and end of the discharge, duration of the discharge, flow rate or velocity, total number of gallons discharged, type(s) of sediment controls used, pH of discharge, type(s) of volumetric and velocity controls used, and field and laboratory monitoring data. Records shall be made available upon request by the Permittee or Regional Water Board.

b. Develop and implement procedures that minimize the discharge of landscape irrigation water into the MS4 by promoting conservation programs.

i. Permittees shall coordinate with the local water purveyor(s), where applicable, to promote landscape water use efficiency requirements for existing landscaping, use of drought tolerant, native vegetation, and the use of less toxic options for pest control and landscape management.

ii. Permittees shall develop and implement a coordinated outreach and education program to minimize the discharge of irrigation water and pollutants associated with irrigation water consistent with Part VI.D.4.c of this Order (Public Information and Participation Program).

c. Evaluate monitoring data collected pursuant to the Monitoring and Reporting Program (MRP) of this Order (Attachment E), and any other associated data or information, and determine whether any of the authorized or conditionally exempt non-storm water discharges identified in Parts III.A.1, III.A.2, and III.A.3 above are a source of pollutants that may be causing or contributing to an exceedance of applicable receiving water limitations in Part V and/or water quality-based effluent limitations in Part VI.E. To evaluate monitoring data, the Permittee shall either use applicable interim or final water quality-based effluent limitations for the pollutant or, if there are no applicable interim or final water quality-based effluent limitations for the pollutant, use applicable action levels provided in Attachment G. Based on non-storm water outfall-based monitoring as implemented through the MRP, if monitoring data show

[16] Pursuant to the Federal Clean Water Act § 401.

exceedances of applicable water quality-based effluent limitations or action levels, the Permittee shall take further action to determine whether the discharge is causing or contributing to exceedances of receiving water limitations in Part V.

d. If the Permittee determines that any of the conditionally exempt non-storm water discharges identified in Part III.A.2.b above is a source of pollutants that causes or contributes to an exceedance of applicable receiving water limitations and/or water quality-based effluent limitations, the Permittee(s) shall report its findings to the Regional Water Board in its annual report. Based on this determination, the Permittee(s) shall also either:

i. Effectively prohibit[17] the non-storm water discharge to the MS4; or

ii. Impose conditions in addition to those in Table 8, subject to approval by the Regional Water Board Executive Officer, on the non-storm water discharge such that it will not be a source of pollutants; or

iii. Require diversion of the non-storm water discharge to the sanitary sewer; or

iv. Require treatment of the non-storm water discharge prior to discharge to the receiving water.

e. If the Permittee determines that any of the authorized or conditionally exempt essential non-storm water discharges identified in Parts III.A.1.a through III.A.1.c, III.A.2.a, or III.A.3 above is a source of pollutants that causes or contributes to an exceedance of applicable receiving water limitations and/or water quality-based effluent limitations, the Permittee shall notify the Regional Water Board within 30 days if the non-storm water discharge is an authorized discharge with coverage under a separate NPDES permit or authorized by USEPA under CERCLA in the manner provided in Part III.A.1.b above, or a conditionally exempt essential non-storm water discharge or emergency non-storm water discharge.

f. If the Permittee prohibits the discharge from the MS4, as per Part III.A.4.d.i, then the Permittee shall implement procedures developed under Part VI.D.9 (Illicit Connections and Illicit Discharges Elimination Program) in order to eliminate the discharge to the MS4.

5. If a Permittee demonstrates that the water quality characteristics of a specific authorized or conditionally exempt essential non-storm water discharge resulted in an exceedance of applicable receiving water limitations and/or water quality-based effluent limitations during a specific sampling event, the Permittee shall not be found in violation of applicable receiving water limitations and/or water quality-based effluent limitations for that specific sampling event. Such

[17] To "effectively prohibit" means to not allow the non-storm water discharge through the MS4 unless the discharger obtains coverage under a separate NPDES permit prior to discharge to the MS4.

demonstration must be based on source specific water quality monitoring data from the authorized or conditionally exempt essential non-storm water discharge or other relevant information documenting the characteristics of the specific non-storm water discharge as identified in Table 8.

6. Notwithstanding the above, the Regional Water Board Executive Officer, based on an evaluation of monitoring data and other relevant information for specific categories of non-storm water discharges, may modify a category or remove categories of conditionally exempt non-storm water discharges from Parts III.A.2 and III.A.3 above if the Executive Officer determines that a discharge category is a source of pollutants that causes or contributes to an exceedance of applicable receiving water limitations and/or water quality-based effluent limitations, or may require that a discharger obtain coverage under a separate individual or general State or Regional Water Board permit for a non-storm water discharge.

Table 8. Required Conditions for Conditionally Exempt Non-Storm Water Discharges

Discharge Category	General Conditions Under Which Discharge Through the MS4 is Allowed	Conditions/BMPs that are Required to be Implemented Prior to Discharge Through the MS4
All Discharge Categories	See discharge specific conditions below.	Ensure conditionally exempt non-storm water discharges avoid potential sources of pollutants in the flow path to prevent introduction of pollutants to the MS4 and receiving water. Whenever there is a discharge of 100,000 gallons or more into the MS4, Permittees shall require advance notification by the discharger to the potentially affected MS4 Permittees, including at a minimum the LACFCD, if applicable, and the Permittee with jurisdiction over the land area from which the discharge originates.
Dewatering of lakes	Discharge allowed only if all necessary permits/water quality certifications for dredge and fill activities, including water diversions, are obtained prior to discharge.	Ensure procedures for advanced notification by the lake owner / operator to the Permittee(s) no less than 72 hours prior to the planned discharge. Immediately prior to discharge, visible trash on the shoreline or on the surface of the lake shall be removed and disposed of in a legal manner. Immediately prior to discharge, the discharge pathway and the MS4 inlet to which the discharge is directed, shall be inspected and cleaned out. Discharges shall be volumetrically and velocity controlled to minimize resuspension of sediments. Measures shall be taken to stabilize lake bottom sediments. Ensure procedures for water quality monitoring for pollutants of concern[18] in the lake. Ensure record-keeping of lake dewatering by the lake owner / operator.

[18] Pollutants of concern include, at a minimum, trash and debris, including organic matter, TSS, and any pollutant for which there is a water quality-based effluent limitation in Part VI.E for the lake and/or receiving water.

Landscape irrigation using potable water	Discharge allowed if runoff due to potable landscape irrigation is minimized through the implementation of an ordinance specifying water efficient landscaping standards, as well as an outreach and education program focusing on water conservation and landscape water use efficiency.	Implement BMPs to minimize runoff and prevent introduction of pollutants to the MS4 and receiving water. Implement water conservation programs to minimize discharge by using less water.
Landscape irrigation using reclaimed or recycled water	Discharge of reclaimed or recycled water runoff from landscape irrigation is allowed if the discharge is in compliance with the producer and distributor operations and management (O&M) plan, and all relevant portions thereof, including the Irrigation Management Plan.	Discharges must comply with applicable O&M Plans, and all relevant portions thereof, including the Irrigation Management Plan.

Dechlorinated/ debrominated swimming pool/spa discharges	Discharges allowed after implementation of specified BMPs. Pool or spa water containing copper-based algaecides is not allowed to be discharged to the MS4. Discharges of cleaning waste water and filter backwash allowed only if authorized by a separate NPDES permit.	Implement BMPs and ensure discharge avoids potential sources of pollutants in the flow path to prevent introduction of pollutants prior to discharge to the MS4 and receiving water. Swimming pool water must be dechlorinated or debrominated using holding time, aeration, and/or sodium thiosulfate. Chlorine residual in the discharge shall not exceed 0.1 mg/L. Swimming pool water shall not contain any detergents, wastes, or algaecides, or any other chemicals including salts from pools commonly referred to as "salt water pools" in excess of applicable water quality objectives.[19] Swimming pool discharges are to be pH adjusted, if necessary, and be within the range of 6.5 and 8.5 standard units. Swimming pool discharges shall be volumetrically and velocity controlled to promote evaporation and/or infiltration. Ensure procedures for advanced notification by the pool owner to the Permittee(s) at least 72 hours prior to planned discharge for discharges of 100,000 gallons or more. For discharges of 100,000 gallons or more, immediately prior to discharge, the discharge pathway and the MS4 inlet to which the discharge is directed, shall be inspected and cleaned out.
Dewatering of decorative fountains	Discharges allowed after implementation of specified BMPs. Fountain water containing copper-based algaecides may not be discharged to the MS4. Fountain water containing dyes my not be discharged to the MS4.	Implement BMPs and ensure discharge avoids potential sources of pollutants in the flow path to prevent introduction of pollutants prior to discharge to the MS4 and receiving water. Fountain water must be dechlorinated or debrominated using holding time, aeration, and/or sodium thiosulfate. Chlorine residual in the discharge shall not exceed 0.1 mg/L. Fountain discharges are to be pH adjusted, if necessary, and be within the range of 6.5 and 8.5 standard units. Fountain discharges shall be volumetrically and velocity controlled to promote evaporation and/or infiltration. Ensure procedures for advanced notification by the fountain owner to the Permittee(s) at least 72 hours prior to planned discharge for discharges of 100,000 gallons or more. For discharges of 100,000 gallons or more, immediately prior to discharge, the discharge pathway and the MS4 inlet to which the discharge is directed, shall be inspected and cleaned out.
Non-commercial car washing by residents or by non-	Discharges allowed after implementation of specified BMPs.	Implement BMPs and ensure discharge avoids potential sources of pollutants in the flow path to prevent introduction of pollutants prior to discharge to the MS4 and receiving water. Minimize the amount of water used by employing water conservation practices such as turning off

[19] Applicable mineral water quality objectives for surface waters are contained in Chapter 3 of the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties.

profit organizations		nozzles or kinking the hose when not spraying a car, and using a low volume pressure washer. Encourage use of biodegradable, phosphate free detergents and non-toxic cleaning products. Where possible, wash cars on a permeable surface where wash water can percolate into the ground (e.g. gravel or grassy areas). Empty buckets of soapy or rinse water into the sanitary sewer system (e.g., sinks or toilets).
Street/sidewalk wash water	Discharges allowed after implementation of specified BMPs.	Sweeping should be used as an alternate BMP whenever possible and sweepings should be disposed of in the trash. BMPs shall be in accordance with Regional Water Board Resolution No. 98-08 that requires: 1) removal of trash, debris, and free standing oil/grease spills/leaks (use absorbent material if necessary) from the area before washing and 2) use of high pressure, low volume spray washing using only potable water with no cleaning agents at an average usage of 0.006 gallons per square feet of sidewalk area. In areas of unsanitary conditions (e.g., areas where the congregation of transient populations can reasonably be expected to result in a significant threat to water quality), whenever practicable, Permittees shall collect and divert street and alley wash water from the Permittee's street and sidewalk cleaning public agency activities to the sanitary sewer.

IV. EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

A. Effluent Limitations

1. **Technology Based Effluent Limitations**: Each Permittee shall reduce pollutants in storm water discharges from the MS4 to the maximum extent practicable (MEP).

2. **Water Quality-Based Effluent Limitations (WQBELs).** This Order establishes WQBELs consistent with the assumptions and requirements of all available TMDL waste load allocations assigned to discharges from the Permittees' MS4s.

   a. Each Permittee shall comply with applicable WQBELs as set forth in Part VI.E of this Order, pursuant to applicable compliance schedules.

B. Land Discharge Specifications – Not Applicable

C. Reclamation Specifications – Not Applicable

V. RECEIVING WATER LIMITATIONS

A. Receiving Water Limitations

1. Discharges from the MS4 that cause or contribute to the violation of receiving water limitations are prohibited.

2. Discharges from the MS4 of storm water, or non-storm water, for which a Permittee is responsible[20], shall not cause or contribute to a condition of nuisance.

3. The Permittees shall comply with Parts V.A.1 and V.A.2 through timely implementation of control measures and other actions to reduce pollutants in the discharges in accordance with the storm water management program and its components and other requirements of this Order including any modifications. The storm water management program and its components shall be designed to achieve compliance with receiving water limitations. If exceedances of receiving water limitations persist, notwithstanding implementation of the storm water management program and its components and other requirements of this Order, the Permittee shall assure compliance with discharge prohibitions and receiving water limitations by complying with the following procedure:

   a. Upon a determination by either the Permittee or the Regional Water Board that discharges from the MS4 are causing or contributing to an exceedance of an applicable Receiving Water Limitation, the Permittee shall promptly notify and thereafter submit an Integrated Monitoring Compliance Report (as described in the Program Reporting Requirements, Part XVIII.A.5 of the Monitoring and Reporting Program) to the Regional Water Board for approval. The Integrated Monitoring Compliance shall describe the BMPs that are currently being

[20] Pursuant to 40 CFR § 122.26(a)(3)(vi), a Permittee is only responsible for discharges of storm water and non-storm water from the MS4 for which it is an owner or operator.

implemented by the Permittee and additional BMPs, including modifications to current BMPs that will be implemented to prevent or reduce any pollutants that are causing or contributing to the exceedances of receiving water limitations. The Integrated Monitoring Compliance Report shall include an implementation schedule. This Integrated Monitoring Compliance Report shall be incorporated in the annual Storm Water Report unless the Regional Water Board directs an earlier submittal. The Regional Water Board may require modifications to the Integrated Monitoring Compliance Report.

b. The Permittee shall submit any modifications to the Integrated Monitoring Compliance Report required by the Regional Water Board within 30 days of notification.

c. Within 30 days following the Regional Water Board Executive Officer's approval of the Integrated Monitoring Compliance Report, the Permittee shall revise the storm water management program and its components and monitoring program to incorporate the approved modified BMPs that have been and will be implemented, an implementation schedule, and any additional monitoring required.

d. The Permittee shall implement the revised storm water management program and its components and monitoring program according to the approved implementation schedule.

4. So long as the Permittee has complied with the procedures set forth in Part V.A.3. above and is implementing the revised storm water management program and its components, the Permittee does not have to repeat the same procedure for continuing or recurring exceedances of the same receiving water limitations unless directed by the Regional Water Board to modify current BMPs or develop additional BMPs.

B. Ground Water Limitations – Not Applicable

VI. PROVISIONS

A. Standard Provisions

1. Federal Standard Provisions. Each Permittee shall comply with all Standard Provisions included in Attachment D of this Order, in accordance with 40 CFR sections 122.41 and 122.42.

2. Legal Authority

a. Each Permittee must establish and maintain adequate legal authority, within its respective jurisdiction, to control pollutant discharges into and from its MS4 through ordinance, statute, permit, contract or similar means. This legal authority must, at a minimum, authorize or enable the Permittee to:

i. Control the contribution of pollutants to its MS4 from storm water discharges associated with industrial and construction activity and control the quality of storm water discharged from industrial and construction sites. This requirement applies both to industrial and construction sites with coverage under an NPDES permit, as well as to those sites that do not have coverage under an NPDES permit.

ii. Prohibit all non-storm water discharges through the MS4 to receiving waters not otherwise authorized or conditionally exempt pursuant to Part III.A;

iii. Prohibit and eliminate illicit discharges and illicit connections to the MS4;

iv. Control the discharge of spills, dumping, or disposal of materials other than storm water to its MS4;

v. Require compliance with conditions in Permittee ordinances, permits, contracts or orders (i.e., hold dischargers to its MS4 accountable for their contributions of pollutants and flows);

vi. Utilize enforcement mechanisms to require compliance with applicable ordinances, permits, contracts, or orders;

vii. Control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements among Co-permittees;

viii. Control of the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other owners of the MS4 such as the State of California Department of Transportation;

ix. Carry out all inspections, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with applicable municipal ordinances, permits, contracts and orders, and with the provisions of this Order, including the prohibition of non-storm water discharges into the MS4 and receiving waters. This means the Permittee must have authority to enter, monitor, inspect, take measurements, review and copy records, and require regular reports from entities discharging into its MS4;

x. Require the use of control measures to prevent or reduce the discharge of pollutants to achieve water quality standards/receiving water limitations;

xi. Require that structural BMPs are properly operated and maintained; and

xii. Require documentation on the operation and maintenance of structural BMPs and their effectiveness in reducing the discharge of pollutants to the MS4.

b. Each Permittee must submit a statement certified by its chief legal counsel that the Permittee has the legal authority within its jurisdiction to implement and enforce each of the requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and this Order. Each Permittee shall submit this certification annually as part of its Annual Report beginning with the first Annual Report required under this Order. These statements must include:

i. Citation of applicable municipal ordinances or other appropriate legal authorities and their relationship to the requirements of 40 CFR § 122.26(d)(2)(i)(A)-(F) and of this Order; and

ii. Identification of the local administrative and legal procedures available to mandate compliance with applicable municipal ordinances identified in subsection (i) above and therefore with the conditions of this Order, and a statement as to whether enforcement actions can be completed administratively or whether they must be commenced and completed in the judicial system.

3. Fiscal Resources

a. Each Permittee shall conduct a fiscal analysis of the annual capital and operation and maintenance expenditures necessary to implement the requirements of this Order.

b. Each Permittee shall also enumerate and describe in its Annual Report the source(s) of funds used in the past year, and proposed for the coming year, to meet necessary expenditures on the Permittee's storm water management program.

4. Responsibilities of the Permittees

a. Each Permittee is required to comply with the requirements of this Order applicable to discharges within its boundaries. Permittees are not responsible for the implementation of the provisions applicable to other Permittees. Each Permittee shall:

i. Comply with the requirements of this Order and any modifications thereto.

ii. Coordinate among its internal departments and agencies, as necessary, to facilitate the implementation of the requirements of this Order applicable to such Permittees in an efficient and cost-effective manner.

iii. Participate in intra-agency coordination (e.g. Planning Department, Fire Department, Building and Safety, Code Enforcement, Public Health, Parks and Recreation, and others) and inter-agency coordination (e.g. co-Permittees, other NPDES permittees) necessary to successfully implement the provisions of this Order.

5. Public Review

a. All documents submitted to the Regional Water Board in compliance with the terms and conditions of this Order shall be made available to members of the public pursuant to the Freedom of Information Act (5 U.S.C. § 552 (as amended)) and the Public Records Act (Cal. Government Code § 6250 et seq.).

b. All documents submitted to the Regional Water Board Executive Officer for approval shall be made available to the public for a 30-day period to allow for public comment.

6. Regional Water Board Review

Any formal determination or approval made by the Regional Water Board Executive Officer pursuant to the provisions of this Order may be reviewed by the Regional Water Board. A Permittee(s) or a member of the public may request such review upon petition within 30 days of the effective date of the notification of such decision to the Permittee(s) and interested parties on file at the Regional Water Board.

7. Reopener and Modification

a. This Order may be modified, revoked, reissued, or terminated in accordance with the provisions of 40 CFR sections 122.44, 122.62, 122.63, 122.64, 124.5, 125.62, and 125.64. Causes for taking such actions include, but are not limited to:

i. Endangerment to human health or the environment resulting from the permitted activity, including information that the discharge(s) regulated by this Order may have the potential to cause or contribute to adverse impacts on water quality and/or beneficial uses;

ii. Acquisition of newly-obtained information that would have justified the application of different conditions if known at the time of Order adoption;

iii. To address changed conditions identified in required reports or other sources deemed significant by the Regional Water Board;

iv. To incorporate provisions as a result of future amendments to the Basin Plan, such as a new or revised water quality objective or the adoption or reconsideration of a TMDL, including the program of implementation. Within 18 months of the effective date of a revised TMDL or as soon as practicable thereafter, where the revisions warrant a change to the provisions of this Order, the Regional Water Board may modify this Order consistent with the assumptions and requirements of the revised WLA(s), including the program of implementation;

v. To incorporate provisions as a result of new or amended statewide water quality control plans or policies adopted by the State Water Board, or in consideration of any State Water Board action regarding the precedential language of State Water Board Order WQ 99-05;

vi. To incorporate provisions as a result of the promulgation of new or amended federal or state laws or regulations, USEPA guidance concerning regulated activities, or judicial decisions that becomes effective after adoption of this Order.

vii. To incorporate effluent limitations for toxic constituents determined to be present in significant amount in the discharge through a more comprehensive monitoring program included as part of this Order and based on the results of the reasonable potential analysis;

viii. In accordance with the provisions set forth in 40 CFR Parts 122 and 124, to include requirements for the implementation of the watershed management approach or to include new Minimum Levels (MLs); and/or

ix. To include provisions or modifications to WQBELs in Part VI.E and Attachments L-R in this Order prior to the final compliance deadlines, if practicable, that would allow an action-based, BMP compliance demonstration approach with regard to final WQBELs for storm water discharges. Such modifications shall be based on the Regional Water Board's evaluation of whether Watershed Management Programs in Part VI.C. have resulted in attainment of interim WQBELs for storm water and review of relevant research, including but not limited to data and information provided by Permittees and other stakeholders, on storm water quality and the efficacy and reliability of storm water control technologies. Provisions or modifications to WQBELs in Part VI.E. shall only be included in this Order where there is evidence that storm water control technologies can reliably achieve final WQBELs.

b. After notice and opportunity for a hearing, this Order may be terminated or modified for cause, including, but not limited to:

i. Violation of any term or condition contained in this Order;

ii. Obtaining this Order by misrepresentation, or failure to disclose all relevant facts; or

iii. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

c. The filing of a request by a Permittee for a modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any condition of this Order.

d. This Order may be modified to make corrections or allowances for changes in the permitted activity, following the procedures at 40 CFR section 122.63, if processed as a minor modification. Minor modifications may only:

i. Correct typographical errors; or

ii. Require more frequent monitoring or reporting by a Permittee.

8. Any discharge of waste to any point(s) other than specifically described in this Order is prohibited, and constitutes a violation of this Order.

9. A copy of this Order shall be maintained by each Permittee so as to be available during normal business hours to Permittee employees responsible for implementation of the provisions of this Order and members of the public.

10. The discharge of any product registered under the Federal Insecticide, Fungicide, and Rodenticide Act to any waste stream that may ultimately be released to waters of the United States, is prohibited, unless specifically authorized elsewhere in this Order or another NPDES permit. This requirement is not applicable to products used for lawn and agricultural purposes.

11. Oil or oily material, chemicals, refuse, or other pollutionable materials shall not be stored or deposited in areas where they may be picked up by rainfall and carried off of the property and/or discharged to surface waters. Any such spill of such materials shall be contained and removed immediately.

12. If there is any storage of hazardous or toxic materials or hydrocarbons at a facility owned and/or operated by a Permittee and if the facility is not manned at all times, a 24-hour emergency response telephone number shall be prominently posted where it can easily be read from the outside.

13. Enforcement

a. Violation of any of the provisions of this Order may subject the violator to any of the penalties described herein or in Attachment D of this Order, or any combination thereof, at the discretion of the prosecuting authority; except that only one kind of penalty may be applied for each kind of violation.

b. Failure to comply with provisions or requirements of this Order, or violation of other applicable laws or regulations governing discharges through the MS4 to receiving waters, may subject a Permittee to administrative or civil liabilities, criminal penalties, and/or other enforcement remedies to ensure compliance. Additionally, certain violations may subject a Permittee to civil or criminal enforcement from appropriate local, state, or federal law enforcement entities.

c. The California Water Code provides that any person who violates a waste discharge requirement or a provision of the California Water Code is subject to civil penalties of up to $5,000 per day, $10,000 per day, or $25,000 per day of

violation, or when the violation involves the discharge of pollutants, is subject to civil penalties of up to $10 per gallon per day or $25 per gallon per day of violation; or some combination thereof, depending on the violation, or upon the combination of violations.

d. California Water Code section 13385(h)(1) requires the Regional Water Board to assess a mandatory minimum penalty of three-thousand dollars ($3,000) for each serious violation. Pursuant to California Water Code section 13385(h)(2), a "serious violation" is defined as any waste discharge that violates the effluent limitations contained in the applicable waste discharge requirements for a Group II pollutant by 20 percent or more, or for a Group I pollutant by 40 percent or more. Appendix A of 40 CFR section 123.45 specifies the Group I and II pollutants. Pursuant to California Water Code section 13385.1(a)(1), a "serious violation" is also defined as "a failure to file a discharge monitoring report required pursuant to Section 13383 for each complete period of 30 days following the deadline for submitting the report, if the report is designed to ensure compliance with limitations contained in waste discharge requirements that contain effluent limitations."

e. California Water Code section 13385(i) requires the Regional Water Board to assess a mandatory minimum penalty of three-thousand dollars ($3,000) for each violation whenever a person violates a waste discharge requirement effluent limitation in any period of six consecutive months, except that the requirement to assess the mandatory minimum penalty shall not be applicable to the first three violations within that time period.

f. Pursuant to California Water Code section 13385.1(d), for the purposes of section 13385.1 and subdivisions (h), (i), and (j) of section 13385, "effluent limitation" means a numeric restriction or a numerically expressed narrative restriction, on the quantity, discharge rate, concentration, or toxicity units of a pollutant or pollutants that may be discharged from an authorized location. An effluent limitation may be final or interim, and may be expressed as a prohibition. An effluent limitation, for these purposes, does not include a receiving water limitation, a compliance schedule, or a best management practice.

g. Unlike subdivision (c) of California Water Code section 13385, where violations of effluent limitations may be assessed administrative civil liability on a per day basis, the mandatory minimum penalties provisions identified above require the Regional Water Board to assess mandatory minimum penalties for "each violation" of an effluent limitation. Some water quality-based effluent limitations in Attachments L through R of this Order (e.g., trash, as described immediately below) are expressed as annual effluent limitations. Therefore, for such limitations, there can be no more than one violation of each interim or final effluent limitation per year.

h. Trash TMDLs.

i. Consistent with the 2009 amendments to Order No. 01-182 to incorporate the Los Angeles River Trash TMDL, the water quality-based effluent limitations in Attachments L through R of this Order for trash are expressed as annual effluent limitations. Therefore, for such limitations, there can be no more than one violation of each interim or final effluent limitation per year. Trash is considered a Group I pollutant, as specified in Appendix A to 40 CFR section 123.45. Therefore, each annual violation of a trash effluent limitation in Attachments L through R of this Order by forty percent or more would be considered a "serious violation" under California Water Code section 13385(h). With respect to the final effluent limitation of zero trash, any detectable discharge of trash necessarily is a serious violation, in accordance with the State Water Board's Enforcement Policy. Violations of the effluent limitations in Attachments L through R of this Order would not constitute "chronic" violations that would give rise to mandatory liability under California Water Code section 13385(i) because four or more violations of the effluent limitations subject to a mandatory penalty cannot occur in a period of six consecutive months.

ii. For the purposes of enforcement under California Water Code section 13385, subdivisions (a), (b), and (c), not every storm event may result in trash discharges. In trash TMDLs adopted by the Regional Water Board, the Regional Water Board states that improperly deposited trash is mobilized during storm events of greater than 0.25 inches of precipitation. Therefore, violations of the effluent limitations are limited to the days of a storm event of greater than 0.25 inches. Once a Permittee has violated the annual effluent limitation, any subsequent discharges of trash during any day of a storm event of greater than 0.25 inches during the same storm year constitutes an additional "day in which the violation [of the effluent limitation] occurs".

14. This Order does not exempt any Permittee from compliance with any other laws, regulations, or ordinances that may be applicable.

15. The provisions of this Order are severable. If any provisions of this Order or the application of any provision of this Order to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Order shall not be affected.

B. Monitoring and Reporting Program (MRP) Requirements

Dischargers shall comply with the MRP and future revisions thereto, in Attachment E of this Order or may, in coordination with an approved Watershed Management Program per Part VI.C, implement a customized monitoring program that achieves the five Primary Objectives set forth in Part II.A. of Attachment E and includes the elements set forth in Part II.E. of Attachment E.

C. Watershed Management Programs

1. General

a. The purpose of this Part VI.C is to allow Permittees the flexibility to develop Watershed Management Programs to implement the requirements of this Order on a watershed scale through customized strategies, control measures, and BMPs.

b. Participation in a Watershed Management Program is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A. (Receiving Water Limitations), Part VI.E (Total Maximum Daily Load Provisions) and Attachments L through R, by customizing the control measures in Parts III.A.4 (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures).

c. Customized strategies, control measures, and BMPs shall be implemented on a watershed basis, where applicable, through each Permittee's storm water management program and/or collectively by all participating Permittees through a Watershed Management Program.

d. The Watershed Management Programs shall ensure that discharges from the Permittee's MS4: (i) achieve applicable water quality-based effluent limitations in Part VI.E and Attachments L through R pursuant to the corresponding compliance schedules, (ii) do not cause or contribute to exceedances of receiving water limitations in Parts V.A and VI.E and Attachments L through R, and (iii) do not include non-storm water discharges that are effectively prohibited pursuant to Part III.A. The programs shall also ensure that controls are implemented to reduce the discharge of pollutants to the maximum extent practicable (MEP) pursuant to Part IV.A.1.

e. Watershed Management Programs shall be developed either collaboratively or individually using the Regional Water Board's Watershed Management Areas (WMAs). Where appropriate, WMAs may be separated into subwatersheds to focus water quality prioritization and implementation efforts by receiving water.

f. Each Watershed Management Program shall be consistent with Part VI.C.5-C.8 and shall:

i. Prioritize water quality issues resulting from storm water and non-storm water discharges from the MS4 to receiving waters within each WMA,

ii. Identify and implement strategies, control measures, and BMPs to achieve the outcomes specified in Part VI.C.1.d,

iii. Execute an integrated monitoring program and assessment program pursuant to Attachment E – MRP, Part IV to determine progress towards achieving applicable limitations and/or action levels in Attachment G, and

iv. Modify strategies, control measures, and BMPs as necessary based on analysis of monitoring data collected pursuant to the MRP to ensure that applicable water quality-based effluent limitations and receiving water limitations and other milestones set forth in the Watershed Management Program are achieved in the required timeframes.

v. Provide appropriate opportunity for meaningful stakeholder input, including but not limited to, a permit-wide watershed management program technical advisory committee (TAC) that will advise and participate in the development of the Watershed Management Programs and enhanced Watershed Management Programs from month 6 through the date of program approval. The composition of the TAC may include at least one Permittee representative from each Watershed Management Area for which a Watershed Management Program will be developed, and must include a minimum of one public representative from a non-governmental organization with public membership, and staff from the Regional Water Board and USEPA Region IX.

g. Permittees may elect to develop an enhanced Watershed Management Program (EWMP). An EWMP is one that comprehensively evaluates opportunities, within the participating Permittees' collective jurisdictional area in a Watershed Management Area, for collaboration among Permittees and other partners on multi-benefit regional projects that, wherever feasible, retain (i) all non-storm water runoff and (ii) all storm water runoff from the 85th percentile, 24-hour storm event for the drainage areas tributary to the projects, while also achieving other benefits including flood control and water supply, among others. In drainage areas within the EWMP area where retention of the 85th percentile, 24-hour storm event is not feasible, the EWMP shall include a Reasonable Assurance Analysis to demonstrate that applicable water quality based effluent limitations and receiving water limitations shall be achieved through implementation of other watershed control measures. An EWMP shall:

i. Be consistent with the provisions in Part VI.C.1.a.-f and VI.C.5-C.8;

ii. Incorporate applicable State agency input on priority setting and other key implementation issues;

iii. Provide for meeting water quality standards and other CWA obligations by utilizing provisions in the CWA and its implementing regulations, policies and guidance;

iv. Include multi-benefit regional projects to ensure that MS4 discharges achieve compliance with all final WQBELs set forth in Part VI.E. and do not cause or contribute to exceedances of receiving water limitations in Part V.A. by retaining through infiltration or capture and reuse the storm water volume from the 85th percentile, 24-hour storm for the drainage areas tributary to the multi-benefit regional projects.;

v. In drainage areas where retention of the storm water volume from the 85th percentile, 24-hour event is not technically feasible, include other watershed control measures to ensure that MS4 discharges achieve compliance with all interim and final WQBELs set forth in Part VI.E. with compliance deadlines occurring after approval of a EWMP and to ensure that MS4 discharges do not cause or contribute to exceedances of receiving water limitations in Part V.A.;

vi. Maximize the effectiveness of funds through analysis of alternatives and the selection and sequencing of actions needed to address human health and water quality related challenges and non-compliance;

vii. Incorporate effective innovative technologies, approaches and practices, including green infrastructure;

viii. Ensure that existing requirements to comply with technology-based effluent limitations and core requirements (e.g., including elimination of non-storm water discharges of pollutants through the MS4, and controls to reduce the discharge of pollutants in storm water to the maximum extent practicable) are not delayed;

ix. Ensure that a financial strategy is in place.

2. Compliance with Receiving Water Limitations Not Otherwise Addressed by a TMDL through a WMP or EWMP

a. For receiving water limitations in Part V.A. associated with water body-pollutant combinations not addressed through a TMDL, but which a Permittee elects to address through a Watershed Management Program or EWMP as set forth in this Part VI.C., a Permittee shall comply as follows:

i. For pollutants that are in the same class[21] as those addressed in a TMDL for the watershed and for which the water body is identified as impaired on the State's Clean Water Act Section 303(d) List as of the effective date of this Order:

(1) Permittees shall demonstrate that the Watershed Control Measures to achieve the applicable TMDL provisions identified pursuant to Part VI.C.5.b.iv.(3) will also adequately address contributions of the pollutant(s) within the same class from MS4 discharges to receiving waters, consistent with the assumptions and requirements of the corresponding TMDL provisions, including interim and final requirements and deadlines for their achievement, such that the MS4 discharges of the pollutant(s) will not cause or contribute to exceedances of receiving water limitations in Part V.A.

[21] Pollutants are considered in a similar class if they have similar fate and transport mechanisms, can be addressed via the same types of control measures, and within the same timeline already contemplated as part of the Watershed Management Program for the TMDL.

(2) Permittees shall include the water body-pollutant combination(s) in the Reasonable Assurance Analysis in Part VI.C.5.b.iv.(5).

(3) Permittees shall identify milestones and dates for their achievement consistent with those in the corresponding TMDL.

ii. For pollutants that are not in the same class as those addressed in a TMDL for the watershed, but for which the water body is identified as impaired on the State's Clean Water Act Section 303(d) List as of the effective date of this Order:

(1) Permittees shall assess contributions of the pollutant(s) from MS4 discharges to the receiving waters and sources of the pollutant(s) within the drainage area of the MS4 pursuant to Part VI.C.5.a.iii.
(2) Permittees shall identify Watershed Control Measures pursuant to Part VI.C.5.b. that will adequately address contributions of the pollutant(s) from MS4 discharges to receiving waters such that the MS4 discharges of the pollutant(s) will not cause or contribute to exceedances of receiving water limitations in Part V.A.
(3) Permittees shall include the water body-pollutant in the Reasonable Assurance Analysis in Part VI.C.5.b.iv.(5).
(4) Permittees shall identify enforceable requirements and milestones and dates for their achievement to control MS4 discharges such that they do not cause or contribute to exceedances of receiving water limitations within a timeframe(s) that is as short as possible, taking into account the technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary. The time between dates shall not exceed one year. Milestones shall relate to a specific water quality endpoint (e.g., x% of the MS4 drainage area is meeting the receiving water limitations) and dates shall relate either to taking a specific action or meeting a milestone.

(5) Where the final date(s) in (4) is beyond the term of this Order, the following conditions shall apply:

(a) For an EWMP, in drainage areas where retention of (i) all non-storm water runoff and (ii) all storm water runoff from the 85th percentile, 24-hour storm event will be achieved, each participating Permittee shall continue to target implementation of watershed control measures in its existing storm water management program, including watershed control measures to eliminate non-storm water discharges that are a source of pollutants to receiving waters.

(b) For a WMP and in areas of a EWMP where retention of the volume in (a) is technically infeasible and where the Regional Water Board determines that MS4 discharges cause or

contribute to the water quality impairment, participating Permittees may initiate development of a stakeholder-proposed TMDL upon approval of the Watershed Management Program or EWMP. For MS4 discharges from these drainage areas to the receiving waters, any extension of this compliance mechanism beyond the term of this Order shall be consistent with the implementation schedule in a TMDL for the waterbody pollutant combination(s) adopted by the Regional Water Board.

iii. For pollutants for which there are exceedances of receiving water limitations in Part V.A., but for which the water body is not identified as impaired on the State's Clean Water Act Section 303(d) List as of the effective date of this Order:

(1) Upon an exceedance of a receiving water limitation, based on data collected pursuant to the MRP and approved IMPs and CIMPs, Permittees shall assess contributions of the pollutant(s) from MS4 discharges to the receiving waters and sources of the pollutant(s) within the drainage area of the MS4 pursuant to Part VI.C.5.a.iii.

(2) If MS4 discharges are identified as a source of the pollutant(s) that has caused or contributed to, or has the potential to cause or contribute to, the exceedance(s) of receiving water limitations in Part V.A., Permittees shall address contributions of the pollutant(s) from MS4 discharges through modifications to the WMP or EWMP pursuant to Part VI.C.8.a.ii.

(a) In a modified WMP or EWMP, Permittees shall identify Watershed Control Measures pursuant to Part VI.C.5.b. that will adequately address contributions of the pollutant(s) from MS4 discharges to receiving waters such that the MS4 discharges of the pollutant(s) will not cause or contribute to exceedances of receiving water limitations in Part V.A.

(b) Permittees shall modify the Reasonable Assurance Analysis pursuant to Part VI.C.5.b.iv.(5) to address the pollutant(s).

(c) Permittees shall identify enforceable requirements and milestones and dates for their achievement to control MS4 discharges such that they do not cause or contribute to exceedances of receiving water limitations within a timeframe(s) that is as short as possible, taking into account the technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary. The time between dates shall not exceed one year. Milestones shall relate to a specific water quality endpoint (e.g., x% of the MS4 drainage area is meeting the receiving water limitations) and dates shall relate either to taking a specific action or meeting a milestone.

(d) Where the final date(s) in (4) is beyond the term of this Order, the following conditions shall apply:

(i) For an EWMP, in drainage areas where retention of (i) all non-storm water runoff and (ii) all storm water runoff from the 85th percentile, 24-hour storm event will be achieved, each participating Permittee shall continue to target implementation of watershed control measures in its existing storm water management program, including watershed control measures to eliminate non-storm water discharges that are a source of pollutants to receiving waters.

(ii) For a WMP and in areas of a EWMP where retention of the volume in (a) is technically infeasible, for newly identified exceedances of receiving water limitations, a Permittee may request that the Regional Water Board approve a modification to its WMP or EWMP to include these additional water body-pollutant combinations.

b. A Permittee's full compliance with all requirements and dates for their achievement in an approved Watershed Management Program or EWMP shall constitute a Permittee's compliance with the receiving water limitations provisions in Part V.A. of this Order for the specific water body-pollutant combinations addressed by an approved Watershed Management Program or EWMP.

c. If a Permittee fails to meet any requirement or date for its achievement in an approved Watershed Management Program or EWMP, the Permittee shall be subject to the provisions of Part V.A. for the waterbody-pollutant combination(s) that were to be addressed by the requirement.

d. Upon notification of a Permittee's intent to develop a WMP or EWMP and prior to approval of its WMP or EWMP, a Permittee's full compliance with all of the following requirements shall constitute a Permittee's compliance with the receiving water limitations provisions in Part V.A. not otherwise addressed by a TMDL, if all the following requirements are met:

i. Provides timely notice of its intent to develop a WMP or EWMP,

ii. Meets all interim and final deadlines for development of a WMP or EWMP,

iii. For the area to be covered by the WMP or EWMP, targets implementation of watershed control measures in its existing storm water management program, including watershed control measures to eliminate non-storm water discharges of pollutants through the MS4 to receiving waters, to address known contributions of

pollutants from MS4 discharges that cause or contribute to exceedances of receiving water limitations, and

iv. Receives final approval of its WMP or EWMP within 28 or 40 months, respectively.

3. Compliance with Receiving Water Limitations Addressed by a TMDL through a WMP or EWMP

a. A Permittee's full compliance with all requirements and dates for their achievement in an approved Watershed Management Program or EWMP shall constitute a Permittee's compliance with provisions pertaining to applicable interim water quality based effluent limitations and interim receiving water limitations in Part VI.E. and Attachments L-R for the pollutant(s) addressed by the approved Watershed Management Program or EWMP.

b. Upon notification of a Permittee's intent to develop a WMP or EWMP and prior to approval of its WMP or EWMP, a Permittee's full compliance with all of the following requirements shall constitute a Permittee's compliance with the receiving water limitations provisions in Part V.A., if all the following requirements are met:

i. Provides timely notice of its intent to develop a WMP or EWMP,

ii. Meets all interim and final deadlines for development of a WMP or EWMP,

iii. For the area to be covered by the WMP or EWMP, targets implementation of watershed control measures in its existing storm water management program, including watershed control measures to eliminate non-storm water discharges of pollutants through the MS4 to receiving waters, to address known contributions of pollutants from MS4 discharges that cause or contribute to exceedances of receiving water limitations, and

iv. Receives final approval of its WMP or EWMP within 28 or 40 months, respectively.

c. Subdivision b. does not apply to receiving water limitations corresponding to final compliance deadlines pursuant to TMDL provisions in Part VI.E. that have passed or will occur prior to approval of a WMP or EWMP.

4. Process

a. Timelines for Implementation

i. Implementation of the following requirements shall occur per the schedule specified in Table 9 below:

Table 9. Watershed Management Program Implementation Requirements

Part	Provision	Due Date
VI.C.4.b	Notify Regional Water Board of intent to develop Watershed Management Program or enhanced WMP and request submittal date for draft program plan	6 months after Order effective date
VI.C.4.c	For Permittee(s) that elect not to implement the conditions of Part VI.C.4.c.i or c.ii, submit draft plan to Regional Water Board	1 year after Order effective date
VI.C.4.c	For Permittee(s) that elect to implement the conditions of Part VI.C.4.c.i or c.ii, submit draft plan to Regional Water Board	18 months after Order effective date
VI.C.4.c.iv	For Permittees that elect to collaborate on an enhanced WMP that meets the requirements of Part VI.C.4.c.iv,submit draft plan to Regional Water Board	18 months after Order effective date, provide final work plan for development of enhanced WMP 30 months after Order effective date, submit draft plan
VI.C.4.c	Comments provided to Permittees by Regional Water Board	4 months after submittal of draft plan
VI.C.4.c	Submit final plan to Regional Water Board	3 months after receipt of Regional Water Board comments on draft plan
VI.C.4.c	Approval or denial of final plan by Regional Water Board or by the Executive Officer on behalf of the Regional Water Board	3 months after submittal of final plan
VI.C.6	Begin implementation of Watershed Management Program or EWMP	Upon approval of final plan
VI.C.8	Comprehensive evaluation of Watershed Management	Every two years from date of

	Program or EWMP and submittal of modifications to plan	approval

b. Permittees that elect to develop a Watershed Management Program or EWMP must notify the Regional Water Board no later than six months after the effective date of this Order.

i. Such notification shall specify if the Permittee(s) are requesting a 12-month or 18-month submittal date for the draft Watershed Management Program, per Part VI.C.4.c.i – ii, or if the Permittees are requesting a 18/30-month submittal date for the draft EWMP per Part VI.C.4.c.iv.

ii. As part of their notice of intent to develop a WMP or EWMP, Permittees shall identify all applicable interim and final trash WQBELs and all other final WQBELs and receiving water limitations pursuant to Part VI.E. and the applicable attachment(s) with compliance deadlines occurring prior to approval of a WMP or EWMP. Permittees shall identify watershed control measures, where possible from existing TMDL implementation plans, that will be implemented by participating Permittees concurrently with the development of a Watershed Management Program or EWMP to ensure that MS4 discharges achieve compliance with applicable interim and final trash WQBELs and all other final WQBELs and receiving water limitations set forth in Part VI.E. and the applicable attachment(s) by the applicable compliance deadlines occurring prior to approval of a WMP or EWMP.

iii. As part of their notification, Permittees electing to develop an EWMP shall submit all of the following in addition to the requirements of Part VI.C.4.b.i.-ii.:

(1) Plan concept and geographical scope,

(2) Cost estimate for plan development,

(3) Executed MOU/agreement among participating Permittees to fund plan development, or final draft MOU among participating Permittees along with a signed letter of intent from each participating City Manager or head of agency. If a final draft MOU is submitted, the MOU shall be fully executed by all participating Permittees within 12 months of the effective date of this Order.

(4) Interim milestones for plan development and deadlines for their achievement,

(5) Identification of, and commitment to fully implement, one structural BMP or a suite of BMPs at a scale that provides meaningful water quality improvement within each watershed covered by the plan within 30 months of the effective date of this Order in addition to

watershed control measures to be implemented pursuant to b.ii. above. The structural BMP or suite of BMPs shall be subject to approval by the Regional Water Board Executive Officer, and

(6) Demonstration that the requirements in Parts VI.C.4.c.iv.(1) and (2) have been met.

c. Permittees that elect to develop a Watershed Management Program shall submit a draft plan to the Regional Water Board as follows:

i. For Permittees that elect to collaborate on the development of a Watershed Management Program, Permittees shall submit the draft Watershed Management Program no later than 18 months after the effective date of this Order if the following conditions are met in greater than 50% of the land area covered by the WMP:

(1) Demonstrate that there are LID ordinances in place and/or commence development of a Low Impact Development (LID) ordinance(s) meeting the requirements of this Order's Planning and Land Development Program within 60 days of the effective date of the Order and have a draft ordinance within 6 months of the effective date of the Order, and

(2) Demonstrate that there are green streets policies in place and/or commence development of a policy(ies) that specifies the use of green street strategies for transportation corridors within 60 days of the effective date of the Order and have a draft policy within 6 months of the effective date of the Order.

(3) Demonstrate in the notification of the intent to develop a Watershed Management Program that Parts VI.C.4.c.i(1) and (2) have been met in greater than 50% of the watershed area.

ii. For a Permittee that elects to develop an individual Watershed Management Program, the Permittee shall submit the draft Watershed Management Program no later than 18 months after the effective date of this Order if the following conditions are met:

(1) Demonstrate that there is a LID ordinance in place for the Permittee's jurisdiction and/or commence development of a Low Impact Development (LID) ordinance for the Permittee's jurisdiction meeting the requirements of this Order's Planning and Land Development Program within 60 days of the effective date of the Order and have a draft ordinance within 6 months of the effective date of the Order, and

(2) Demonstrate that there is a green streets policy in place for the Permittee's jurisdiction and/or commence development of a policy

that specifies the use of green street strategies for transportation corridors within the Permittee's jurisdiction within 60 days of the effective date of the Order and have a draft policy within 6 months of the effective date of the Order.

(3) Demonstrate in the notification of the intent to develop a Watershed Management Program that Parts VI.C.4.c.ii.(1) and (2) have been met.

iii. For Permittees that elect not to implement the conditions under Part VI.C.4.c.i. or Part VI.C.4.c.ii., Permittees shall submit the draft Watershed Management Program no later than 12 months after the effective date of this Order.

iv. For Permittees that elect to collaborate on the development of an EWMP, Permittees shall submit the work plan for development of the EWMP no later than 18 months after the effective date of this Order, and shall submit the draft program no later than 30 months after the effective date of this Order if the following conditions are met in greater than 50% of the land area in the watershed:

(1) Demonstrate that there are LID ordinances in place and/or commence development of a Low Impact Development (LID) ordinance(s) meeting the requirements of this Order's Planning and Land Development Program within 60 days of the effective date of the Order and have a draft ordinance within 6 months of the effective date of the Order, and

(2) Demonstrate that there are green streets policies in place and/or commence development of a policy(ies) that specifies the use of green street strategies for transportation corridors within 60 days of the effective date of the Order and have a draft policy within 6 months of the effective date of the Order.

(3) Demonstrate in the notification of the intent to develop an EWMP that Parts VI.C.4.c.iv.(1) and (2) have been met in greater than 50% of the watershed area.

d. Until the Watershed Management Program or EWMP is approved by the Regional Water Board or by the Executive Officer on behalf of the Regional Water Board, Permittees that elect to develop a Watershed Management Program or EWMP shall:

i. Continue to implement watershed control measures in their existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with 40 CFR section 122.26(d)(2)(iv),

ii. Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with CWA section 402(p)(3)(B)(ii), and

iii. Implement watershed control measures, where possible from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash WQBELs and all other final WQBELs and receiving water limitations pursuant to Part VI.E. and set forth in Attachments L through R by the applicable compliance deadlines occurring prior to approval of a WMP or EWMP.

e. Permittees that do not elect to develop a Watershed Management Program or EWMP, or that do not have an approved WMP or EWMP within 28 or 40 months, respectively, of the effective date of this Order, shall be subject to the baseline requirements in Part VI.D and shall demonstrate compliance with receiving water limitations pursuant to Part V.A. and with applicable interim water quality-based effluent limitations in Part VI.E pursuant to subparts VI.E.2.d.i.(1)-(3).

f. Permittees subject to the Middle Santa Ana River Watershed Bacteria Indicator TMDL shall submit a Comprehensive Bacteria Reduction Plan (CBRP) for dry weather to the Regional Water Board Executive Officer no later than nine months after the effective date of this Order. The CBRP shall describe, in detail, the specific actions that have been taken or will be taken to achieve compliance with the dry weather water quality-based effluent limitations and the receiving water limitations for the Middle Santa Ana River Watershed Bacteria Indicator TMDL by December 31, 2015. The CBRP shall also establish a schedule for developing a CBRP to comply with the water quality-based effluent limitations and the receiving water limitations for the Middle Santa Ana River Bacteria TMDL during wet weather by December 31, 2025. The CBRP may be developed in lieu of the Watershed Management Program for MS4 discharges of bacteria within the Middle Santa Ana River Watershed.

5. Program Development

a. Identification of Water Quality Priorities

Permittees shall identify the water quality priorities within each WMA that will be addressed by the Watershed Management Program. At a minimum, these priorities shall include achieving applicable water quality-based effluent limitations and/or receiving water limitations established pursuant to TMDLs, as set forth in Part VI.E and Attachments L through R of this Order.

i. Water Quality Characterization. Each plan shall include an evaluation of existing water quality conditions, including characterization of storm water and non-storm water discharges from the MS4 and receiving water quality,

to support identification and prioritization/sequencing of management actions.

ii. Water Body-Pollutant Classification. On the basis of the evaluation of existing water quality conditions, water body-pollutant combinations shall be classified into one of the following three categories:

(1) Category 1 (Highest Priority): Water body-pollutant combinations for which water quality-based effluent limitations and/or receiving water limitations are established in Part VI.E and Attachments L through R of this Order.

(2) Category 2 (High Priority): Pollutants for which data indicate water quality impairment in the receiving water according to the State's Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (State Listing Policy) and for which MS4 discharges may be causing or contributing to the impairment.

(3) Category 3 (Medium Priority): Pollutants for which there are insufficient data to indicate water quality impairment in the receiving water according to the State's Listing Policy, but which exceed applicable receiving water limitations contained in this Order and for which MS4 discharges may be causing or contributing to the exceedance.

iii. Source Assessment. Utilizing existing information, potential sources within the watershed for the water body-pollutant combinations in Categories 1 - 3 shall be identified.

(1) Permittees shall identify known and suspected storm water and non-storm water pollutant sources in discharges to the MS4 and from the MS4 to receiving waters and any other stressors related to MS4 discharges causing or contributing to the water quality priorities. The identification of known and suspected sources of the highest water quality priorities shall consider the following:

(a) Review of available data, including but not limited to:

(i) Findings from the Permittees' Illicit Connections and Illicit Discharge Elimination Programs;

(ii) Findings from the Permittees' Industrial/Commercial Facilities Programs;

(iii) Findings from the Permittees' Development Construction Programs;

(iv) Findings from the Permittees' Public Agency Activities Programs;

(v) TMDL source investigations;

(vi) Watershed model results;

(vii) Findings from the Permittees' monitoring programs, including but not limited to TMDL compliance monitoring and receiving water monitoring; and

(viii) Any other pertinent data, information, or studies related to pollutant sources and conditions that contribute to the highest water quality priorities.

(b) Locations of the Permittees' MS4s, including, at a minimum, all MS4 major outfalls and major structural controls for storm water and non-storm water that discharge to receiving waters.

(c) Other known and suspected sources of pollutants in non-storm water or storm water discharges from the MS4 to receiving waters within the WMA.

iv. Prioritization. Based on the findings of the source assessment, the issues within each watershed shall be prioritized and sequenced. Watershed priorities shall include at a minimum:

(1) TMDLs

(a) Controlling pollutants for which there are water quality-based effluent limitations and/or receiving water limitations with interim or final compliance deadlines within the permit term, or TMDL compliance deadlines that have already passed and limitations have not been achieved.

(b) Controlling pollutants for which there are water quality-based effluent limitations and/or receiving water limitations with interim or final compliance deadlines between September 6, 2012 and October 25, 2017.

(2) Other Receiving Water Considerations

(a) Controlling pollutants for which data indicate impairment or exceedances of receiving water limitations in the receiving water and the findings from the source assessment implicates discharges from the MS4 shall be considered the second highest priority.

b. Selection of Watershed Control Measures

i. Permittees shall identify strategies, control measures, and BMPs to implement through their individual storm water management programs, and collectively on a watershed scale, with the goal of creating an efficient program to focus individual and collective resources on watershed priorities.

ii. The objectives of the Watershed Control Measures shall include:

(1) Prevent or eliminate non-storm water discharges to the MS4 that are a source of pollutants from the MS4 to receiving waters.

(2) Implement pollutant controls necessary to achieve all applicable interim and final water quality-based effluent limitations and/or receiving water limitations pursuant to corresponding compliance schedules.

(3) Ensure that discharges from the MS4 do not cause or contribute to exceedances of receiving water limitations.

iii. Watershed Control Measures may include:

(1) Structural and/or non-structural controls and operation and maintenance procedures that are designed to achieve applicable water quality-based effluent limitations, receiving water limitations in Part VI.E and/or Attachments L through R;

(2) Retrofitting areas of existing development known or suspected to contribute to the highest water quality priorities with regional or sub-regional controls or management measures; and

(3) Stream and/or habitat rehabilitation or restoration projects where stream and/or habitat rehabilitation or restoration are necessary for, or will contribute to demonstrable improvements in the physical, chemical, and biological receiving water conditions and restoration and/or protection of water quality standards in receiving waters.

iv. The following provisions of this Order shall be incorporated as part of the Watershed Management Program:

(1) Minimum Control Measures.

(a) Permittees shall assess the minimum control measures (MCMs) as defined in Part VI.D.4 to Part VI.D.10 of this Order to identify opportunities for focusing resources on the high priority issues in each watershed. For each of the following minimum control measures, Permittees shall identify potential modifications that will address watershed priorities:

(i) Development Construction Program

(ii) Industrial/Commercial Facilities Program

(iii) Illicit Connection and Illicit Discharges Detection and Elimination Program

(iv) Public Agency Activities Program

(v) Public Information and Participation Program

(b) At a minimum, the Watershed Management Program shall include management programs consistent with 40 CFR section 122.26(d)(2)(iv)(A)-(D).

(c) If the Permittee(s) elects to eliminate a control measure identified in Parts VI.D.4, VI.D.5, VI.D.6 and VI.D.8 to VI.D.10 because that specific control measure is not applicable to the Permittee(s), the Permittee(s) shall provide a justification for its elimination. The Planning and Land Development Program is not eligible for elimination.

(d) Such customized actions, once approved as part of the Watershed Management Program, shall replace in part or in whole the requirements in Parts VI.D.4, VI.D.5, VI.D.6 and VI.D.8 to VI.D.10 for participating Permittees.

(2) Non-Storm Water Discharge Measures. Where Permittees identify non-storm water discharges from the MS4 as a source of pollutants that cause or contribute to exceedance of receiving water limitations, the Watershed Control Measures shall include strategies, control measures, and/or BMPs that must be implemented to effectively eliminate the source of pollutants consistent with Parts III.A and VI.D.10. These may include measures to prohibit the non-storm water discharge to the MS4, additional BMPs to reduce pollutants in the non-storm water discharge or conveyed by the non-storm water discharge, diversion to a sanitary sewer for treatment, or strategies to require the non-storm water discharge to be separately regulated under a general NPDES permit.

(3) TMDL Control Measures. Permittees shall compile control measures that have been identified in TMDLs and corresponding implementation plans. Permittees shall identify those control measures to be modified, if any, to most effectively address TMDL requirements within the watershed. If not sufficiently identified in previous documents, or if implementation plans have not yet been developed (e.g., USEPA established TMDLs), the Permittees shall evaluate and identify control measures to achieve water quality-based effluent limitations and/or

receiving water limitations established in this Order pursuant to these TMDLs.

(a) TMDL control measures shall include where necessary control measures to address both storm water and non-storm water discharges from the MS4.

(b) TMDL control measures may include baseline or customized activities covered under the general MCM categories in Part VI.D as well as BMPs and other control measures covered under the non-storm water discharge provisions of Part III.A of this Order.

(c) The WMP shall include, at a minimum, those actions that will be implemented during the permit term to achieve interim and/or final water quality-based effluent limitations and/or receiving water limitations with compliance deadlines within the permit term.

(4) Each plan shall include the following components:

(a) Identification of specific structural controls and non-structural best management practices, including operational source control and pollution prevention, and any other actions or programs to achieve all water quality-based effluent limitations and receiving water limitations contained in this Part VI.E and Attachments L through R to which the Permittee(s) is subject;

(b) For each structural control and non-structural best management practice, the number, type, and location(s) and/or frequency of implementation;

(c) For any pollution prevention measures, the nature, scope, and timing of implementation;

(d) For each structural control and non-structural best management practice, interim milestones and dates for achievement to ensure that TMDL compliance deadlines will be met; and

(e) The plan shall clearly identify the responsibilities of each participating Permittee for implementation of watershed control measures.

(5) Permittees shall conduct a Reasonable Assurance Analysis for each water body-pollutant combination addressed by the Watershed Management Program. A Reasonable Assurance Analysis (RAA) shall be quantitative and performed using a peer-reviewed model in the public domain. Models to be considered for the RAA, without exclusion, are the Watershed Management Modeling System (WMMS), Hydrologic Simulation Program-FORTRAN (HSPF), and the Structural BMP Prioritization and Analysis Tool (SBPAT). The RAA shall commence with assembly of all available, relevant subwatershed data collected within the last 10 years, including land use and pollutant

loading data, establishment of quality assurance/quality control (QA/QC) criteria, QA/QC checks of the data, and identification of the data set meeting the criteria for use in the analysis. Data on performance of watershed control measures needed as model input shall be drawn only from peer-reviewed sources. These data shall be statistically analyzed to determine the best estimate of performance and the confidence limits on that estimate for the pollutants to be evaluated. The objective of the RAA shall be to demonstrate the ability of Watershed Management Programs and EWMPs to ensure that Permittees' MS4 discharges achieve applicable water quality based effluent limitations and do not cause or contribute to exceedances of receiving water limitations.

(a) Permittees shall demonstrate using the RAA that the activities and control measures identified in the Watershed Control Measures will achieve applicable water quality-based effluent limitations and/or receiving water limitations in Attachments L through R with compliance deadlines during the permit term.

(b) Where the TMDL Provisions in Part VI.E and Attachments L through R do not include interim or final water quality-based effluent limitations and/or receiving water limitations with compliance deadlines during the permit term, Permittees shall identify interim milestones and dates for their achievement to ensure adequate progress toward achieving interim and final water quality-based effluent limitations and/or receiving water limitations with deadlines beyond the permit term.

(c) For water body-pollutant combinations not addressed by TMDLs, Permittees shall demonstrate using the RAA that the activities and control measures identified in the Watershed Control Measures will achieve applicable receiving water limitations as soon as possible.

(6) Permittees shall provide documentation that they have the necessary legal authority to implement the Watershed Control Measures identified in the plan, or that other legal authority exists to compel implementation of the Watershed Control Measures.

c. Compliance Schedules

Permittees shall incorporate compliance schedules in Attachments L through R into the plan and, where necessary develop interim milestones and dates for their achievement. Compliance schedules and interim milestones and dates for their achievement shall be used to measure progress towards addressing the highest water quality priorities and achieving applicable water quality-based effluent limitations and/or receiving water limitations.

i. Schedules must be adequate for measuring progress on a watershed scale once every two years.

ii. Schedules must be developed for both the strategies, control measures and BMPs implemented by each Permittee within its jurisdiction and for those that will be implemented by multiple Permittees on a watershed scale.

iii. Schedules shall incorporate the following:

(1) Compliance deadlines occurring within the permit term for all applicable interim and/or final water quality-based effluent limitations and/or receiving water limitations in Part VI.E and Attachments L through R of this Order,

(2) Interim milestones and dates for their achievement within the permit term for any applicable final water quality-based effluent limitation and/or receiving water limitation in Part VI.E and Attachments L through R, where deadlines within the permit term are not otherwise specified.

(3) For watershed priorities related to addressing exceedances of receiving water limitations in Part V.A and not otherwise addressed by Part VI.E:

(a) Milestones based on measureable criteria or indicators, to be achieved in the receiving waters and/or MS4 discharges,

(a) A schedule with dates for achieving the milestones, and

(b) A final date for achieving the receiving water limitations as soon as possible.

(c) The milestones and implementation schedule in (a)-(c) fulfill the requirements in Part V.A.3.a to prepare an Integrated Monitoring Compliance Report.

6. Watershed Management Program Implementation

Each Permittee shall begin implementing the Watershed Management Program or EWMP immediately upon approval of the plan by the Regional Water Board or the Executive Officer on behalf of the Regional Water Board.

a. Permittees may request an extension of deadlines for achievement of interim milestones established pursuant to Part VI.C.4.c.iii.(3) only. Permittees shall provide requests in writing at least 90 days prior to the deadline and shall include in the request the justification for the extension. Extensions shall be subject to approval by the Regional Water Board Executive Officer.

7. Integrated Watershed Monitoring and Assessment

Permittees in each WMA shall develop an integrated monitoring program as set forth in Part IV of the MRP (Attachment E) or implement a customized monitoring program with the primary objective of allowing for the customization of the outfall monitoring program (Parts VIII and IX) in conjunction with an approved Watershed Management Program or EWMP, as defined below. Each monitoring program shall assess progress toward achieving the water quality-based effluent limitations and/or receiving water limitations per the compliance schedules, and progress toward addressing the water quality priorities for each WMA. The customized monitoring program shall be submitted as part of the Watershed Management Program, or where Permittees elect to develop an EWMP, shall be submitted within 18 months of the effective date of this Order. If pursuing a customized monitoring program, the Permittee(s) shall provide sufficient justification for each element of the program that differs from the monitoring program requirements as set forth in Attachment E. Monitoring programs shall be subject to approval by the Executive Officer following a public comment period. The customized monitoring program shall be designed to address the Primary Objectives detailed in Attachment E, Part II.A and shall include the following program elements:

- Receiving Water Monitoring
- Storm Water Outfall Monitoring
- Non-Storm Water Outfall Monitoring
- New Development/Re-Development Effectiveness Tracking
- Regional Studies

8. Adaptive Management Process

a. Watershed Management Program Adaptive Management Process

i. Permittees in each WMA shall implement an adaptive management process, every two years from the date of program approval, adapting the Watershed Management Program or EWMP to become more effective, based on, but not limited to a consideration of the following:

(1) Progress toward achieving interim and/or final water quality-based effluent limitations and/or receiving water limitations in Part VI.E and Attachments L through R, according to established compliance schedules;

(2) Progress toward achieving improved water quality in MS4 discharges and achieving receiving water limitations through implementation of the watershed control measures based on an evaluation of outfall-based monitoring data and receiving water monitoring data;

(3) Achievement of interim milestones;

(4) Re-evaluation of the water quality priorities identified for the WMA based on more recent water quality data for discharges from the MS4 and the receiving water(s) and a reassessment of sources of pollutants in MS4 discharges;

(5) Availability of new information and data from sources other than the Permittees' monitoring program(s) within the WMA that informs the effectiveness of the actions implemented by the Permittees;

(6) Regional Water Board recommendations; and

(7) Recommendations for modifications to the Watershed Management Program solicited through a public participation process.

ii. Based on the results of the adaptive management process, Permittees shall report any modifications, including where appropriate new compliance deadlines and interim milestones, with the exception of those compliance deadlines established in a TMDL, necessary to improve the effectiveness of the Watershed Management Program or EWMP in the Annual Report, as required pursuant to Part XVIII.A.6 of the MRP (Attachment E), and as part of the Report of Waste Discharge (ROWD) required pursuant to Part II.B of Attachment D – Standard Provisions.

(1) The adaptive management process fulfills the requirements in Part V.A.4 to address continuing exceedances of receiving water limitations.

iii. Permittees shall implement any modifications to the Watershed Management Program or EWMP upon approval by the Regional Water Board Executive Officer or within 60 days of submittal if the Regional Water Board Executive Officer expresses no objections.

D. Storm Water Management Program Minimum Control Measures

1. General Requirements

a. Each Permittee shall implement the requirements in Parts VI.D.4 through VI.D.10 below, or may in lieu of the requirements in Parts VI.D.4 through VI.D.10 implement customized actions within each of these general categories of control measures as set forth in an approved Watershed Management Program per Part VI.C. Implementation shall be consistent with the requirements of 40 CFR § 122.26(d)(2)(iv).

b. Timelines for Implementation

i. Unless otherwise noted in Part VI.D, each Permittee that does not elect to develop a Watershed Management Program or EWMP per Part VI.C shall implement the requirements contained in Part VI.D within 6 months after the

effective date of this Order. In the interim, a Permittee shall continue to implement its existing storm water management program, including actions within each of the six categories of minimum control measures consistent with 40 CFR section 122.26(d)(2)(iv).

ii. Permittees that elect to develop a Watershed Management Program or EWMP shall continue to implement their existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with 40 CFR section 122.26(d)(2)(iv) until the Watershed Management Program or EWMP is approved by the Regional Water Board Executive Officer.

2. Progressive Enforcement and Interagency Coordination

a. Each Permittee shall develop and implement a Progressive Enforcement Policy to ensure that (1) regulated Industrial/Commercial facilities, (2) construction sites, (3) development and redevelopment sites with post-construction controls, and (4) illicit discharges are each brought into compliance with all storm water and non-storm water requirements within a reasonable time period as specified below.

i. Follow-up Inspections

In the event that a Permittee determines, based on an inspection or illicit discharge investigation conducted, that a facility or site operator has failed to adequately implement all necessary BMPs, that Permittee shall take progressive enforcement actions which, at a minimum, shall include a follow-up inspection within 4 weeks from the date of the initial inspection and/or investigation.

ii. Enforcement Action

In the event that a Permittee determines that a facility or site operator has failed to adequately implement BMPs after a follow-up inspection, that Permittee shall take enforcement action as established through authority in its municipal code and ordinances, through the judicial system, or refer the case to the Regional Water Board, per the Interagency Coordination provisions below.

iii. Records Retention

Each Permittee shall maintain records, per their existing record retention policies, and make them available on request to the Regional Water Board, including inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating a good faith effort to bring facilities into compliance.

iv. Referral of Violations of Municipal Ordinances and California Water Code § 13260

A Permittee may refer a violation(s) of its municipal storm water ordinances and/or California Water Code section 13260 by Industrial and Commercial facilities and construction site operators to the Regional Water Board

provided that the Permittee has made a good faith effort of applying its Progressive Enforcement Policy to achieve compliance with its own ordinances. At a minimum, a Permittee's good faith effort must be documented with:

(1) Two follow-up inspections, and

(2) Two warning letters or notices of violation.

v. Referral of Violations of the Industrial and Construction General Permits, including Requirements to File a Notice of Intent or No Exposure Certification

For those facilities or site operators in violation of municipal storm water ordinances and subject to the Industrial and/or Construction General Permits, Permittees may escalate referral of such violations to the Regional Water Board (promptly via telephone or electronically) after one inspection and one written notice of violation (copied to the Regional Water Board) to the facility or site operator regarding the violation. In making such referrals, Permittees shall include, at a minimum, the following documentation:

(1) Name of the facility or site,

(2) Operator of the facility or site,

(3) Owner of the facility or site,

(4) WDID Number (if applicable),

(5) Records of communication with the facility/site operator regarding the violation, which shall include at least one inspection report,

(6) The written notice of violation (copied to the Regional Water Board),

(7) For industrial sites, the industrial activity being conducted at the facility that is subject to the Industrial General Permit, and

(8) For construction sites, site acreage and Risk Factor rating.

b. Investigation of Complaints Transmitted by the Regional Water Board Staff

Each Permittee shall initiate, within one business day,[22] investigation of complaints from facilities within its jurisdiction. The initial investigation shall include, at a minimum, a limited inspection of the facility to confirm validity of the complaint and to determine if the facility is in compliance with municipal storm water ordinances and, if necessary, to oversee corrective action.

c. Assistance with Regional Water Board Enforcement Actions

As directed by the Regional Water Board Executive Officer, Permittees shall assist Regional Water Board enforcement actions by:

i. Assisting in identification of current owners, operators, and lessees of properties and sites.

[22] Permittees may comply with the Permit by taking initial steps (such as logging, prioritizing, and tasking) to "initiate" the investigation within that one business day. However, the Regional Water Board would expect that the initial investigation, including a site visit, to occur within four business days.

ii. Providing staff, when available, for joint inspections with Regional Water Board inspectors.

iii. Appearing to testify as witnesses in Regional Water Board enforcement hearings.

iv. Providing copies of inspection reports and documentation demonstrating application of its Progressive Enforcement Policy.

3. Modifications/Revisions

a. Each Permittee shall modify its storm water management programs, protocols, practices, and municipal codes to make them consistent with the requirements in this Order.

4. Requirements Applicable to the Los Angeles County Flood Control District

a. Public Information and Participation Program (PIPP)

i. General

(1) The LACFCD shall participate in a regional Public Information and Participation Program (PIPP) or alternatively, shall implement its own PIPP that includes the requirements listed in this part. The LACFCD shall collaborate, as necessary, with other Permittees to implement PIPP requirements. The objectives of the PIPP are as follows:

(a) To measurably increase the knowledge of the target audience about the MS4, the adverse impacts of storm water pollution on receiving waters and potential solutions to mitigate the impacts.

(b) To measurably change the waste disposal and storm water pollution generation behavior of target audiences by encouraging the implementation of appropriate alternatives by providing information to the public.

(c) To involve and engage a diversity of socio-economic groups and ethnic communities in Los Angeles County to participate in mitigating the impacts of stormwater pollution.

ii. PIPP Implementation

(1) The LACFCD shall implement the PIPP requirements listed in this Part VI.D.5 using one or more of the following approaches:

(a) By participating in a collaborative PIPP covering the entire service area of the Los Angeles County Flood Control District,

(b) By participating in one or more Watershed Group sponsored PIPPs, and/or

(c) Individually within the service area of the Los Angeles County Flood Control District.

(2) If the LACFCD participates in a collaborative District-wide or Watershed Group PIPP, the LACFCD shall provide the contact information for their appropriate staff responsible for storm water public education activities to the designated PIPP coordinator and contact information changes no later than 30 days after a change occurs.

iii. Public Participation

(1) The LACFCD, in collaboration with the County of Los Angeles, shall continue to maintain the countywide hotline (888-CLEAN-LA) for public reporting of clogged catch basin inlets and illicit discharges/dumping, faded or missing catch basin labels, and general storm water management information.

(a) The LACFCD shall include the reporting information, updated when necessary, in public information, and the government pages of the telephone book, as they are developed or published.

(b) The LACFCD, in collaboration with the County of Los Angeles, shall continue to maintain the www.888cleanla.com website.

iv. Residential Outreach Program

(1) Working in conjunction with a District-wide or Watershed Group sponsored PIPP or individually, the LACFCD shall implement the following activities:

(a) Conduct storm water pollution prevention public service announcements and advertising campaigns

(b) Facilitate the dissemination of public education materials including, at a minimum, information on the proper handling (i.e., disposal, storage and/or use) of:

(i) Vehicle waste fluids

(ii) Household waste materials (i.e., trash and household hazardous waste)

(iii) Construction waste materials

(iv) Pesticides and fertilizers (including integrated pest management practices [IPM] to promote reduced use of pesticides),

(v) Green waste (including lawn clippings and leaves)

(vi) Animal wastes

(c) Facilitate the dissemination of activity-specific storm water pollution prevention public education materials, at a minimum, for the following points of purchase:

(i) Automotive parts stores

(ii) Home improvement centers / lumber yards / hardware stores / paint stores

(iii) Landscaping / gardening centers

(iv) Pet shops / feed stores

(d) Maintain a storm water website, which shall include educational material and opportunities for the public to participate in storm water pollution prevention and clean-up activities listed in Part VI.D.5.

(e) When implementing activities in (a)-(d), the LACFCD shall use effective strategies to educate and involve ethnic communities in storm water pollution prevention through culturally effective methods.

b. Industrial/Commercial Facilities Program

If the LACFCD operates, or has authority over, any facility(ies) identified in Part VI.D.6.b, LACFCD shall comply with the requirements in Part VI.D.6 for those facilities.

c. Public Agency Activities Program

i. General

(1) The LACFCD shall implement a Public Agency Activities Program to minimize storm water pollution impacts from LACFCD-owned or operated facilities and activities. Requirements for Public Agency Facilities and Activities consist of the following components:

(a) Public Construction Activities Management.

(b) Public Facility Inventory

(c) Public Facility and Activity Management

(d) Vehicle and Equipment Washing

(e) Landscape and Recreational Facilities Management

(f) Storm Drain Operation and Maintenance

(g) Parking Facilities Management

(h) Emergency Procedures

(i) Employee and Contractor Training

ii. Public Construction Activities Management

(1) The LACFCD shall implement and comply with the Planning and Land Development Program requirements in Part VI.D.7 of this Order at LACFCD-owned or operated public construction projects that are categorized under the project types identified in Part VI.D.7 of this Order.

(2) The LACFCD shall implement and comply with the appropriate Development Construction Program requirements in Part VI.D.8 of this Order at LACFCD-owned or operated construction projects as applicable.

(3) For LACFCD-owned or operated projects that disturb less than one acre of soil, the LACFCD shall require the implementation of an effective combination of erosion and sediment control BMPs from Table 13 (see Construction Development Program).

(4) The LACFCD shall obtain separate coverage under the Construction General Permit for all LACFCD-owned or operated construction sites that require coverage.

iii. Public Facility Inventory

(1) The LACFCD shall maintain an updated watershed-based inventory and map of all LACFCD-owned or operated facilities that are potential sources of storm water pollution. The incorporation of facility information into a GIS is recommended. Sources to be tracked include but are not limited to the following:

(a) Chemical storage facilities

(b) Equipment storage and maintenance facilities (including landscape maintenance-related operations)

(c) Fueling or fuel storage facilities

(d) Materials storage yards

(e) Pesticide storage facilities

(f) LACFCD buildings

(g) LACFCD vehicle storage and maintenance yards

(h) All other LACFCD-owned or operated facilities or activities that the LACFCD determines may contribute a substantial pollutant load to the MS4.

(2) The LACFCD shall include the following minimum fields of information for each LACFCD-owned or operated facility in its watershed-based inventory and map.

(a) Name of facility

(b) Name of facility manager and contact information

(c) Address of facility (physical and mailing)

(d) A narrative description of activities performed and principal products used at each facility and status of exposure to storm water.

(e) Coverage under the Industrial General Permit or other individual or general NPDES permits or any applicable waiver issued by the Regional or State Water Board pertaining to storm water discharges.

(3) The LACFCD shall update its inventory and map once during the Permit term. The update shall be accomplished through a collection of new information obtained through field activities.

iv. Public Agency Facility and Activity Management

(1) The LACFCD shall obtain separate coverage under the Industrial General Permit for all LACFCD-owned or operated facilities where industrial activities are conducted that require coverage under the Industrial General Permit.

(2) The LACFCD shall implement the following measures for flood management projects:

(a) Develop procedures to assess the impacts of flood management projects on the water quality of receiving waterbodies; and

(b) Evaluate existing structural flood control facilities during the planning phases of major maintenance or rehabilitation projects to determine if retrofitting the facility to provide additional pollutant removal from storm water is feasible.

(3) The LACFCD shall implement and maintain the general and activity-specific BMPs listed in Table 18 (BMPs for Public Agency Facilities and Activities) or an equivalent set of BMPs when such activities occur at LACFCD-owned or operated facilities and field activities (e.g., project sites) including but not limited to the facility types listed in Part VI.D.9.c above, and at any area that includes the activities described in Table 18, or that have the potential to discharge pollutants in storm water.

(4) Any contractors hired by the LACFCD to conduct Public Agency Activities shall be contractually required to implement and maintain the general and activity specific BMPs listed in Table 18 or an equivalent set of BMPs. The LACFCD shall conduct oversight of contractor activities to ensure these BMPs are implemented and maintained.

(5) Effective source control BMPs for the activities listed in Table 18 shall be implemented at LACFCD-owned or operated facilities, unless the pollutant generating activity does not occur. The LACFCD shall require implementation of additional BMPs where storm water from the MS4 discharges to a significant ecological area (SEA, see Attachment A for definition), a water body subject to TMDL Provisions in Part VI.E, or a CWA section 303(d) listed water body (see Part VI.E below). Likewise, for those BMPs that are not adequately protective of water quality standards, the LACFCD shall implement additional site-specific controls.

v. Vehicle and Equipment Washing

(1) The LACFCD shall implement and maintain the activity specific BMPs listed in Table 18 (BMPs for Public Agency Facilities and Activities) or an equivalent set of BMPs for all fixed vehicle and equipment washing areas;

(2) The LACFCD shall prevent discharges of wash waters from vehicle and equipment washing to the MS4 by implementing any of the following measures at existing facilities with vehicle or equipment wash areas:

(a) Self-contain, and haul off for disposal; or

(b) Equip with a clarifier or an alternative pre-treatment device and plumb to the sanitary sewer in accordance with applicable waste water provider regulations

(3) The LACFCD shall ensure that any LACFCD facilities constructed, redeveloped, or replaced shall not discharge wastewater from vehicle and equipment wash areas to the MS4 by plumbing all areas to the sanitary sewer in accordance with applicable waste water provider regulations, or self-containing all waste water/ wash water and hauling to a point of legal disposal.

vi. Landscape and Recreational Facilities Management

(1) The LACFCD shall implement and maintain the activity specific BMPs listed in Table 18 (BMPs for Public Agency Facilities and Activities) or an equivalent set of BMPs for all its public right-of-ways, flood control facilities and open channels and reservoirs, and landscape and recreational facilities and activities.

(2) The LACFCD shall implement an IPM program that includes the following:

(a) Pesticides are used only if monitoring indicates they are needed, and pesticides are applied according to applicable permits and established guidelines.

(b) Treatments are made with the goal of removing only the target organism.

(c) Pest controls are selected and applied in a manner that minimizes risks to human health, beneficial non-target organisms, and the environment.

(d) The use of pesticides, including Organophosphates and Pyrethroids, does not threaten water quality.

(e) Partner, as appropriate, with other agencies and organizations to encourage the use of IPM.

(f) Adopt and verifiably implement policies, procedures, and/ or ordinances requiring the minimization of pesticide use and encouraging the use of IPM techniques (including beneficial insects) for Public Agency Facilities and Activities.

(g) Policies, procedures, and ordinances shall include a schedule to reduce the use of pesticides that cause impairment of surface waters by implementing the following procedures:

(i) Prepare and annually update an inventory of pesticides used by all internal departments, divisions, and other operational units.

(ii) Quantify pesticide use by staff and hired contractors.

(iii) Demonstrate implementation of IPM alternatives where feasible to reduce pesticide use.

(3) The LACFCD shall implement the following requirements:

(a) Use a standardized protocol for the routine and non-routine application of pesticides (including pre-emergents), and fertilizers.

(b) Ensure there is no application of pesticides or fertilizers (1) when two or more consecutive days with greater than 50% chance of rainfall are predicted by NOAA, (2) within 48 hours of a ½-inch rain event, or (3) when water is flowing off the area where the application is to occur. This requirement does not apply to the application of aquatic pesticides or pesticides which require water for activation.

(c) Ensure that no banned or unregistered pesticides are stored or applied.

(d) Ensure that all staff applying pesticides are certified in the appropriate category by the California Department of Pesticide Regulation, or are under the direct supervision of a pesticide applicator certified in the appropriate category.

(e) Implement procedures to encourage the retention and planting of native vegetation to reduce water, pesticide and fertilizer needs; and

(f) Store pesticides and fertilizers indoors or under cover on paved surfaces, or use secondary containment.

(i) Reduce the use, storage, and handling of hazardous materials to reduce the potential for spills.

(ii) Regularly inspect storage areas.

vii. Storm Drain Operation and Management

(1) The LACFCD shall implement and maintain the activity specific BMPs listed in Table 18 or equivalent set of BMPs for storm drain operation and maintenance.

(2) Ensure that all the material removed from the MS4 does not reenter the system. Solid material shall be dewatered in a contained area and liquid material shall be disposed in accordance with any of the following measures:

(a) Self-contain, and haul off for legal disposal; or

(b) Equip with a clarifier or an alternative pre-treatment device; and plumb to the sanitary sewer in accordance with applicable waste water provider regulations.

(3) Catch Basin Cleaning

(a) In areas that are not subject to a trash TMDL, the LACFCD shall determine priority areas and shall update its map or list of catch basins with their GPS coordinates and priority:

Priority A: Catch basins that are designated as consistently generating the highest volumes of trash and/or debris.

Priority B: Catch basins that are designated as consistently generating moderate volumes of trash and/or debris.

Priority C: Catch basins that are designated as generating low volumes of trash and/or debris.

The map or list shall contain the rationale or data to support priority designations.

(b) In areas not subject to a trash TMDL, the LACFCD shall inspect its catch basins according to the following schedule:

Priority A: A minimum of 3 times during the wet season (October 1 through April 15) and once during the dry season every year.

Priority B: A minimum of once during the wet season and once during the dry season every year.

Priority C: A minimum of once per year.

Catch basins shall be cleaned as necessary on the basis of inspections. At a minimum, LACFCD shall ensure that any catch basin that is determined to be at least 25% full of trash shall be cleaned out. LACFCD shall maintain inspection and cleaning records for Regional Water Board review.

(c) In areas that are subject to a trash TMDL, the subject Permittees shall implement the applicable provisions in Part VI.E.

(4) Catch Basin Labels and Open Channel Signage

(a) LACFCD shall label all catch basin inlets that they own with a legible “no dumping” message.

(b) The LACFCD shall inspect the legibility of the catch basin stencil or label nearest the inlet prior to the wet season every year.

(c) The LACFCD shall record all catch basins with illegible stencils and re-stencil or re-label within 180 days of inspection.

(d) The LACFCD shall post signs, referencing local code(s) that prohibit littering and illegal dumping, at designated public access points to open channels, creeks, urban lakes, and other relevant waterbodies.

(5) Open Channel Maintenance

The LACFCD shall implement a program for Open Channel Maintenance that includes the following:

(a) Visual monitoring of LACFCD owned open channels and other drainage structures for trash and debris at least annually;

(b) Removal of trash and debris from open channels a minimum of once per year before the wet season;

(c) Elimination of the discharge of contaminants produced by storm drain maintenance and clean outs; and

(d) Proper disposal of debris and trash removed during open channel maintenance.

(6) Infiltration from Sanitary Sewer to MS4/Preventive Maintenance

(a) The LACFCD shall implement controls and measures to prevent and eliminate infiltration of seepage from sanitary sewers to its MS4 thorough routine preventive maintenance of its MS4.

(b) The LACFCD shall implement controls to limit infiltration of seepage from sanitary sewers to its MS4 where necessary. Such controls must include:

(i) Adequate plan checking for construction and new development;

(ii) Incident response training for its employees that identify sanitary sewer spills;

(iii) Code enforcement inspections;

(iv) MS4 maintenance and inspections;

(v) Interagency coordination with sewer agencies; and

(vi) Proper education of its staff and contractors conducting field operations on its MS4.

(7) LACFCD-Owned Treatment Control BMPs

(a) The LACFCD shall implement an inspection and maintenance program for all LACFCD-owned treatment control BMPs, including post-construction treatment control BMPs.

(b) The LACFCD shall ensure proper operation of all its treatment control BMPs and maintain them as necessary for proper operation, including all post-construction treatment control BMPs.

(c) Any residual water produced by a treatment control BMP and not being internal to the BMP performance when being maintained shall be:

(i) Hauled away and legally disposed of; or

(ii) Applied to the land without runoff; or

(iii) Discharged to the sanitary sewer system (with permits or authorization); or

(iv) Treated or filtered to remove bacteria, sediments, nutrients, and meet the limitations set in Table 19 (Discharge Limitations for Dewatering Treatment BMPs), prior to discharge to the MS4.

viii. Parking Facilities Management

LACFCD-owned parking lots exposed to storm water shall be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. In no case shall a LACFCD-owned parking lot be cleaned less than once a month.

ix. Emergency Procedures

The LACFCD may conduct repairs and rehabilitation of essential public service systems and infrastructure in emergency situations with a self-waiver of the provisions of this Order as follows:

(1) The LACFCD shall abide by all other regulatory requirements, including notification to other agencies as appropriate.

(2) Where the self-waiver has been invoked, the LACFCD shall notify the Regional Water Board Executive Officer of the occurrence of the emergency no later than 30 business days after the situation of emergency has passed.

(3) Minor repairs of essential public service systems and infrastructure in emergency situations (that can be completed in less than one week) are not subject to the notification provisions. Appropriate BMPs to reduce the threat to water quality shall be implemented.

x. Employee and Contractor Training

(1) The LACFCD shall, no later than one year after Order adoption and annually thereafter before June 30, train all of their employees and contractors in targeted positions (whose interactions, jobs, and activities affect storm water quality) on the requirements of the overall storm water management program to:

(a) Promote a clear understanding of the potential for activities to pollute storm water.

(b) Identify opportunities to require, implement, and maintain appropriate BMPs in their line of work.

(2) The LACFCD shall, no later than one year after Order adoption and annually thereafter before June 30, train all of their employees and contractors who use or have the potential to use pesticides or fertilizers (whether or not they normally apply these as part of their work). Outside contractors can self-certify, providing they certify they have received all applicable training required in the Order and have documentation to that effect. Training programs shall address:

(a) The potential for pesticide-related surface water toxicity.

(b) Proper use, handling, and disposal of pesticides.

(c) Least toxic methods of pest prevention and control, including IPM.

(d) Reduction of pesticide use.

(3) The LACFCD shall require appropriate training of contractor employees in targeted positions as described above.

d. Illicit Connections and Illicit Discharge Elimination Program

i. General

(1) The LACFCD shall continue to implement an Illicit Connection and Illicit Discharge (IC/ID) Program to detect, investigate, and eliminate IC/IDs to its MS4. The IC/ID Program must be implemented in accordance with the requirements and performance measures specified in the following subsections.

(2) As stated in Part VI.A.2 of this Order, each Permittee must have adequate legal authority to prohibit IC/IDs to the MS4 and enable enforcement capabilities to eliminate the source of IC/IDs.

(3) The LACFCD's IC/ID Program shall consist of at least the following major program components:

(a) An up-to-date map of LACFCD's MS4

(b) Procedures for conducting source investigations for IC/IDs

(c) Procedures for eliminating the source of IC/IDs

(d) Procedures for public reporting of illicit discharges

(e) Spill response plan

(f) IC/IDs education and training for LACFCD staff

ii. MS4 Mapping

(1) The LACFCD shall maintain an up-to-date and accurate electronic map of its MS4. If possible, the map should be maintained within a GIS. The map must show the following, at a minimum:

(a) Within one year of Permit adoption, the location of outfalls owned and maintained by the LACFCD. Each outfall shall be given an alphanumeric identifier, which must be noted on the map. Each mapped outfall shall be located using a geographic positioning system (GPS). Photographs of the major outfalls shall be taken to provide baseline information to track operation and maintenance needs over time.

(b) The location and length of open channels and underground storm drain pipes with a diameter of 36 inches or greater that are owned and operated by the LACFCD.

(c) The location and name of all waterbodies receiving discharges from those MS4 major outfalls identified in (a).

(d) All LACFCD's dry weather diversions installed within the MS4 to direct flows from the MS4 to the sanitary sewer system, including the owner and operator of each diversion.

(e) By the end of the Permit term, map all known permitted and documented connections to its MS4 system.

(2) The MS4 map shall be updated as necessary.

iii. Illicit Discharge Source Investigation and Elimination

(1) The LACFCD shall develop written procedures for conducting investigations to prioritize and identify the source of all illicit discharges to its MS4, including procedures to eliminate the discharge once the source is located.

(2) At a minimum, the LACFCD shall initiate[23] an investigation(s) to identify and locate the source within one business day of becoming aware of the illicit discharge.

(3) When conducting investigations, the LACFCD shall comply with the following:

(a) Illicit discharges suspected of being sanitary sewage and/or significantly contaminated shall be investigated first.

(b) The LACFCD shall track all investigations to document, at a minimum, the date(s) the illicit discharge was observed; the results

[23] Permittees may comply with the Permit by taking initial steps (such as logging, prioritizing, and tasking) to "initiate" the investigation within one business day. However, the Regional Water Board would expect that the initial investigation, including a site visit, occur within two business days of becoming aware of the illicit discharge.

of the investigation; any follow-up of the investigation; and the date the investigation was closed.

(c) The LACFCD shall prioritize and investigate the source of all observed illicit discharges to its MS4.

(d) If the source of the illicit discharge is found to be a discharge authorized under an NPDES permit, the LACFCD shall document the source and report to the Regional Water Board within 30 days of determination. No further action is required.

(e) If the source of the illicit discharge has been determined to originate from within the jurisdiction of other Permittee(s) with land use authority over the suspected responsible party/parties, the LACFCD shall immediately alert the appropriate Permittee(s) of the problem for further action by the Permittee(s).

(4) When taking corrective action to eliminate illicit discharges, the LACFCD shall comply with the following:

(a) If the source of the illicit discharge has been determined or suspected by the LACFCD to originate within an upstream jurisdiction(s), the LACFCD shall immediately notify the upstream jurisdiction(s), and notify the Regional Water Board within 30 days of such determination and provide all the information collected and efforts taken.

(b) Once the Permittee with land use authority over the suspected responsible party/parties has been alerted, the LACFCD may continue to work in cooperation with the Permittee(s) to notify the responsible party/parties of the problem, and require the responsible party/parties to immediately initiate necessary corrective actions to eliminate the illicit discharge. Upon being notified that the discharge has been eliminated, the LACFCD may, in conjunction with the Permittee(s) conduct a follow-up investigation to verify that the discharge has been eliminated and cleaned up to the satisfaction of the LACFCD. The LACFCD shall document its follow-up investigation. The LACFCD may seek recovery and remediation costs from responsible parties or require compensation for the cost of all inspection and investigation activities. Resulting enforcement actions shall follow the program's Progressive Enforcement Policy.

(c) If the source of the illicit discharge cannot be traced to a suspected responsible party, the LACFCD, in conjunction with other affected Permittees, shall continue implementing the illicit discharge/spill response plan.

(5) In the event the LACFCD and/or other Permittees are unable to eliminate an ongoing illicit discharge following full execution of its legal authority and in accordance with its Progressive Enforcement Policy, including the inability to find the responsible party/parties, or other circumstances prevent the full elimination of an ongoing illicit discharge, the LACFCD and/or other Permittees shall notify the Regional Water Board within 30 days of such determination and provide available information to the Regional Water Board.

iv. Identification and Response to Illicit Connections

(1) Investigation

The LACFCD, upon discovery or upon receiving a report of a suspected illicit connection, shall initiate an investigation within 21 days, to determine the following: (1) source of the connection, (2) nature and volume of discharge through the connection, and (3) responsible party for the connection.

(2) Elimination

The LACFCD, upon confirmation of an illicit connection to its MS4, shall ensure that the connection is:

(a) Permitted or documented, provided the connection will only discharge storm water and non-storm water allowable under this Order or other individual or general NPDES Permits/WDRs, or

(b) Eliminated within 180 days of completion of the investigation, using its formal enforcement authority, if necessary, to eliminate the illicit connection.

(3) Documentation

Formal records must be maintained for all illicit connection investigations and the formal enforcement taken to eliminate illicit connections.

v. Public Reporting of Non-Stormwater Discharges and Spills

(1) The LACFCD shall, in collaboration with the County, continue to maintain the 888-CLEAN-LA hotline and corresponding internet site at www.888cleanla.org to promote, publicize, and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from MS4s.

(2) The LACFCD shall include information regarding public reporting of illicit discharges or improper disposal on the signage adjacent to open channels as required in Part VI.D.9.h.vi.(4).

(3) The LACFCD shall develop and maintain written procedures that document how complaint calls and internet submissions are received, documented, and tracked to ensure that all complaints are adequately addressed. The procedures shall be evaluated annually to determine whether changes or updates are needed to ensure that the procedures accurately document the methods employed by the LACFCD. Any identified changes shall be made to the procedures subsequent to the annual evaluation.

(4) The LACFCD shall maintain documentation of the complaint calls and internet submissions and record the location of the reported spill or IC/ID and the actions undertaken, including referrals to other agencies, in response to all IC/ID complaints.

vi. Illicit Discharge and Spill Response Plan

(1) The LACFCD shall implement an ID and spill response plan for all spills that may discharge into its system. The ID and spill response plan shall clearly identify agencies responsible for ID and spill response and cleanup, contact information, and shall contain at a minimum the following requirements:

(a) Coordination with spill response teams throughout all appropriate departments, programs and agencies so that maximum water quality protection is provided.

(b) Initiation of investigation of all public and employee ID and spill complaints within one business day of receiving the complaint to assess validity.

(c) Response to ID and spills within 4 hours of becoming aware of the ID or spill, except where such IDs or spills occur on private property, in which case the response should be within 2 hours of gaining legal access to the property.

(d) IDs or spills that may endanger health or the environment shall be reported to appropriate public health agencies and the Office of Emergency Services (OES).

vii. Illicit Connection and Illicit Discharge Education and Training

(1) The LACFCD must continue to implement a training program regarding the identification of IC/IDs for all LACFCD field staff, who, as part of their normal job responsibilities (e.g., storm drain inspection and maintenance), may come into contact with or otherwise observe an illicit discharge or illicit connection to its MS4. Contact information, including the procedure for reporting an illicit discharge, must be included in the LACFCD's fleet vehicles that are used by field staff. Training program documents must be available for review by the Regional Water Board.

(2) The LACFCD's training program should address, at a minimum, the following:

(a) IC/ID identification, including definitions and examples,

(b) investigation,

(c) elimination,

(d) cleanup,

(e) reporting, and

(f) documentation.

(3) The LACFCD must create a list of applicable positions which require IC/ID training and ensure that training is provided at least twice during the term of this Order. The LACFCD must maintain documentation of the training activities.

(4) New LACFCD staff members must be provided with IC/ID training within 180 days of starting employment.

(5) The LACFCD shall require its contractors to train their employees in targeted positions as described above.

5. Public Information and Participation Program

a. General

i. Each Permittee shall implement a Public Information and Participation Program (PIPP) that includes the requirements listed in this Part VI.D.5. Each Permittee shall be responsible for developing and implementing the PIPP and implementing specific PIPP requirements. The objectives of the PIPP are as follows:

(1) To measurably increase the knowledge of the target audiences about the MS4, the adverse impacts of storm water pollution on receiving waters and potential solutions to mitigate the impacts.

(2) To measurably change the waste disposal and storm water pollution generation behavior of target audiences by developing and encouraging the implementation of appropriate alternatives.

(3) To involve and engage a diversity of socio-economic groups and ethnic communities in Los Angeles County to participate in mitigating the impacts of storm water pollution.

b. PIPP Implementation

i. Each Permittee shall implement the PIPP requirements listed in this Part VI.D.4 using one or more of the following approaches:

(1) By participating in a County-wide PIPP,

(2) By participating in one or more Watershed Group sponsored PIPPs, and/or

(3) Or individually within its jurisdiction.

ii. If a Permittee participates in a County-wide or Watershed Group PIPP, the Permittee shall provide the contact information for their appropriate staff responsible for storm water public education activities to the designated PIPP coordinator and contact information changes no later than 30 days after a change occurs.

c. Public Participation

i. Each Permittee, whether participating in a County-wide or Watershed Group sponsored PIPP, or acting individually, shall provide a means for public reporting of clogged catch basin inlets and illicit discharges/dumping, faded or missing catch basin labels, and general storm water and non-storm water pollution prevention information.

(1) Permittees may elect to use the 888-CLEAN-LA hotline as the general public reporting contact or each Permittee or Watershed Group may establish its own hotline, if preferred.

(2) Each Permittee shall include the reporting information, updated when necessary, in public information, and the government pages of the telephone book, as they are developed or published.

(3) Each Permittee shall identify staff or departments who will serve as the contact person(s) and shall make this information available on its website.

(4) Each Permittee is responsible for providing current, updated hotline contact information to the general public within its jurisdiction.

ii. Organize events targeted to residents and population subgroups to educate and involve the community in storm water and non-storm water pollution prevention and clean-up (e.g., education seminars, clean-ups, and community catch basin stenciling).

d. Residential Outreach Program

i. Working in conjunction with a County-wide or Watershed Group sponsored PIPP or individually, each Permittee shall implement the following activities:

(1) Conduct storm water pollution prevention public service announcements and advertising campaigns

(2) Public education materials shall include but are not limited to information on the proper handling (i.e., disposal, storage and/or use) of:

(a) Vehicle waste fluids

(b) Household waste materials (i.e., trash and household hazardous waste, including personal care products and pharmaceuticals)

(c) Construction waste materials

(d) Pesticides and fertilizers (including integrated pest management practices [IPM] to promote reduced use of pesticides)

(e) Green waste (including lawn clippings and leaves)

(f) Animal wastes

(3) Distribute activity specific storm water pollution prevention public education materials at, but not limited to, the following points of purchase:

(a) Automotive parts stores

(b) Home improvement centers / lumber yards / hardware stores/paint stores

(c) Landscaping / gardening centers

(d) Pet shops / feed stores

(4) Maintain storm water websites or provide links to storm water websites via the Permittee's website, which shall include educational material and opportunities for the public to participate in storm water pollution prevention and clean-up activities listed in Part VI.D.4.

(5) Provide independent, parochial, and public schools within in each Permittee's jurisdiction with materials to educate school children (K-12) on storm water pollution. Material may include videos, live presentations, and other information. Permittees are encouraged to work with, or leverage, materials produced by other statewide agencies and associations such as the State Water Board's "Erase the Waste" educational program and the California Environmental Education Interagency Network (CEEIN) to implement this requirement.

(6) When implementing activities in subsections (1)-(5), Permittees shall use effective strategies to educate and involve ethnic communities in storm water pollution prevention through culturally effective methods.

6. Industrial/Commercial Facilities Program

a. General

i. Each Permittee shall implement an Industrial / Commercial Facilities Program that meets the requirements of this Part VI.D.6. The Industrial / Commercial

Facilities Program shall be designed to prevent illicit discharges into the MS4 and receiving waters, reduce industrial / commercial discharges of storm water to the maximum extent practicable, and prevent industrial / commercial discharges from the MS4 from causing or contributing to a violation of receiving water limitations. At a minimum, the Industrial / Commercial Facilities Program shall be implemented in accordance with the requirements listed in this Part VI.D.6, or as approved in a Watershed Management Program per Part VI.C. Minimum program components shall include the following components:

(1) Track

(2) Educate

(3) Inspect

(4) Ensure compliance with municipal ordinances at industrial and commercial facilities that are critical sources of pollutants in storm water

b. Track Critical Industrial / Commercial Sources

i. Each Permittee shall maintain an updated watershed-based inventory or database containing the latitude / longitude coordinates of all industrial and commercial facilities within its jurisdiction that are critical sources of storm water pollution. The inventory or database shall be maintained in electronic format and incorporation of facility information into a Geographical Information System (GIS) is recommended. Critical Sources to be tracked are summarized below:

(1) Commercial Facilities

(a) Restaurants

(b) Automotive service facilities (including those located at automotive dealerships)

(c) Retail Gasoline Outlets

(d) Nurseries and Nursery Centers (Merchant Wholesalers, Nondurable Goods, and Retail Trade)

(2) USEPA “Phase I” Facilities [as specified in 40 CFR §122.26(b)(14)(i)-(xi)]

(3) Other federally-mandated facilities [as specified in 40 CFR §122.26(d)(2)(iv)(C)]

(a) Municipal landfills

(b) Hazardous waste treatment, disposal, and recovery facilities

(c) Industrial facilities subject to section 313 “Toxic Release Inventory” reporting requirements of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) [42 U.S.C. § 11023]

(4) All other commercial or industrial facilities that the Permittee determines may contribute a substantial pollutant load to the MS4.

ii. Each Permittee shall include the following minimum fields of information for each critical source industrial and commercial facility identified in its watershed-based inventory or database:

(1) Name of facility

(2) Name of owner/ operator and contact information

(3) Address of facility (physical and mailing)

(4) North American Industry Classification System (NAICS) code

(5) Standard Industrial Classification (SIC) code

(6) A narrative description of the activities performed and/or principal products produced

(7) Status of exposure of materials to storm water

(8) Name of receiving water

(9) Identification of whether the facility is tributary to a CWA § 303(d) listed water body segment or water body segment subject to a TMDL, where the facility generates pollutants for which the water body segment is impaired.

(10) Ability to denote if the facility is known to maintain coverage under the State Water Board's General NPDES Permit for the Discharge of Stormwater Associated with Industrial Activities (Industrial General Permit) or other individual or general NPDES permits or any applicable waiver issued by the Regional or State Water Board pertaining to storm water discharges.

(11) Ability to denote if the facility has filed a No Exposure Certification with the State Water Board.

iii. Each Permittee shall update its inventory of critical sources at least annually. The update shall be accomplished through collection of new information obtained through field activities or through other readily available inter- and intra-agency informational databases (e.g., business licenses, pretreatment permits, sanitary sewer connection permits, and similar information).

c. Educate Industrial / Commercial Sources

i. At least once during the five-year period of this Order, each Permittee shall notify the owner/operator of each of its inventoried commercial and industrial sites identified in Part VI.D.6.b of the BMP requirements applicable to the site/source.

ii. Business Assistance Program

(1) Each Permittee shall implement a Business Assistance Program to provide technical information to businesses to facilitate their efforts to reduce the discharge of pollutants in storm water. Assistance shall be targeted to select business sectors or small businesses upon a determination that their activities may be contributing substantial pollutant

loads to the MS4 or receiving water. Assistance may include technical guidance and provision of educational materials. The Program may include:

(a) On-site technical assistance, telephone, or e-mail consultation regarding the responsibilities of business to reduce the discharge of pollutants, procedural requirements, and available guidance documents.

(b) Distribution of storm water pollution prevention educational materials to operators of auto repair shops; car wash facilities; restaurants and mobile sources including automobile/equipment repair, washing, or detailing; power washing services; mobile carpet, drape, or upholstery cleaning services; swimming pool, water softener, and spa services; portable sanitary services; and commercial applicators and distributors of pesticides, herbicides and fertilizers, if present.

d. Inspect Critical Commercial Sources

i. Frequency of Mandatory Commercial Facility Inspections

Each Permittee shall inspect all commercial facilities identified in Part VI.D.6.b twice during the 5-year term of the Order, provided that the first mandatory compliance inspection occurs no later than 2 years after the effective date of this Order. A minimum interval of 6 months between the first and the second mandatory compliance inspection is required. In addition, each Permittee shall implement the activities outlined in the following subparts.

ii. Scope of Mandatory Commercial Facility Inspections

Each Permittee shall inspect all commercial facilities to confirm that storm water and non-storm water BMPs are being effectively implemented in compliance with municipal ordinances. At each facility, inspectors shall verify that the operator is implementing effective source control BMPs for each corresponding activity. Each Permittee shall require implementation of additional BMPs where storm water from the MS4 discharges to a significant ecological area (SEA), a water body subject to TMDL provisions in Part VI.E, or a CWA § 303(d) listed impaired water body. Likewise, for those BMPs that are not adequately protective of water quality standards, a Permittee may require additional site-specific controls.

e. Inspect Critical Industrial Sources

Each Permittee shall conduct industrial facility compliance inspections as specified below.

i. Frequency of Mandatory Industrial Facility Compliance Inspections

(1) Minimum Inspection Frequency

Each Permittee shall perform an initial mandatory compliance inspection at all industrial facilities identified in Part VI.D.6.b no later than 2 years after the effective date of this Order. After the initial inspection, all

facilities that have not filed a No Exposure Certification with the State Water Board are subject to a second mandatory compliance inspection. A minimum interval of 6 months between the first and the second mandatory compliance inspection is required. A facility need not be inspected more than twice during the term of the Order unless subject to an enforcement action as specified in Part VI.D.6.h below.

(2) Exclusion of Facilities Previously Inspected by the Regional Water Board

Each Permittee shall review the State Water Board's Storm Water Multiple Application and Report Tracking System (SMARTS) database[24] at defined intervals to determine if an industrial facility has recently been inspected by the Regional Water Board. The first interval shall occur approximately 2 years after the effective date of the Order. The Permittee does not need to inspect the facility if it is determined that the Regional Water Board conducted an inspection of the facility within the prior 24 month period. The second interval shall occur approximately 4 years after the effective date of the Order. Likewise, the Permittee does not need to inspect the facility if it is determined that the Regional Water Board conducted an inspection of the facility within the prior 24 month period.

(3) No Exposure Verification

As a component of the first mandatory inspection, each Permittee shall identify those facilities that have filed a No Exposure Certification with the State Water Board. Approximately 3 to 4 years after the effective date of the Order, each Permittee shall evaluate its inventory of industrial facilities and perform a second mandatory compliance inspection at a minimum of 25% of the facilities identified to have filed a No Exposure Certification. The purpose of this inspection is to verify the continuity of the no exposure status.

(4) Exclusion Based on Watershed Management Program

A Permittee is exempt from the mandatory inspection frequencies listed above if it is implementing industrial inspections in accordance with an approved Watershed Management Program per Part VI.C.

ii. Scope of Mandatory Industrial Facility Inspections

Each Permittee shall confirm that each industrial facility:

(1) Has a current Waste Discharge Identification (WDID) number for coverage under the Industrial General Permit, and that a Storm Water Pollution Prevention Plan (SWPPP) is available on-site; *or*

(2) Has applied for, and has received a current No Exposure Certification for facilities subject to this requirement;

(3) Is effectively implementing BMPs in compliance with municipal ordinances. Facilities must implement the source control BMPs identified

[24] SMARTS is accessible at https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.jsp

in Table 10, unless the pollutant generating activity does not occur. The Permittees shall require implementation of additional BMPs where storm water from the MS4 discharges to a water body subject to TMDL Provisions in Part VI.E, or a CWA § 303(d) listed impaired water body. Likewise, if the specified BMPs are not adequately protective of water quality standards, a Permittee may require additional site-specific controls. For critical sources that discharge to MS4s that discharge to SEAs, each Permittee shall require operators to implement additional pollutant-specific controls to reduce pollutants in storm water runoff that are causing or contributing to exceedances of water quality standards.

(4) Applicable industrial facilities identified as not having either a current WDID or No Exposure Certification shall be notified that they must obtain coverage under the Industrial General Permit and shall be referred to the Regional Water Board per the Progressive Enforcement Policy procedures identified in Part VI.D.2.

f. Source Control BMPs for Commercial and Industrial Facilities

Effective source control BMPs for the activities listed in Table 10 shall be implemented at commercial and industrial facilities, unless the pollutant generating activity does not occur:

Table 10. Source Control BMPs at Commercial and Industrial Facilities

Pollutant-Generating Activity	BMP Narrative Description
Unauthorized Non-Storm water Discharges	Effective elimination of non-storm water discharges
Accidental Spills/ Leaks	Implementation of effective spills/ leaks prevention and response procedures
Vehicle/ Equipment Fueling	Implementation of effective fueling source control devices and practices
Vehicle/ Equipment Cleaning	Implementation of effective equipment/ vehicle cleaning practices and appropriate wash water management practices
Vehicle/ Equipment Repair	Implementation of effective vehicle/ equipment repair practices and source control devices
Outdoor Liquid Storage	Implementation of effective outdoor liquid storage source controls and practices
Outdoor Equipment Operations	Implementation of effective outdoor equipment source control devices and practices
Outdoor Storage of Raw Materials	Implementation of effective source control practices and structural devices
Storage and Handling of Solid Waste	Implementation of effective solid waste storage/ handling practices and appropriate control measures
Building and Grounds Maintenance	Implementation of effective facility maintenance practices

Pollutant-Generating Activity	BMP Narrative Description
Parking/ Storage Area Maintenance	Implementation of effective parking/ storage area designs and housekeeping/ maintenance practices
Storm water Conveyance System Maintenance Practices	Implementation of proper conveyance system operation and maintenance protocols
Pollutant-Generating Activity	**BMP Narrative Description from Regional Water Board Resolution No. 98-08**
Sidewalk Washing	**1.** Remove trash, debris, and free standing oil/grease spills/leaks (use absorbent material, if necessary) from the area before washing; and **2.** Use high pressure, low volume spray washing using only potable water with no cleaning agents at an average usage of 0.006 gallons per square feet of sidewalk area.
Street Washing	Collect and divert wash water to the sanitary sewer – publically owned treatment works (POTW). Note: POTW approval may be needed.

g. Significant Ecological Areas (SEAs)

See VI.D.6.e.ii.3.

h. Progressive Enforcement

Each Permittee shall implement its Progressive Enforcement Policy to ensure that Industrial / Commercial facilities are brought into compliance with all storm water requirements within a reasonable time period. See Part VI.D.2 for requirements for the development and implementation of a Progressive Enforcement Policy.

7. Planning and Land Development Program

a. Purpose

i. Each Permittee shall implement a Planning and Land Development Program pursuant to Part VI.D.7.b for all New Development and Redevelopment projects subject to this Order to:

(1) Lessen the water quality impacts of development by using smart growth practices such as compact development, directing development towards existing communities via infill or redevelopment, and safeguarding of environmentally sensitive areas.

(2) Minimize the adverse impacts from storm water runoff on the biological integrity of Natural Drainage Systems and the beneficial uses of water

bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 21000 et seq.).

(3) Minimize the percentage of impervious surfaces on land developments by minimizing soil compaction during construction, designing projects to minimize the impervious area footprint, and employing Low Impact Development (LID) design principles to mimic predevelopment hydrology through infiltration, evapotranspiration and rainfall harvest and use.

(4) Maintain existing riparian buffers and enhance riparian buffers when possible.

(5) Minimize pollutant loadings from impervious surfaces such as roof tops, parking lots, and roadways through the use of properly designed, technically appropriate BMPs (including Source Control BMPs such as good housekeeping practices), LID Strategies, and Treatment Control BMPs.

(6) Properly select, design and maintain LID and Hydromodification Control BMPs to address pollutants that are likely to be generated, reduce changes to pre-development hydrology, assure long-term function, and avoid the breeding of vectors[25].

(7) Prioritize the selection of BMPs to remove storm water pollutants, reduce storm water runoff volume, and beneficially use storm water to support an integrated approach to protecting water quality and managing water resources in the following order of preference:

(a) On-site infiltration, bioretention and/or rainfall harvest and use.

(b) On-site biofiltration, off-site ground water replenishment, and/or off-site retrofit.

b. Applicability

i. New Development Projects

(1) Development projects subject to Permittee conditioning and approval for the design and implementation of post-construction controls to mitigate storm water pollution, prior to completion of the project(s), are:

(a) All development projects equal to 1 acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area

(b) Industrial parks 10,000 square feet or more of surface area

(c) Commercial malls 10,000 square feet or more surface area

(d) Retail gasoline outlets 5,000 square feet or more of surface area

(e) Restaurants (SIC 5812) 5,000 square feet or more of surface area

[25] Treatment BMPs when designed to drain within 96 hours of the end of rainfall minimize the potential for the breeding of vectors. See California Department of Public Health *Best Management Practices for Mosquito Control in California* (2012) at http://www.westnile.ca.gov/resources.php

(f) Parking lots 5,000 square feet or more of impervious surface area, or with 25 or more parking spaces

(g) Street and road construction of 10,000 square feet or more of impervious surface area shall follow USEPA guidance regarding Managing Wet Weather with Green Infrastructure: Green Streets[26] (December 2008 EPA-833-F-08-009) to the maximum extent practicable. Street and road construction applies to standalone streets, roads, highways, and freeway projects, and also applies to streets within larger projects.

(h) Automotive service facilities (SIC 5013, 5014, 5511, 5541, 7532-7534 and 7536-7539) 5,000 square feet or more of surface area

(i) Redevelopment projects in subject categories that meet Redevelopment thresholds identified in Part VI.D.6.b.ii (Redevelopment Projects) below

(j) Projects located in or directly adjacent to, or discharging directly to a Significant Ecological Area (SEA), where the development will:

(i) Discharge storm water runoff that is likely to impact a sensitive biological species or habitat; and

(ii) Create 2,500 square feet or more of impervious surface area

(k) Single-family hillside homes. To the extent that a Permittee may lawfully impose conditions, mitigation measures or other requirements on the development or construction of a single-family home in a hillside area as defined in the applicable Permittee's Code and Ordinances, each Permittee shall require that during the construction of a single-family hillside home, the following measures are implemented:

(i) Conserve natural areas

(ii) Protect slopes and channels

(iii) Provide storm drain system stenciling and signage

(iv) Divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability

(v) Direct surface flow to vegetated areas before discharge unless the diversion would result in slope instability.

ii. Redevelopment Projects

(1) Redevelopment projects subject to Permittee conditioning and approval for the design and implementation of post-construction controls to mitigate storm water pollution, prior to completion of the project(s), are:

(a) Land-disturbing activity that results in the creation or addition or replacement of 5,000 square feet or more of impervious surface area

[26] http://water.epa.gov/infrastructure/greeninfrastructure/index.cfm

on an already developed site on development categories identified in Part VI.D.6.c. (New Development/Redevelopment Performance Criteria).

(b) Where Redevelopment results in an alteration to more than fifty percent of impervious surfaces of a previously existing development, and the existing development was not subject to post-construction storm water quality control requirements, the entire project must be mitigated.

(c) Where Redevelopment results in an alteration of less than fifty percent of impervious surfaces of a previously existing development, and the existing development was not subject to post-construction storm water quality control requirements, only the alteration must be mitigated, and not the entire development.

(i) Redevelopment does not include routine maintenance activities that are conducted to maintain original line and grade, hydraulic capacity, original purpose of facility or emergency redevelopment activity required to protect public health and safety. Impervious surface replacement, such as the reconstruction of parking lots and roadways which does not disturb additional area and maintains the original grade and alignment, is considered a routine maintenance activity. Redevelopment does not include the repaving of existing roads to maintain original line and grade.

(ii) Existing single-family dwelling and accessory structures are exempt from the Redevelopment requirements unless such projects create, add, or replace 10,000 square feet of impervious surface area.

(d) In this section, Existing Development or Redevelopment projects shall mean all discretionary permit projects or project phases that have not been deemed complete for processing, or discretionary permit projects without vesting tentative maps that have not requested and received an extension of previously granted approvals within 90 days of adoption of the Order. Projects that have been deemed complete within 90 days of adoption of the Order are not subject to the requirements Section 7.c. For Permittee's projects the effective date shall be the date the governing body or their designee approves initiation of the project design.

(e) Specifically, the Newhall Ranch Project Phases I and II (a.k.a. the Landmark and Mission Village projects) are deemed to be an existing development that will at a minimum, be designed to comply with the Specific LID Performance Standards attached to the Waste Discharge Requirements (Order No. R4-2012-0139). All subsequent phases of the Newhall Ranch Project constructed during the term of this Order shall be subject to the requirements of this Order.

c. New Development/ Redevelopment Project Performance Criteria

i. Integrated Water Quality/Flow Reduction/Resources Management Criteria

(1) Each Permittee shall require all New Development and Redevelopment projects (referred to hereinafter as "new projects") identified in Part VI.D.7.b to control pollutants, pollutant loads, and runoff volume emanating from the project site by: (1) minimizing the impervious surface area and (2) controlling runoff from impervious surfaces through infiltration, bioretention and/or rainfall harvest and use.

(2) Except as provided in Part VI.D.7.c.ii. (Technical Infeasibility or Opportunity for Regional Ground Water Replenishment), Part VI.D.7.d.i (Local Ordinance Equivalence), or Part VI.D.7.c.v (Hydromodification), below, each Permittee shall require the project to retain on-site the Stormwater Quality Design Volume (SWQDv) defined as the runoff from:

(a) The 0.75-inch, 24-hour rain event or

(b) The 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, *whichever is greater*.

(3) Bioretention and biofiltration systems shall meet the design specifications provided in Attachment H to this Order unless otherwise approved by the Regional Water Board Executive Officer.

(4) When evaluating the potential for on-site retention, each Permittee shall consider the maximum potential for evapotranspiration from green roofs and rainfall harvest and use.

ii. Alternative Compliance for Technical Infeasibility or Opportunity for Regional Ground Water Replenishment

(1) In instances of technical infeasibility or where a project has been determined to provide an opportunity to replenish regional ground water supplies at an offsite location, each Permittee may allow projects to comply with this Order through the alternative compliance measures as described in Part VI.D.7.c.iii.

(2) To demonstrate technical infeasibility, the project applicant must demonstrate that the project cannot reliably retain 100 percent of the SWQDv on-site, even with the maximum application of green roofs and rainwater harvest and use, and that compliance with the applicable post-construction requirements would be technically infeasible by submitting a site-specific hydrologic and/or design analysis conducted and endorsed by a registered professional engineer, geologist, architect, and/or landscape architect. Technical infeasibility may result from conditions including the following:

(a) The infiltration rate of saturated in-situ soils is less than 0.3 inch per hour and it is not technically feasible to amend the in-situ soils to attain an infiltration rate necessary to achieve reliable performance of infiltration or bioretention BMPs in retaining the SWQDv on-site.

(b) Locations where seasonal high ground water is within 5 to 10 feet of the surface,

(c) Locations within 100 feet of a ground water well used for drinking water,

(d) Brownfield development sites where infiltration poses a risk of causing pollutant mobilization,

(e) Other locations where pollutant mobilization is a documented concern[27],

(f) Locations with potential geotechnical hazards, or

(g) Smart growth and infill or redevelopment locations where the density and/ or nature of the project would create significant difficulty for compliance with the on-site volume retention requirement.

(3) To utilize alternative compliance measures to replenish ground water at an offsite location, the project applicant shall demonstrate *(i)* why it is not advantageous to replenish ground water at the project site, *(ii)* that ground water can be used for beneficial purposes at the offsite location, and *(iii)* that the alternative measures shall also provide equal or greater water quality benefits to the receiving surface water than the Water Quality/Flow Reduction/Resource Management Criteria in Part VI.7.D.c.i.

iii. Alternative Compliance Measures

When a Permittee determines a project applicant has demonstrated that it is technically infeasible to retain 100 percent of the SWQDv on-site, or is proposing an alternative offsite project to replenish regional ground water supplies, the Permittee shall require one of the following mitigation options:

(1) On-site Biofiltration

(a) If using biofiltration due to demonstrated technical infeasibility, then the new project must biofiltrate 1.5 times the portion of the SWQDv that is not reliably retained on-site, as calculated by Equation 1 below.

Equation 1:

$$Bv = 1.5 * [SWQDv - Rv]$$

Where:

Bv = biofiltration volume

[27] Pollutant mobilization is considered a documented concern at or near properties that are contaminated or store hazardous substances underground.

SWQDv = the storm water runoff from a 0.75 inch, 24-hour storm or the 85th percentile storm, *whichever is greater*.

Rv = volume reliably retained on-site

(b) Conditions for On-site Biofiltration

(i) Biofiltration systems shall meet the design specifications provided in Attachment H to this Order unless otherwise approved by the Regional Water Board Executive Officer.

(ii) Biofiltration systems discharging to a receiving water that is included on the Clean Water Act section 303(d) list of impaired water quality-limited water bodies due to nitrogen compounds or related effects shall be designed and maintained to achieve enhanced nitrogen removal capability. See Attachment H for design criteria for underdrain placement to achieve enhanced nitrogen removal.

(2) Offsite Infiltration

(a) Use infiltration or bioretention BMPs to intercept a volume of storm water runoff equal to the SWQDv, less the volume of storm water runoff reliably retained on-site, at an approved offsite project, and

(b) Provide pollutant reduction (treatment) of the storm water runoff discharged from the project site in accordance with the Water Quality Mitigation Criteria provided in Part VI.D.7.c.iv.

(c) The required offsite mitigation volume shall be calculated by Equation 2 below and equal to:

Equation 2:

$$Mv = 1.0 * [SWQDv - Rv]$$

Where:

Mv = mitigation volume

SWQDv = runoff from the 0.75 inch, 24-hour storm event or the 85th percentile storm, *whichever is greater*

Rv = the volume of storm water runoff reliably retained on-site.

(3) Ground Water Replenishment Projects

Permittees may propose, in their Watershed Management Program or EWMP, regional projects to replenish regional ground water supplies at offsite locations, provided the groundwater supply has a designated beneficial use in the Basin Plan.

(a) Regional groundwater replenishment projects must use infiltration, ground water replenishment, or bioretention BMPs to intercept a volume of storm water runoff equal to the SWQDv for new development and redevelopment projects, subject to Permittee conditioning and approval for the design and implementation of post-construction controls, within the approved project area, and

(b) Provide pollutant reduction (treatment) of the storm water runoff discharged from development projects, within the project area, subject to Permittee conditioning and approval for the design and implementation of post-construction controls to mitigate storm water pollution in accordance with the Water Quality Mitigation Criteria provided in Part VI.D.7.c.iv.

(c) Permittees implementing a regional ground water replenishment project in lieu of onsite controls shall ensure the volume of runoff captured by the project shall be equal to:

Equation 2:

$$Mv = 1.0 * [SWQDv - Rv]$$

Where:

Mv = mitigation volume

SWQDv = runoff from the 0.75 inch, 24-hour storm event or the 85th percentile storm, whichever is greater

Rv = the volume of storm water runoff reliably retained on-site.

(d) Regional groundwater replenishment projects shall be located in the same sub-watershed (defined as draining to the same HUC-12 hydrologic area in the Basin Plan) as the new development or redevelopment projects which did not implement on site retention BMPs . Each Permittee may consider locations outside of the HUC-12 but within the HUC-10 subwatershed area if there are no opportunities within the HUC-12 subwatershed or if greater pollutant reductions and/or ground water replenishment can be achieved at a location within the expanded HUC-10 subwatershed. The use of a mitigation, ground water replenishment, or retrofit project outside of the HUC-12 subwatershed is subject to the approval of the Executive Officer of the Regional Water Board.

(4) Offsite Project - Retrofit Existing Development

Use infiltration, bioretention, rainfall harvest and use and/or biofiltration BMPs to retrofit an existing development, with similar land uses as the new development or land uses associated with comparable or higher storm water runoff event mean concentrations (EMCs) than the new development.

Comparison of EMCs for different land uses shall be based on published data from studies performed in southern California. The retrofit plan shall be designed and constructed to:

(a) Intercept a volume of storm water runoff equal to the mitigation volume (Mv) as described above in Equation 2, except biofiltration BMPs shall be designed to meet the biofiltration volume as described in Equation 1 and

(b) Provide pollutant reduction (treatment) of the storm water runoff from the project site as described in the Water Quality Mitigation Criteria provided in Part VI.D.7.c.iv.

(5) Conditions for Offsite Projects

(a) Project applicants seeking to utilize these alternative compliance provisions may propose other offsite projects, which the Permittees may approve if they meet the requirements of this subpart.

(b) Location of offsite projects. Offsite projects shall be located in the same sub-watershed (defined as draining to the same HUC-12 hydrologic area in the Basin Plan) as the new development or redevelopment project. Each Permittee may consider locations outside of the HUC-12 but within the HUC-10 subwatershed area if there are no opportunities within the HUC-12 subwatershed or if greater pollutant reductions and/or ground water replenishment can be achieved at a location within the expanded HUC-10 subwatershed. The use of a mitigation, ground water replenishment, or retrofit project outside of the HUC-12 subwatershed is subject to the approval of the Executive Officer of the Regional Water Board.

(c) Project applicant must demonstrate that equal benefits to ground water recharge cannot be met on the project site.

(d) Each Permittee shall develop a prioritized list of offsite mitigation, ground water replenishment and/or retrofit projects, and when feasible, the mitigation must be directed to the highest priority project within the same HUC-12 or if approved by the Regional Water Board Executive Officer, the HUC-10 drainage area, as the new development project.

(e) Infiltration/bioretention shall be the preferred LID BMP for offsite mitigation or ground water replenishment projects. Offsite retrofit projects may include green streets, parking lot retrofits, green roofs, and rainfall harvest and use. Biofiltration BMPs may be considered for retrofit projects when infiltration, bioretention or rainfall harvest and use is technically infeasible.

(f) Each Permittee shall develop a schedule for the completion of offsite projects, including milestone dates to identify, fund, design, and construct the projects. Offsite projects shall be completed as soon as possible, and at the latest, within 4 years of the certificate of occupancy for the first project that contributed funds toward the

construction of the offsite project, unless a longer period is otherwise authorized by the Executive Officer of the Regional Water Board. For public offsite projects, each Permittee must provide in their annual reports a summary of total offsite project funds raised to date and a description (including location, general design concept, volume of water expected to be retained, and total estimated budget) of all pending public offsite projects. Funding sufficient to address the offsite volume must be transferred to the Permittee (for public offsite mitigation projects) or to an escrow account (for private offsite mitigation projects) within one year of the initiation of construction.

(g) Offsite projects must be approved by the Permittee and may be subject to approval by the Regional Water Board Executive Officer, if a third-party petitions the Executive Officer to review the project. Offsite projects will be publicly noticed on the Regional Water Board's website for 30 days prior to approval.

(h) The project applicant must perform the offsite projects as approved by either the Permittee or the Regional Water Board Executive Officer or provide sufficient funding for public or private offsite projects to achieve the equivalent mitigation storm water volume.

(6) Regional Storm Water Mitigation Program

A Permittee or Permittee group may apply to the Regional Water Board for approval of a regional or sub-regional storm water mitigation program to substitute in part or wholly for New and Redevelopment requirements for the area covered by the regional or sub-regional storm water mitigation program. Upon review and a determination by the Regional Water Board Executive Officer that the proposal is technically valid and appropriate, the Regional Water Board may consider for approval such a program if its implementation meets all of the following requirements:

(a) Retains the runoff from the 85th percentile, 24-hour rain event or the 0.75 inch, 24-hour rain event, whichever is greater;
(b) Results in improved storm water quality;
(c) Protects stream habitat;
(d) Promotes cooperative problem solving by diverse interests;
(e) Is fiscally sustainable and has secure funding; and
(f) Is completed in five years including the construction and start-up of treatment facilities.
(g) Nothing in this provision shall be construed as to delay the implementation of requirements for new and redevelopment, as approved in this Order.

(7) Water Quality Mitigation Criteria

(a) Each Permittee shall require all New Development and Redevelopment projects that have been approved for offsite mitigation or ground water replenishment projects as defined in Part VI.D.7.c.ii-iii to also provide treatment of storm water runoff from the project site. Each Permittee shall require these projects to design and implement post-construction storm water BMPs and control measures to reduce pollutant loading as necessary to:

(i) Meet the pollutant specific benchmarks listed in Table 11 at the treatment systems outlet or prior to the discharge to the MS4, and

(ii) Ensure that the discharge does not cause or contribute to an exceedance of water quality standards at the Permittee's downstream MS4 outfall.

(b) Each Permittee may allow the project proponent to install flow-through modular treatment systems including sand filters, or other proprietary BMP treatment systems with a demonstrated efficiency at least equivalent to a sand filter. The sizing of the flow through treatment device shall be based on a rainfall intensity of:

(i) 0.2 inches per hour, or

(ii) The one year, one-hour rainfall intensity as determined from the most recent Los Angeles County isohyetal map, *whichever is greater*.

Table 11. Benchmarks Applicable to New Development Treatment BMPs[28]

Conventional Pollutants

Pollutant	Suspended Solids mg/L	Total P mg/L	Total N mg/L		TKN mg/L	
Effluent Concentration	14	0.13	1.28		1.09	

Metals

Pollutant	Total Cd µg/L	Total Cu µg/L	Total Cr µg/L	Total Pb µg/L	Total Zn µg/L
Effluent Concentration	0.3	6	2.8	2.5	23

[28] The treatment control BMP performance benchmarks were developed from the median effluent water quality values of the six highest performing BMPs, per pollutant, in the storm water BMP database (http://www.bmpdatabase.org/, last visited September 25, 2012).

(c) In addition to the requirements for controlling pollutant discharges as described in Part VI.D.7.c.iii. and the treatment benchmarks described above, each Permittee shall ensure that the new development or redevelopment will not cause or contribute to an exceedance of applicable water quality-based effluent limitations established in Part VI.E pursuant to Total Maximum Daily Loads (TMDLs).

iv. Hydromodification (Flow/ Volume/ Duration) Control Criteria

Each Permittee shall require all New Development and Redevelopment projects located within natural drainage systems as described in Part VI.D.7.c.iv.(1)(a)(iii) to implement hydrologic control measures, to prevent accelerated downstream erosion and to protect stream habitat in natural drainage systems. The purpose of the hydrologic controls is to minimize changes in post-development hydrologic storm water runoff discharge rates, velocities, and duration. This shall be achieved by maintaining the project's pre-project storm water runoff flow rates and durations.

(1) Description

(a) Hydromodification control in natural drainage systems shall be achieved by maintaining the Erosion Potential (Ep) in streams at a value of 1, unless an alternative value can be shown to be protective of the natural drainage systems from erosion, incision, and sedimentation that can occur as a result of flow increases from impervious surfaces and prevent damage to stream habitat in natural drainage system tributaries (see Attachment J - Determination of Erosion Potential).

(ii) Hydromodification control may include one, or a combination of on-site, regional or sub-regional hydromodification control BMPs, LID strategies, or stream and riparian buffer restoration measures. Any in-stream restoration measure shall not adversely affect the beneficial uses of the natural drainage systems.

(iii) Natural drainage systems that are subject to the hydromodification assessments and controls as described in this Part of the Order, include all drainages that have not been improved (e.g., channelized or armored with concrete, shotcrete, or rip-rap) or drainage systems that are tributary to a natural drainage system, except as provided in Part VI.D.7c.iv.(1)(b)--Exemptions to Hydromodification Controls [see below]. The clearing or dredging of a natural drainage system does not constitute an "improvement."

(iv) Until the State Water Board or the Regional Water Board adopts a final Hydromodification Policy or criteria, Permittees shall implement the Hydromodification Control Criteria described in Part VI.D.7.c.iv.(1)(c) to control the potential adverse impacts of changes in hydrology that may result from new development and

redevelopment projects located within natural drainage systems as described in Part VI.D.7.c.iv.(1)(a)(iii).

(b) Exemptions to Hydromodification Controls. Permittees may exempt the following New Development and Redevelopment projects from implementation of hydromodification controls where assessments of downstream channel conditions and proposed discharge hydrology indicate that adverse hydromodification effects to beneficial uses of Natural Drainage Systems are unlikely:

(i) Projects that are replacement, maintenance or repair of a Permittee's existing flood control facility, storm drain, or transportation network.

(ii) Redevelopment Projects in the Urban Core that do not increase the effective impervious area or decrease the infiltration capacity of pervious areas compared to the pre-project conditions.

(iii) Projects that have any increased discharge directly or via a storm drain to a sump, lake, area under tidal influence, into a waterway that has a 100-year peak flow (Q100) of 25,000 cfs or more, or other receiving water that is not susceptible to hydromodification impacts.

(iv) Projects that discharge directly or via a storm drain into concrete or otherwise engineered (not natural) channels (e.g., channelized or armored with rip rap, shotcrete, etc.), which, in turn, discharge into receiving water that is not susceptible to hydromodification impacts (as in Parts VI.D.7.c.iv.(1)(b)(i)-(iii) above).

(v) LID BMPs implemented on single family homes are sufficient to comply with Hydromodification criteria.

(c) Hydromodification Control Criteria. The Hydromodification Control Criteria to protect natural drainage systems are as follows:

(i) Except as provided for in Part VI.D.7.c.iv.(1)(b), projects disturbing an area greater than 1 acre but less than 50 acres within natural drainage systems will be presumed to meet pre-development hydrology if one of the following demonstrations is made:

1. The project is designed to retain on-site, through infiltration, evapotranspiration, and/or harvest and use, the storm water volume from the runoff of the 95th percentile, 24-hour storm, or
2. The runoff flow rate, volume, velocity, and duration for the post-development condition do not exceed the pre-development condition for the 2-year, 24-hour rainfall event. This condition may be substantiated by simple screening models, including those described in *Hydromodification Effects on Flow Peaks*

and Durations in Southern California Urbanizing Watersheds (Hawley et al., 2011) or other models acceptable to the Executive Officer of the Regional Water Board, or

3. The Erosion Potential (Ep) in the receiving water channel will approximate 1, as determined by a Hydromodification Analysis Study and the equation presented in Attachment J. Alternatively, Permittees can opt to use other work equations to calculate Erosion Potential with Executive Officer approval.

(ii) Projects disturbing 50 acres or more within natural drainage systems will be presumed to meet pre-development hydrology based on the successful demonstration of one of the following conditions:

1. The site infiltrates on-site at least the runoff from a 2-year, 24-hour storm event, or
2. The runoff flow rate, volume, velocity, and duration for the post-development condition does not exceed the pre-development condition for the 2-year, 24-hour rainfall events. These conditions must be substantiated by hydrologic modeling acceptable to the Regional Water Board Executive Officer, or
3. The Erosion Potential (Ep) in the receiving water channel will approximate 1, as determined by a Hydromodification Analysis Study and the equation presented in Attachment J.

(c) Alternative Hydromodification Criteria

(i) Permittees may satisfy the requirement for Hydromodification Controls by implementing the hydromodification requirements in the County of Los Angeles Low Impact Development Manual (2009) for all projects disturbing an area greater than 1 acre within natural drainage systems.

(ii) Each Permittee may alternatively develop and implement watershed specific Hydromodification Control Plans (HCPs). Such plans shall be developed no later than one year after the effective date of this Order.

(iii) The HCP shall identify:

1. Stream classifications
2. Flow rate and duration control methods
3. Sub-watershed mitigation strategies
4. Stream and/or riparian buffer restoration measures, which will maintain the stream and tributary Erosion Potential at 1 unless

an alternative value can be shown to be protective of the natural drainage systems from erosion, incision, and sedimentation that can occur as a result of flow increases from impervious surfaces and prevent damage to stream habitat in natural drainage system tributaries.

(iv) The HCP shall contain the following elements:

1. Hydromodification Management Standards
2. Natural Drainage Areas and Hydromodification Management Control Areas
3. New Development and Redevelopment Projects subject to the HCP
4. Description of authorized Hydromodification Management Control BMPs
5. Hydromodification Management Control BMP Design Criteria
6. For flow duration control methods, the range of flows to control for, and goodness of fit criteria
7. Allowable low critical flow, Qc, which initiates sediment transport
8. Description of the approved Hydromodification Model
9. Any alternate Hydromodification Management Model and Design
10. Stream Restoration Measures Design Criteria
11. Monitoring and Effectiveness Assessment
12. Record Keeping
13. The HCP shall be deemed in effect upon Executive Officer approval.

v. Watershed Equivalence.

Regardless of the methods through which Permittees allow project applicants to implement alternative compliance measures, the subwatershed-wide (defined as draining to the same HUC-12 hydrologic area in the Basin Plan) result of all development must be at least the same level of water quality protection as would have been achieved if all projects utilizing these alternative compliance provisions had complied with Part VI.D.7.c.i (Integrated Water Quality/Flow Reduction/Resource Management Criteria).

vi. Annual Report

Each Permittee shall provide in their annual report to the Regional Water Board a list of mitigation project descriptions and estimated pollutant and flow reduction analyses (compiled from design specifications submitted by project

applicants and approved by the Permittee(s)). Within 4 years of Order adoption, Permittees must submit in their Annual Report, a comparison of the expected aggregate results of alternative compliance projects to the results that would otherwise have been achieved by retaining on site the SWQDv.

d. Implementation

i. Local Ordinance Equivalence

A Permittee that has adopted a local LID ordinance prior to the adoption of this Order, and which includes a retention requirement numerically equal to the 0.75-inch, 24-hour rain event or the 85th percentile, 24-hour rain event, whichever is greater, may submit documentation to the Regional Water Board that the alternative requirements in the local ordinance will provide equal or greater reduction in storm water discharge pollutant loading and volume as would have been obtained through strict conformance with Part VI.D.7.c.i. (Integrated Water Quality/Flow Reduction Resources Management Criteria) or Part VI.D.7.c.ii. (Alternative Compliance Measures for Technical Infeasibility or Opportunity for Regional Ground water Replenishment) of this Order and, if applicable, Part VI.D.7.c.iv. (Hydromodification (Flow/Volume Duration) Control Criteria).

(1) Documentation shall be submitted within 180 days after the effective date of this Order.

(2) The Regional Water Board shall provide public notice of the proposed equivalency determination and a minimum 30-day period for public comment. After review and consideration of public comments, the Regional Water Board Executive Officer will determine whether implementation of the local ordinance provides equivalent pollutant control to the applicable provisions of this Order. Local ordinances that do not strictly conform to the provisions of this Order must be approved by the Regional Water Board Executive Officer as being “equivalent” in effect to the applicable provisions of this Order in order to substitute for the requirements in Parts VI.D.7.c.i and, where applicable, VI.D.7.c.iv.

(3) Where the Regional Water Board Executive Officer determines that a Permittee’s local LID ordinance does not provide equivalent pollutant control, the Permittee shall either

(a) Require conformance with Parts VI.D.7.c.i and, where applicable, VI.D.7.c.iv, or

(b) Update its local ordinance to conform to the requirements herein within two years of the effective date of this Order.

ii. Project Coordination

(1) Each Permittee shall facilitate a process for effective approval of post-construction storm water control measures. The process shall include:

(a) Detailed LID site design and BMP review including BMP sizing calculations, BMP pollutant removal performance, and municipal approval; and

(b) An established structure for communication and delineated authority between and among municipal departments that have jurisdiction over project review, plan approval, and project construction through memoranda of understanding or an equivalent agreement.

iii. Maintenance Agreement and Transfer

(1) Prior to issuing approval for final occupancy, each Permittee shall require that all new development and redevelopment projects subject to post-construction BMP requirements, with the exception of simple LID BMPs implemented on single family residences, provide an operation and maintenance plan, monitoring plan, where required, and verification of ongoing maintenance provisions for LID practices, Treatment Control BMPs, and Hydromodification Control BMPs including but not limited to: final map conditions, legal agreements, covenants, conditions or restrictions, CEQA mitigation requirements, conditional use permits, and/or other legally binding maintenance agreements. Permittees shall require maintenance records be kept on site for treatment BMPs implemented on single family residences.

(a) Verification at a minimum shall include the developer's signed statement accepting responsibility for maintenance until the responsibility is legally transferred; and either:

(i) A signed statement from the public entity assuming responsibility for BMP maintenance; or

(ii) Written conditions in the sales or lease agreement, which require the property owner or tenant to assume responsibility for BMP maintenance and conduct a maintenance inspection at least once a year; or

(iii) Written text in project covenants, conditions, and restrictions (CCRs) for residential properties assigning BMP maintenance responsibilities to the Home Owners Association; or

(iv) Any other legally enforceable agreement or mechanism that assigns responsibility for the maintenance of BMPs.

(b) Each Permittee shall require all development projects subject to post-construction BMP requirements to provide a plan for the operation and maintenance of all structural and treatment controls. The plan shall be submitted for examination of relevance to keeping the BMPs in proper working order. Where BMPs are transferred to Permittee for ownership and maintenance, the plan shall also include all relevant costs for upkeep of BMPs in the transfer. Operation and Maintenance plans for private BMPs shall be kept on-site for periodic review by Permittee inspectors.

iv. Tracking, Inspection, and Enforcement of Post-Construction BMPs

(1) Each Permittee shall implement a tracking system and an inspection and enforcement program for new development and redevelopment post-construction storm water no later than 60 days after Order adoption date.

(a) Implement a GIS or other electronic system for tracking projects that have been conditioned for post-construction BMPs. The electronic system, at a minimum, should contain the following information:

(i) Municipal Project ID

(ii) State WDID No.

(iii) Project Acreage

(iv) BMP Type and Description

(v) BMP Location (coordinates)

(vi) Date of Acceptance

(vii) Date of Maintenance Agreement

(viii) Maintenance Records

(ix) Inspection Date and Summary

(x) Corrective Action

(xi) Date Certificate of Occupancy Issued

(xii) Replacement or Repair Date

(b) Inspect all development sites upon completion of construction and prior to the issuance of occupancy certificates to ensure proper installation of LID measures, structural BMPs, treatment control BMPs and hydromodification control BMPs. The inspection may be combined with other inspections provided it is conducted by trained personnel.

(c) Verify proper maintenance and operation of post-construction BMPs previously approved for new development and redevelopment and operated by the Permittee. The post-construction BMP maintenance inspection program shall incorporate the following elements:

(i) The development of a Post-construction BMP Maintenance Inspection checklist

(ii) Inspection at least once every 2 years after project completion, of post-construction BMPs to assess operation conditions with particular attention to criteria and procedures for post-construction

treatment control and hydromodification control BMP repair, replacement, or re-vegetation.

(d) For post-construction BMPs operated and maintained by parties other than the Permittee, the Permittee shall require the other parties to document proper maintenance and operations.

(e) Undertake enforcement action per the established Progressive Enforcement Policy as appropriate based on the results of the inspection. See Part VI.D.2 for requirements for the development and implementation of a Progressive Enforcement Policy.

8. Development Construction Program

a. Each Permittee shall develop, implement, and enforce a construction program that:

i. Prevents illicit construction-related discharges of pollutants into the MS4 and receiving waters.

ii. Implements and maintains structural and non-structural BMPs to reduce pollutants in storm water runoff from construction sites.

iii. Reduces construction site discharges of pollutants to the MS4 to the MEP.

iv. Prevents construction site discharges to the MS4 from causing or contributing to a violation of water quality standards.

b. Each Permittee shall establish for its jurisdiction an enforceable erosion and sediment control ordinance for all construction sites that disturb soil.

c. Applicability

The provisions contained in Part VI.D.8.d below apply exclusively to construction sites less than 1 acre. Provisions contained in Part VI.D.8.e – j, apply exclusively to construction sites 1 acre or greater. The requirements contained in this part apply to all activities involving soil disturbance with the exception of agricultural activities. Activities covered by this permit include but are not limited to grading, vegetation clearing, soil compaction, paving, re-paving and linear underground/overhead projects (LUPs).

d. Requirements for Construction Sites Less than One Acre

i. For construction sites less than 1 acre, each Permittee shall:

(1) Through the use of the Permittee's erosion and sediment control ordinance or and/or building permit, require the implementation of an effective combination of erosion and sediment control BMPs from Table 12 to prevent erosion and sediment loss, and the discharge of construction wastes.

Table 12. Applicable Set of BMPs for All Construction Sites

Erosion Controls	Scheduling
	Preservation of Existing Vegetation
Sediment Controls	Silt Fence
	Sand Bag Barrier
	Stabilized Construction Site Entrance/Exit
Non-Storm Water Management	Water Conservation Practices
	Dewatering Operations
Waste Management	Material Delivery and Storage
	Stockpile Management
	Spill Prevention and Control
	Solid Waste Management
	Concrete Waste Management
	Sanitary/Septic Waste Management

(2) Possess the ability to identify all construction sites with soil disturbing activities that require a permit, regardless of size, and shall be able to provide a list of permitted sites upon request of the Regional Water Board. Permittees may use existing permit databases or other tracking systems to comply with these requirements.

(3) Inspect construction sites on as needed based on the evaluation of the factors that are a threat to water quality. In evaluating the threat to water quality, the following factors shall be considered: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-storm water discharges; past record of non-compliance by the operators of the construction site; and any water quality issues relevant to the particular MS4.

(4) Implement the Permittee's Progressive Enforcement Policy to ensure that construction sites are brought into compliance with the erosion and sediment control ordinance within a reasonable time period. See Part VI.D.2 for requirements for the development and implementation of a Progressive Enforcement Policy.

e. Each Permittee shall require operators of public and private construction sites within its jurisdiction to select, install, implement, and maintain BMPs that comply with its erosion and sediment control ordinance.

f. The requirements contained in this part apply to all activities involving soil disturbance with the exception of agricultural activities. Activities covered by this permit include but are not limited to grading, vegetation clearing, soil compaction, paving, re-paving and linear underground/overhead projects (LUPs).

g. Construction Site Inventory / Electronic Tracking System

i. Each Permittee shall use an electronic system to inventory grading permits, encroachment permits, demolition permits, building permits, or construction permits (and any other municipal authorization to move soil and/ or construct or destruct that involves land disturbance) issued by the Permittee. To satisfy this requirement, the use of a database or GIS system is recommended.

ii. Each Permittee shall complete an inventory and continuously update as new sites are permitted and sites are completed. The inventory / tracking system shall contain, at a minimum:

(1) Relevant contact information for each project (e.g., name, address, phone, email, etc. for the owner and contractor.

(2) The basic site information including location, status, size of the project and area of disturbance.

(3) The proximity all water bodies, water bodies listed as impaired by sediment-related pollutants, and water bodies for which a sediment-related TMDL has been adopted and approved by USEPA.

(4) Significant threat to water quality status, based on consideration of factors listed in Appendix 1 to the Statewide General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit).

(5) Current construction phase where feasible.

(6) The required inspection frequency.

(7) The project start date and anticipated completion date.

(8) Whether the project has submitted a Notice of Intent and obtained coverage under the Construction General Permit.

(9) The date the Permittee approved the Erosion and Sediment Control Plan (ESCP).

(10) Post-Construction Structural BMPs subject to Operation and Maintenance Requirements.

h. Construction Plan Review and Approval Procedures

i. Each Permittee shall develop procedures to review and approve relevant construction plan documents.

ii. The review procedures shall be developed and implemented such that the following minimum requirements are met:

(1) Prior to issuing a grading or building permit, each Permittee shall require each operator of a construction activity within its jurisdiction to prepare and submit an ESCP prior to the disturbance of land for the Permittee's review and written approval. The construction site operator shall be prohibited from commencing construction activity prior to receipt of written approval by the Permittee. Each Permittee shall not approve any ESCP unless it contains appropriate site-specific construction site BMPs that

meet the minimum requirements of a Permittee's erosion and sediment control ordinance.

(2) ESCPs must include the elements of a Storm Water Pollution Prevention Plan (SWPPP). SWPPPs prepared in accordance with the requirements of the Construction General Permit can be accepted as ESCPs.

(3) At a minimum, the ESCP must address the following elements:

(a) Methods to minimize the footprint of the disturbed area and to prevent soil compaction outside of the disturbed area.

(b) Methods used to protect native vegetation and trees.

(c) Sediment/Erosion Control.

(d) Controls to prevent tracking on and off the site.

(e) Non-storm water controls (e.g., vehicle washing, dewatering, etc.).

(f) Materials Management (delivery and storage).

(g) Spill Prevention and Control.

(h) Waste Management (e.g., concrete washout/waste management; sanitary waste management).

(i) Identification of site Risk Level as identified per the requirements in Appendix 1 of the Construction General Permit.

(4) The ESCP must include the rationale for the selection and design of the proposed BMPs, including quantifying the expected soil loss from different BMPs.

(5) Each Permittee shall require that the ESCP is developed and certified by a Qualified SWPPP Developer (QSD).

(6) Each Permittee shall require that all structural BMPs be designed by a licensed California Engineer.

(7) Each Permittee shall require that for all sites, the landowner or the landowner's agent sign a statement on the ESCP as follows:

(a) "I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that submitting false and/ or inaccurate information, failing to update the ESCP to reflect current conditions, or failing to properly and/ or adequately implement the ESCP may result in revocation of grading and/ or other permits or other sanctions provided by law."

(8) Prior to issuing a grading or building permit, each Permittee must verify that the construction site operators have existing coverage under

applicable permits, including, but not limited to the State Water Board's Construction General Permit, and State Water Board 401 Water Quality Certification.

(9) Each Permittee shall develop and implement a checklist to be used to conduct and document review of each ESCP.

i. BMP Implementation Level

i. Each Permittee shall implement technical standards for the selection, installation and maintenance of construction BMPs for all construction sites within its jurisdiction.

ii. The BMP technical standards shall require:

(1) The use of BMPs that are tailored to the risks posed by the project. Sites are to be ranked from Low Risk (Risk 1) to High Risk (Risk 3). Project risks are to be calculated based on the potential for erosion from the site and the sensitivity of the receiving water body. Receiving water bodies that are listed on the Clean Water Act (CWA) Section 303(d) list for sediment or siltation are considered High Risk. Likewise, water bodies with designated beneficial uses of SPWN, COLD, and MIGR are also considered to be High Risk. The combined (sediment/receiving water) site risk shall be calculated using the methods provided in Appendix 1 of the Construction General Permit. At a minimum, the BMP technical standards shall include requirements for High Risk sites as defined in Table 15.

(2) The use of BMPs for all construction sites, sites equal or greater to 1 acre, and for paving projects per Tables 14 and 16 of this Order.

(3) Detailed installation designs and cut sheets for use within ESCPs.

(4) Maintenance expectations for each BMP, or category of BMPs, as appropriate.

iii. Permittees are encouraged to adopt respective BMPs from latest versions of the *California BMP Handbook, Construction* or *Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices (BMPs) Manual* and addenda. Alternatively, Permittees are authorized to develop or adopt equivalent BMP standards consistent for Southern California and for the range of activities presented below in Tables 13 through 16.

iv. The local BMP technical standards shall be readily available to the development community and shall be clearly referenced within each Permittee's storm water or development services website, ordinance, permit approval process and/or ESCP review forms. The local BMP technical standards shall also be readily available to the Regional Water Board upon request.

v. Local BMP technical standards shall be available for the following:

Table 13. Minimum Set of BMPs for All Construction Sites

Erosion Controls	Scheduling
	Preservation of Existing Vegetation
Sediment Controls	Silt Fence
	Sand Bag Barrier
	Stabilized Construction Site Entrance/Exit
Non-Storm water Management	Water Conservation Practices
	Dewatering Operations
Waste Management	Material Delivery and Storage
	Stockpile Management
	Spill Prevention and Control
	Solid Waste Management
	Concrete Waste Management
	Sanitary/Septic Waste Management

Table 14. Additional BMPs Applicable to Construction Sites Disturbing 1 Acre or More

Erosion Controls	Hydraulic Mulch
	Hydroseeding
	Soil Binders
	Straw Mulch
	Geotextiles and Mats
	Wood Mulching
Sediment Controls	Fiber Rolls
	Gravel Bag Berm
	Street Sweeping and/ or Vacuum
	Storm Drain Inlet Protection
	Scheduling
	Check Dam
Additional Controls	Wind Erosion Controls
	Stabilized Construction Entrance/ Exit
	Stabilized Construction Roadway
	Entrance/ Exit Tire Wash
Non-Storm water Management	Vehicle and Equipment Washing
	Vehicle and Equipment Fueling
	Vehicle and Equipment Maintenance
Waste Management	Material Delivery and Storage
	Spill Prevention and Control

Table 15. Additional Enhanced BMPs for High Risk Sites

Erosion Controls	Hydraulic Mulch
	Hydroseeding
	Soil Binders
	Straw Mulch

	Geotextiles and Mats
	Wood Mulching
	Slope Drains
Sediment Controls	Silt Fence
	Fiber Rolls
	Sediment Basin
	Check Dam
	Gravel Bag Berm
	Street Sweeping and/or Vacuum
	Sand Bag Barrier
	Storm Drain Inlet Protection
Additional Controls	Wind Erosion Controls
	Stabilized Construction Entrance/Exit
	Stabilized Construction Roadway
	Entrance/Exit Tire Wash
	Advanced Treatment Systems*
Non-Storm water Management	Water Conservation Practices
	Dewatering Operations (Ground water dewatering only under NPDES Permit No. CAG994004)
	Vehicle and Equipment Washing
	Vehicle and Equipment Fueling
	Vehicle and Equipment Maintenance
Waste Management	Material Delivery and Storage
	Stockpile Management
	Spill Prevention and Control
	Solid Waste Management

* Applies to public roadway projects.

Table 16. Minimum Required BMPs for Roadway Paving or Repair Operation (For Private or Public Projects)

1.	Restrict paving and repaving activity to exclude periods of rainfall or predicted rainfall unless required by emergency conditions.
2.	Install gravel bags and filter fabric or other equivalent inlet protection at all susceptible storm drain inlets and at manholes to prevent spills of paving products and tack coat.
3.	Prevent the discharge of release agents including soybean oil, other oils, or diesel to the storm water drainage system or receiving waters.
4.	Minimize non storm water runoff from water use for the roller and for evaporative cooling of the asphalt.
5.	Clean equipment over absorbent pads, drip pans, plastic sheeting or other material to capture all spillage and dispose of properly.
6.	Collect liquid waste in a container, with a secure lid, for transport to a maintenance facility to be reused, recycled or disposed of properly.
7.	Collect solid waste by vacuuming or sweeping and securing in an

	appropriate container for transport to a maintenance facility to be reused, recycled or disposed of properly.
8.	Cover the "cold-mix" asphalt (i.e., pre-mixed aggregate and asphalt binder) with protective sheeting during a rainstorm.
9.	Cover loads with tarp before haul-off to a storage site, and do not overload trucks.
10.	Minimize airborne dust by using water spray or other approved dust suppressant during grinding.
11.	Avoid stockpiling soil, sand, sediment, asphalt material and asphalt grindings materials or rubble in or near storm water drainage system or receiving waters.
12.	Protect stockpiles with a cover or sediment barriers during a rain.

j. Construction Site Inspection

i. Each Permittee shall use its legal authority to implement procedures for inspecting public and private construction sites.

ii. The inspection procedures shall be implemented as follows:

(1) Inspect the public and private construction sites as specified in Table 17 below:

Table 17. Inspection Frequencies for Sites One Acre or Greater

Site	Inspection Frequency Shall Occur
a. All sites 1 acre or larger that discharge to a tributary listed by the state as an impaired water for sediment or turbidity under the CWA § 303(d)	(1) when two or more consecutive days with greater than 50% chance of rainfall are predicted by NOAA[29], (2) within 48 hours of a ½-inch rain event and at (3) least once every two weeks
b. Other sites 1 acre or more determined to be a significant threat to water quality[30]	
c. All other construction sites with 1 acre or more of soil disturbance not meeting the criteria above	At least monthly

(2) Each Permittee shall inspect all phases of construction as follows:

(a) Prior to Land Disturbance

Prior to allowing an operator to commence land disturbance, each Permittee shall perform an inspection to ensure all necessary erosion

[29] www.srh.noaa.gov/forecast

[30] In evaluating the threat to water quality, the following factors shall be considered: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-storm water discharges; past record of non-compliance by the operators of the construction site; and any water quality issues relevant to the particular MS4.

and sediment structural and non-structural BMP materials and procedures are available per the erosion and sediment control plan.

(b) During Active Construction, including Land Development[31] and Vertical Construction[32]

In accordance with the frequencies specified in Part VI.D.8.j and Table 17 of this Order, each Permittee shall perform an inspection to ensure all necessary erosion and sediment structural and non-structural BMP materials and procedures are available per the erosion and sediment control plan throughout the construction process.

(c) Final Landscaping / Site Stabilization[33]

At the conclusion of the project and as a condition of approving and/or issuing a Certificate of Occupancy, each Permittee shall inspect the constructed site to ensure that all graded areas have reached final stabilization and that all trash, debris, and construction materials, and temporary erosion and sediment BMPs are removed.

(3) Based on the required frequencies above, each construction project shall be inspected a minimum of three times.

(4) Inspection Standard Operating Procedures

Each Permittee shall develop, implement, and revise as necessary, standard operating procedures that identify the inspection procedures each Permittee will follow. Inspections of construction sites, and the standard operating procedures, shall include, but are not limited to:

(a) Verification of active coverage under the Construction General Permit for sites disturbing 1 acre or more, or that are part of a planned development that will disturb 1 acre or more and a process for referring non-filers to the Regional Water Board.

(b) Review of the applicable ESCP and inspection of the construction site to determine whether all BMPs have been selected, installed, implemented, and maintained according to the approved plan and subsequent approved revisions.

(c) Assessment of the appropriateness of the planned and installed BMPs and their effectiveness.

(d) Visual observation and record keeping of non-storm water discharges, potential illicit discharges and connections, and potential discharge of pollutants in storm water runoff.

(e) Development of a written or electronic inspection report generated from an inspection checklist used in the field.

[31] Activities include cuts and fills, rough and finished grading; alluvium removals; canyon cleanouts; rock undercuts; keyway excavations; stockpiling of select material for capping operations; and excavation and street paving, lot grading, curbs, gutters and sidewalks, public utilities, public water facilities including fire hydrants, public sanitary sewer systems, storm sewer system and/or other drainage improvement.
[32] The build out of structures from foundations to roofing, including rough landscaping.
[33] All soil disturbing activities at each individual parcel within the site have been completed.

(f) Tracking of the number of inspections for the inventoried construction sites throughout the reporting period to verify that the sites are inspected at the minimum frequencies required in Table 17 of this Order.

k. Enforcement

Each Permittee shall implement its Progressive Enforcement Policy to ensure that construction sites are brought into compliance with all storm water requirements within a reasonable time period. See Part VI.D.2 for requirements for the development and implementation of a Progressive Enforcement Policy.

l. Permittee Staff Training

i. Each Permittee shall ensure that all staff whose primary job duties are related to implementing the construction storm water program are adequately trained.

ii. Each Permittee may conduct in-house training or contract with consultants. Training shall be provided to the following staff positions of the MS4:

(1) Plan Reviewers and Permitting Staff

Ensure staff and consultants are trained as qualified individuals, knowledgeable in the technical review of local erosion and sediment control ordinance, local BMP technical standards, ESCP requirements, and the key objectives of the State Water Board QSD program. Permittees may provide internal training to staff or require staff to obtain QSD certification.

(2) Erosion Sediment Control/Storm Water Inspectors

Each Permittee shall ensure that its inspectors are knowledgeable in inspection procedures consistent with the State Water Board sponsored program QSD or a Qualified SWPPP Practitioner (QSP) or that a designated person on staff who has been trained in the key objectives of the QSD/QSP programs supervises inspection operations. Each Permittee may provide internal training to staff or require staff to obtain QSD/QSP certification. Each inspector must be knowledgeable of the local BMP technical standards and ESCP requirements.

(3) Third-Party Plan Reviewers, Permitting Staff, and Inspectors

If the Permittee utilizes outside parties to conduct inspections and/or review plans, each Permittee shall ensure these staff are trained per the requirements listed above. Outside contractors can self-certify, providing they certify they have received all applicable training required in the Permit and have documentation to that effect.

9. Public Agency Activities Program

a. Each Permittee shall implement a Public Agency Activities Program to minimize storm water pollution impacts from Permittee-owned or operated facilities and activities and to identify opportunities to reduce storm water pollution impacts

from areas of existing development. Requirements for Public Agency Facilities and Activities consist of the following components:

i. Public Construction Activities Management

ii. Public Facility Inventory

iii. Inventory of Existing Development for Retrofitting Opportunities

iv. Public Facility and Activity Management

v. Vehicle and Equipment Wash Areas

vi. Landscape, Park, and Recreational Facilities Management

vii. Storm Drain Operation and Maintenance

viii. Streets, Roads, and Parking Facilities Maintenance

ix. Emergency Procedures

x. Municipal Employee and Contractor Training

b. Public Construction Activities Management

i. Each Permittee shall implement and comply with the Planning and Land Development Program requirements in Part VI.D.7 of this Order at Permittee-owned or operated (i.e., public or Permittee sponsored) construction projects that are categorized under the project types identified in Part VI.D.7.b of this Order.

ii. Each Permittee shall implement and comply with the appropriate Development Construction Program requirements in Part VI.D.8 of this Order at Permittee-owned or operated construction projects as applicable.

iii. For Permittee-owned or operated projects (including those under a capital improvement project plan) that disturb less than one acre of soil, each Permittee shall require an effective combination of erosion and sediment control BMPs from Table 13 (see Construction Development Program, minimum BMPs).

iv. Each Permittee shall obtain separate coverage under the Construction General Permit for all Permittee-owned or operated construction sites that require coverage.

c. Public Facility Inventory

i. Each Permittee shall maintain an updated inventory of all Permittee-owned or operated (i.e., public) facilities within its jurisdiction that are potential sources of storm water pollution. The incorporation of facility information into a GIS is recommended. Sources to be tracked include but are not limited to the following:

(1) Animal control facilities

(2) Chemical storage facilities

(3) Composting facilities

(4) Equipment storage and maintenance facilities (including landscape maintenance-related operations)

(5) Fueling or fuel storage facilities (including municipal airports)

(6) Hazardous waste disposal facilities

(7) Hazardous waste handling and transfer facilities

(8) Incinerators

(9) Landfills

(10) Materials storage yards

(11) Pesticide storage facilities

(12) Fire stations

(13) Public restrooms

(14) Public parking lots

(15) Public golf courses

(16) Public swimming pools

(17) Public parks

(18) Public works yards

(19) Public marinas

(20) Recycling facilities

(21) Solid waste handling and transfer facilities

(22) Vehicle storage and maintenance yards

(23) Storm water management facilities (e.g., detention basins)

(24) All other Permittee-owned or operated facilities or activities that each Permittee determines may contribute a substantial pollutant load to the MS4.

ii. Each Permittee shall include the following minimum fields of information for each Permittee-owned or operated facility in its inventory.

(1) Name of facility

(2) Name of facility manager and contact information

(3) Address of facility (physical and mailing)

(4) A narrative description of activities performed and potential pollution sources.

(5) Coverage under the Industrial General Permit or other individual or general NPDES permits or any applicable waiver issued by the Regional or State Water Board pertaining to storm water discharges.

iii. Each Permittee shall update its inventory at least once during the 5-year term of the Order. The update shall be accomplished through collection of new information obtained through field activities or through other readily available inter and intra-agency informational databases (e.g., property management, land-use approvals, accounting and depreciation ledger account, and similar information).

d. Inventory of Existing Development for Retrofitting Opportunities

i. Each Permittee shall develop an inventory of retrofitting opportunities that meets the requirements of this Part VI.9.d. Retrofit opportunities shall be identified within the public right-of-way or in coordination with a TMDL implementation plan(s). The goals of the existing development retrofitting inventory are to address the impacts of existing development through regional or sub-regional retrofit projects that reduce the discharges of storm water pollutants into the MS4 and prevent discharges from the MS4 from causing or contributing to a violation of water quality standards as defined in Part V.A, Receiving Water Limitations.

ii. Each Permittee shall screen existing areas of development to identify candidate areas for retrofitting using watershed models or other screening level tools.

iii. Each Permittee shall evaluate and rank the areas of existing development identified in the screening to prioritize retrofitting candidates. Criteria for evaluation may include but are not limited to:

(1) Feasibility, including general private and public land availability;

(2) Cost effectiveness;

(3) Pollutant removal effectiveness;

(4) Tributary area potentially treated;

(5) Maintenance requirements;

(6) Landowner cooperation;

(7) Neighborhood acceptance;

(8) Aesthetic qualities;

(9) Efficacy at addressing concern; and

(10) Potential improvements to public health and safety.

iv. Each Permittee shall consider the results of the evaluation in the following programs:

(1) The Permittee's storm water management program: Highly feasible projects expected to benefit water quality should be given a high priority to implement source control and treatment control BMPs in a Permittee's SWMP.

(2) Off-site mitigation for New Development and Redevelopment: Each Permittee shall consider high priority retrofit projects as candidates for off-site mitigation projects per Part VI.D.7.c.iii.(4).(d).

(3) Where feasible, at the discretion of the Permittee, the existing development retrofitting program may be coordinated with flood control projects and other infrastructure improvement programs per Part VI.D.9.e.ii.(2) below.

v. Each Permittee shall cooperate with private landowners to encourage site specific retrofitting projects. Each Permittee shall consider the following practices in cooperating with private landowners to retrofit existing development:

(1) Demonstration retrofit projects;

(2) Retrofits on public land and easements that treat runoff from private developments;

(3) Education and outreach;

(4) Subsidies for retrofit projects;

(5) Requiring retrofit projects as enforcement, mitigation or ordinance compliance;

(6) Public and private partnerships;

(7) Fees for existing discharges to the MS4 and reduction of fees for retrofit implementation.

e. Public Agency Facility and Activity Management

i. Each Permittee shall obtain separate coverage under the Industrial General Permit for all Permittee-owned or operated facilities where industrial activities are conducted that require coverage under the Industrial General Permit.

ii. Each Permittee shall implement the following measures for Permittee- owned and operated flood management projects:

(1) Develop procedures to assess the impacts of flood management projects on the water quality of receiving water bodies; and

(2) Evaluate existing structural flood control facilities to determine if retrofitting the facility to provide additional pollutant removal from storm water is feasible.

iii. Each Permittee shall ensure the implementation and maintenance of activity specific BMPs listed in Table 18 (BMPs for Public Agency Facilities and Activities) or an equivalent set of BMPs when such activities occur at Permittee-owned or operated facilities and field activities (e.g., project sites) including but not limited to the facility types listed in Part VI.D.9.c above, and at any area that includes the activities described in Table 18, or that have the potential to discharge pollutants in storm water.

iv. Any contractors hired by the Permittee to conduct Public Agency Activities including, but not limited to, storm and/or sanitary sewer system inspection and repair, street sweeping, trash pick-up and disposal, and street and right-of-way construction and repair shall be contractually required to implement and maintain the activity specific BMPs listed in Table 18. Each Permittee shall conduct oversight of contractor activities to ensure these BMPs are implemented and maintained.

v. Permittee-owned or operated facilities that have obtained coverage under the Industrial General Permit shall implement and maintain BMPs consistent with the associated SWPPP and are therefore not required to implement and maintain the activity specific BMPs listed in Table 18.

vi. Effective source control BMPs for the activities listed in Table 18 shall be implemented at Permittee-owned or operated facilities, unless the pollutant generating activity does not occur. Each Permittee shall require implementation of additional BMPs where storm water from the MS4 discharges to a significant ecological area (SEA, see Attachment A for definition), a water body subject to TMDL provisions in Part VI.E., or a CWA § 303(d) listed water body (see Part VI.E below). Likewise, for those BMPs that are not adequately protective of water quality standards, a Permittee may require additional site-specific controls.

Table 18. BMPs for Public Agency Facilities and Activities

General and Activity Specific BMPs	
General BMPs	Scheduling and Planning
	Spill Prevention and Control
	Sanitary/Septic Waste Management
	Material Use
	Safer Alternative Products
	Vehicle/Equipment Cleaning, Fueling and Maintenance
	Illicit Connection Detection, Reporting and Removal
	Illegal Spill Discharge Control
	Maintenance Facility Housekeeping Practices
Flexible Pavement	Asphalt Cement Crack and Joint Grinding/ Sealing
	Asphalt Paving
	Structural Pavement Failure (Digouts) Pavement Grinding and Paving
	Emergency Pothole Repairs
	Sealing Operations
Rigid Pavement	Portland Cement Crack and Joint Sealing
	Mudjacking and Drilling
	Concrete Slab and Spall Repair
Slope/ Drains/ Vegetation	Shoulder Grading
	Nonlandscaped Chemical Vegetation Control
	Nonlandscaped Mechanical Vegetation Control/

General and Activity Specific BMPs	
	Mowing
	Nonlandscaped Tree and Shrub Pruning, Brush Chipping, Tree and Shrub Removal
	Fence Repair
	Drainage Ditch and Channel Maintenance
	Drain and Culvert Maintenance
	Curb and Sidewalk Repair
Litter/ Debris/ Graffiti	Sweeping Operations
	Litter and Debris Removal
	Emergency Response and Cleanup Practices
	Graffiti Removal
Landscaping	Chemical Vegetation Control
	Manual Vegetation Control
	Landscaped Mechanical Vegetation Control/ Mowing
	Landscaped Tree and Shrub Pruning, Brush Chipping, Tree and Shrub Removal
	Irrigation Line Repairs
	Irrigation (Watering), Potable and Nonpotable
Environmental	Storm Drain Stenciling
	Roadside Slope Inspection
	Roadside Stabilization
	Stormwater Treatment Devices
	Traction Sand Trap Devices
Bridges	Welding and Grinding
	Sandblasting, Wet Blast with Sand Injection and Hydroblasting
	Painting
	Bridge Repairs
Other Structures	Pump Station Cleaning
	Tube and Tunnel Maintenance and Repair
	Tow Truck Operations
	Toll Booth Lane Scrubbing Operations
Electrical	Sawcutting for Loop Installation
Traffic Guidance	Thermoplastic Striping and Marking
	Paint Striping and Marking
	Raised/ Recessed Pavement Marker Application and Removal
	Sign Repair and Maintenance
	Median Barrier and Guard Rail Repair
	Emergency Vehicle Energy Attenuation Repair
Storm Maintenance	Minor Slides and Slipouts Cleanup/ Repair
Management and Support	Building and Grounds Maintenance
	Storage of Hazardous Materials (Working Stock)
	Material Storage Control (Hazardous Waste)

General and Activity Specific BMPs	
	Outdoor Storage of Raw Materials
	Vehicle and Equipment Fueling
	Vehicle and Equipment Cleaning
	Vehicle and Equipment Maintenance and Repair
	Aboveground and Underground Tank Leak and Spill Control

f. Vehicle and Equipment Washing

i. Each Permittee shall implement and maintain the activity specific BMPs listed in Table 18 (BMPs for Public Agency Facilities and Activities) for all fixed vehicle and equipment washing; including fire fighting and emergency response vehicles.

ii. Each Permittee shall prevent discharges of wash waters from vehicle and equipment washing to the MS4 by implementing any of the following measures at existing facilities with vehicle or equipment wash areas:

(1) Self-contain, and haul off for disposal; or

(2) Equip with a clarifier or an alternative pre-treatment device and plumb to the sanitary sewer in accordance with applicable waste water provider regulations.

iii. Each Permittee shall ensure that any municipal facilities constructed, redeveloped, or replaced shall not discharge wastewater from vehicle and equipment wash areas to the MS4 by plumbing all areas to the sanitary sewer in accordance with applicable waste water provider regulations, or self-containing all waste water/ wash water and hauling to a point of legal disposal.

g. Landscape, Park, and Recreational Facilities Management

i. Each Permittee shall implement and maintain the activity specific BMPs listed in Table 18 for all public right-of-ways, flood control facilities and open channels, lakes and reservoirs, and landscape, park, and recreational facilities and activities.

ii. Each Permittee shall implement an IPM program that includes the following:

(1) Pesticides are used only if monitoring indicates they are needed, and pesticides are applied according to applicable permits and established guidelines.

(2) Treatments are made with the goal of removing only the target organism.

(3) Pest controls are selected and applied in a manner that minimizes risks to human health, beneficial non-target organisms, and the environment.

(4) The use of pesticides, including Organophosphates and Pyrethroids, does not threaten water quality.

(5) Partner with other agencies and organizations to encourage the use of IPM.

(6) Adopt and verifiably implement policies, procedures, and/ or ordinances requiring the minimization of pesticide use and encouraging the use of IPM techniques (including beneficial insects) for Public Agency Facilities and Activities.

(7) Policies, procedures, and ordinances shall include commitments and a schedule to reduce the use of pesticides that cause impairment of surface waters by implementing the following procedures:

(a) Prepare and annually update an inventory of pesticides used by all internal departments, divisions, and other operational units.

(b) Quantify pesticide use by staff and hired contractors.

(c) Demonstrate implementation of IPM alternatives where feasible to reduce pesticide use.

iii. Each Permittee shall implement the following requirements:

(1) Use a standardized protocol for the routine and non-routine application of pesticides (including pre-emergents), and fertilizers.

(2) Ensure there is no application of pesticides or fertilizers (1) when two or more consecutive days with greater than 50% chance of rainfall are predicted by NOAA[34], (2) within 48 hours of a ½-inch rain event, or (3) when water is flowing off the area where the application is to occur. This requirement does not apply to the application of aquatic pesticides described in Part VI.D.9.g.iii.(1) above or pesticides which require water for activation.

(3) Ensure that no banned or unregistered pesticides are stored or applied.

(4) Ensure that all staff applying pesticides are certified in the appropriate category by the California Department of Pesticide Regulation, or are under the direct supervision of a pesticide applicator certified in the appropriate category.

(5) Implement procedures to encourage the retention and planting of native vegetation to reduce water, pesticide and fertilizer needs; and

(6) Store pesticides and fertilizers indoors or under cover on paved surfaces, or use secondary containment.

(a) Reduce the use, storage, and handling of hazardous materials to reduce the potential for spills.

(b) Regularly inspect storage areas.

h. Storm Drain Operation and Maintenance

[34] www.srh.noaa.gov/forecast

i. Each Permittee shall implement and maintain the activity specific BMPs listed in Table 18 for storm drain operation and maintenance.

ii. Ensure that all material removed from the MS4 does not reenter the system. Solid material shall be dewatered in a contained area and liquid material shall be disposed in accordance with any of the following measures:

(1) Self-contain, and haul off for legal disposal; or

(2) Applied to the land without runoff; or

(3) Equip with a clarifier or an alternative pre-treatment device; and plumb to the sanitary sewer in accordance with applicable waste water provider regulations.

iii. Catch Basin Cleaning

(1) In areas that are not subject to a trash TMDL, each Permittee shall determine priority areas and shall update its map or list of Catch Basins with their GPS coordinates and priority:

Priority A: Catch basins that are designated as consistently generating the highest volumes of trash and/or debris.

Priority B: Catch basins that are designated as consistently generating moderate volumes of trash and/or debris.

Priority C: Catch basins that are designated as generating low volumes of trash and/or debris.

The map or list shall contain the rationale or data to support priority designations.

(2) In areas that are not subject to a trash TMDL, each Permittee shall inspect catch basins according to the following schedule:

Priority A: A minimum of 3 times during the wet season (October 1 through April 15) and once during the dry season every year.

Priority B: A minimum of once during the wet season and once during the dry season every year.

Priority C: A minimum of once per year.

Catch basins shall be cleaned as necessary on the basis of inspections. At a minimum, Permittees shall ensure that any catch basin that is determined to be at least 25% full of trash shall be cleaned out. Permittees shall maintain inspection and cleaning records for Regional Water Board review.

(3) In areas that are subject to a trash TMDL, the subject Permittees shall implement the applicable provisions in Part VI.E.

iv. Trash Management at Public Events

(1) Each Permittee shall require the following measures for any event in the public right of way or wherever it is foreseeable that substantial quantities

of trash and litter may be generated, including events located in areas that are subject to a trash TMDL:

(a) Proper management of trash and litter generated; and

(b) Arrangement for temporary screens to be placed on catch basins; or

(c) Provide clean out of catch basins, trash receptacles, and grounds in the event area within one business day subsequent to the event.

v. Trash Receptacles

(1) Each Permittee shall ensure trash receptacles, or equivalent trash capturing devices, are covered in areas newly identified as high trash generation areas within its jurisdiction.

(2) Each Permittee shall ensure that all trash receptacles are cleaned out and maintained as necessary to prevent trash overflow.

vi. Catch Basin Labels and Open Channel Signage

(1) Each Permittee shall label all storm drain inlets that they own with a legible “no dumping” message.

(2) Each Permittee shall inspect the legibility of the stencil or label nearest each inlet prior to the wet season every year.

(3) Each Permittee shall record all catch basins with illegible stencils and re-stencil or re-label within 180 days of inspection.

(4) Each Permittee shall post signs, referencing local code(s) that prohibit littering and illegal dumping, at designated public access points to open channels, creeks, urban lakes, and other relevant water bodies.

vii. Additional Trash Management Practices

(1) In areas that are not subject to a trash TMDL, each Permittee shall install trash excluders, or equivalent devices, on or in catch basins or outfalls to prevent the discharge of trash to the MS4 or receiving water no later than four years after the effective date of this Order in areas defined as Priority A (Part VI.D.9.h.iii.(1)) except at sites where the application of such BMP(s) alone will cause flooding. Lack of maintenance that causes flooding is not an acceptable exception to the requirement to install BMPs. Alternatively, each Permittee may implement alternative or enhanced BMPs beyond the provisions of this Order (such as but not limited to increased street sweeping, adding trash cans near trash generation sites, prompt enforcement of trash accumulation, increased trash collection on public property, increased litter prevention messages or trash nets within the MS4) that provide substantially equivalent removal of trash. Each Permittee shall demonstrate that BMPs, which substituted for trash excluders, provide equivalent trash removal performance as excluders. When outfall trash capture is provided, revision of the schedule for inspection and cleanout of catch basins in Part VI.D.9.h.iii.(2) shall be reported in the next year’s annual report.

viii. Storm Drain Maintenance

Each Permittee shall implement a program for Storm Drain Maintenance that includes the following:

(1) Visual monitoring of Permittee-owned open channels and other drainage structures for trash and debris at least annually.

(2) Removal of trash and debris from open channels a minimum of once per year before the wet season.

(3) Elimination of the discharge of contaminants during MS4 maintenance and clean outs.

(4) Proper disposal of debris and trash removed during storm drain maintenance.

ix. Infiltration from Sanitary Sewer to MS4/Preventive Maintenance

(1) Each Permittee shall implement controls and measures to prevent and eliminate infiltration of seepage from sanitary sewers to MS4s through thorough, routine preventive maintenance of the MS4.

(2) Each Permittee that operates both a municipal sanitary sewer system and a MS4 must implement controls and measures to prevent and eliminate infiltration of seepage from the sanitary sewers to the MS4s that must include overall sanitary sewer and MS4 surveys and thorough, routine preventive maintenance of both. Implementation of a Sewer System Management Plan in accordance with the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, may be used to fulfill this requirement.

(3) Each Permittee shall implement controls to limit infiltration of seepage from sanitary sewers to the MS4 where necessary. Such controls must include:

(a) Adequate plan checking for construction and new development;

(b) Incident response training for its municipal employees that identify sanitary sewer spills;

(c) Code enforcement inspections;

(d) MS4 maintenance and inspections;

(e) Interagency coordination with sewer agencies; and

(f) Proper education of its municipal staff and contractors conducting field operations on the MS4 or its municipal sanitary sewer (if applicable).

x. Permittee Owned Treatment Control BMPs

(1) Each Permittee shall implement an inspection and maintenance program for all Permittee owned treatment control BMPs, including post-construction treatment control BMPs.

(2) Each Permittee shall ensure proper operation of all treatment control BMPs and maintain them as necessary for proper operation, including all post-construction treatment control BMPs.

(3) Any residual water[35] produced by a treatment control BMP and not being internal to the BMP performance when being maintained shall be:

(a) Hauled away and legally disposed of; or

(b) Applied to the land without runoff; or

(c) Discharged to the sanitary sewer system (with permits or authorization); or

(d) Treated or filtered to remove bacteria, sediments, nutrients, and meet the limitations set in Table 19 (Discharge Limitations for Dewatering Treatment BMPs), prior to discharge to the MS4.

Table 19. Discharge Limitations for Dewatering Treatment BMPs[36]

Parameter	Units	Limitation
Total Suspended Solids	mg/L	100
Turbidity	NTU	50
Oil and Grease	mg/L	10

i. Streets, Roads, and Parking Facilities Maintenance

i. Each Permittee shall designate streets and/or street segments within its jurisdiction as one of the following:

Priority A: Streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or debris.

Priority B: Streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or debris.

Priority C: Streets and/or street segments that are designated as generating low volumes of trash and/or debris.

ii. Each Permittee shall perform street sweeping of curbed streets according to the following schedule:

Priority A: Streets and/or street segments that are designated as Priority A shall be swept at least two times per month.

Priority B: Streets and/or street segments that are designated as Priority B shall be swept at least once per month.

Priority C: Streets and/or street segments that are designated as Priority C shall be swept as necessary but in no case less than once per year.

[35] See Attachment A.
[36] Technology based effluent limitations.

iii. Road Reconstruction

Each Permittee shall require that for any project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing roadbed surfaces, that the following BMPs be implemented for each project.

(1) Restrict paving and repaving activity to exclude periods of rainfall or predicted rainfall[37] unless required by emergency conditions.

(2) Install sand bags or gravel bags and filter fabric at all susceptible storm drain inlets and at manholes to prevent spills of paving products and tack coat;

(3) Prevent the discharge of release agents including soybean oil, other oils, or diesel into the MS4 or receiving waters.

(4) Prevent non-storm water runoff from water use for the roller and for evaporative cooling of the asphalt.

(5) Clean equipment over absorbent pads, drip pans, plastic sheeting or other material to capture all spillage and dispose of properly.

(6) Collect liquid waste in a container, with a secure lid, for transport to a maintenance facility to be reused, recycled or disposed of properly.

(7) Collect solid waste by vacuuming or sweeping and securing in an appropriate container for transport to a maintenance facility to be reused, recycled or disposed of properly.

(8) Cover the “cold-mix” asphalt (i.e., pre-mixed aggregate and asphalt binder) with protective sheeting during a rainstorm.

(9) Cover loads with tarp before haul-off to a storage site, and do not overload trucks.

(10) Minimize airborne dust by using water spray during grinding.

(11) Avoid stockpiling soil, sand, sediment, asphalt material and asphalt grindings materials or rubble in or near MS4 or receiving waters.

(12) Protect stockpiles with a cover or sediment barriers during a rain.

iv. Parking Facilities Maintenance

(1) Permittee-owned parking lots exposed to storm water shall be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. In no case shall a Permittee-owned parking lot be cleaned less than once a month.

j. Emergency Procedures

i. Each Permittee may conduct repairs of essential public service systems and infrastructure in emergency situations with a self-waiver of the provisions of this Order as follows:

[37] A probability of precipitation (POP) of 50% is required.

(1) The Permittee shall abide by all other regulatory requirements, including notification to other agencies as appropriate.

(2) Where the self-waiver has been invoked, the Permittee shall submit to the Regional Water Board Executive Officer a statement of the occurrence of the emergency, an explanation of the circumstances, and the measures that were implemented to reduce the threat to water quality, no later than 30 business days after the situation of emergency has passed.

(3) Minor repairs of essential public service systems and infrastructure in emergency situations (that can be completed in less than one week) are not subject to the notification provisions. Appropriate BMPs to reduce the threat to water quality shall be implemented.

k. Municipal Employee and Contractor Training

i. Each Permittee shall, no later than 1 year after Order adoption and annually thereafter before June 30, train all of their employees in targeted positions (whose interactions, jobs, and activities affect storm water quality) on the requirements of the overall storm water management program, or shall ensure contractors performing privatized/contracted municipal services are appropriately trained to:

(1) Promote a clear understanding of the potential for activities to pollute storm water.

(2) Identify opportunities to require, implement, and maintain appropriate BMPs in their line of work.

Outside contractors can self-certify, providing they certify they have received all applicable training required in the Permit and have documentation to that effect.

ii. Each Permittee shall, no later than 1 year after Order adoption and annually thereafter before June 30, train all of their employees and contractors who use or have the potential to use pesticides or fertilizers (whether or not they normally apply these as part of their work). Training programs shall address:

(1) The potential for pesticide-related surface water toxicity.

(2) Proper use, handling, and disposal of pesticides.

(3) Least toxic methods of pest prevention and control, including IPM.

(4) Reduction of pesticide use.

iii. Outside contractors can self-certify, providing they certify they have received all applicable training required in the Permit and have documentation to that effect.

10. Illicit Connections and Illicit Discharges Elimination Program

a. General

i. Each Permittee shall continue to implement an Illicit Connection and Illicit Discharge Elimination (IC/ID) Program to detect, investigate, and eliminate IC/IDs to the MS4. The IC/ID Program must be implemented in accordance with the requirements and performance measures specified in this Order.

ii. As stated in Part VI.A.2 of this Order, each Permittee must have adequate legal authority to prohibit IC/IDs to the MS4 and enable enforcement capabilities to eliminate the source of IC/IDs.

iii. Each Permittee's IC/ID Program shall consist of at least the following major program components:

(1) Procedures for conducting source investigations for IC/IDs

(2) Procedures for eliminating the source of IC/IDs

(3) Procedures for public reporting of illicit discharges

(4) Spill response plan

(5) IC/IDs education and training for Permittee staff

b. Illicit Discharge Source Investigation and Elimination

i. Each Permittee shall develop written procedures for conducting investigations to identify the source of all suspected illicit discharges, including procedures to eliminate the discharge once the source is located.

ii. At a minimum, each Permittee shall initiate an investigation(s) to identify and locate the source within 72 hours of becoming aware of the illicit discharge.

iii. When conducting investigations, each Permittee shall comply with the following:

(1) Illicit discharges suspected of being sanitary sewage and/or significantly contaminated shall be investigated first.

(2) Each Permittee shall track all investigations to document at a minimum the date(s) the illicit discharge was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed.

(3) Each Permittee shall investigate the source of all observed illicit discharges.

iv. When taking corrective action to eliminate illicit discharges, each Permittee shall comply with the following:

(1) If the source of the illicit discharge has been determined to originate within the Permittee's jurisdiction, the Permittee shall immediately notify the responsible party/parties of the problem, and require the responsible party to initiate all necessary corrective actions to eliminate the illicit discharge.

Upon being notified that the discharge has been eliminated, the Permittee shall conduct a follow-up investigation to verify that the discharge has been eliminated and cleaned-up to the satisfaction of the Permittee(s). Each Permittee shall document its follow-up investigation. Each Permittee may seek recovery and remediation costs from responsible parties or require compensation for the cost of all inspection, investigation, cleanup and oversight activities. Resulting enforcement actions shall follow the program's Progressive Enforcement Policy, per Part VI.D.2.

(2) If the source of the illicit discharge has been determined to originate within an upstream jurisdiction, the Permittee shall notify the upstream jurisdiction and the Regional Water Board within 30 days of such determination and provide all of the information collected regarding efforts to identify its source. Each Permittee may seek recovery and remediation costs from responsible parties or require compensation for the cost of all inspection, investigation, cleanup and oversight activities. Resulting enforcement actions shall follow the program's Progressive Enforcement Policy, per Part VI.D.2.

(3) If the source of the illicit discharge cannot be traced to a suspected responsible party, affected Permittees shall implement its spill response plan and then initiate a permanent solution as described in section 10.b.v below.

v. In the event the Permittee is unable to eliminate an ongoing illicit discharge following full execution of its legal authority and in accordance with its Progressive Enforcement Policy, or other circumstances prevent the full elimination of an ongoing illicit discharge, including the inability to find the responsible party/parties, the Permittee shall provide for diversion of the entire flow to the sanitary sewer or provide treatment. In either instance, the Permittee shall notify the Regional Water Board in writing within 30 days of such determination and shall provide a written plan for review and comment that describes the efforts that have been undertaken to eliminate the illicit discharge, a description of the actions to be undertaken, anticipated costs, and a schedule for completion.

c. Identification and Response to Illicit Connections

i. Investigation

Each Permittee, upon discovery or upon receiving a report of a suspected illicit connection, shall initiate an investigation within 21 days, to determine the following: (1) source of the connection, (2) nature and volume of discharge through the connection, and (3) responsible party for the connection.

ii. Elimination

Each Permittee, upon confirmation of an illicit MS4 connection, shall ensure that the connection is:

(1) Permitted or documented, provided the connection will only discharge storm water and non-storm water allowed under this Order or other individual or general NPDES Permits/WDRs, or
(2) Eliminated within 180 days of completion of the investigation, using its formal enforcement authority, if necessary, to eliminate the illicit connection.

iii. Documentation

Formal records must be maintained for all illicit connection investigations and the formal enforcement taken to eliminate illicit connections.

d. Public Reporting of Non-Storm Water Discharges and Spills

i. Each Permittee shall promote, publicize, and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from MS4s through a central contact point, including phone numbers and an internet site for complaints and spill reporting. Each Permittee shall also provide the reporting hotline to Permittee staff to leverage the field staff that has direct contact with the MS4 in detecting and eliminating illicit discharges.

ii. Each Permittee shall implement the central point of contact and reporting hotline requirements listed in this part in one or more of the following methods:

(1) By participating in a County-wide sponsored hotline

(2) By participating in one or more Watershed Group sponsored hotlines

(3) Or individually within its own jurisdiction

(4) The LACFCD shall, in collaboration with the County, continue to maintain the 888-CLEAN-LA hotline and internet site to promote, publicize, and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from MS4s.

iii. Each Permittee shall ensure that signage adjacent to open channels, as required in Part F.8.h.vi, include information regarding dumping prohibitions and public reporting of illicit discharges.

iv. Each Permittee shall develop and maintain written procedures that document how complaint calls are received, documented, and tracked to ensure that all complaints are adequately addressed. The procedures shall be evaluated to determine whether changes or updates are needed to ensure that the procedures accurately document the methods employed by the Permittee. Any identified changes shall be made to the procedures subsequent to the evaluation.

v. Each Permittee shall maintain documentation of the complaint calls and record the location of the reported spill or IC/ ID and the actions undertaken in response to all IC/ID complaints, including referrals to other agencies.

e. Spill Response Plan

i. Each Permittee shall implement a spill response plan for all sewage and other spills that may discharge into its MS4. The spill response plan shall clearly identify agencies responsible for spill response and cleanup, telephone numbers and e-mail address for contacts, and shall contain at a minimum the following requirements:

(1) Coordination with spill response teams throughout all appropriate departments, programs and agencies so that maximum water quality protection is provided.

(2) Initiate investigation of all public and employee spill complaints within one business day of receiving the complaint to assess validity.

(3) Response to spills for containment within 4 hours of becoming aware of the spill, except where such spills occur on private property, in which case the response should be within 2 hours of gaining legal access to the property.

(4) Spills that may endanger health or the environment shall be reported to appropriate public health agencies and the Office of Emergency Services (OES).

f. Illicit Connection and Illicit Discharge Education and Training

i. Each Permittee must continue to implement a training program regarding the identification of IC/IDs for all municipal field staff, who, as part of their normal job responsibilities (e.g., street sweeping, storm drain maintenance, collection system maintenance, road maintenance), may come into contact with or otherwise observe an illicit discharge or illicit connection to the MS4. Contact information, including the procedure for reporting an illicit discharge, must be readily available to field staff. Training program documents must be available for review by the permitting authority.

ii. Each Permittee shall ensure contractors performing privatized/contracted municipal services such as, but not limited to, storm and/or sanitary sewer system inspection and repair, street sweeping, trash pick-up and disposal, and street and right-of-way construction and repair are trained regarding IC/ID identification and reporting. Permittees may provide training or include contractual requirements for IC/ID identification and reporting training. Outside contractors can self-certify, providing they certify they have received all applicable training required in the Permit and have documentation to that effect.

iii. Each Permittee's training program should address, at a minimum, the following:

(1) IC/ID identification, including definitions and examples,

(2) investigation,

(3) elimination,

(4) cleanup,

(5) reporting, and

(6) documentation.

iv. Each Permittee must create a list of applicable positions and contractors which require IC/ID training and ensure that training is provided at least twice during the term of the Order. Each Permittee must maintain documentation of the training activities.

v. New Permittee staff members must be provided with IC/ID training within 180 days of starting employment.

E. Total Maximum Daily Load Provisions

1. The provisions of this Part VI.E. implement and are consistent with the assumptions and requirements of all waste load allocations (WLAs) established in TMDLs for which some or all of the Permittees in this Order are responsible.

a. Part VI.E of this Order includes provisions that are designed to assure that Permittees achieve WLAs and meet other requirements of TMDLs covering receiving waters impacted by the Permittees' MS4 discharges. TMDL provisions are grouped by WMA (WMA) in Attachments L through R.

b. The Permittees subject to each TMDL are identified in Attachment K.

c. The Permittees shall comply with the applicable water quality-based effluent limitations and/or receiving water limitations contained in Attachments L through R, consistent with the assumptions and requirements of the WLAs established in the TMDLs, including implementation plans and schedules, where provided for in the State adoption and approval of the TMDL (40 CFR §122.44(d)(1)(vii)(B); Cal. Wat. Code §13263(a)).

d. A Permittee may comply with water quality-based effluent limitations and receiving water limitations in Attachments L through R using any lawful means.

2. Compliance Determination

a. General

i. A Permittee shall demonstrate compliance at compliance monitoring points established in each TMDL or, if not specified in the TMDL, at locations identified in an approved TMDL monitoring plan or in accordance with an approved integrated monitoring program per Attachment E, Part VI.C.5 (Integrated Watershed Monitoring and Assessment).

ii. Compliance with water quality-based effluent limitations shall be determined as described in Parts VI.E.2.d and VI.E.2.e, or for trash water quality-based effluent limitations as described in Part VI.E.5.b, or as otherwise set forth in TMDL specific provisions in Attachments L through R.

iii. Pursuant to Part VI.C, a Permittee may, individually or as part of a watershed-based group, develop and submit for approval by the Regional Water Board Executive Officer a Watershed Management Program that addresses all water quality-based effluent limitations and receiving water limitations to which the Permittee is subject pursuant to established TMDLs.

b. Commingled Discharges

i. A number of the TMDLs establish WLAs that are assigned jointly to a group of Permittees whose storm water and/or non-storm water discharges are or may be commingled in the MS4 prior to discharge to the receiving water subject to the TMDL.

ii. In these cases, pursuant to 40 CFR section 122.26(a)(3)(vi), each Permittee is only responsible for discharges from the MS4 for which they are owners and/or operators.

iii. Where Permittees have commingled discharges to the receiving water, compliance at the outfall to the receiving water or in the receiving water shall be determined for the group of Permittees as a whole unless an individual Permittee demonstrates that its discharge did not cause or contribute to the exceedance, pursuant to subpart v. below.

iv. For purposes of compliance determination, each Permittee is responsible for demonstrating that its discharge did not cause or contribute to an exceedance of an applicable water quality-based effluent limitation(s) at the outfall or receiving water limitation(s) in the target receiving water.

v. A Permittee may demonstrate that its discharge did not cause or contribute to an exceedance of an applicable water quality-based effluent limitation or receiving water limitation in any of the following ways:

(1) Demonstrate that there is no discharge from the Permittee's MS4 into the applicable receiving water during the time period subject to the water quality-based effluent limitation and/or receiving water limitation; or

(2) Demonstrate that the discharge from the Permittee's MS4 is controlled to a level that does not exceed the applicable water quality-based effluent limitation; or

(3) For exceedances of bacteria receiving water limitations or water quality-based effluent limitations, demonstrate through a source investigation pursuant to protocols established under California Water Code section 13178 or for exceedances of other receiving water limitations or water quality-based effluent limitations, demonstrate using other accepted source identification protocols, that pollutant sources within the jurisdiction of the Permittee or the Permittee's MS4 have not caused or contributed to the exceedance of the Receiving Water Limitation(s).

c. Receiving Water Limitations Addressed by a TMDL

i. For receiving water limitations in Part V.A. associated with water body-pollutant combinations addressed in a TMDL, Permittees shall achieve compliance with the receiving water limitations in Part V.A. as outlined in this Part VI.E. and Attachments L through R of this Order.

ii. A Permittee's full compliance with the applicable TMDL requirement(s), including compliance schedules, of this Part VI.E. and Attachments L through R constitutes compliance with Part V.A. of this Order for the specific pollutant addressed in the TMDL.

iii. As long as a Permittee is in compliance with the applicable TMDL requirements in a time schedule order (TSO) issued by the Regional Water Board pursuant to California Water Code sections 13300 and 13385(j)(3), it is not the Regional Water Board's intention to take an enforcement action for violations of Part V.A. of this Order for the specific pollutant(s) addressed in the TSO.

d. Interim Water Quality-Based Effluent Limitations and Receiving Water Limitations

i. A Permittee shall be considered in compliance with an applicable interim water quality-based effluent limitation and interim receiving water limitation for a pollutant associated with a specific TMDL if any of the following is demonstrated:

(1) There are no violations of the interim water quality-based effluent limitation for the pollutant associated with a specific TMDL at the Permittee's applicable MS4 outfall(s),[38] including an outfall to the receiving water that collects discharges from multiple Permittees' jurisdictions;

(2) There are no exceedances of the applicable receiving water limitation for the pollutant associated with a specific TMDL in the receiving water(s) at, or downstream of, the Permittee's outfall(s);

(3) There is no direct or indirect discharge from the Permittee's MS4 to the receiving water during the time period subject to the water quality-based effluent limitation and/or receiving water limitation for the pollutant associated with a specific TMDL; or

(4) The Permittee has submitted and is fully implementing an approved Watershed Management Program or EWMP pursuant to Part VI.C.

(a) To be considered fully implementing an approved Watershed Management Program or EWMP, a Permittee must be implementing

[38] An outfall may include a manhole or other point of access to the MS4 at the Permittee's jurisdictional boundary.

all actions consistent with the approved program and applicable compliance schedules, including structural BMPs.

(b) Structural storm water BMPs or systems of BMPs should be designed and maintained to treat storm water runoff from the 85th percentile, 24-hour storm, where feasible and necessary to achieve applicable WQBELs and receiving water limitations, and maintenance records must be up-to-date and available for inspection by the Regional Water Board.

(c) A Permittee that does not implement the Watershed Management Program in accordance with the milestones and compliance schedules shall demonstrate compliance with its interim water quality-based effluent limitations and/or receiving water limitations pursuant to Part VI.E.2.d.i.(1)-(3), above.

(d) Upon notification of a Permittee's intent to develop a WMP or EWMP and prior to approval of its WMP or EWMP, a Permittee's full compliance with all of the following requirements shall constitute a Permittee's compliance with provisions pertaining to interim WQBELs with compliance deadlines occurring prior to approval of a WMP or EWMP. This subdivision (d) shall not apply to interim trash WQBELs.

(1) Provides timely notice of its intent to develop a WMP or EWMP,

(2) Meets all interim and final deadlines for development of a WMP or EWMP,

(3) For the area to be covered by the WMP or EWMP, targets implementation of watershed control measures in its existing storm water management program, including watershed control measures to eliminate non-storm water discharges of pollutants through the MS4 to receiving waters, to address known contributions of pollutants from MS4 discharges that cause or contribute to the impairment(s) addressed by the TMDL(s), and

(4) Receives final approval of its WMP or EWMP within 28 or 40 months, respectively.

e. Final Water Quality-based Effluent Limitations and/or Receiving Water Limitations

i. A Permittee shall be deemed in compliance with an applicable final water quality-based effluent limitation and final receiving water limitation for the pollutant(s) associated with a specific TMDL if any of the following is demonstrated:

(1) There are no violations of the final water quality-based effluent limitation for the specific pollutant at the Permittee's applicable MS4 outfall(s)[39];

(2) There are no exceedances of applicable receiving water limitation for the specific pollutant in the receiving water(s) at, or downstream of, the Permittee's outfall(s);

(3) There is no direct or indirect discharge from the Permittee's MS4 to the receiving water during the time period subject to the water quality-based effluent limitation and/or receiving water limitation for the pollutant(s) associated with a specific TMDL; or

(4) In drainage areas where Permittees are implementing an EWMP, (i) all non-storm water and (ii) all storm water runoff up to and including the volume equivalent to the 85th percentile, 24-hour event is retained for the drainage area tributary to the applicable receiving water. This provision (4) shall not apply to final trash WQBELs.

3. USEPA Established TMDLs

TMDLs established by the USEPA, to which Permittees are subject, do not contain an implementation plan adopted pursuant to California Water Code section 13242. However, USEPA has included implementation recommendations as part of these TMDLs. In lieu of inclusion of numeric water quality based effluent limitations at this time, this Order requires Permittees subject to WLAs in USEPA established TMDLs to propose and implement best management practices (BMPs) that will be effective in achieving compliance with USEPA established numeric WLAs. The Regional Water Board may, at its discretion, revisit this decision within the term of this Order or in a future permit, as more information is developed to support the inclusion of numeric water quality based effluent limitations.

a. Each Permittee shall propose BMPs to achieve the WLAs contained in the applicable USEPA established TMDL(s), and a schedule for implementing the BMPs that is as short as possible, in a Watershed Management Program or EWMP.

b. Each Permittee may either individually submit a Watershed Management Program, or may jointly submit a WMP or EWMP with other Permittees subject to the WLAs contained in the USEPA established TMDL.

c. At a minimum, each Permittee shall include the following information in its Watershed Management Program or EWMP, relevant to each applicable USEPA established TMDL:

i. Available data demonstrating the current quality of the Permittee's MS4 discharge(s) in terms of concentration and/or load of the target pollutant(s) to the receiving waters subject to the TMDL;

[39] Ibid.

ii. A detailed description of BMPs that have been implemented, and/or are currently being implemented by the Permittee to achieve the WLA(s), if any;

iii. A detailed time schedule of specific actions the Permittee will take in order to achieve compliance with the applicable WLA(s);

iv. A demonstration that the time schedule requested is as short as possible, taking into account the time since USEPA establishment of the TMDL, and technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the WLA(s);

(1) For the Malibu Creek Nutrient TMDL established by USEPA in 2003, in no case shall the time schedule to achieve the final numeric WLAs exceed five years from the effective date of this Order; and

v. If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements and numeric milestones and the date(s) for their achievement.

d. Each Permittee subject to a WLA in a TMDL established by USEPA shall submit a draft of a Watershed Management Program or EWMP to the Regional Water Board Executive Officer for approval per the schedule Part VI.C.4.

e. If a Permittee does not submit a Watershed Management Program, or the plan is determined to be inadequate by the Regional Water Board Executive Officer and the Permittee does not make the necessary revisions within 90 days of written notification that plan is inadequate, the Permittee shall be required to demonstrate compliance with the numeric WLAs immediately based on monitoring data collected under the MRP (Attachment E) for this Order.

4. State Adopted TMDLs where Final Compliance Deadlines have Passed

a. Permittees shall comply immediately with water quality-based effluent limitations and/or receiving water limitations to implement WLAs in state-adopted TMDLs for which final compliance deadlines have passed pursuant to the TMDL implementation schedule.

b. Where a Permittee believes that additional time to comply with the final water quality-based effluent limitations and/or receiving water limitations is necessary, a Permittee may within 45 days of Order adoption request a time schedule order pursuant to California Water Code section 13300 for the Regional Water Board's consideration.

c. Permittees may either individually request a TSO, or may jointly request a TSO with all Permittees subject to the water quality-based effluent limitations and/or receiving water limitations, to implement the WLAs in the state-adopted TMDL.

d. At a minimum, a request for a time schedule order shall include the following:

i. Data demonstrating the current quality of the MS4 discharge(s) in terms of concentration and/or load of the target pollutant(s) to the receiving waters subject to the TMDL;

ii. A detailed description and chronology of structural controls and source control efforts, since the effective date of the TMDL, to reduce the pollutant load in the MS4 discharges to the receiving waters subject to the TMDL;

iii. Justification of the need for additional time to achieve the water quality-based effluent limitations and/or receiving water limitations;

iv. A detailed time schedule of specific actions the Permittee will take in order to achieve the water quality-based effluent limitations and/or receiving water limitations;

v. A demonstration that the time schedule requested is as short as possible, taking into account the technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the effluent limitation(s); and

vi. If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements and the date(s) for their achievement. The interim requirements shall include both of the following:

(1) Effluent limitation(s) for the pollutant(s) of concern; and

(2) Actions and milestones leading to compliance with the effluent limitation(s).

5. Water Quality-Based Effluent Limitations for Trash

Permittees assigned a Waste Load Allocation in a trash TMDL shall comply as set forth below.

a. Effluent Limitations: Permittees shall comply with the interim and final water quality-based effluent limitations for trash set forth in Attachments L through R for the following Trash TMDLs:

i. Lake Elizabeth Trash TMDL (Attachment L)

ii. Santa Monica Bay Nearshore and Offshore Debris TMDL (Attachment M)

iii. Malibu Creek Watershed Trash TMDL (Attachment M)

iv. Ballona Creek Trash TMDL (Attachment M)

v. Machado Lake Trash TMDL (Attachment N)

vi. Los Angeles River Trash TMDL (Attachment O)

vii. Peck Road Park Lake Trash TMDL (Attachment O)

viii. Echo Park Lake Trash TMDL (Attachment O)

ix. Legg Lake Trash TMDL (Attachment O)

b. Compliance

i. Pursuant to California Water Code section 13360(a), Permittees may comply with the trash effluent limitations using any lawful means. Such compliance options are broadly classified as *full capture*, *partial capture, institutional controls,* or *minimum frequency of assessment and collection,* as described below, and any combination of these may be employed to achieve compliance:

(1) Full Capture Systems:

(a) The Basin Plan authorizes the Regional Water Board Executive Officer to certify *full capture systems*, which are systems that meet the operating and performance requirements as described in this Order, and the procedures identified in "Procedures and Requirements for Certification of a Best Management Practice for Trash Control as a Full Capture System."[40]

(b) Permittees are authorized to comply with their effluent limitations through certified *full capture systems* provided the requirements of paragraph (c), immediately below, and any conditions in the certification, continue to be met.

(c) Permittees may comply with their effluent limitations through progressive installation of *full capture systems* throughout their jurisdictional areas until all areas draining to Lake Elizabeth, Santa Monica Bay, Malibu Creek, Ballona Creek, Machado Lake, the Los Angeles River system, Legg Lake, Peck Road Park Lake, and/or Echo Park Lake are addressed. For purposes of this Order, attainment of the effluent limitations shall be conclusively presumed for any drainage area to Lake Elizabeth, Santa Monica Bay, Malibu Creek (and its tributaries), Ballona Creek (and its tributaries), Machado Lake, the Los Angeles River (and its tributaries), Legg Lake, Peck Road Park Lake, and/or Echo Park Lake where certified *full capture systems* treat all drainage from the area, provided that the *full capture systems* are adequately sized and maintained, and that maintenance records are up-to-date and available for inspection by the Regional Water Board.

[40] The Regional Water Board currently recognizes eight *full capture systems*. These are: Vortex Separation Systems (VSS) and seven other Executive Officer certified *full capture systems*, including specific types or designs of trash nets; two gross solids removal devices (GSRDs); catch basin brush inserts and mesh screens; vertical and horizontal trash capture screen inserts; and a connector pipe screen device. See August 3, 2004 Los Angeles Regional Water Quality Control Board Memorandum titled "Procedures and Requirements for Certification of a Best Management Practice for Trash Control as a Full Capture System.

(i) A Permittee shall be deemed in compliance with its final effluent limitation if it demonstrates that all drainage areas under its jurisdiction and/or authority are serviced by appropriate certified *full capture systems* as described in paragraph (1)(c).

(ii) A Permittee shall be deemed in compliance with its interim effluent limitations, where applicable:

1. By demonstrating that *full capture systems* treat the percentage of drainage areas in the watershed that corresponds to the required trash abatement.

2. Alternatively, a Permittee may propose a schedule for installation of *full capture systems* in areas under its jurisdiction and/or authority within a given watershed, targeting first the areas of greatest trash generation, for the Executive Officer's approval. The Executive Officer shall not approve any such schedule that does not result in timely compliance with the final effluent limitations, consistent with the established TMDL implementation schedule and applicable State policies. A Permittee shall be deemed in compliance with its interim effluent limitations provided it is fully in compliance with any such approved schedule.

(2) Partial Capture Devices and Institutional Controls: Permittees may comply with their interim and final effluent limitations through the installation of *partial capture devices* and the application of *institutional controls*.[41]

(a) Trash discharges from areas serviced solely by *partial capture devices* may be estimated based on demonstrated performance of the device(s) in the implementing area.[42] That is, trash reduction is equivalent to the *partial capture devices'* trash removal efficiency multiplied by the percentage of drainage area serviced by the devices.

(b) Except as provided in subdivision (c), immediately below, trash discharges from areas addressed by *institutional controls* and/or *partial capture devices* (where site-specific performance data is not available) shall be calculated using a mass balance approach, based on the daily generation rate (DGR) for a representative area.[43] The DGR shall be determined from direct measurement of trash deposited in the drainage area during any thirty-day period between June 22nd and September 22nd exclusive of rain events[44], and shall be re-calculated every year thereafter unless a less frequent period for recalculation is approved by the Regional Water Board Executive Officer. The DGR

[41] While interim effluent limitations may be complied with using *partial capture devices*, compliance with final effluent limitations cannot be achieved with the exclusive use of *partial capture devices*.
[42] Performance shall be demonstrated under different conditions (e.g. low to high trash loading).
[43] The area(s) should be representative of the land uses and activities within the Permittees' authority and shall be approved by the Executive Officer prior to the 30-day collection period.
[44] Provided no special events are scheduled that may affect the representative nature of that collection period.

shall be calculated as the total amount of trash collected during this period divided by the length of the collection period.

DGR = (Amount of trash collected during a 30-day collection period[45] / (30 days)

The DGR for the applicable area under the Permittees' jurisdiction and/or authority shall be extrapolated from that of the representative drainage area(s). A mass balance equation shall be used to estimate the amount of trash discharged during a storm event.[46] The *Storm Event Trash Discharge* for a given rain event in the Permittee's drainage area shall be calculated by multiplying the number of days since the last street sweeping by the DGR and subtracting the amount of any trash recovered in the catch basins.[47] For each day of a storm event that generates precipitation greater than 0.25 inch, the Permittee shall calculate a *Storm Event Trash Discharge*.

Storm Event Trash Discharge = [(Days since last street sweeping*DGR)] – [Amount of trash recovered from catch basins][48]

The sum of the *Storm Event Trash Discharges* for the storm year shall be the Permittee's calculated annual trash discharge.

Total Storm Year Trash Discharge = ∑Storm Event Trash Discharges from Drainage Area

(c) The Executive Officer may approve alternative compliance monitoring approaches for calculating total storm year trash discharge, upon finding that the program will provide a scientifically-based estimate of the amount of trash discharged from the Permittee's MS4.

(3) Combined Compliance Approaches:

Permittees may comply with their interim and final effluent limitations through a combination of *full capture systems*, *partial capture devices*, and *institutional controls*. Where a Permittee relies on a combination of approaches, it shall demonstrate compliance with the interim and final effluent limitations as specified in (1)(c) in areas where *full capture systems* are installed and as specified in (2)(a) or (2)(b), as appropriate, in areas where *partial capture devices* and *institutional controls* are applied.

(4) Minimum Frequency of Assessment and Collection Approach:

If allowed in a trash TMDL and approved by the Executive Officer, a Permittee may alternatively comply with its final effluent limitations by

[45] Between June 22nd and September 22nd
[46] Amount of trash shall refer to the uncompressed volume (in gallons) or drip-dry weight (in pounds) of trash collected.
[47] Any negative values shall be considered to represent a zero discharge.
[48] When more than one storm event occurs prior to the next street sweeping the discharge shall be calculated from the date of the last assessment.

implementing a program for *minimum frequency of assessment and collection* (MFAC) in conjunction with BMPs. To the satisfaction of the Executive Officer, the MFAC/BMP program must meet the following criteria:

(a) The MFAC/BMP Program includes an initial minimum frequency of trash assessment and collection and suite of structural and/or nonstructural BMPs. The MFAC/BMP program shall include collection and disposal of all trash found in the receiving water and shoreline. Permittees shall implement an initial suite of BMPs based on current trash management practices in land areas that are found to be sources of trash to the water body. The initial minimum frequency of trash assessment and collection shall be set as specified in the following TMDLs:

  (i) Malibu Creek Watershed Trash TMDL

  (ii) Machado Lake Trash TMDL

  (iii) Legg Lake Trash TMDL

(b) The MFAC/BMP Program includes reasonable assurances that it will be implemented by the responsible Permittees.

(c) MFAC protocols may be based on SWAMP protocols for rapid trash assessment, or alternative protocols proposed by Permittees and approved by the Regional Water Board Executive Officer.

(d) Implementation of the MFAC/BMP program should include a Health and Safety Program to protect personnel. The MFAC/BMP program shall not require Permittees to access and collect trash from areas where personnel are prohibited.

(e) The Regional Water Board Executive Officer may approve or require a revised assessment and collection frequency and definition of the critical conditions under the MFAC:

  (i) To prevent trash from accumulating in deleterious amounts that cause nuisance or adversely affect beneficial uses between collections;

  (ii) To reflect the results of trash assessment and collection;

  (iii) If the amount of trash collected does not show a decreasing trend, where necessary, such that a shorter interval between collections is warranted; or

  (iv) If the amount of trash collected is decreasing such that a longer interval between collections is warranted.

(f) At the end of the implementation period, a revised MFAC/BMP program may be required if the Regional Water Board Executive Officer determines that the amount of trash accumulating between

collections is causing nuisance or otherwise adversely affecting beneficial uses.

(g) With regard to (4)(e)(i), (4)(e)(ii), or (4)(e)(iii), above, the Regional Water Board Executive Officer is authorized to allow responsible Permittees to implement additional structural or non-structural BMPs in lieu of modifying the monitoring frequency.

ii. If a Permittee is not in compliance with its applicable interim and/or final effluent limitation as identified in Attachments L through R, then it shall be in violation of this Order.

(1) A Permittee relying on *partial capture devices* and/or *institutional controls* that has violated its interim and/or final effluent limitation(s) shall be presumed to have violated the applicable limitation for each day of each storm event that generated precipitation greater than 0.25 inch during the applicable storm year, except those storm days on which it establishes that its cumulative Storm Event Trash Discharges has not exceeded the applicable effluent limitation.

(2) If a Permittee relying on *full capture systems* has failed to demonstrate that the *full capture systems* for any drainage area are adequately sized and maintained, and that maintenance records are up-to-date and available for inspection by the Regional Water Board, and that it is in compliance with any conditions of its certification, shall be presumed to have discharged trash in an amount that corresponds to the percentage of the baseline waste load allocation represented by the drainage area in question.

(a) A Permittee may overcome this presumption by demonstrating (using any of the methods authorized in Part VI.E.5.b) that the actual or calculated discharge for that drainage area is in compliance with the applicable interim or final effluent limitation.

iii. Each Permittee shall be held liable for violations of the effluent limitations assigned to their area. If a Permittee's compliance strategy includes *full* or *partial capture devices* and it chooses to install a full or partial capture device in the MS4 physical infrastructure of another public entity, it is responsible for obtaining all necessary permits to do so. If a Permittee believes it is unable to obtain the permits needed to install a full capture or partial capture device within another Permittee's MS4 physical infrastructure, either Permittee may request the Executive Officer to hold a conference with the Permittees. Nothing in this Order shall affect the right of that public entity or a Permittee to seek indemnity or other recourse from the other as they deem appropriate. Nothing in this subsection shall be construed as relieving a Permittee of any liability that the Permittee would otherwise have under this Order.

c. Monitoring and Reporting Requirements (pursuant to California Water Code section 13383)

i. Each Permittee shall submit a TMDL Compliance Report as part of its Annual Report detailing compliance with the applicable interim and/or final effluent limitations. Reporting shall include the information specified below. The report shall be submitted on the reporting form specified by the Regional Water Board Executive Officer. The report shall be signed under penalty of perjury by the Permittee's principal executive officer or ranking elected official or duly authorized representative of the officer, consistent with Part V.B of Attachment D (Standard Provisions), who is responsible for ensuring compliance with this Order. Each Permittee shall be charged with and shall demonstrate compliance with its applicable effluent limitations beginning with its December 15, 2013, TMDL Compliance Report.

(1) Reporting Compliance based on Full Capture Systems: Permittees shall provide information on the number and location of full capture installations, the sizing of each full capture installation, the drainage areas addressed by these installations, and compliance with the applicable interim or final effluent limitation, in its TMDL Compliance Report. The Los Angeles Water Board will periodically audit sizing, performance, and other data to validate that a system satisfies the criteria established for a *full capture system* and any conditions established by the Regional Water Board Executive Officer in the certification.

(2) Reporting Compliance based on Partial Capture Systems and/or Institutional Controls:

(a) Using Performance Data Specific to the Permittee's Area: In its TMDL Compliance Report, a Permittee shall provide: (i) site-specific performance data for the applicable device(s); (ii) information on the number and location of such installations, and the drainage areas addressed by these installations; and (iii) calculated compliance with the applicable effluent limitations.

(b) Using Direct Measurement of Trash Discharge: Permittees shall provide an accounting of DGR and trash removal via street sweeping, catch basin clean outs, etc., in a database to facilitate the calculation of discharge for each rain event. The database shall be maintained and provided to the Regional Water Board for inspection upon request. In its TMDL Compliance Report, a Permittee shall provide information on its annual DGR, calculated storm year discharge, and compliance with the applicable effluent limitation.

(3) Reporting Compliance based on Combined Compliance Approaches:

Permittees shall provide the information specified in Part VI.E.5.c.i(1) for areas where *full capture systems* are installed and that are specified in Part VI.E.5.c.i(2)(a) or (b), as appropriate, for areas where *partial capture devices* and *institutional controls* are applied. In its TMDL Compliance Report, a Permittee shall also provide information on compliance with the applicable effluent limitation based on the combined compliance approaches.

(4) Reporting Compliance based on an MFAC/BMP Approach:

The MFAC/BMP Program includes a Trash Monitoring and Reporting Plan, and a requirement that the responsible Permittees will self-report any non-compliance with its provisions. The results and report of the Trash Monitoring and Reporting Plan must be submitted to Regional Water Board with the Permittee's Annual Report.

ii. Violation of the reporting requirements of this Part shall be punishable pursuant to, inter alia, California Water Code section 13385, subdivisions (a)(3) and (h)(1), and/or section 13385.1.

From: **Katrina Drabeck** <katdrabeck@gmail.com>
Date: Mon, Dec 10, 2012 at 3:03 PM
Subject: Millennium Hollywood Project comments
To: srimal.hewawitharana@lacity.org

Dear Ms. Hewawitharana:

I want to submit my extreme disapproval of the Millennium Hollywood Project, specifically the height of the towers. This plan is obscene. Growth in Hollywood should be in line with the aesthetic of the city. The Hollywood skyline is beautiful and iconic. These towers will dwarf all other buildings and absolutely ruin the skyline. As a long time Angelino, I love driving the stretch of the 101 and seeing the Capitol Records building, which would look ridiculous in between these highrises. As a Hollywood resident, I take great joy in driving down Vine, past all of the beautiful historical buildings - this is about so much more than just Capitol Records - that make Hollywood so special.

Every city needs to grow and change over time to thrive. But that growth needs to make sense. It needs to have respect and thought to the world around it. (For example, the Hollywood W Hotel was a perfect fit for the community, aesthetically.) This plan simply does not fit in Hollywood and it would absolutely break my heart to see it realized. Perhaps the future of Hollywood involves a change in the skyline, but one this drastic, one that you can not even see past from the hills, one that would impede the view of the Hollywood sign from the city, is not what Hollywood is to the people who live here. A generic city just like any other we are not. Please support growth that maintains Hollywood's character. Diminishing the feel of community that we all enjoy here will reduce the quality of life for current residents and even impact local businesses. 41-1

In addition, it is hard to understand a need for a residential tower when countless apartment and condo buildings built in the past few years still sit partially empty. Anyone who could afford to live in a new building like this would not get out of their nice cars to utilize the subway nearby. Traffic flow in Hollywood is already bad enough. This would make it a nightmare. 41-2

I much more strongly support the 220 ft high version of the project. 41-3

Sincerely,
Katrina Drabeck
6238 De Longpre Avenue
Hollywood CA 90028

From: **Olivia Duke** <oliviaduke@yahoo.com>
Date: Mon, Dec 10, 2012 at 1:53 AM
Subject: Ugly Two Hollywood Towers.
To: "Srimal.Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

I am OUTRAGED that these ugly two towers are being allowed to be built in Hollywood. We are already suffering so much from the building that has been allowed to continue. What is it going to take! Nobody but the contractors want these buildings built. Homeowners are moving out of Hollywood and the state because of all of the obvious under the table money that is being received by the city from the contractors building these totally unnecessary Gothic structures that take away from the unique history of the Hollywood city structure's. Is everyone on drugs? It must be either this or the money that is being handed over to the city. If you think that someone will not call in an investigation on this I can hardly believe the lack of thought. It is so obvious to everyone in the Hollywood Hills what is going on. We are just disgusted. I am thinking of moving after 25 years in the Hollywood Hills. The traffic due to all the building that has been allowed is destroying our Hollywood Hills area. Thank you. 42-1

Olivia Duke

From: **Olivia Duke** <oliviaduke@yahoo.com>
Date: Tue, Dec 11, 2012 at 10:24 PM
Subject: Re: Ugly Two Hollywood Towers.
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

Thank you, Srimal, I am sorry to be so curt but please understand the deep frustration that we feel in our neiborhood. We are totally being disregarded by the city that we pay high taxes to. Our wonderful city and Hollywood is being destroyed by all of the building that is being allowed. I live up in Beachwood Drive at Glen Holly. I have to park four blocks away, during the summer people come to blows with the tourists, the noise level is out of control (there is no longer any quiet enjoyment time) and the traffic out front on a street that used to be safe to cross is unbelievable. It takes triple the time to get anywhere, even to the store. There is no parking anywhere. We have gotten no help from the city after repeated requests and we are all just burnt out and jaded on the lack of care that we feel for our circumstances. We have gotten no help from Councilman La Bonge's office -- he is up to his ear lobes trying to put out the other fires that the city has caused. I don't know of one person who supports the building of those two towers -- we are very concerned about the increased environmental impact (on an environment that can hardly take more) and the biggest thing is the W as well as the surrounding condo's can not be rented out so there is no need for more. Why then have these awful, un-blending buildings been green lit? It truly makes me physically ill. I used to love to come home. Now I can't wait to get out.I am thinking of moving after 25 years -- I have multiple neighbors who already have left the state because of what is happening.

43-1

Thank you, Srimal, for your time and assistance with this matter.
All best wishes,
Olivia Duke

From: **Brian Dyer** <bwdyer@hotmail.com>
Date: Mon, Dec 10, 2012 at 1:03 PM
Subject: ENV-2011-675-EIR Millennium Project
To: srimal.hewawitharana@lacity.org
Cc: darlene.navarette@lacity.org

Dear Ms. Hewaitharana

Below is the text of the attached word document. If you have any questions, please feel free to contact me at (323) 469-5681. Best, Brian Dyer

44-1

Brian Dyer
1835 Grace Avenue
Los Angeles, CA 90028

December 10, 2012

Environmental Review Unit
City of Los Angeles Planning Department
200 N. Spring, 7th Floor
Los Angeles, California, 90012

Re: ENV-2011-675-EIR, State Clearinghouse Number:2011041094, Millennium Project

To Whom It May Concern:

After reviewing the DEIR, I find some troubling aspects to it, particularly in the design and in the geological and soils section.

44-2

Design: Even though East of Vine is not considered by the Hollywood Community Plan as the Hollywood Core, as the area west of Vine is, the design elements should be the same. The Pantages Theatre, which the Millennium Project (MP) will abut, finished construction in the 1930s. This alone should have extended the core to Argyle and up to the Henry Fonda theatre as the Eastern reaches of the core. As such, this “theatre district” as the city is already wanting to extol, should follow the design standards regarding height restrictions that the core has already been adjusted to through the Hollywood Community Plan.

44-3

Geology: The MP DEIR uses the Modified Mercalli scale, which uses people’s impressions about the intensity they feel during the earthquake. That is fine. However, the DEIR should go beyond and use the Richter scale as well so the public, in this questioning period, could better understand the DEIR. Also, the DEIR does not use any report more recent than 2002. Nowhere in the DEIR is the recent activity in

44-4

Beverly Hills, on the Inglewood Fault and Beverly Hills Fault mentioned. These faults have, in effect, cut in two the Santa Monica Fault and the Hollywood Fault, both of which can be triggered by the above mentioned faults and trigger each other. Cal Tech currently states on their website that the Santa Monica Fault can reach a 7.0 or higher, in conjunction with another fault. The Hollywood fault, which runs north of the Santa Monica fault may reach 6.5 or higher.

44-4 (Cont)

Regarding the liquefaction of soils mentioned in the DEIR, one only has to look at the building of the Metro Redline, which created a hole in Hollywood Boulevard, when underground erosion due to an underground stream created a collapse in the tunnel. The water table under the Runyon Canyon park was also reduced. Nowhere in the study are these incidences mentioned. If the soils and water table on either end of the project were not discoverable by the METRO DEIR, what is yet to be found with the huge MP?

44-5

Traffic: As already stated in the DEIR, traffic will be impacted. As witnessed by the Project Plan for Trizec Hahn's "Hollywood & Highland" the traffic mitigation processes listed on that projects section IV, , page 13 & 14 (attached document) for neighborhoods has not continued to be implemented. Traffic in the neighborhoods are already overflowing and causing cut-throughs. Since the project's Western boundary includes Argyle, this project will have a heavy impact on the communities into the core, South of Franklin and North of Hollywood where traffic is already beyond capacity due to clubs, theatres, The Ford Theatre and the Hollywood Bowl. In the above mentioned Trizec Hahn plan, one of the mitigations was that Trizec Hahn would provide traffic control officers where necessary. Lack of one is a continuing problem at Franklin and Highland intersection. Because Yucca, north of the project, from Gower, traveling West to Highland, is a two lane street, with Historic buildings on either side prohibiting street expansion, traffic mitigation, without city oversight, will not be handled correctly. As the City does not have the personnel according to budget and cutting back, this is a bad policy at this time.

44-6

Already four North South bound streets, Vine, Cahuenga, Highland and La Brea, push traffic through the Cahuenga corridor. This traffic pattern should be kept as "friction less" as possible to facilitate transportation and emergency services. The rail system (Metro Redline) has not alleviated much of this problem to date. Donald Appleyard's San Francisco study subsequently put forth in his 1981 book "Livable Streets" shows how traffic erodes and destroys community which self admittedly the Millennium Project exacerbate. Traffic levels are a problem. But community and emergency routes need to be conserved by the city for the greater good of the people, rather than exploited for a short term solution of a company.

44-7

For these reasons, I would not want the MP to move forward in its current form. It does nothing for the community. In fact, it builds its own community where another already exists. It does not encourage community but divides it. It does not provide solutions to traffic, emergency services and community, but compounds the problems already there.

44-8

Respectfully,

Brian Dyer
Resident Area 13

attachments

Franklin Avenue, Highland Avenue and associated intersections to improve the congestion and delays that now cause drivers to seek routes which cut through residential neighborhoods.

In the event that a particular neighborhood experiences significant non-residential traffic intrusion, neighborhood traffic protection measures shall be implemented to allow neighborhoods to work with LADOT and the proposed Developer to develop focused solutions which will discourage through traffic while not adversely affecting the mobility and convenience of the residents themselves.

The following mitigation measures have been developed in coordination with LADOT to address potential neighborhood traffic impacts:

1. The Outpost Estates Community Area - A LADOT approved Neighborhood Traffic Protection Plan has been established for the Outpost Estates Homeowners Association community area. This Neighborhood Traffic Protection Plan shall be implemented by the LADOT and the Outpost Estates community, funded by the Project Developer.

   Responsibility for Implementation: Department of Transportation

Monitoring Phase:	Occupancy
Enforcement Agency:	Department of Transportation
Monitoring Agency:	Department of Transportation

2. The Hollywood Heights and Whitley Heights Community Areas - An approved Neighborhood Traffic Protection Plan has not been established for either of these community areas. Due to the unique constraints of residential roadways in these community areas, the significance threshold of a 2% increase in vehicle volumes has been established to identify areas where mitigation measures will be needed. The Project Developer would collaborate with the LADOT and neighborhood associations in developing and implementing neighborhood traffic protection measures in the Hollywood Heights and Whitley Heights community areas. Implementation of neighborhood traffic protection measures could include such measures as permit parking, speed humps, "No Thru Traffic" signs,

lowering posted speed limits, traffic circles, "No Left (or Right) Turn" signs, traffic control officers at key intersections during peak periods, and restricted access (gates) to neighborhoods.

Responsibility for Implementation: Department of Transportation
Monitoring Phase: Occupancy
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation

D.2 PARKING

1. Long Term Contracts, Employee Parking: The Project Developer shall obtain long-term contract commitments for a minimum of 417 off-site parking spaces at a location or locations to be coordinated with CRA to accommodate the projected need for Project-related employee parking at an off-site location(s).

Responsibility for Implementation: Developer
Monitoring Phase: Pre-Construction
Enforcement Agency: Community Redevelopment Agency/ Department of Transportation
Monitoring Agency: Community Redevelopment Agency/ Department of Transportation

2. Permit Parking District: The Developer shall support the establishment of a permit parking district by the City of Los Angeles within the residential areas located north of the site, including those located north of Franklin Avenue, designed to deter "spill over" parking from the Project into the adjacent neighborhoods when initiated by separate action on the part of the City.

Responsibility for Implementation: Developer
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation

November 30, 2012

Srimal Hewawitharana, Environmental Specialist II
Los Angeles Department of City Planning
200 S. Spring St., Room 750
Los Angeles, CA 90012

Re: Millenium Hollywood Project, Draft EIR

Dear Ms. Hewawitharana,

I'm writing to contest the EIR you have approved for the Millenium Hollywood Project. My reasons are as follows: 45-1

-The EIR has not completed a thorough study of the environmental impacts for our area. The infrastructure will be seriously impacted with all of the additional population created with this project. The air quality, noise, police and fire response, sewer usage, road wear and increased traffic locally as well as on the 101 Freeway and Vine Street off ramp, will all be impacted by this project. These things need further study. The access for people leaving the hills in their cars will be seriously affected as well, as traffic will become even more dense. Air quality is of major concern to me. I already get black soot throughout my apartment that overlooks the city. With the increased traffic, this will also increase. The noise also concerns me; the increased traffic on the 101 Freeway and the Vine Street off ramp will bring increased traffic noise and the increased population, night clubs, shops, etc., will bring increased noise to the area. Peace of mind and quality of life for local residents must be considered in any community plan. 45-2, 45-3, 45-4, 45-5

-The population growth needs to be correctly addressed. The need for more rapid transit and density needs to be studied, based on true population growth, not biased figures. 45-6

-The proposed project removes height limits that were put in place previously. They were put in place for a very good reason—to prevent over development such as this project and to retain the integrity of the area. The heights of the buildings proposed are contrary to the elements of the area. Yucca Ave is mainly a street with low slung buildings, and should remain that way. The skyscrapers and high rises proposed are so out of place that it is ridiculous! It will ruin the whole feel of the area and the quality of life for local residents.

-Preserving the quality of life in the area should be of great importance to the City of Los Angeles. In this case, the residents of the area have been left out of the equation. Yucca Ave, between Argyle and Cahuenga is a very neighborhood friendly place, with small shops and low buildings, creating a relaxed place for local residents to walk their dogs, go for a walk, or enjoy the locality. Placing high rises and skyscrapers here will ruin this whole atmosphere, taking away the friendly neighborhood feel we have, replacing it with an anonymous "any big city" feeling. It will take our neighborhood away. Creating so 45-7

much density in this part of the city, in Hollywood, is detrimental to the quality of life here.

45-7 (Cont)

-Hollywood is special, and should be kept that way. The Capitol Records building is one of a kind, and surrounding it with skyscrapers is incongruent and tasteless. It also reduces the iconic feel of the Capitol Records building and the area, and diminishes its importance. People come to Hollywood to experience a unique place; they can go to any city in the world to see glass and steel skyscrapers and high rises. The views, historic buildings and one-of-a-kind shops in Hollywood are what draw people here; not skyscrapers, chain stores and restaurants that can be found anywhere.

45-8

-Since there is a major earthquake fault at Yucca and Vine Street, it is a danger to build these skyscrapers in that vicinity. I believe further study should be done on this. In the event of a major earthquake, those skyscrapers would create a huge problem. Large numbers of people would rush out of the buildings into the street, creating even more of a challenge for fire and police vehicles to get through.

45-9

-Building with a conscience: I personally don't understand why the planned development of this community does not flow with the existing buildings. Should we not think along the lines of creating buildings that actually work with the classic structures here in Hollywood, instead of against them? If you must fill in every space with dense construction, can they not at least have similar heights to the surrounding area, and similar architectural styles? Just think how wonderful that would look! The future doesn't have to be a Hollywood filled with crappy looking "affordable housing" apartments, cheap-looking hotels (The W), disparate high rises and skyscrapers stuck in between classic buildings.

45-10

-Lastly, and apparently not a serious issue for the City of Los Angeles, is the further blocking of the view of the Hollywood Hills with extremely tall buildings. Part of the charm and attraction of this area is the Hollywood Hills and the Hollywood sign.

45-11

I care about Hollywood and OPPOSE the current version of the Hollywood Community Plan and Millenium Hollywood Project. It must be modified to take into consideration correct census data, height limits, infrastructure, emergency services, public transportation; and to alleviate density and congestion. I would like to see another EIR performed, but one that takes into account the real figures and problems. The Los Angeles City Council has rushed this through without considering many things. This is a dangerous way to go, creating serious problems for the future in Hollywood. We should not rush into such projects, and should take a long hard look at the affects of projects of this nature on the future.

45-12

Sincerely,

Suzanne England
6330 Franklin Ave.
Hollywood, CA 90028

Comment Letter No. 46

October 27, 2012

Dear Ms. Hewawitharana,

I perused the CD mailed to me by The City of Los Angeles Planning Department with great sorrow and fear. 46-1

This project will spell disaster for the Hollywood area.

Traffic in this neighborhood has already grown to epic proportions and there are many hours of the day when it is just best not to leave the house. The introduction of hundreds (if not thousands) of additional cars will make living in this area impossible. 46-2

The Cahuenga pass cannot be widened – that is just a fact. The confluence of Hollywood and Vine is inexorably bordered on the north, and, in essence, on the east, by the freeway which traverses this narrow throat. What will happen with all those vehicles? The noise! The pollution! The traffic jams! 46-3

What on earth are the developers thinking? Who will benefit from these proposed edifices? Yes, some jobs for construction contractors/workers will be created, but they will be short-term jobs, existing only for the duration of building. Then those of us who reside in the area will be left, trapped. 46-4

And where are the tenants for the housing spaces? There are already many empty condos and apartments in this neighborhood. 46-5

Services? What services will be provided by this development? A gym? We already have one nearby. More bars? We do not need more of those – our streets are already filled nightly with screaming revelers, urinating in the street and leaving trash behind. 46-6

The historic, iconic Hollywood sign and Capitol Records building have already been eclipsed and pushed aside by new construction. Those are the proud symbols of our neighborhood, the reason that tourists come to Hollywood. 46-7

I understand that Mayor Villaraigosa and Councilman Garcetti are determined to develop areas around the Metro stops and I do see validity in these desires, but fifty story buildings? And north of Sunset, near the hills, mired beneath the freeway? 46-8

If this project were to become half the height, half the size, and go near Fountain and Vine (Now that's an ugly intersection!) I would consider supporting it, but under the current description..... No way, no how, under no circumstances, never, ever, ever! 46-9

This is just the first of many letters and the beginning of my protest. Hollywood has been my home for many years and I will not relinquish her magnificence without a fight. 46-10

Sincerely,

Emily Ferry

1958 Vista del Mar
Los Angeles, CA 90068
323 – 462 - 4468

PARAMOUNT
CONTRACTORS
& DEVELOPERS
INCORPORATED

December 6, 2012

Srimal Hewawitharana
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA. 90012

Dear Commissioner Hewawitharana:

I am writing in support of the Millennium Hollywood Project.

Our company developed several mid-range height (6-12 stories) office buildings in the late 1960's and early 1970's during what was considered a development boom period for Hollywood. Weak economic conditions slowed things down in the 90's and early 2000's. However, we are seeing a growth trend starting again now with the resurgence of a significant amount of multi-family housing occurring in Hollywood and I don't see this trend slowing down in the near future. 47-1

Further, the Hollywood Community Plan calls for higher density development around the mass transit portals and this project is a perfect fit in accommodating this mandate. We also feel the proposed taller buildings would be appropriate and an asset providing street-level opportunities for much needed public open space, green space and linkages to existing and planned green space adjacent to the site. The taller buildings will also provide the opportunity for a roof-top public observation deck offering visitors panoramic views of the entire city and the famous Hollywood Sign. 47-2

On the Economic benefits side, 5900 jobs will be created by this project, of which 2900 jobs would be involved directly in the construction of the Project. The anticipated $540 million investment would result in a total economic output of approximately $925 million in L.A. County. At full development, the business activities generated, including household spending has the potential to provide recurring economic output of approximately $230 million and $4.3 million in net recurring revenue to the City of L.A. upon completion. Quimby Fees are an additional benefit. 47-3

6464 Sunset Boulevard
Suite 700, Hollywood
California 90028-8009

Phone: (323) 462-6727
Fax: (323) 462-0863

The project also intends to preserve and showcase the iconic Capitol Records Building, by creating open public spaces around the area of the building, activating the neighborhood and giving people an opportunity to interact with the famous landmark. The result will create a more public feel to what up to now has been an isolated, private site, bringing in a new population to energize the area, and fostering an active streetscape where none has existed in the past. 47-4

Please feel free to contact me personally should you have any questions or require any additional information.

Sincerely,

Brian Folb
Authorized Representative
PARAMOUNT CONTRACTORS & DEVELOPERS, INC.

From: **Jim Geoghan** <bangzoomer@aol.com>
Date: Tue, Dec 4, 2012 at 2:56 PM
Subject: DEIR
To: srimal.hewawitharana@lacity.org

Dear Srimal:

As the newly elected HHWNC Traffic Chair and as a 27 year resident of Hollywood I protest this move totally.

The DEIR report is hundreds of pages and most people have yet to read ANY of it.

This must be delayed so people have a chance to READ this enormous document.

48-1

BEst,

Jim Geoghan
HHWNC Traffic Chair

From: **Jim Geoghan** <bangzoomer@aol.com>
Date: Sat, Dec 8, 2012 at 6:27 PM
Subject: Mellennium Project
To: srimal.hewawitharana@lacity.org

The Mellennium Project at the proposed 54 stories is a MONSTROSITY - I have lived in Whitley Heights for 27 years - the city should not and cannot approve a building over 540 feet, more than half the height of the Empire State Building.

This plan taxes our services of water and electricity, the response time for the fire and police department and will make traffic worse than it is already.

This project MUST be downsized to keep the community livable.

49-1

Jim Geoghan
6603 Whitley Terrace
LA CA 90068

On Fri, Dec 7, 2012 at 2:25 PM, Terri Gerger <TGerger@pacbell.net> wrote:

Under consideration and the letters filed to date in response to the DEIR

For

CASE No: ENV-2011-675-EIR

50-1

Thank you,

Terri Gerger

On Fri, Dec 7, 2012 at 5:08 PM, Terri Gerger <TGerger@pacbell.net> wrote:

Thank you.

How do I see the comment letters that have been filed to date?

50-2

Terri

Terri Gerger, GRI, SFR
Realtor, DRE # 01237417
Keller Williams Realty
323.466.3875
www.talktoterri.com

Treasurer
Friends of Hollywood Central Park
www.hollywoodcentralpark.org

Chair
Friends of Franklin Ivar Park
www.FriendsofFranklinIvarPark.org

On Tue, Dec 11, 2012 at 3:20 PM, Terri Gerger <tgerger@pacbell.net> wrote:
Aren't you going to post them online like you normally do?

Thank you for the information.

50-3

Sent from my iPad

Terri Gerger, Realtor, GRI, SFR
Tgerger@pacbell.net
www.talktoterri.com
323.466.3875 home office
323.333.2537 cell

From: **Goldstein, Jeffrey** <jgoldstein@dentistry.ucla.edu>
Date: Mon, Dec 10, 2012 at 7:37 AM
Subject: comment
To: "Srimal.Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

It is clearly outrageous that projects like this can be rammed though without appropriate studies impacting traffic, fire safety, water a sewer preparations and public safety, overall. Where is Tom LaBonge and Eric Garcetti when it comes to this. 51-1

Dr. Jeffrey M. Goldstein

UCLA School of Dentistry

Director, Clinical Dental Center

Room 10-136, CHS

Box 951668

Los Angeles, CA 90095-1668

310-794-5565

jgoldstein@dentistry.ucla.edu

PUBLISHER OF THE FICTION WORKS OF L. RON HUBBARD

Srimal Hewawitharana
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

EMAIL: srimal.hewawitharana@lacity.org

December 9, 2012

Dear Mr. Hewawitharana

I am writing to signify my support of the Millennium Hollywood Project. My specific reasons more closely align with the desire to see the continued achievement of Hollywood's renaissance. One of my side projects is the annual Hollywood Christmas Parade, for which I am one of the key organizers and my office is the green room (Hollywood and Sycamore). The intention of this parade is to portray the benefits of and to drive business and activity to Hollywood (the original purpose of the parade over 80 years ago.) I am thus very supportive of activities which seek to validate Hollywood as a regional center.

Having the Metro Red Line at Hollywood and Vine, makes public transportation a very viable option to get in and out of Hollywood at this site if visitors choose not to drive.

52-1

As a member of the Board of the Hollywood Chamber, there are additional attendant benefits to this project: namely the estimated 5,900 total jobs created (2,900 jobs in the construction alone) and at full development, the business activities generated, including household spending has the potential to provide recurring economic output of approximately $230 million and $4.3 million in net recurring revenue to the City of Los Angeles upon completion.

Thank you for your consideration.

John Goodwin
President

7051 Hollywood Blvd., Suite 200, Hollywood, CA 90028 (323) 466-7815 Fax (323) 466-7817
Web site: www.galaxypress.com E-mail: info@galaxypress.com

From: **wendy green** <casaverde@mac.com>
Date: Thu, Dec 6, 2012 at 11:19 AM
Subject: urgent: your attention please
To: srimal.hewawitharana@lacity.org

As a member of the public who will be very much affected by this project, I want to say that it has been next to impossible to find out about where it is in the approval process. I just spent half an hour on the official city website, and called and emailed appropriate parties (as best I could determine) to find out about that very thing, to no avail whatsoever. The public is not informed. It certainly should be with a project of this magnitude. I am begging those involved with deciding the future of my neighborhood and quality of life for more time. Please extend the deadline. 53-1

Respectfully,

Wendy Green

From: **Lucy Gregorian** <greatbobo21@yahoo.com>
Date: Mon, Dec 10, 2012 at 1:27 PM
Subject: Manhattan-ized Hollywood
To: "Srimal.Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

My dog and I will actually fall for it

54-1

From: **Eda Hallinan** <beachwoodflat@gmail.com>
Date: Sun, Dec 9, 2012 at 9:48 PM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org
Cc: Fran Reichenbach <beachwoodcanyon@sbcglobal.net>, Alison Gallant <alison.gallant@gmail.com>, Katrina <mme.katrina.leigh@gmail.com>, Lynne Littman <ll@lynlit.com>, Judy James <judith@djprods.com>, Nicole Runkle <nrunkle@hotmail.com>, Alexandra Kerr <alexakerr@aol.com>, judithwhitm@aim.com, Judith Whitman <jwhitman3@roadrunner.com>, Steve Morton Smith <smortonsmith@sbcglobal.net>, Tracey Thompson <roadcase@earthlink.net>, Steve Grant <cstgrant@dslextreme.com>, Alison Brooker <se_ku@earthlink.net>, David Poelman <davidpoelman@me.com>, Suzan Hanson <Suzhanson@aol.com>, Susie Karasic <susiekarasic@gmail.com>

It is really hard for me to believe that City Council will approve these two ridiculous buildings in our small Hollywood community. Change is natural, but there is no one who actually cares about our community of Hollywood who could approve these two monstrosities. 55-1

How is it possible that city council has not yet protected us in Hollywood by passing building height restrictions in the Vine corridor? 55-2

How is it possible that there could be a vote on this proposal when there is has not yet been a traffic study. 55-3

I urge you to extend the public comment period -- to give time to the community to really see what the plans are. There was not enough of a public comment period for people who actually live here to make voice their opinions. Now that these drawings exist let us truly air them and let people know their opinions count. 55-4

Eda Godel Hallinan

From: **Barbara Hodous** <Bhodous@bcrslaw.com>
Date: Mon, Dec 10, 2012 at 10:07 AM
Subject: millenium project Hollywood
To: Srimal.Hewawitharana@lacity.org

I am writing to express my vehement opposition to the ugly and unnecessary high rise towers proposed to be erected near Vine. A great deal of the appeal of Hollywood (and Los Angeles in general) is that one can see the hills from many places, even when one is driving in the midst of the Hollywood commercial districts. This ability to see the land and the beautiful hills, despite the traffic and congestion, is much of what distinguishes Hollywood and Los Angeles from most other major cities. Hasn't anyone learned from the disastrous high rise at Sunset and Vine which sat hideous and unused for years? There is no need for such ugly high rise buildings which will only destroy the city, destroy the panorama, add to traffic (assuming these monstrosities can be filled, which I doubt) and generally make life more difficult and unpleasant. This project should be stopped! I am a long-time Hollywood resident, extremely distressed by such bad decisions on the part of city planners, etc. I will not vote for anyone who approves such a project.

56-1

56-2

Barbara S. Hodous

Berkes Crane Robinson & Seal LLP

213.955.1150 ext. 1195

From: **Mary Holmes** <maryholmes@aol.com>
Date: Thu, Dec 6, 2012 at 11:03 AM
Subject: The Millennium Project
To: srimal.hewawitharana@lacity.org

As a member of the public who will be very much affected by this project, I want to say that it has been next to impossible to find out about where it is in the approval process. I just spent half an hour on the official city website, and called and emailed appropriate parties (as best I could determine) to find out about that very thing, to no avail whatsoever. The public is not informed. It certainly should be with a project of this magnitude. I am begging those involved with deciding the future of my neighborhood and quality of life for more time. Please extend the deadline. 57-1

57-2

Respectfully,

Mary Holmes

From: **Alexa Iles** <alexa@mediaart.com>
Date: Thu, Dec 6, 2012 at 1:32 PM
Subject: Extension Request
To: srimal.hewawitharana@lacity.org
Cc: Patti Negri <pinkkaire@aol.com>

Please note that a signed hard copy of the extension request letter attached will be mailed with a signature. 58-1

December 10, 2012
Srimal Hewawitharana
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
E-Mail: srimal.hewawitharana@lacity.org

RE: Millennium Hollywood Draft Environmental Impact Report (ENV-2011-675-EIR)

We are the owner of the property located at 6320 Yucca Avenue which is immediately adjacent to the proposed Millennium Hollywood project and would be one the properties most impacted by this massive project. Based on our preliminary evaluation, we are concerned that the DEIR does not adequately analyze the potential environmental impacts of the project and contains a number of inaccuracies and false assumptions that does not fully disclose all impacts. Moreover, we are concerned that the proposed project sets a dangerous precedent by proposing significantly more development than allowed for the project site under the updated Hollywood Community Plan which created maximum floor area parameters for the project site that are consistent with adjacent properties. 59-1

Our concerns include, but are not limited to, the following:

1. General Comments

- The project description is unclear and seems intentionally nebulous. The DEIR is more akin to a programmatic EIR than a project EIR, in that it allows for an almost infinite number of use and square footage permutations, as well as different use distribution and site access schemes. It is impossible to understand the maximum build out scenario and how it impacts the community. An accurate project description is fundamental to fulfilling the purpose of CEQA to inform the public. This project description fails in that regard. It should be redone and recirculated for public comment. 59-2

- It is unclear whether the equivalence formula really considers all impact parameters. This lack of clarity disguises potentially significant impacts and obscures full and accurate public information about the project.

- The Development Agreement is key information that is excluded from the DEIR. The applicant proposes that the development standards and regulations for the project are established in the Development Agreement which would serve as the regulatory document for future development. A Development Agreement is not a tool to create special development standards that in certain instances propose more lenient standards than the City's zoning code. What the applicant really wants is a Specific Plan approved via a Development Agreement which is not typically used for such purposes. If the applicant wants special regulations, the appropriate vehicle should be a Specific Plan which must be analyzed in the DEIR and available to the public for full review and comment. Failing to include the draft Development Agreement deprives the public of a meaningful opportunity to comment on the DEIR. 59-3

2. Aesthetics

- The DEIR concludes that the proposed project would not create a significant shade and shadow impact. However, the shade and shadow study clearly shows that according to the City's significance criteria the project would result in a significant shade and shadow impact on our entitled residential project at 6230 Yucca. This is an undisclosed significant impact that requires recirculating the DEIR. 59-4

3. Air Quality

- The project will result in significant long term operational ROG and NO impacts, yet the AQMP consistency analysis on p. IV.B.1-31 focuses only on CO. This obscures a significant impact from meaningful public input. 59-5

- The construction assumptions are not spelled out clearly. Given the amount of excavation, the PM10 and PM2.5 emissions in Table IV. B-10 and IV.B-11 seem very low. 59-6

- The LST analysis on page IV.B.1-44 is based on the SCAQMD look up tables. These tables do not reflect the most current federal NO_2 thresholds. Thus, impacts may be understated. The impacts should be re-run according to the federal standards and publicly disclosed in a recirculated EIR. 59-7

- There is no LST analysis for operations. This failure obscures potentially significant impacts. LST analysis for operations is standard and is included in most City of Los Angeles EIRs. An LST analysis should be prepared and re-circulated for public review. 59-8

- The DEIR at page IV.B.1-52 claims that the project is substantially consistent with the CARB siting guidelines because most of the residential receptors would be located beyond 500 feet from the freeway. The project is either consistent or it is not. "Mostly consistent" implies that there are potentially significant impacts for some residential receptors. These impacts should be identified and the analysis recirculated. 59-9

- The DEIR's conclusion of no significant impacts due to project related TAC emissions at page IV.B.1-52 is unsupported by any facts. As construction could occur until 2035 and thus expose sensitive receptors to TACs over a long period, the DEIR should have included an HRA for construction emissions. 59-10

- The mitigation measures, commencing on page IV.B.1-60, are very limited and should be expanded to include, at a minimum: 59-11
    - All construction Tier 4 construction equipment should be used from 2015 on;
    - Non-VOC paints and finishes shall be used;
    - The project should install filters rated MERV 17 or higher;
    - The project should install cool roofs;
    - All outdoor lighting should be LED;

- The project should maximize solar panel use;
- The project should install DPM filters on all emergency generators;
- The project should include EV charging stations and an alternative fuel station; and
- The project should use only alternative fuel maintenance equipment.

59-11 (Cont)

4. Geology

- The amount of export appears to be severely underestimated based on the proposed number of subterranean parking levels. Therefore, construction air quality, noise and traffic impacts may also be understated. An updated soil export analysis should be required for the Final EIR, and a mitigation measure should require a final export analysis prior to issuance of building permits because the analysis will be more accurate when based on construction-level detail drawings. If the soil export increases, subsequent environmental analysis should be required.

59-12

5. Hydrology

- The project will require dewatering, which can induce settlement. However, the impacts on nearby fragile structures (Pantages, Avalon, Capital Records echo chambers) are not addressed. There is no substantial evidence in the Draft EIR or its appendices to address the known potential impact of settlement from de-watering.

59-13

6. Land Use

- The updated Hollywood Community Plan, adopted only a few months, placed a Q condition on the project site that limits the maximum FAR to 4.5:1 which is consistent with surrounding properties. The proposed zone change and FAR of 6:1 is not compatible with the Community Plan and surrounding properties. This reduced FAR was adopted in part to reduce aesthetic and land use impacts resulting from incompatibly large developments. No substantial evidence supports the conclusion that the project is consistent with the updated Hollywood Community Plan.

59-14

- The project proposes supergraphic signage and states they are permitted in the Hollywood Signage Supplemental Use District. The Hollywood Signage SUD was amended which prohibits supergraphic signs. This error results in a significant land use impact because the purpose of the amended sign ordinance was to avoid the aesthetic environmental impact of supergraphic signage.

59-15

7. Noise

- The vibration and noise analyses do not account for pile drivers, yet there is no prohibition against the use of such equipment (see, e.g., Table IV.H-7). Pile driving generates significant groundborne vibration. Impacts to sensitive receptors such as the Capital Records recording studios, therefore, are not adequately analyzed.

59-16

- The DEIR states at page IV.H.1-23 that the construction noise analysis uses the Commercial Scenario to assess noise impacts as this scenario will generate the most construction and operational noise. However, the DEIR does not explain why or include a quantitative analysis to demonstrate this. Therefore, no substantial evidence is included in the DEIR to support this conclusion. Noise is quantitative analysis and must be supported by quantitative evidence—not mere unsupported statements. 59-17

- The DEIR should require the use of noise curtains and reduced hours (especially in the p.m.) as feasible mitigation to reduce noise impacts on the Pantages and Avalon Theater. Limited hours would also be effective in reducing vibration impacts on these sensitive receptors. Noise curtains are a standard and feasible measure to reduce the severity of construction noise impacts. Thus the DEIR fails to include feasible mitigation to avoid or reduce the severity of impacts. 59-18

- The impact conclusion regarding the Capitol Record's echo chambers at page IV.H.1-30 is not consistent with the analysis and conclusions of the 6230 Yucca Project EIR. The analysis in the Yucca Project EIR is substantial evidence that the conclusion in this DEIR is incorrect and understates potential impacts. 59-19

- Page IV.H.1-30 discloses vibration levels at the Pantages, Avalon Theater and the Art Deco storefronts of that exceed the building damage significance threshold by 3250%. The vibration levels at the echo chambers will be almost 4000 times beyond the significance threshold. The DEIR nonetheless concludes a less than significant impact with mitigation. However, Measure H-11 merely requires the applicant to perform all work in a manner that does not damage these structures, without explaining how this can be done. This vague mitigation measure is inadequate because it neither prescribes a specific measure nor sets a performance standard relative to damage. Furthermore, damage is not the only consideration. These uses are sensitive receptors because vibration can also cause disruption to their operation. The DEIR is devoid of adequate disruption analysis. The DEIR should include analysis demonstrating how such damage can be avoided, amended to adequately analyze potential disruption impacts, and then re-circulated for public review. 59-20

- Table IV.H-13 shows a cumulative noise increase along Argyle between Yucca and Hollywood of over 3 dBA CNEL under the various development and access scenarios, but concludes that the impact will not be significant. However, the Pantages is located adjacent to this roadway segment, and at over 65 dBA the noise levels would be considered to be "clearly unacceptable" for this use. Therefore, the DEIR should have applied the more restrictive 3 dBA threshold and conclude the impact to be significant. This failure disguises a significant impact under the correct significance threshold. Applying the correct threshold would result in a significant impact. Therefore the DEIR should be corrected and this significant impact disclosed and recirculated for public review. 59-21

8. Public Services 59-22

- As there is no guarantee that the library fee imposed as mitigation will be used on local libraries, and no quantitative analysis showing that the amount will be sufficient to mitigate impacts even if spent locally, the DEIR should have found a significant impact. Any mitigation imposing a fee must show that the amount of the fee will reduce the impact to less-than-significant levels and further show that a mechanism is in place to use the funds for the prescribed mitigation. The mitigation in the DEIR fails to include either of these requirements.

59-22 (Cont)

- The DEIR does not acknowledge the significant cumulative impact regarding solid waste due to limited landfill capacity. A quantitative cumulative analysis of solid waste capacity is necessary and required. The draft EIR should be amended and recirculated with this analysis.

59-23

9. Recreation

- The DEIR does not acknowledge the significant cumulative impact on parks due to the shortfall in existing parkland per the City's standard. A quantitative cumulative analysis of parks and recreation impacts is necessary and required. The DEIR should be amended and recirculated with this analysis.

59-24

10. Traffic

- The project may include a significant amount of retail (the concept plan refers to 100 KSF) but there is no midday Saturday traffic analysis (retail uses tend to experience peak generation at that time). This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of weekend traffic impacts is necessary and required. The DEIR should be amended and recirculated with this analysis.

59-25

- The existing traffic conditions in Table IV.K.1-3 show only one intersection operating at LOS E and none at LOS F. Recent EIRs for other projects (e.g., NBCU and Hollywood & Gower) show the same intersections to be much more congested, in some case three levels of service worse. These other EIRs are substantial evidence of more sever impacts than are disclosed in this EIR.

59-26

- The internal capture rates in Table IV.K.1-4 lack support. LADOT relies on ITE studies from Florida from the early 90's. These studies are out dated and were limited to 3 land uses. The DEIR must justify the internal capture rates used to avoid undercounting trips.

59-27

- The table in the traffic study used to calculate the net project trips appears to use lower trip generation rates for residential and sports club uses than the ITE rates on which they were purportedly based (see also Table IV.K-5). This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of traffic impacts using the ITE rates is necessary and required. The draft EIR should be amended and recirculated with this analysis.

59-28

- Page IV.K.1-26 uses a single set of trip distribution assumptions, despite the fact that the mix of uses can vary dramatically under the equivalency program. It is likely that the individual land uses would have different distribution patterns, so that varying the overall mix would cause the distribution to change. Because the project description is vague and ambiguous as to the mix of uses, the DEIR is flawed by its failure to analyze traffic impacts under a similarly wide array of potential uses. 59-29

- Table IV.K.1-6 establishes a trip cap based on adding up a.m. and p.m. trip numbers for various uses. It is not appropriate to combine a.m. and p.m. peak hour trips, since the traffic impacts must be assessed separately for each peak hour under longstanding City methodology. This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of traffic impacts by separating am and pm peaks is necessary and required. The DEIR should be amended and recirculated with this analysis. 59-30

- Table IV.1.-7 uses light industrial trip rates as a proxy for construction traffic. This appears to be a novel first-time approach that no other City EIR has taken. This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of construction traffic impacts by using passenger car equivalencies for each construction truck trip is necessary and required. The draft EIR should be amended and recirculated with this analysis. 59-31

- It is not clear how the trip computation factors in Table IV.K.1-8 were derived. Moreover, it is unclear whether the analysis considers ballroom or meeting room space in the hotel. The vagueness of this analysis denies the public a meaningful opportunity to comment and disguises potentially significant impacts. 59-32

- Pages IV.K.1-44 discloses long term lane closures during construction on Argyle, Vine, Ivar and Yucca, but finds a less than significant impact since the closures would not completely block ***all*** traffic lanes in any direction. The DEIR should have found the impact to be significant due to the amount and duration of the lane closures. At a minimum, the DEIR should have considered whether the rerouting of traffic due to these closures would have significant impacts at local intersections. This failure not only disguises a potentially significant impact, but also deviates from the standard established in other City EIRs. A quantitative analysis of traffic impacts resulting from reducing traffic flow to one lane is necessary and required. The DEIR should be amended and recirculated with this analysis. 59-33

- Table IV.K.1-14 discloses significant impacts at the northern edge of the study area. The analysis should be expanded to confirm that there are no significantly impacts intersections beyond this edge. Whenever a significant impact occurs at the edge of the study area, that impact provides substantial evidence of potentially significant impacts outside the study area. The traffic study should be revised to a larger geographic area and recirculated. 59-34

- The analysis relies on the TDM program in Mitigation Measure K.1.4 to reduce or avoid significant intersection impacts. This reliance is misplaced, since the Mitigation Measure does not establish any objective criteria to measure the success of the program or provide for corrective action if the trip reduction goals are not met. CEQA mitigation measures must be specific, setting forth specific measures and performance standards to justify the conclusion that the mitigation will reduce impacts to less-than-significant levels. 59-35

- Mitigation Measure K.1-12 allows for the granting of TCO's under certain circumstances where the mitigation measures are delayed. Since the TCO will allow the project to become operational before mitigation is in place, this could result in significant impacts that should have been disclosed. The DEIR should be revised and recirculated to include an analysis of impacts resulting from TCO's granted before relevant mitigation is in place. 59-36

- The transit impact analysis in Table IV.K.1-17 fails to consider increased transit usage from related projects and ambient growth. Moreover, the analysis lumps all bus and rail lines together, rather than considering impacts on individual lines, which would allow a true analysis of peak directional demand. 59-37

- In some case the project's incremental contribution at intersections varies between Table IV.K.1-14 (2011) and IV.K.1-18 (2020) (see, e.g., intersections 16 and 19). This error disguises potentially significant impacts and denies the public a meaningful opportunity to comment on potentially significant impacts. 59-38

- The analysis uses a 1 percent annual ambient growth factor between 2011 and 2020, but a lower factor (4.4% total) from 2020 to 2035. No justification is given for this deviation from the standard ambient growth rate of 1 percent through to the stated horizon date. 59-39

- Table IV.K.1.21 contains a number of inaccuracies in the With Project Plus Mitigation (i.e, minuses that should be pluses- see Intersections 2, 4, 14, 15, and 18). This error deprives the public a meaningful opportunity to comment on potential impacts. They should be corrected and recirculated for public review. 59-40

- The access analysis at page IV.K.1-114 concludes that there is no feasible mitigation to avoid the additional significant impact under the No Vine Street Access Scenario. In fact, there is an obvious mitigation - requiring access on Vine Street. It is insufficient to merely state that access on Vine Street is infeasible; substantial evidence must be included to show that it is truly infeasible rather than merely undesirable. 59-41

- Page IV.K.1-128 provides that contributions to Signal System Upgrades should be made proportional to each phase's trip generation value. This could result in undisclosed significant impacts, since the DEIR relies upon the improvements to mitigate otherwise significant impacts, and the signal upgrades only provide the full benefit on a system-wide basis. Thus, the funding should be paid up front to avoid the impacts as assumed in the DEIR. Fair-share contributions only provide adequate mitigation when there is substantial evidence that that the mitigation measure will ultimately be fully funded and 59-42

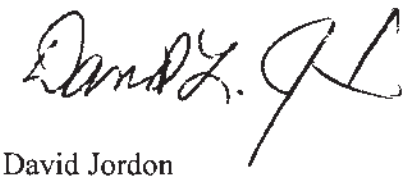
implemented. Furthermore, until the mitigation measure is fully operational, project impacts will remain significant. This impact may be temporary, but the duration of the significant impact is irrelevant. The DEIR, therefore, fails to disclose the significant impact that will occur until the Signal System Upgrades are in place.

59-42 (Cont)

Based on the above, the DEIR analysis does not adequately analyze the potential impacts of the project and must be revised and recirculated for further public review and comment.

59-43

Sincerely,



David Jordon
6230 Yucca LLC

From: **tal kahana** <t_kahana@yahoo.com>
Date: Mon, Dec 10, 2012 at 3:30 PM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: "Srimal.Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

Hello- I am a home owner and investment property owner in Beachwood Canyon. I have lived and owed in the canyon for over 20 years. In that time, I have seen the traffic drastically increase as a result of the W hotel and the resurgance of Hollywood Boulevard. 60-1

The new building proposal is troubling for several reasons. The lack of height restriction is troubling for the traffic and visual impact it will have. 60-2 The lack of upgrades to our sewers and infrastructures is a problem deferred. 60-3 The lack of a traffic study before allowing the plans is irresponsible and creates the appearance of impropriety. 60-4

Please continue the time period so that resident fears can be addressed and the traffic study completed. 60-5

Thank you, Tal Kahana
6000 Temple HIll Drive, 90068

From: <leafnose@aol.com>
Date: Mon, Dec 10, 2012 at 11:39 AM
Subject: Millenium Project Response
To: srimal.hewawitharana@lacity.org
Cc: lisakatz24@gmail.com

To Whom It May Concern:

I am expressing my serious opposition to the Millenium Projects DEIR 61-1

As a key point to my objection, the City of Los Angeles has removed the "D" limitation and has given Millenium a height variance. The proposed area of improvement is directly in front of our neighborhood. The project, when complete, would obscure vast areas currently visible from our area. The sheer scale that Millenium is requesting in their project will make the balance of buildings surrounding dwarfed. These will be the tallest buildings east to downtown, and west to Century City. 61-2

For our part as family residing here, was Hollywood enjoys a central location in the city and has easy access to outlying areas of Los Angeles.
Needless to say, the congestion we're suffering already in the "Dell" residential area of the Hollywood Hills is catastrophic. This project condemns the area to traffic congestion beyond any scope I could imagine. 61-3

There are facets to the DEIR that I haven't been able to ascertain given the short response period. 61-4

What are the codicils for residential units of the property in regards to noise and light? 61-5
What limitations have been set for special use events that will imact our area? 61-6
And what of filming companies using the location? What kind of sound, hours of filming, and huge lighting and techno rigs have been regulated for the property? Especially, along the upper floors where the aforementioned would be the most annoying? 61-7

What is the light pollution factor for entire project? This is large question. We suffered with Super Graphics on what is the largest building in Hollywood at this time. Those graphics are found on virtually every building in Hollywood now. There is a supposed billboard and graphic disallowance in this plan, but for instance, there are huge amounts of light that have been added to the Hollywood area over the last couple of years. The Pantages addes neon. The W Hotel has a very bright emanation. The electronic billboard at Franklin and Cahuenga, the electronic billboard at the Target property on the edge of West Hollywood is even an issue up here. Add to that the former Bekins Storage building for years had super graphics and intense lighting that took the entire community a very long time to finally get resolved. I don't believe the city is proactive on this front, and the City remains solely reactive to these issues only after the fact, and uproar by Hollywood residents. 61-8

Add to this, that I believe no intensive sound study can show the level of noise that will bounce reflective off the structures. Everything from motorcycles, to helicopters are a nuisance for us. I have had to make numerous calls, and complaints to the FAA regarding news helicopters that fail to adhere to aviation law. I can't imagine what the added decibels will be from this projejct. There's an area for an exterior stage. The right to some peace and happiness in our home, could easily be set aside to allow an oversized project to have concerts and events that naturally exceed standards due to the sound bouncing off these structures. 61-9

But I remain steadfast in the opposition to allow a 6-1 ratio allowance for Millenium, and find it wholly incomprehensible that the city would set the D limitation aside, and allow this scale of project to move forward. This is the center of complaint with the project. Why can't they adhere to the 4.5 - 1 allowance? Seems that plenty of other projects have, and Millenium ought to as well. 61-10

Thank you for your time,

Dean Katz
6376 Quebec Drive
Los Angeles, CA 90068

From: **Ziggy Kruse** <ziggykruse2005@yahoo.com>
Date: Tue, Dec 4, 2012 at 1:30 PM
Subject: RE: DEIR No ENV-2011-267-EIR ... MILLENNIUM HOLLYWOOD PROJECT ... Comment Period Extension Request ...
To: srimal.hewawitharana@lacity.org
Cc: michael.logrande@lacity.org, Eric Garcetti <councilmember.garcetti@lacity.org>, Eric Garcetti <eric.garcetti@lacity.org>, Tom LaBonge <councilmember.labonge@lacity.org>, Tom LaBonge <tom.labonge@lacity.org>, councilmember.koretz@lacity.org, Jill <jstewart@laweekly.com>, Patrick McDonald <patrick.range.mcdonald@gmail.com>, Ron Kaye <ron@ronkayela.com>, David Zahniser <david.zahniser@latimes.com>, larry.frank@lacity.org, renee.weitzer@lacity.org, Susan Swan <sswanla@gmail.com>, Susan Polifronio <susancpt@earthlink.net>, Anastasia Mann <president@hhwnc.org>, Annie Gagen <poonsy6603@aol.com>, Rosemary de Monte <ggpnc_RDM@yahoo.com>, Fran Reichenbach <beachwoodcanyon@sbcglobal.net>, George Abraham <ggg@copper.net>

Dear Srimal:

Given the gravity and the scope of the Millennium Project and the for sure long period of time it took to complete the DEIR on the project it seems unreasonable that the public is only given roughly 6 weeks (10-25-2012 through 12-10-2012) to submit comments on the DEIR.

The traffic section of the main text is 131 pages long, the parking section is 26 pages long, and the alternatives section is 151 pages long. Also, those main text sections do not include the appropriate appendices that would have to be evaluated, as well.

This DEIR was compiled with input by experts and city planners, which is not the case of the the input you will receive from the public. Some might hire a "pro", but the majority of stakeholders / constituents are not equipped to rush through any document this size in the time period asserted by your office.

At this time it would be very appropriate for your office to extend the comment period at best for an additional 90 - 120 days or at a minimum until after the December 2012 / January 2013 holiday season.

62-1

Thank you for your time.

Sincerely,
Ziggy Kruse

From: **Ziggy Kruse** <ziggykruse2005@yahoo.com>
Date: Mon, Dec 10, 2012 at 5:03 PM
Subject: RE: DEIR No ENV-2011-267-EIR ... MILLENNIUM HOLLYWOOD PROJECT ...
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>
Cc: Ziggy Kruse <ziggykruse2005@yahoo.com>

DEIR No ENV-2011-267-EIR

Objections to the

MILLENNIUM HOLLYWOOD PROJECT

Dear Srimal:

These objections are send to you on behalf of myself, Robert Blue, Richard MacNaughton, Patricia Macfadden, SaveHollywood.org, Hollywoodians Encouraging Logical Planning and CCLA as well as on behalf of Citizens Opposing Corrupt Development, Task Force for a Livable Hollywood. 63-1

—

Time to review and respond too short

The developer had years and millions of dollars all this documentation for the city and the city is providing residence who have to work in their spare time only 45 days to review and respond. This time period is unreasonably short and shows the disregard for the citizen opinions. 63-2

A considerable portion of these documents including the special traffic report commissioned by the developer appeared to be the product of Accounting Control Fraud, but residents need much more time in order to document these problems.

Traffic

We have obtained a document from the city stating that the traffic mitigation under the Hollywood Community Plan overwhelm any possible mitigation and thus the DEIR and the Traffic Study are directly contradicted by the city's own opinion on this subject. 63-3

—

DEIR relies on matgerially false data 63-4

This project is authorized under the June 19, 2012 Hollywood Community Plan (HCP), which is based on materially false data. Therefore the data underline this DEIR are similarly defected.

63-4 (Cont)

Earthquake danger

This project is build on the edge of an active earthquake fault and his failed to properly assess the earthquake ramifications on this project.

63-5

Harmful Nature of Transit Oriented Districts (TOD)

The DEiR fails to consider the harmful nature of TOD's , not withstanding the fact that TOD's are mentioned in the defective HCP. The city first pointed out the ill advised nature of TOD's and in the 1915 Traffic Study by the city of Los Angeles, a copy of which is already in the City's files. The DEIR fails to consider any of these factors, and the mathematics of transportation, the geography of the city and the interplay of density, zoning as well as modes of transportation have not changed since 1915.

Furthermore, the DEIR fails to take into account the fact that the city of los Angeles is the most densely populated city in the country with approximately 7,000 people per square mile.

63-6

Inaccurate Data makes the entire DEIR defective

Garbage in, Garbage out. - The DEIR and its thousands of pages of accompanying document are replete with factual errors, half truth and omissions of material information making all the conclusions defective.

63-7

Lack of proper procedure

The defects in preparing these papers are so great that the DEIR fails to follow the proper procedures under CEQA. Furthermore, there is not substantial evidence to support the conclusions which favor the construction of this project.

63-8

If the public had been provided a reasonable opportunity to review these materials, than I could have been more detailed in my comments. The burden, however, rests solely on the city to ferret out all the material data and to present it in a fair and balanced manner so that the public can understand the various pros and cons of the project. The city has an opportunity to rectify its failures when it drafts the FEIR.

63-9

Very truly yours,

Ziggy Kruse

From: **Stacey Kuhrt** <staceyhealingarts@yahoo.com>
Date: Thu, Nov 29, 2012 at 8:05 AM
Subject: Re: Millenium Hollywood Project, NO. ENV-2011-675-EIR
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

November 29, 2012

Srimal Hewawitharana, Environmental Specialist II
Los Angeles Department of City Planning
200 S. Spring St., Room 750
Los Angeles, CA 90012

Re: Millenium Hollywood Project, Draft EIR

Dear Ms. Hewawitharana,

I'm writing to contest the EIR you have approved for the Millenium Hollywood Project. My reasons are as follows: 64-1

-The EIR has not completed a thorough study of the environmental impacts for our area. The infrastructure will be seriously impacted with all of the additional population created with this project. 64-2 The air quality, noise, police and fire response, sewer usage, road wear and increased traffic locally as well as on the 101 Freeway and Vine Street off ramp, will all be impacted by this project. 64-3 These things need further study. The access for people leaving the hills in their cars will be seriously affected as well, as traffic will become even more dense. Air quality is of major concern to me. I already get black soot throughout my apartment that overlooks the city. With the increased traffic, this will also increase. 64-4 The noise also concerns me; the increased traffic on the 101 Freeway and the Vine Street off ramp will bring increased traffic noise and the increased population, night clubs, shops, etc., will bring increased noise to the area. 64-5 Peace of mind and quality of life for local residents must be considered in any community plan.

-The population growth needs to be correctly addressed. The need for more rapid transit and density needs to be studied, based on true population growth, not biased figures. 64-6

-The proposed project removes height limits that were put in place previously. They were put in place for a very good reason—to prevent over development such as this project and to retain the integrity of the area. The heights of the buildings proposed are contrary to the elements of the area. Yucca Ave is mainly a street with low slung buildings, and should remain that way. The skyscrapers and high rises proposed are so out of place that it is ridiculous! It will ruin the whole feel of the area and the quality of life for local residents. 64-7

-Preserving the quality of life in the area should be of great importance to the City of Los Angeles. In this case, the residents of the area have been left out of the equation. Yucca Ave, between Argyle and Cahuenga is a very neighborhood friendly place, with small shops and low buildings, creating a relaxed place for local residents to walk their dogs, go for a walk, or enjoy the locality. Placing high rises and skyscrapers here will ruin this whole atmosphere, taking 64-8

away the friendly neighborhood feel we have, replacing it with an anonymous “any big city” feeling. It will take our neighborhood away. Creating so much density in this part of the city, in Hollywood, is detrimental to the quality of life here.

64-8 (Cont)

-Hollywood is special, and should be kept that way. The Capitol Records building is one of a kind, and surrounding it with skyscrapers is incongruent and tasteless. It also reduces the iconic feel of the Capitol Records building and the area, and diminishes its importance. People come to Hollywood to experience a unique place; they can go to any city in the world to see glass and steel skyscrapers and high rises. The views, historic buildings and one-of-a-kind shops in Hollywood are what draw people here; not skyscrapers, chain stores and restaurants that can be found anywhere.

64-9

-Since there is a major earthquake fault at Yucca and Vine Street, it is a danger to build these skyscrapers in that vicinity. I believe further study should be done on this. In the event of a major earthquake, those skyscrapers would create a huge problem. Large numbers of people would rush out of the buildings into the street, creating even more of a challenge for fire and police vehicles to get through.

64-10

-Building with a conscience: I personally don’t understand why the planned development of this community does not flow with the existing buildings. Should we not think along the lines of creating buildings that actually work with the classic structures here in Hollywood, instead of against them? If you must fill in every space with dense construction, can they not at least have similar heights to the surrounding area, and similar architectural styles? Just think how wonderful that would look! The future doesn’t have to be a Hollywood filled with crappy looking “affordable housing” apartments, cheap-looking hotels (The W), disparate high rises and skyscrapers stuck in between classic buildings.

64-11

-Lastly, and apparently not a serious issue for the City of Los Angeles, is the further blocking of the view of the Hollywood Hills with extremely tall buildings. Part of the charm and attraction of this area is the Hollywood Hills and the Hollywood sign.

64-12

I care about Hollywood and OPPOSE the current version of the Hollywood Community Plan and Millenium Hollywood Project. It must be modified to take into consideration correct census data, height limits, infrastructure, emergency services, public transportation; and to alleviate density and congestion. I would like to see another EIR performed, but one that takes into account the real figures and problems. The Los Angeles City Council has rushed this through without considering many things. This is a dangerous way to go, creating serious problems for the future in Hollywood. We should not rush into such projects, and should take a long hard look at the affects of projects of this nature on the future.

64-13

Sincerely,

Stacey Kuhrt
5200 Franklin Ave.
Hollywood, CA 90027

From: **Mary Ledding** <ledfam6384@sbcglobal.net>
Date: Mon, Dec 10, 2012 at 4:44 PM
Subject: FW: Objections to the Millenium Project
To: srimal.hewawitharana@lacity.org

For some reason this was bounced back. 65-1

From: Mary Ledding [mailto:ledfam6384@sbcglobal.net]
Sent: Monday, December 10, 2012 4:05 PM
To: 'Srimial.hewawitharana@lacity.org'; 'councilmember.garcetti@lacity.org'; 'councilmember.Labonge@lacity.org'
Subject: Objections to the Millenium Project

Dear Folks:

This is to register my profound objections to the proposed Millenium Project. As currently anticipated it will increase the congestion immensely. I have lived in the Hollywood Hills since 1975 and in recent years, due to the extensive increased development in Hollywood, the ability to transgress through the Hollywood area in order to get home has gone from about 10 minutes in prior years to about 4 times that.

Hollywood is NOT New York. I object strongly to the idea as some of you have proposed, that Hollywood should be developed with the type of density that New York has. We do not live on an island with limited space. We do not have useable, highly trafficked public transport systems – the buses are subject to the same sorts of traffic congestion as all cars in the area. They do not promise a quicker, more efficient mode of transportation. 65-2

In addition to congestion, these projects will guarantee an increase in the level of air pollution in the area, as already congested on-off ramps to the Hollywood freeway will become even more idling lanes for cars waiting to enter/exit. 65-3

I know that others in the Hollywood Dell have already sent you comments regarding this project, of which I am aware and heartily concur. These deal with the development ratio, parking spaces, 65-4

and the lack of adherence to the CRA guidelines. Please consider those comments re-iterated here.

65-4 (Cont)

This project will not only cause YEARS of congestion as it is built, but given how empty so many of the buildings in Hollywood currently are, it will take decades to turn it into really used space. Do not take the short-term view that any development is good for jobs, good for the economy, etc. This development is MAMMOUTH, OVERSIZED, and A DEVELOPER'S BOONDOGGLE. Please take every effort you can to reconsider this horror. For the first time in living here since 1975, I am considering moving to another state. That is what this project means to me and to the neighbors who live and work in the Hollywood area.

Please stop or at least severely reduce and limit the size of this ugly, massive project.

65-5

Sincerely,

Mary Ledding

323 465 7797

6384 La Punta Drive

Los Angeles, CA 90068

From: **Harley Lond** <harleyl@earthlink.net>
Date: Thu, Nov 15, 2012 at 10:21 AM
Subject: Millennium Hollywood Project
To: srimal.hewawitharana@lacity.org
Cc: councilmember.Labonge@lacity.org, councilmember.garcetti@lacity.org, mayor@lacity.org, patti@hollywooddell.com

Dear Srimal Hewawitharana:

This is in response to
Draft Environmental Impact Report No. ENV-2011-675-EIR
State Clearinghouse No. 2011041094 66-1

I have reviewed the report regarding the Millennium Hollywood Project and have come to the conclusion that the development is not beneficial to the community. Hollywood does not need more shops or hotel rooms or pricey condos. There is much unused retail space on Hollywood Blvd and -- surprising given all the hoopla when The W was proposed -- retail space at The W. There appears to be other mixed use developments going up to the east of this development. Enough is enough. 66-2

No. 1: The size of the proposed development will be detrimental to the Hollywood skyline: To wit, destroying or altering views from the South, West and East of the Capitol Building (despite what the developers say) and the beautiful Hollywood Hills (and perhaps views of the Hollywood sign.). 66-3

No. 2: The development would increase traffic congestion in an area already clogged with traffic; nearby freeway onramps and arteries are already at a virtual standstill during rush hour; this development would make that worse. 66-4

No. 3: There is already a higher level of noise and crime engendered by the clubs and restaurants that have opened in Hollywood; this will only contribute more. 66-5

No. 4: During construction, the noise will drift up into the hills and be unbearable (noise from construction of The W was horrible). 66-6

No. 5: The air quality will suffer from the dust and dirt of construction. 66-7

No. 6: Construction will clog streets with construction vehicles, adding to local congestion. 66-8

No. 7: After construction, the streets in the area will be damaged with potholes, alligator ridges, etc. Many streets around the W still show signs of damage from that construction. The city just can't seem to make developers take care of the streets they damage. 66-9

Let's leave things the way they are -- instead of developing the land here into gigantic structures that strain the earth, why not put in a much-needed park? 66-10 Or keep the land as parking lots -- Hollywood certainly needs more parking. 66-11

If you want to redevelop Hollywood, let's get rid of some of the sleazy stores that line parts of Hollywood Blvd.? 66-12

Also, I'm not sure whether or not the City is helping to fund this development -- if so, I resent using my tax money to line the pockets of developers. 66-13

Thank you for your time.

Harley W. Lond
2274 Alcyona Dr.
Los Angeles, CA 90068

From: **Harley Lond** <harleyl@earthlink.net>
Date: Mon, Dec 10, 2012 at 1:17 PM
Subject: Millennium Hollywood Project
To: srimal.hewawitharana@lacity.org
Cc: councilmember.Labonge@lacity.org, councilmember.garcetti@lacity.org, mayor@lacity.org, patti@hollywooddell.com

Dear Srimal Hewawitharana:

I'm sure that -- given the power that developers hold over the current members of the city council and the mayor -- the Millennium project will go ahead -- to the detriment of Hollywood. However, I urge you to take note:

67-1

Do not allow the following to be approved:

Increasing the present zoning from a 4.5:1 ratio to a 6:1 ratio would allow the developer to increase the project size from 825,000SF to 1.1Million SF.

Allowing a reduction in the City's parking requirement for the proposed 35,000SF health club from 10-spaces/1000 to 2-spaces/1000. The reduction in parking spaces would have 280 health club users looking for parking on Hollywood's streets.

The Community Redevelopment Agency's development requirements were put in place to maintain Hollywood's historic core and Unallow for redevelopment to enhance and compliment existing development and the livability of the surrounding residential communities. Allowing Millennium/Argent to eliminate their development's adherence to the CRA guidelines creates a massive project totally out of scale with the Hollywo

67-2

Thank you,

Harley Lond

Below is a copy of my previous letter to you and the Hollywood-area council members:

This is in response to
Draft Environmental Impact Report No. ENV-2011-675-EIR
State Clearinghouse No. 2011041094

I have reviewed the report regarding the Millennium Hollywood Project and have come to the conclusion that the development is not beneficial to the community. Hollywood does not need more shops or hotel rooms or pricey condos. There is much unused retail space on Hollywood Blvd and -- surprising given all the hoopla when The W was proposed -- retail space at The W.

67-3

There appears to be other mixed use developments going up to the east of this development. Enough is enough.

No. 1: The size of the proposed development will be detrimental to the Hollywood skyline: To wit, destroying or altering views from the South, West and East of the Capitol Building (despite what the developers say) and the beautiful Hollywood Hills (and perhaps views of the Hollywood sign.).

No. 2: The development would increase traffic congestion in an area already clogged with traffic; nearby freeway onramps and arteries are already at a virtual standstill during rush hour; this development would make that worse.

No. 3: There is already a higher level of noise and crime engendered by the clubs and restaurants that have opened in Hollywood; this will only contribute more.

No. 4: During construction, the noise will drift up into the hills and be unbearable (noise from construction of The W was horrible).

No. 5: The air quality will suffer from the dust and dirt of construction.

67-3 (Cont)

No. 6: Construction will clog streets with construction vehicles, adding to local congestion.

No. 7: After construction, the streets in the area will be damaged with potholes, alligator ridges, etc. Many streets around the W still show signs of damage from that construction. The city just can't seem to make developers take care of the streets they damage.

Let's leave things the way they are -- instead of developing the land here into gigantic structures that strain the earth, why not put in a much-needed park? Or keep the land as parking lots -- Hollywood certainly needs more parking.

If you want to redevelop Hollywood, let's get rid of some of the sleazy stores that line parts of Hollywood Blvd.?

Also, I'm not sure whether or not the City is helping to fund this development -- if so, I resent using my tax money to line the pockets of developers.

Thank you for your time.

Harley W. Lond
2274 Alcyona Dr.
Los Angeles, CA 90068

Dec. 10, 2012

Ms. Srimal Hewawitharana,
Environmental Specialist II
Los Angeles Department of City Planning
srimal.hewawitharan@lacity.org

Re: Case Number: ENV-2011-675-EIR
State Clearinghouse Number: 2011041094

Dear Ms. Hewawitharana,

I am writing to comment on the proposed Millenium Project.

I am not a land use attorney or a traffic expert, so I don't suppose that I will be able to add any expertise to your consideration process. 68-1

Further, it would have been nice if the Planning Department could have given us more time to review this DEIR. After all, the developer is asking you for a 20 year agreement. Why then do we receive only a few weeks to look at this mountain of documents? 68-2

I question the adequacy of the traffic study supporting this DEIR.

I live near the intersection of Argyle and Franklin, and I believe that it is already in failure at many evening peak times. I routinely drive east on Franklin at about 6:30 pm (which is outside of the mistakenly-truncated peak afternoon study time of 3:00 pm to 6:00 pm), Tuesdays and Thursdays, and I observe that west-going traffic on Franklin (mostly people waiting to get on the 101 at Argyle) is backed up often as far as Wilton Place.

Again, this is at a time which was not even measured by the traffic study.

Despite this, the traffic study describes the Franklin/Argyle intersection as being currently adequate. (IV.K.1 Transportation - Traffic Draft Environmental Impact Report Page IV.K.1-22) 68-3

I recognize that whoever did this study may have complied with the applicable procedures or regulations of LA DOT. However, if LA DOT considers the Franklin/Argyle intersection to be acceptable currently, then its judgment too must be questioned.

Argyle is a Local Street, and many of us depend on it to get in and out of our homes. Not everyone can use public transit, and this is a hilly area. Please reconsider the proposed impacts on our neighborhood.

There is so much more I would like to say, but I am out of time. 68-4

Sincerely,
N. Manzo
shire90068@gmail.com

From: **jean clyde mason** <jean.clyde@att.net>
Date: Tue, Dec 11, 2012 at 12:25 AM
Subject: New corrupt height allowances
To: srimal.hewawitharana@lacity.org
Cc: jean clyde mason <jean.clyde@att.net>

These height allowances are outrageous.
I will join with my neighbors and I will fight against them. 69-1

Garcetti is the leader of our now corrupt City Government.
He should be impeached, dethroned, fined and first EXPOSED as
a CROOKED POLITICIAN, taking bribes and favors from money hungry developers. 69-2

JEAN CLYDE MASON

2777 Woodshire Drive
Hollywoodland California 90068

From: <barbmcd@mac.com>
Date: Sat, Dec 8, 2012 at 11:36 PM
Subject: Proposed towers on Vine
To: Srimal.Hewawitharana@lacity.org

Dear Sirs,

This is a travesty on the landscape! These buildings are completely out of scale for anywhere in LA, not to mention the historic neighborhood of Hollywood. Not only will they be an eyesore, you will ruin the one-of-a-kind underground echo chambers in the Capitol Studios which unfortunately will sit between the two hideous towers to-be. These echo chambers were built by the legendary Les Paul and still are attracting the top musical talent of the world to record there, which gives a lot of business to the area and are recognized globally as beyond valuable. Sinatra, the Beach Boys, The Beatles and hundreds of legendary acts have sought out recording there for the existing echo chambers. In 2007 one was damaged when the digging began to build that adjacent parking lot. With these buildings, they will all be ruined for sure. Who's going to answer for that? 70-1 70-2

And have you even considered the traffic nightmare you will further aggravate? All the other development you have recently allowed will not even be functioning… just try getting to Trader Joes on Vine now… it's at least 10-15 minutes to even get into the parking structure because the surrounding streets are infested with tourist foot traffic, cabs are parked all around the W hotel, and cars are backed up all the way up the hill past Yucca. You will also have everyone trying to get on and off the 101 backing up the highway ramp. It's horrible as it is now on Argyle and with Vine being out of commission, this is a receipt for disaster. This is not proper civic planning! This is absolute greed driving your decision. 70-3 70-4

Additionally, with all the recent earthquake activity in North America, nobody wants to even live in a high-rise, so undoubtedly they will sit with minimum capacity occupancy, just like the others that already exist on Vine. I ask you, who are they serving, save for greedy developers? Answer: just you and the guys making all the money to destroy such a historical corner. 70-5

You owe it to those you serve to revisit the building of such architectural ugly structures and the ethically-challanged glad-shaking deals you've been making on behalf of those you serve. It's truly disgusting. 70-6

Sincerely, a disappointed local resident-
Barbara McDonough

From: **michaEL morrow** <michaelallenmorrow@gmail.com>
Date: Mon, Dec 10, 2012 at 3:50 AM
Subject: ENV-2011-675-EIR Millennium Hollywood Project protest
To: Srimal.Hewawitharana@lacity.org
Cc: Fran Reichenbach <beachwoodcanyon@sbcglobal.net>

I'm almost a 66 year resident of Hollywood and am awestruck that a traffic study was not yet done for the proposed project. Former City Councilman, Mike Woo, knew how bad traffic could get, and that was one reason he had a four-story height limit set on new Hollywood construction. Towers ten times that seem out of the question of sanity for all but pedestrians. As popular as Hollywood has been, I'd rather it not have something build that would even resemble a tempting, twin-towers type target for any troubled terrorist. I'd think that City-Hall height would be enough for more than enough for any future (additional) Hollywood landmark, 71-1

Finally, please extend the time for public comment on the traffic study, and let me know the results of a traffic study for the proposed project. 71-2

--
michaEL (Mat. 6:33-4(KJV)) morrow
h323-464-3412 c213-407-4258

From: <Pinkkaire@aol.com>
Date: Fri, Dec 7, 2012 at 3:50 PM
Subject: Re: Comments on DEIR Hollywood Millennium Project Case Number: ENV-2011-67...
To: JR90068@aol.com, srimal.hewawitharana@lacity.org
Cc: alexa@mediaart.com, jwalker536@sbcglobal.net

Thank you Jack, this is GREAT! We will shortly be sending an email around for hopefully ALL residents to do the same! ;o) Patti

72-1

Patti Negri

323.461.0640 Office
323.573.2102 Cell
323.465.8407 Home
www.PattiNegri.com
www.BrainBrewEntertainment.com
Facebook | YouTube | IMDB
http://www.americanfederationofcertifiedpsychicsandmediums.org/profiles.htm

From: **Nelson, Todd** <TNelson@manatt.com>
Date: Tue, Dec 11, 2012 at 9:34 AM
Subject: Request for confirmation of receipt - Millennium Hollywood Project DEIR Comment Letter - ENV-2011-675-EIR
To: srimal.hewawitharana@lacity.org
Cc: "De la Cruz, Victor" <VDelaCruz@manatt.com>

Good morning Ms. Hewawitharana,

When you have a moment, could you please confirm that you received our DEIR comment letter that was emailed to you yesterday afternoon? Thank you very much! 73-1

Todd Nelson
Senior Land Use Planner
manatt | phelps | phillips
11355 West Olympic Boulevard, Los Angeles, California 90064 | phone: (310) 231-5449 | direct fax: (310) 914-5870 | e-mail: tnelson@manatt.com

From: **barbpage@pacbell.net** <barbpage@pacbell.net>
Date: Mon, Dec 10, 2012 at 11:21 AM
Subject: RE:ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org

Please consider the traffic implications in the Hollywood area. The traffic on Franklin between the Mayfair market and Gower is already impossible and getting worse. This is unacceptable, to proceed without a traffic study. I object to the Millennium Hollywood Project because it is not ready unless/until the traffic studies have been completed!

74-1

From: **Suzanne Phillips** <sepims@aol.com>
Date: Sun, Dec 9, 2012 at 10:41 AM
Subject: Millennium Project
To: "Srimal.Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

I strongly object to the overly high towers proposed for Hollywood. I believe they will mar forever a world famously view of the Hollywood hills that the whole city enjoys. This area is already congested as we who live here know too well and I understand that parking. In the buildings will be inadequate. 75-1 75-2

I own 3 residential properties in the area as well as 2 commercial buildings. I live in Hollywoodland. Please pass my comments on. 75-3

Suzanne Phillips, 2917 Ledgewood Drive. 90068

Sent from my iPad

From: **Carla Poole** <carlapoole09@gmail.com>
Date: Sun, Dec 9, 2012 at 1:59 PM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: Srimal.Hewawitharana@lacity.org

Dear Sir/Madame,

Please extend the public comment period for the Millennium Hollywood Project. 76-1
The traffic study must be done. 76-2
As a homeowner, I already experience congested traffic in the area. How will traffic get onto the 101? It will also be out of size compared to the surrounding buildings. 76-3
This is a recipe for an eyesore that will ruin the historic Hollywood area.

Thank You,
Nancy Carla Poole
5860 Canyon Cove
LA, CA 90068

From: **Fran Reichenbach** <beachwoodcanyon@sbcglobal.net>
Date: Tue, Dec 4, 2012 at 11:49 AM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: michael.logrande@lacity.org
Cc: "Srimal Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

Dear Mr. LoGrande,

I just got off the phone with Srimal. She tells me that requests for an extension of time for commenting on this Environmental document have been received and while they are still being reviewed, she is of the understanding that you are officially preparing a statement refusing to allow such an extension of time. I also understand that you are in receipt of a request to extend this comment period by Eric Garcetti.

I'm hoping that you will call me so we can discuss this. It would help to understand directly from you the rationale for denying so many requests.

77-1

Fran Reichenbach
323-610-1967

From: **Fran Reichenbach** <beachwoodcanyon@sbcglobal.net>
Date: Tue, Dec 4, 2012 at 3:54 PM
Subject: Re: ENV-2011-675-EIR
To: srimal.hewawitharana@lacity.org, ggg@copper.net
Cc: michael.logrande@lacity.org

It is my opinion, that the Planning Department should be responsive to the people as well as the councilmember (Garcetti) who have made this request. Please extend the comment period. 78-1

Fran Reichenbach

From: **Fran Reichenbach** <beachwoodcanyon@sbcglobal.net>
Date: Thu, Dec 6, 2012 at 2:47 PM
Subject: Millennium Project - request for extension from the Dell
To: "Srimal Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>, Michael LoGrande <michael.logrande@lacity.org>
Cc: George Abrahams <ggg@copper.net>, Ziggy Kruse <ziggykruse2005@yahoo.com>, Richard MacNaughten <Abramsrl@gmail.com>, Rosemary DeMonte <GGPNC_RDM@yahoo.com>, Jim Van Dusen <wjvd@roadrunner.com>

Attached is a copy of the extension request from the Hollywood Dell. Please consider and include in the file for the Millennium Hollywood Project.

79-1

JMBM | Jeffer Mangels Butler & Mitchell LLP

Benjamin M. Reznik
Direct: (310) 201-3572
Fax: (310) 712-8572
bmr@jmbm.com

1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
(310) 203-8080 (310) 203-0567 Fax
www.jmbm.com

December 6, 2012

VIA E-MAIL (Srimal.Hewawitharana@lacity.org)

Srimal Hewawitharana, Environmental Specialist II
Department of City Planning
Environmental Analysis Section
200 North Spring Street, Room 570
Los Angeles, California 90012

Re: Millennium Hollywood Project
ENV-2011-275-EIR
Request for Extension of Comment Period

Dear Mr. Hewawitharana:

We represent and are writing on behalf of HEI/GC Hollywood & Vine Condominiums, LLC and the Hollywood & Vine Residences Association, the owner and homeowners association, respectively, of the W Hollywood Hotel & Residences at 6250 Hollywood Boulevard, Los Angeles, California 90028. On October 25, 2012, the Planning Department circulated the Environmental Impact Report ("EIR") for the Millennium Hollywood Project for a 45-day comment period until December 10, 2012. We request that the comment period be extended to a total of 60 days ending on December 24, 2012. We also request notice of your approval of the extension by Friday, December 7, 2012.

80-1

The Project provides over a million square feet of new development including dwelling units, hotel, office, restaurant, health and fitness and retail uses on a property that has historic designation. The EIR is 1,250 pages with thousands of additional pages of Appendices. Due to the expansive scope of proposed development and the extraordinary length of the EIR, the extension is warranted under the California Environmental Quality Act. (CEQA Guidelines,

§ 15105) As the City frequently provides for a 60-day comment period on other large projects, this request is reasonable and consistent with City practices.

80-1 (Cont)

Sincerely,

BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

BMR:slb
cc: Michael LoGrande, Planning Director (via e-mail Michael.Logrande@lacity.org)

JMBM | Jeffer Mangels Butler & Mitchell LLP

Benjamin M. Reznik
Direct: (310) 201-3572
Fax: (310) 712-8572
bmr@jmbm.com

1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
(310) 203-8080 (310) 203-0567 Fax
www.jmbm.com

December 10, 2012

VIA E-MAIL (Srimal.Hewawitharana@lacity.org) AND MAIL

Srimal Hewawitharana, Environmental Specialist II
Department of City Planning
Environmental Analysis Section
200 North Spring Street, Room 570
Los Angeles, California 90012

Re: Millennium Hollywood Project
ENV-2011-275-EIR
Public Comment Letter

Dear Ms. Hewawitharana:

On behalf of HEI/GC Hollywood & Vine Condominiums, LLC ("HEI/GC") and the Hollywood & Vine Residences Association ("HVRA"), the owner and homeowners association, respectively, of the W Hollywood Hotel & Residences at 6250 Hollywood Boulevard, Los Angeles, California 90028 (the "W Residences"), we provide the following public comment regarding the Draft Environmental Impact Report ("DEIR") for the Millennium Hollywood Project (the "Project"), prepared by the City of Los Angeles (the "City").

81-1

On May 31, 2011, HEI/GC submitted a public comment letter regarding the scoping of the EIR for the Project. After review of the DEIR, we have several concerns about the Project and the accompanying environmental analysis, because the DEIR fails to fully evaluate the issues identified in this letter, and fails to properly analyze several additional issues relating to: project description, land use, aesthetics, parking, air quality, school and library services, parkland, historic resources, noise, landfill capacity and growth inducing impacts.

I. The DEIR Does Not Contain A Stable, Accurate, and Finite Project Description, Precluding an Understanding of What the Project Actually Contains.

81-2

The DEIR contains an amorphous, confusing, and wholly unstable Project Description, which amounts in essence to a zone change with no definite proposal to accompany it. An "accurate, stable, and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *San Joaquin Raptor Rescue Center v. County of Merced*, 149 Cal. App. 4th 645,

655 (2007) ("*San Joaquin Raptor II*"), quoting *County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 193 (1977). Furthermore, "[a]n accurate Project Description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." *Silveira v. Las Gallinas Valley Sanitary Dist.*, 54 Cal. App. 4th 980, 990 (1997). Therefore, an inaccurate or incomplete project description renders the analysis of environmental effects inherently unreliable, in turn rendering impossible any evaluation of the benefits of the Project in light of its significant effects. Although extensive detail is not necessarily required, a DEIR must describe a project not only with sufficient detail, but also with sufficient accuracy, to permit informed decision-making. *See* CEQA Guidelines § 15124.

81-2 (Cont)

The DEIR fails to meet this foundational requirement and, ultimately, provides only the most basic understanding of what the Project entails. In fact, the only clear aspects of the Project are the doubling of the currently permitted floor area ratio to allow development of about 1.2 million square feet ("s.f.") of some combination of uses, of which about 1.1 million s.f.—an amount approximately equivalent to the Staples Center—comprises new development. Also, development of the Project would presumably occur sometime before the 2035 horizon year of the requested development agreement ("D.A."). The purported equivalency program and development regulations represent little more than a jumbled amalgam of different Project characteristics, different aspects of which are evaluated depending on the environmental issue area. A project description that allows anything is a project description that clarifies nothing.

81-3

For instance, the EIR includes a basic "Concept Plan," as well as two additional scenarios—the so-called Commercial and Residential Scenarios. (DEIR, pp. 23, 27-28) However, further reading soon clarifies that these scenarios are merely three among many, as uses, floor area, and parking may be transferred between the two halves of the Project site. Moreover, as illustrated in the purported "Development Regulations," the only guarantees provided with respect to massing are a 150-foot-tall podium on each half of the Project site, above which any number of development configurations could occur. Development above the podium could result in towers or large, blocky structures ranging in height from 220 to 585 feet,[1] dwarfing the 151-foot-tall (including the spire) Capitol Records Building and potentially displacing the Century Plaza Towers as the tallest buildings outside of downtown Los Angeles. Or, as the building envelopes illustrated in the Development Regulations indicate, two massive walls of development more akin to the Las Vegas Strip's Planet Hollywood than to Hollywood Boulevard. Despite representations throughout the DEIR that the Development Regulations would guide and limit development, avoiding environmental impacts, the Development Regulations provide large building envelopes and a number of broad generalities masquerading as standards. For example, Section 6.2 (Street Walls) only encourages architectural elements to reduce the apparent massing of the inevitable monolith: it requires nothing. Similarly, section 6.6.1.f provides that windows be recessed, except where "inappropriate." Section 7.1.1 provides that the towers shall not appear "overwrought" and shall have "big, simple moves": how can 600-

81-4

[1] By way of comparison, the Ritz Carlton at L.A. Live is 653 feet tall; the Century Plaza Towers are 571 feet tall.

foot-tall structures not appear "overwrought" in comparison to adjacent development less than one third its height?[2]

81-4 (Cont)

Further, the purported Equivalency Program and Development Regulations allow development of a nearly infinite number of development mixes, ranging anywhere from nearly over 900 residential units (rental or owned) to none, anywhere from over 200 hotel rooms to none, and 215,000 s.f. or more of office uses. Other uses, such as restaurants and health/fitness clubs are listed, but may or may not appear in the final development.

81-5

Thus, the project description fails not only to provide any meaningful description of the actually proposed development, but also, by using only generalities in terms of square footages, fails to provide any information about the actual uses planned for the Project site. As stated above, residential units could comprise rental units or for-sale units. The requested entitlements also include a conditional use permit for alcoholic beverage sales though, consistent with the rest of the project description, the DEIR fails to provide any specific information on this point (will the contemplated roof-top café (if the tower exceeds 550 feet in height), or other spaces, include alcohol service?). To the extent the Applicant has any specific plans for specialized uses that might occur on-site, the DEIR must describe those plans. *See Bakersfield Citizens for Local Control v. City of Bakersfield*, 124 Cal. App. 4th 1184, 1213 (2004) ("[T]o simply state as did the . . . EIR that 'no stores have been identified' without disclosing the type of retailers envisioned . . . is not only misleading and inaccurate, but hints at mendacity."). The actual uses of the site could alter the impact analysis and, as described in more detail below, the significant omissions in the DEIR either prevent or obscure key impact analyses. As the project description stands, the community and decision-makers are simply left to wonder as to what the Applicant would ultimately construct and precisely what would occupy that square footage. Furthermore, changes to the Project would occur with the Applicant "filing a request," but no further detail is provided regarding the level of review and how the Project would achieve compliance with CEQA.

81-6

81-7

As a result of the exclusions described above and in more detail below, the DEIR lacks the information necessary for reasoned and informed consideration of the Project's environmental impacts. *See* CEQA Guidelines § 15121(a). Moreover, given the many significant and unavoidable impacts the DEIR predicts that the Project will cause, the lack of specificity regarding the development proposal—specifically, the request for a building envelope and virtually unlimited physical and temporal flexibility—renders impossible any informed judgment by the decision-makers regarding the benefits of the Project against its significant effects, contrary to CEQA. *See King County Farm Bureau v. City of Hanford*, 221 Cal. App. 3d 692, 712 (1990). These omissions in the DEIR also deprive the decision-makers of substantial evidence upon which to make findings or adopt a statement of overriding considerations. The City must demand that the Applicant put forth an actual, finite development proposal, and must

81-8

[2] Particularly instructive in this regard is the acknowledgement in the Development Regulations that the "historic datum" for the community is 150 feet. *See* Development Regulations, § 7.1.5. Thus, this development would, even under the most charitable reading, dwarf the surrounding neighborhood.

base both the environmental analysis and the consideration of the Project on that basis. The City must also revise and recirculate the DEIR to provide the public and decisionmakers the opportunity for informed comment and deliberation.

81-8 (Cont)

II. The DEIR Fails to Adequately identify and Analyze the Significant Environmental Impacts of Removing the Zoning Restrictions and Amending the Community Plan.

The DEIR notes that the Property is within a C4-2D-SN zone, with a "D" development limitation that restrict the total floor area on the Property to a floor area ratio ("FAR") of 3:1 (Ord. No. 165659). (DEIR, III-25) The Property has a Regional Center Commercial land use designation. On June 19, 2012, the City Council approved a Community Plan Update that increased the FAR on the site to 4.5:1. Subsequently, several neighborhood groups sued the City over the Community Plan Update in response to the proposed increase in density. These include *Save Hollywood.org v. City of Los Angeles* (BS138370), *Fix the City, Inc. v. City of Los Angeles* (BS138580), and *La Mirada Neighborhood Association of Hollywood* (BS138369). These complaints allege violations of CEQA for failure to properly evaluate the increase in density, among other issues. These cases have been consolidated and are being heard by Judge Goodman in Los Angeles Superior Court, with yet unknown outcome. The Hollywood Chamber of Commerce intervened in the case, and is represented by Sheppard Mullin Richter & Hampton, the same attorneys that represent the developer of the Hollywood Millennium Project. A Motion to Compel documents is calendared for December 14, 2012. Possible outcomes of the litigation include a stay on issuing permits under the new 4.5:1 FAR density, or an order for additional environmental review under CEQA. As such, the DEIR must evaluate the Project under the existing FAR of 3:1, or provide a caveat that if the court issues a petition for writ of mandate requiring additional CEQA review for the Community Plan Update, the Project will also require subsequent CEQA review.

81-9

The Project includes an increase in FAR from 3:1 to 6:1, which is double the currently permitted density on the site. The DEIR states that the Redevelopment Plan allows an increase in FAR from 4.5:1 to 6:1, if the proposed development furthers the goals and intent of the Redevelopment Plan and the Community Plan. (DEIR, III-26) However, the DEIR does not evaluate the increase in FAR from the existing permitted FAR of 3:1 to 4.5:1, in the event that the Community Plan Update is not upheld in the court. Therefore, the DEIR must fully evaluate the land use impacts of doubling the density on the Property.

III. The DEIR Does Not Evaluate Any Impacts Related to a Conditional Use Permit for the Sale of Alcoholic Beverages or Live Entertainment.

The DEIR lists one of the proposed uses of the DEIR as a "Conditional Use Permit for limited sale and on-site consumption of alcoholic beverages, live entertainment, and floor area ratio averaging in a unified development". (DEIR, II-49) However, the DEIR fails to identify and fully evaluate the impacts for the proposed conditional uses for the sale of alcoholic beverages or live entertainment.

81-10

For a Conditional Use Permit for the sale of alcohol and/or live entertainment (CUB), the City requires specific information, such as (i) floor plans identifying areas where alcohol will be served and consumed, (ii) the total occupancy numbers of each area where alcohol will be served, (iii) the sensitive uses in the area that may be affected by the service of alcohol in this specific location, (iv) the hours of operation of the establishment, and the times when alcohol will be served within the hours of operation, (v) food service during alcohol service, (vi) the times at which live entertainment is permitted, (vii) mitigation measures, including design features and insulation, to limit the noise of live entertainment, (viii) particular mitigation measures for service of alcohol on outdoor patios and roof decks, and several other mitigation measures related to noise, traffic, security, parking, and impact on public services that are directly effected by the sale of alcohol and live entertainment. Hollywood is an area that is oversaturated with liquor licenses for both on and off-site consumption. Therefore, any proposed conditional use permit for the sale of alcohol or live entertainment must be thoroughly evaluated with input from the Police Department and community stakeholders, and each establishment within the Project must be evaluated separately. Therefore, a supplemental or subsequent MND or EIR is required for the service of alcohol and live entertainment use within the Property, at the time that the Applicant has completed at least schematic design level drawings for each establishment. This is the standard of review for CUB permits that has been consistently applied to the entitlements for the numerous hotels, restaurants and night clubs in the Hollywood area, and is required to properly evaluate the Project's environmental impacts under CEQA.

81-10 (Cont)

IV. The Traffic Analysis Uses Inappropriate Trip Generation Rates.

As shown in page IV.K.1-34, the traffic analysis for the Project used a trip generation rate for residential units of 0.685 trips per unit. This rate is about two thirds of the trip generation rate employed in studies for other similarly sized projects. For example, the Casden Sepulveda Project EIR used a rate of 1 trip per unit. Both projects use discounts for transit proximity. However, the DEIR for the Project provides no substantial evidence to support this lower rate, and given the number of potential residential units (about 500 in one scenario), this trip generation difference is substantial and would have a material effect on the analysis. The City must revise the DEIR and traffic study either to substantiate the failure to employ an appropriate trip generation rate, or to revise the traffic study to reflect that rate.

81-11

V. The DEIR Fails to Properly Analyze the Parking Required for the Project.

The DEIR fails to properly analyze the parking for the entire Project, in an area with a significant shortage of public parking for restaurant, entertainment and retail uses in the evenings, especially on the weekends. The Project is located in the Hollywood area near mass transit and several bus lines. These methods of transit are easily accessible for commuting to and from Hollywood for work during the day, and for tourists to access the Hollywood venues. However, the MTA lines are not frequently used for attending theater, restaurants, bars and nightclub venues in the evening, due to factors of convenience and safety. Although the Red Line has direct access to downtown for work commuting, it does not directly access most

81-12

residential areas in the City, and therefore does not provide a viable alternative for commuting for evening entertainment.

The Property currently contains approximately 264 parking spaces available to the public. (DEIR, IV.K2-4). The Project removes and does not replace these parking spaces. In addition, the Project provides parking for office, retail, restaurant, and bar uses at a rate of two parking spaces per 1,000 square feet of floor area (per LAMC 12.21.A.4(x)(3)). This is a special rate for projects within the Hollywood Redevelopment Project Area, based on proximity to transit. This rate is half of the rate of four spaces/1,000 sf that is typically required for retail spaces in the City of Los Angeles, and one tenth the standard rate of one space/100 square feet for restaurant uses (LAMC 12.21.A.4(c)(3), (4), (5)). The City adopted this rate to promote the use of mass transit in a Redevelopment Area; however, it has not proven effective, and restaurants and retail spaces are vastly underparked in Hollywood. There are not enough private lots to accommodate all of the restaurant valet services along Hollywood Boulevard and for individuals seeking to visit the restaurants, theaters and nightclubs. Therefore, the Project should include spaces available to the public to replace the 264 parking spaces that currently serve various existing restaurants and nightclubs through leases and other agreements. In addition, the Project should provide parking fully accessible to the public for all of the non-residential uses at the rates set forth in LAMC 12.21.A.4(x)(3) without additional discount.

81-12 (Cont)

Although the DEIR states that the final parking layout will be determined by the final use configuration of the Project, the DEIR should require that the Project be fully parked to code standards within each phase of development, so that parking cannot be deferred to a later phase. In addition, any transit reduction analysis or shared parking analysis must consider that the office/restaurant/retail/commercial calculation of two parking spaces/1,000 square feet already includes a 50 percent reduction for proximity to transit.

VI. The DEIR Wrongly Downplays The Significance Conclusions Of The Air Quality Analysis.

A. The DEIR Provides A Misleading Discussion of Significant Unavoidable Air Quality Impacts.

The tables in the Air Quality analysis for the DEIR demonstrate that the Project would result in significant and unavoidable impacts to both local and regional air quality, as well as to any residents of the Project (should the Project include residential units). However, the discussion then impermissibly seeks to downplay and dilute the effect of those impacts. For example, the analysis states on page IV.B.1-48 that even though impacts regarding toxic air contaminants ("TACs") are significant, they are typical of "other, similar residential developments in the City." However, there are no comparable developments within the community. Moreover, the analysis implies that such impacts would be mitigated by stating on the same page that local, regional, and federal regulations would "protect" sensitive receptors, but provides no discussion as to how this protection would occur or what form it would take. If impacts associated with ultrafine diesel particulate matter cannot be mitigated, and the cancer

81-13

burden on the Project site remains in excess of established thresholds, what protection can regulations provide? The DrEIR misleads the public and decisionmakers regarding the true extent of Project impacts.

81-13 (Cont)

B. The DEIR Fails to Disclose That The Project Would Obstruct Implementation Of The 2007 Air Quality Management Plan

The DEIR states on page IV.B.1-54 that the Project, despite multiple significant project-related and cumulative air quality impacts, including air quality impacts directly relating to cancer, would not obstruct implementation of the 2007 Air Quality Management Plan (the "AQMP"). However, the DEIR states on page IV.B.1-21 that the purpose of the AQMP is to reduce pollutants and meet state and federal air quality standards. In fact, the emissions thresholds published by the South Coast Air Quality Management District (the "SCAQMD") were developed for the purpose of attaining state and federal air quality standards. Thus, even if a project is consistent with broad growth projections, exceeding thresholds—particularly operational thresholds—would thwart the ability of the air basin to reach attainment. Indeed, this is the very meaning embodied in the concept of cumulative impacts. As stated on page IV.B.1-55 of the DEIR, the SCAQMD considers exceedences of emissions thresholds at the project level also to constitute cumulatively considerable contributions to cumulative impacts on regional air quality. Such a conclusion requires a determination that a cumulative impact—here, regional air quality and cancer risk—would occur in the first instance. *See Communities for a Better Environment v. California Resources Agency* ("*CBE*"), 103 Cal. App. 4th 98, 120 (2002). By contributing to—and by definition, worsening—the significantly impacted regional air quality, the Project impedes implementation of the AQMP. By failing to disclose this significant impact, the DEIR wrongly seeks to downplay it and robs the public and decisionmakers to understand the importance and effect of their decision to approve or reject the project. The City must revise the DEIR to accurately disclose this impact as significant and unavoidable. Also, where, as here, revisions to the EIR would disclose a significant impact not previously disclosed, the City must recirculate the DEIR to properly inform the public regarding the impacts of the Project. CEQA Guidelines § 15088.5(a)(1).

81-14

VII. The DEIR Fails To Evaluate The Project's Indirect Impact On School Overcrowding and Library Services.

The DEIR states on page IV.J.3-16 that payment of school fees authorized under Senate Bill 50 ("SB50") would mitigate the impact of the Project on area schools, but failed to analyze the secondary effects of school-related traffic and construction activities on the surrounding community. Recent changes to SB50 now provide that school impact fees established according to the provisions of that statute comprise full and complete mitigation of impacts "on school facilities." Cal. Govt. Code § 65996(a) (emphasis added). Impacts "on school facilities" are narrow defined, and do not absolve a lead agency of the requirement to discuss impacts that could occur to parties other than the school itself. *Chawanakee Unified Sch. Dist. v. County of Madera*, 196 Cal. App. 4th 1016, 1028–29 (2011). Examples of impacts an EIR is obligated to address, where overcrowding and a need exists to construct new facilities to accommodate

81-15

project or cumulative student generation, include traffic impacts associated with student travel to a new school facility, as well as indirect construction-related impacts on the environment surrounding a proposed school construction site. *Id.* at 1029.

Here, the DEIR has provided evidence (enrollment figures, and the facilities lack of ability to accommodate all of the Project-related student generation) that overcrowding could or would result from the addition of Project-generated and cumulatively generated students at Cheremoya Elementary and Le Conte Middle School. (DEIR, Table IV.J.3-5) Having identified a future overcrowding condition at these schools, the DEIR failed to discuss measures necessary to accommodate Project-related and cumulative students, whether at the campuses identified, or at another location, and such measures could include construction of new buildings or expansion of existing buildings at those campuses. Although the impacts of any construction activities on the school would be mitigated by SB50 fees, the impacts of such construction on the communities surrounding the affected schools or school sites do not fall within the types of impacts that fees can mitigate and are therefore subject to analysis and mitigation in the DEIR. *Id.* Thus, the DEIR must evaluate the potential construction-related impacts of school expansion, such as air quality and noise issues associated with construction, new architectural coatings, and hardscaping improvements, as well as potential indirect traffic impacts associated with the use of the expanded school. The DEIR's failure to provide this analysis, particularly in the absence of evidence to contradict the claimed necessity to reopen a school, represents prejudicial failure. The City must revise the DEIR to disclose and evaluate impacts related to project-specific and cumulative contributions to overcrowding. The City must also recirculate the DEIR to inform the public of the true consequences of approving the Project.

81-15 (Cont)

Similarly, the DEIR concludes that the library system would be above capacity, because the Project would create a service population of 94,494 people by 2020, but the local library system is only designed to accommodate 90,000 people (DEIR, IV.J.5-12) The only mitigation is the payment of a $200 per capita mitigation fee. Although the Project complies with code through payment of mitigation fees, the Project is being developed in an area that does not have sufficient educational and information systems to support the residential development. Education and information are essential for creating and supporting an educated public and growing economy. Therefore, the Project should include educational and informational facilities for its residents, including resident library and business centers, free internet access for educational and job purposes, and technical support.

81-16

VIII. The DEIR Fails to Fully Evaluate the Project's Impact on Historic Resources On and Adjacent to the Property.

The DEIR concludes that the Project causes a significant impact to historic resources that cannot be fully mitigated; however, the DEIR fails to provide additional measures necessary to mitigate the significant impact to the extent feasible.

81-17

First, the Millennium Hollywood Project Historic Resources Technical Report, dated July 2012, by the Historic Resources Group (DEIR, Appendix IV.C), identifies several historic

resources on the Property (including the Capital Records Building and the Gogerty Building), and immediately adjacent to the Property (including the contributing buildings to the Hollywood Boulevard Commercial and Entertainment District (the "Entertainment District"), such as the Pantages Theater, Equitable Building, and the Guaranty Building). The public view from street level on Hollywood Boulevard includes a streetscape of historic buildings from the first half of the 20th century, that have a maximum height of 150 feet, and are visible without obstruction in front or behind. The public view from street level looking north on Vine Street from Hollywood Boulevard is an unobstructed view of the cylindrical shape of the Capital Records Building.

The proposed Project will drastically alter these views of historic structures, by providing 580+ foot towers that dominate the skyline above the Entertainment District, and by partially obscuring the Capital Records Building, even with the 4% triangular open space to the south. The Report states that in order for the Project to be considered a substantial adverse change, "it must be shown that the integrity and/or significance of the historic resources would be materially impaired by the proposed alteration." (Historic Report, p. 37) However, the Report then concludes that the Project's allowable height and density does have the "potential to block important views and obscure public sight lines, particularly from the south of Capital Records along Vine Street and from the Hollywood Freeway." (Historic Report, p. 37) The DEIR concludes that the Development Regulations (Section 6.1), which require certain setbacks, mitigate the impact to historic resources to the extent feasible. However, this is not sufficient under the Los Angeles Municipal Code or the Secretary of the Interior's Standards for Rehabilitation. The City's Office of Historic Resources does not just consider setback, massing and distance when evaluating a project's impact on an historic resource; it also considers the design, material, articulation, connectivity of visual lines, architectural style, space flow and other elements of a project's design. In order to properly evaluate the impact of the Project on the several historic resources on or near the Property, the Applicant must provide schematic level design drawings with sufficient information regarding materials, façade articulation, and character to properly evaluate the necessary design modifications to fully mitigate any impact to the extent feasible. Therefore, a supplemental or subsequent EIR will be required at the time that schematic design has been completed for each phase of the Project to evaluate and mitigate impacts to the historic structures.

81-17 (Cont)

Second, the Historic Report identifies the sound chambers of the Capital Records Building as character defining elements of the historic structure. The Report proposes that the Project include a shoring plan to ensure protection of the resource during construction, and general construction procedures to mitigate the possibility of settlement. (Historic Report, p. 51) However, this mitigation is not sufficient to preserve the special acoustic properties of the sound chambers. The sound chambers are significant not just for their architectural shape, but also for the quality of sound created in the space. This sound requires preservation of the chamber as well as the density of ground surrounding the chamber that is necessary to maintain the specific acoustic quality. The Applicant must evaluate this quality quantitatively, and then require that the quality be maintained during and after construction, as part of the proposed Adjacent Structure Monitoring Plan. (DEIR, MM C-2) The DEIR states that the preservation of the

81-18

Capital Records and Gogerty Building is a landlord/tenant issue, because the Project and these historic properties are under common ownership. This is not true – Once a property is designated as an Historic-Cultural Monument, its preservation comes under the public trust. The quality of work necessary to maintain the Capital Records Building and its sound chambers will be identified by the City's Office of Historic Resources, and not negotiated between the owner and tenant.

81-18 (Cont)

Third, other recent projects in the area, such as the W Residences, were required to limit their height to 150 feet in order to be consistent with neighboring historic properties. The Applicant must provide an explanation regarding why it was architecturally and financially feasible for the W Residences to comply with a 150 foot height limit, but it is not feasible for the Applicant to provide the same height limit for identical uses on the adjacent block.

81-19

Finally, the DEIR requires that the Applicant document the Project site in conformance with HABS standards. This documentation should require "at least" 25 images, and not "up to" 25 images (DEIR, MM C-5). Full documentation is the only method to ensure that the historic resource is properly maintained.

81-20

IX. The DEIR Does Not Protect Views and the Insufficient Project Description Does Not Provide a Full Evaluation of Aesthetic Impact.

The DEIR concludes that the Project will have significant unavoidable impacts due to focal view obstruction, cumulative height and massing. (DEIR, I-11) The Project does not include an actual architectural design, but proposes massing envelope standards, which include Development Standards, Density Standards, Tower Massing Standards, Building Height Standards, and Building and Streetscape Standards (DEIR, MM A.I-1) The DEIR then provides additional mitigation measures that attempt to mitigate any aesthetic, light/glare, or shade/shadow impacts that may be created within the design limitations. These mitigation measures include requiring treated or low-reflective materials (DEIR, MM A.I-4), and requiring certain spacing in the Tower Massing Standards to minimize shade (DEIR, MM A.2-1, 2-2). However, the aesthetic impact cannot be evaluated merely by creating massing standards, and certain limits on light and glare. The Applicant must provide the actual material and design of the various buildings in order to properly evaluate the environmental impact. The design includes the architectural style, the flow of space, the contrast to adjacent buildings, and the actual landscaping on streetscape and higher levels. This cannot be properly evaluated by trying to imagine the infinite scenarios that may be created within these proposed standards. In addition, a finding that the Project will have "significant unavoidable impacts" should not provide a free pass for the architect to design a Project with any aesthetic impact as long as it complies with basic standards. Therefore, a supplement or subsequent EIR will be required for the construction of future buildings on the site.

81-21

X. The DEIR Underestimates the Impact of the Project on Parks.

The DEIR identifies certain park in-lieu fees required for the Project, including the Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1) and the Quimby Fees for Condominium Units (LAMC 17.12). The fees should also include all applicable recreation and park fees for residential units subject to a zone change, as set forth in LAMC 12.33 (the fees are identical to Quimby Fees for condominium units). In addition, all park in-lieu funds should be specifically allocated to parks within the immediate vicinity of the Project as a condition of the Development Agreement. This may include renovation to existing parks, or funding of future parks, such as the Hollywood Cap Park. The DEIR identifies the required open space per unit required by the Project (DEIR, MM J.4-1); however, this open space does not count towards the required parkland, unless it exceeds the typical open space requirements. The DEIR must also evaluate the proposed 2-year closure of Runyon Canyon on the Project. 81-22

XI. The DEIR Improperly Considers Certain Area as Open Space.

The Development Regulations provide that a number of building forms and structures may encroach into Project-provided open space. These include building entries, architectural façade details (undefined and unlimited), and retail storefronts. "Open space" with such encroachments provides no benefit as such, and the DEIR wrongly allows the Project to take credit for providing such space. 81-23

XII. The DEIR Failed To Adequately Evaluate and Mitigate Construction-Related Noise And Vibration Impacts.

A. The DEIR Construction Vibration Analysis Relies On Deferred Mitigation, The Effectiveness Of Which Is Unsubstantiated.

Mitigation for vibration-related building damage comprises measure H-11, which improperly defers development of mitigation and contains no quantifiable performance standards. For deferral of mitigation and analysis to properly occur, the DEIR must describe the nature of the actions anticipated for incorporation into the mitigation plan and provide performance standards. *See, e.g., Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70, 95 (2010). Here, the DEIR fails. No specific criteria are provided, except for a vague commitment not to adversely affect certain structures, and to develop and implement mitigation if damage is observed during construction. Further, measure H-11 provides no information regarding the actual nature of the options available to address potential impacts. Absent an articulation of such options, the mitigation is simply insufficient and does not provide enough information to allow informed consideration of the potential effects of the project. *See Endangered Habitats League, Inc. v. County of Orange*, 131 Cal. App. 4th 777, 794 (2005). 81-24

However, even if deferral of mitigation was appropriate in this instance (it is not), the DEIR has failed to explain why deferral is appropriate. This failure alone constitutes an abuse of discretion. *San Joaquin Raptor Rescue Center v. County of Merced*, 1749 Cal. App. 4th 645,

670 (2005). Therefore, the City must revise the analysis to provide information adequate to inform decisionmakers and the public regarding the potential effects of the Project. The City must also recirculate the EIR to allow public comment on the new information that concerns this key impact analysis.

81-24 (Cont)

B. The DEIR Construction Noise Analysis Failed To Evaluate The Effects of Construction Noise On Residents of the Project.

The Project Description never clarifies whether the East and West Sites would be developed only together, or in some sequence, during the 22-year building horizon requested by the Applicant (2013-2035). The Project Description states that the Project will take three to three and a half years to construct, if completed in a single phase, which is unlikely. Consequently, it is reasonable to assume that construction of the Project could occur in phases, and that an early phase of the Project may include residential units, which construction activities during a later phase could adversely affect. Given that the proximity of nearby sensitive receptors renders full construction noise mitigation technically infeasible according to the City's Noise Ordinance (*see* DEIR, p. IV.H-27), the probability exists that any residents present on either site during construction of a subsequent phase would experience construction noise levels well in excess of the City significance thresholds. Consequently, the DEIR has failed to disclose a significant, unavoidable impact of the Project, and must be amended to provide this analysis. Moreover, the presence of an additional significant impact requires recirculation of the EIR for public comment. CEQA Guidelines § 15088.5(a)(1).

81-25

The fact that the DEIR determines that the noise will be "significant and unavoidable" does not provide a pass to allow any level of noise on the site during construction hours. Therefore, the Applicant must provide phase-specific standards at each phase of construction, that limits the noise during construction to all extents feasible.

C. The DEIR Construction Noise Analysis Failed to Evaluate The Effects of Construction Noise on the W Hotel and Residences

The DEIR identifies the Lofts at Hollywood & Vine, a residential project on the north side of Hollywood Boulevard, as a sensitive use within proximity of the Project site that has the potential to be impacted by the Project. (DEIR, Page IV H-15) However, the DEIR does not identify the W Residences, which includes a hotel and residential units, as a sensitive use. The W Residences are located directly across the street from the Pantages Theater, which has a height of 44 feet at the street façade, and 68 feet at the rear of the parcel. The DEIR notes that there will be a peak noise level increase of 33.8-47.9 dB at the Pantages Theater and 10.1 dB at the Lofts. (DEIR, Page IV.H-25)

81-26

Any construction work above the 44 foot height will not be buffered by the Pantages Theater structure, and will be clearly audible at the W Residences, which has a height of 150 feet. Therefore, the DEIR must evaluate the impact of construction noise on the W Residences over the 22 year period. The DEIR must include conditions, such as appropriate noise buffers

during construction, including at the upper stories. The DEIR must also provide proper notice to surrounding neighbors, which will affect the ability to utilize the hotel rooms and residential units facing the Project during the various construction periods. 81-26 (Cont)

D. The DEIR Fails to Adequately Evaluate Operational Noise Caused by Outdoor Patios and Rooftop Decks

The DEIR also fails to properly identify noise impacts during the operation of the Project. The DEIR states that the residential units, hotels, and restaurants, will have outdoor areas and rooftop patios. The DEIR fails to identify the location of these outdoor areas, and fails to provide typical mitigation measures required of other hotel rooftops in the areas, such as (i) time limits for rooftop patio use, (ii) prohibition of live entertainment and limits to background music on rooftops, and (iii) proper design and landscaping to locate noisier areas, such as pools, away from residential uses. A subsequent or supplemental environmental review is necessary prior to approval of specific outdoor areas for residential, hotel and restaurant use. 81-27

E. The DEIR Failed To Adequately Evaluate Construction-Related Vibration Impacts To The Capitol Records Echo Chambers

Page IV.H-30 of the DEIR includes a discussion of potential vibration-related building damage that could occur as a result of the Project. However, although it includes structures such as the Capitol Records Complex (receptor 15), it omits the Capitol Records echo chambers (receptor 16). Though the remainder of the Capitol Records Complex is characterized as fragile for the purposes of the analysis, the analysis fails to discuss why the echo chambers, which are also part of the complex, are not. 81-28

XIII. The DEIR Failed To Disclose Growth-Inducing Impacts Of The Project.

The Project includes, among other requests, a zone change that would allow a substantially more intensive commercial or mixed use of the Project site. Yet the DEIR includes no analysis of the impacts of the substantially increased development allowed under the new designation, or even of the (intended) growth-inducement potential of the change in designation.

The Project would vastly increase the allowable density of development in the Project site and vicinity. As described on page II-7 of the DEIR, the Project would rezone the Project site from C4 to C2, and would also remove the existing density limitation. Collectively, these changes are intended to double the permitted floor area ratio and remove all limitations on height, allowing construction of towers as tall as (in the case of the Project) 585 feet. Simply put, the Project would bring downtown and Century City building heights and density to Hollywood, establishing a precedent for other projects to follow, and an expectation among developers regarding the square footage they can obtain. Development consistent with the new designation therefore becomes foreseeable, and the failure of the DEIR to evaluate, even in a general sense, the reasonably foreseeable cumulative development facilitated by the Project renders the impact analysis incomplete and inadequate. Consequently, the City must revise the 81-29

DEIR to include this analysis, and must recirculate the DEIR to allow informed comment by the public and informed decision-making by the City regarding this undeniably precedent-setting project.

81-29 (Cont)

XIV. The DEIR Underestimates the Impact of the Project on Landfill Capacity and Mischaracterizes the Impact as Less Than Significant.

According to page IV.L.3-10, the landfills currently serving the City have remaining capacity of 9,947 tons per day ("tpd") of solid waste. However, as also acknowledged in the DEIR, one of those landfills, Chiquita Canyon, has only three years of capacity remaining. Consequently, even under the most aggressive development scenario, only a single landfill will serve the City by the time the Project becomes operational. If the Applicant obtains a 22-year term on the proposed D.A., fewer than ten years of landfill capacity will remain by the time the Project is constructed.

81-30

Although some plans exist for future expansion, such plans have not yet been approved, and the DEIR carefully avoids a description of the likelihood or timing of such an expansion occurring. Consequently, landfill space within and near the City remains at a premium and is properly considered a diminishing asset. Therefore, until such time as additional or alternative means of solid waste disposal become available, a cumulative impact regarding such capacity exists, and the Project's contribution to that impact is cumulatively considerable. The City must revise the DEIR to reflect the proper impact category, and must recirculate the DEIR for public comment, consistent with CEQA Guidelines § 15088.5(a)(1).

In summary, HEI/GC and HVRA support the broad vision and diverse mix of uses for the Project, however they strongly object to the scale of the Project, in terms of height and density, and the lack of specificity of the requested entitlements that will allow a variety of configurations not evaluated in this DEIR. Thank you for your consideration and response to these comments. If you have any additional questions, please contact me directly at (310) 201-3572 or bmr@jmbm.com.

81-31

Sincerely,

BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

BMR:slb
cc: Michael LoGrande, Planning Director (via e-mail Michael.Logrande@lacity.org)

From: **Lois Rosby** <loisrosby@hotmail.com>
Date: Mon, Dec 10, 2012 at 2:13 PM
Subject: Millenium Project
To: srimal.hewawitharana@lacity.org

Dear Srimal:

I am writing to request that you reconsider building two skyscrapers on Vine at Hollywood Blvd. Presently, the traffic congestion in this area is horrific and with the addition of the two skyscrapers, it will be next to impossible to get home during rush hour. Please consider the residents that reside in the area. 82-1

Thank you,
Lois Rosby
323-466-7273

From: **Jack Rosenfeld** <JR90068@aol.com>
Date: Fri, Dec 7, 2012 at 1:04 AM
Subject: Comments on DEIR Hollywood Millennium Project Case Number: ENV-2011-675-EIR
To: srimal.hewawitharana@lacity.org
Cc: pinkkaire@aol.com, Alexa Iles <alexa@mediaart.com>, Justin Walker <jwalker536@sbcglobal.net>

As an area resident, I have two main concerns with respect to this proposed project: the height of the proposed towers, and traffic mitigation. 83-1

1. Building heights.

The Draft EIR states:

 Height Zone B would permit development to a maximum height of 585 feet above grade and would be located on the eastern half of the West Site fronting Vine Street.
 Height Zone C would be located on the west side of the East Site fronting Vine Street (south of the Capitol Records Building) and would permit development to be a maximum height of 585 feet above grade.

With all due respect, towers that reach 585 feet in height would be unacceptable. I do support sensible development, in harmony with the existing physical landscape. The Capitol Records building, as well as the 12-story towers at Hollywood and Vine (the old Equitable building, the Taft building, and the Broadway building), are the baseline that should be considered in determining an appropriate height for the new towers. The two new towers, as proposed, are completely out of scale with the neighborhood. They will cast long shadows and they will overwhelm the landmark Capitol Records building. which is one of this city's iconic structures. Aesthetically, the 585 foot towers would be a disaster. Limiting the towers to 12 stories, or even 20 stories, would be a vast improvement. 83-2

2. Traffic mitigation measures; parking issues.

There are basically three ways to enter or exit the Hollywood Dell: (1) a left or right turn from Ivar onto Franklin, which an uncontrolled intersection; (2) a left or right turn from Dix Street onto Cahuenga, (also uncontrolled); and (3) a left or right turn from Odin onto Cahuenga (also uncontrolled). We need traffic mitigation, by way of controlled signals or other improvements. At present, it is already a challenge to travel south from the Dell into Hollywood. The Millennium project will inevitably aggravate traffic. A condition of approval should be traffic mitigation, by way of signalized intersections or other measures, to facilitate movement into and out of the Dell. 83-3

On a related point, the project approval should ensure that the Millennium Project does not burden street parking in the Dell, which is already scarce. 83-4

Jack Rosenfeld
2268 Fink Street, Los Angeles, CA 90068 323-236-6988 jr90068@aol.com

From: **jamie rosenthal** <jdrlostandfound@earthlink.net>
Date: Mon, Dec 10, 2012 at 10:30 AM
Subject: env-2011-675-eir
To: Srimal.Hewawitharana@lacity.org

dear srimal hewawitharana,

i am writing in support of an extension of the public comment period for the environmental impact report. i am outraged that the allotted public comment time period has not allowed sufficient time for a necessary independent traffic study that is imperative for a project of this scale. i am a hollywood dell home owner and i am a commercial building owner whose property abuts this project as well as a business owner for 13 years at that property. i know quite well the traffic problems that already exist in this area since it is my exact commute each day. there are many more than 5 intersections that will be impacted by this project. all it takes is a drive at rush hour from my business on yucca street, to meet my son's school bus at gelson's market less than a mile away on franklin and back to my home in the hollywood dell to see first hand the disastrous traffic problems that currently exist. the eir report does not adequately address or provide solutions on the issues of infrastructure and traffic that will surround this project and negatively impact this area as a result of this over scaled project. while i do not expect the out of town developers to care about the negative impact their project will have on the quality of life in our community, i do expect the city of los angeles to respect and support the voices of the thousands of tax payers and voters who have invested millions of dollars in their homes and properties in this neighborhood. a more detailed independent traffic study could provide alternative insights that could lead to viable solutions for this already troubled and poorly functioning problem. this can only benefit all of the residents of los angeles .

84-1

84-2

please extend the public comment time period to allow for an independent traffic study.

84-3

thank you,

jamie d. rosenthal

From: **Erik Sanjurjo** <eriksanjurjo@hotmail.com>
Date: Fri, Nov 30, 2012 at 12:02 PM
Subject: HUNC letter on Millennium DEIR
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>
Cc: "kevin.keller@lacity.org" <kevin.keller@lacity.org>, Susan Swan <sswanla@gmail.com>, "renee.weizer@lacity.org" <renee.weizer@lacity.org>, Orrin Feldman <ofeldman@pacbell.net>

Please find attached a letter from HUNC pertaining to a position we have taken on the Millennium project. I am submitting the letter on behalf of myself, our president and our governing Board.
Our PLUM Committee is meeting again next Thursday to further consider what specific issues we would like the City to address when deliberating over the project. We will send another letter.

85-1

From: **Jay Schoenfeldt** <jay@brickandmortarinc.com>
Date: Wed, Dec 5, 2012 at 7:21 PM
Subject: Protest to the Millennium
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

Dear Srimal,

I recently received notification of the Environmental Impact Report regarding the Millennium project. The proposed project will, no doubt, dramatically alter the Hollywood skyline. Is this development in Hollywood's best interest? As a neighboring property owner, I am generally enthusiastic with Hollywood's redevelopment. However, I am not in favor of the proposed scale of the Millennium Project and it's alternatives. 86-1

After review of the renderings found at http://millenniumhollywood.net/project-overview/, I think the project's two new skyscrapers will compromise the architectural integrity of the landmark Capitol Records building. The developer states that the two towers will "frame views of the Capitol Records Building". I disagree. The existing Capitol Records building will be dwarfed by the two proposed towers that, conceptually, will stand at nearly three times the height of the 13 floor Hollywood Landmark as per the architectural rendering on the former weblink. 86-2

Architectural preservation is important to Angelinos. That is why we have over two dozen Historic Preservation Overlay Zones throughout the city. The Millennium Project should pay homage to the existing Capitol Records building by allowing it to be the focal point rather than miniaturized by two skyscrapers sandwiching the landmark. 86-3

It is important for in-fill developments to be in harmony with their surroundings. The neighboring buildings are all medium to low-rise developments with varying degrees of architectural pedigree. I don't see how this pair of behemoth skyscraper will fit in with its neighbors. The proposed project seeks to overshadow and dominate the surrounding Hollywood area with its vertical density and massive rentable floor area. It seems a project better suited for the Las Vegas strip. 86-4

It's for the above reasons that I object to the proposed Millennium Project, but would be in favor of a smaller scale concept that highlights the architecture of the Capitol Records landmark without compromising its integrity. This can be accomplished by developing a commercial focused development with a height less than the Captiol Records landmark. However, this is not an alternative as per the EIR. I therefore am in favor of no development at this point in time. 86-5

Sincerely,

Jay Evan Schoenfeldt
Brokerage & Acquisitions
310.497.8100 **Tel**
323.663.6606 **Fax**
jay@brickandmortarinc.com

DRE 01898245

From: **schwab kc** <schwabkc323@gmail.com>
Date: Sun, Dec 9, 2012 at 9:46 PM
Subject: Millennium/Capitol Records Project
To: srimal.hewawitharana@lacity.org

Dear Mr. Hewawitharana,

I have been a resident of the Hollywood Hills since 1966 and have seen Hollywood descend from a very livable area to a shabby neighborhood filled with tacky stores, tattoo parlors, head shops, and mediocre restaurants. Attempts have been made in the past to revive the area but were always sabotaged by fierce opposition from mostly ignorant activists who were trying to preserve something that was not worth saving.

The recent developments along Vine Street and Hollywood Boulevard, such as the W Hotel and residential complex have already had a remarkable effect on Hollywood, and I feel that the new Millennium/Capitol Records Project will substantially enhance the ongoing rejuvenation of the area. When residents move in, they will support upscale stores, restaurants and other business ventures, and the homeowners from the Hollywood Hills will not have to drive to other areas to go shopping or to find a good meal. 87-1

Based on the somewhat alarmist e-mails I have received from the local neighborhood association, I believe that the opposition to this project is mainly founded in ignorance and activist hysteria. Obviously traffic will increase but in my experience (I am a retired licensed structural engineer), issues such as parking and utilities will be addressed as part of the overall planning. I have confidence in the professionalism of the planners and designers that they will find acceptable solutions to these problems.

My wife and I would like to express our full support for the proposed development.

With best regards,

Christof E. Schwab

NAI Capital
Commercial Real Estate Services, Worldwide.

310 440 8500 Ofc
310 440 8525 Fax
www.naicapital.com

1640 S. Sepulveda Blvd.
Suite 500
Los Angeles, CA 90025
DRE License #00806840

December 9, 2012

Srimal Hewawitharana *via facsimile: Srimal.hewawitharana@lacity.org*
Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street, RM 750
Los Angeles. CA 90012

RE: Draft Environmental Impact Report
ENV-2011-675-EIR

Dear Ms. Hewawitharana:

I submit this letter in support of the Millennium Hollywood Project and the positive impact it will have on the continued revitalization of Hollywood. I understand the developer is seeking approval of a Development Agreement and with that they would also implement an Equivalency Program. In my opinion, the Equivalency Program shows the developer intends to be responsive to market demands and the economy going forward which can only benefit the Hollywood Community.

88-1

Also, as a representative of the ownership of 6363 Hollywood Boulevard, Hollywood, CA we welcome the economic growth the project will generate, jobs both construction and permanent, the transit oriented nature of the project, the planned open space and finally the preservation of the Capitol Records building.

Sincerely,

NAI Capital, Inc.

Marty Shelton

Marty Shelton
Vice President
(310) 440-8500

mls1117.doc

From: **Lynn Shepodd** <shepodd@gmail.com>
Date: Sat, Dec 8, 2012 at 12:12 PM
Subject: hwd community plan-height limits
To: srimal.hewawitharana@lacity.org

Is it true you passed no height limits for Cahuenga and Vine Streets? This is lousy if it is true. 89-1

I know the city has to build to stay modern but we have to drive to work and the more units you put the harder it will be. 89-2

Lynn Shepodd
Resident Hollywoodland up Beachwood Canyon

--

Lynn Shepodd
323.301.6331
Sotheby's International Realty
Great Real Estate Service in L.A....
Great Agent Referrals Around the World

On Wed, Nov 7, 2012 at 3:08 PM, lex shontz <lexshontz@gmail.com> wrote:

Dear Mr. Hewawitharana,

Thank you for sharing the Environmental Impact Report for the Millennium Hollywood Project. I am a resident, property owner and the Vice President of the Board of Directors of The Lofts at Hollywood + Vine located at 6253 Hollywood Blvd., Los Angeles, CA 90028. I want to register a serious level of concern, not opposition but concern regarding the development of this project over the next 20 odd years. 90-1

How can I keep myself and my constituency of homeowners apprised of the who, what, when and how regarding the "unavoidable environmental impacts" discussed in your report dated October 25, 2012? Will there be a timeline? Is there a way to keep us updated during the life of the project? 90-2 Will there be any measures to protect us and our property from such impacts? 90-3

I think the more informed, protected and respected we are as neighbors, the less concerning this development will be. 90-4

I look forward to your thoughts.

Thank you,

Lexis B. Shontz
V.P. The Lofts at Hollywood + Vine
6253 Hollywood Blvd.
Suite 903
Los Angeles, CA 90028
323 401 8767
LexShontz@gmail.com

SMITH LAW FIRM
A PROFESSIONAL LAW CORPORATION
21550 OXNARD STREET, SUITE 760
WOODLAND HILLS, CALIFORNIA 91367
818-703-6057 TEL. 818-703-6058 FAX.

December 10, 2012

VIA EMAIL ONLY

Srimal Hewawitharana
Environmental Specialist II
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
E-Mail: srimal.hewawitharana@lacity.org

RE: Millennium Hollywood Project
ENV-2011-675-EIR

Dear Ms. Hewawitharana:

Please be advised that this office represents 1718 Vine St., LLC, the owner of the property located at 1718 Vine Street, Los Angeles, California 90028.

91-1

Pursuant to your request, we write to you to voice our client's comments concerning the EIR study and the City's actions concerning the project.

Our client has concerns involving the manner in which the development will obstruct its access to the rear portion of its property. While our client generally supports the Millennium Hollywood Project, it does not to the extent it is denied access to its property. Our client reserves all of its rights and remedies in this regard.

91-2

Sincerely,

Smith Law Firm
A Professional Law Corporation

By: Craig R. Smith

cc: Client

On Sun, Nov 4, 2012 at 11:26 AM, Jimmie Smith <jl.smith.jr@hotmail.com> wrote:
Hello Srimal,

I reside at 6253 Hollywood Blvd. As my building is the only residential space within direct proximity of the proposed Millennium Hollywood Project, I and the other residents of my building will certainly experience some of the largest impacts of this construction. 92-1

To state it simply: I am concerned. I am concerned about the traffic implications both during construction and after, when the project is finished. 92-2 I am concerned about what will surely be a huge increase in dust. Our building has an historical designation and therefore we are not allowed to make changes to the exterior aesthetic of the building, this includes the windows. Already, without any construction, battling dust is a constant problem. How will this be mitigated? Our cars are parked in an outdoor lot adjacent to the building. How will mitigation of continual dust issues be addressed for our cars? 92-3

And lastly, my largest concern is the change in topography. These massive structures will obliterate my view of one of the best aspects of my loft - my view of the Hollywood sign. 92-4 I know a view is not my right, but it would be devastating to lose it. From proposed design sketches I am also concerned that I will lose my view if the Capitol Records building. This along with the view if the Hollywood sign were among the principal reasons for me to live here. Have any provisions been made for these issues? 92-5

Your response is greatly appreciated.

Sincerely,

Jimmie Smith

Sent from my iPhone

From: **MD Sam Smith, CFP** <sam@genesisfinancial.biz>
Date: Thu, Dec 6, 2012 at 8:34 PM
Subject: Millenium Hollywood Project DEIR - SUPPORT
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

December 6, 2012

TO: Srimal Hewawitharana

Environmental Review Coordinator

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

From: MD Sam Smith, CFP

President, Genesis Financial

I am writing you today in SUPPORT of the Millenium Hollywood Project.

Over the course of the last several years as a businessman living and working in Hollywood, I have watched the evolution of the Millenium Hollywood Project and witnessed the exceptional consideration of our community, its long term best interests and the overall vitality of Hollywood as it transforms itself in the new century. MHP is a sterling example of next generation Transit Oriented Development that will enable residents, workers and visitors to enjoy a quality of life that is transformational at its core.

93-1

Hollywood's renaissance has continued its uphill climb despite the recent economic setbacks. The Millenium Hollywood Project will greatly enhance Hollywood's ability to continue this evolution. The investment of the project and the economic inertia it will create will bring new energy to our city. The long term effect on our tax base and economic vitality will be broad reaching and well distributed throughout the surrounding communities.

The Millenium Hollywood Project has taken great lengths to preserve and enhance the iconic Capitol Records Building while bringing much needed pedestrian energy to the neighborhood.

The design of the project has succeeded in considering the view and the impact of the project from every angle. From every vantage point the project brings a new perspective to our future city and its citizens.

93-1

Every great vision creates change and change is not always comfortable at first. Every great vision also requires courage. Courage to believe in the possibility.

The possibility created by the Hollywood Millenium Project is a vibrant regional center that will bring new life and new energy to an already electric city! Let's move this project forward!

Most sincerely,

MD Sam Smith, CFP

MD Sam Smith, CFP

President

CA Lic No. 0596920 . CA Corp Lic No. 0D91095

<image001.jpg>

Phone 818.988.9880 ● eFax 323.417.5074

8033 W Sunset Blvd, Suite 893 ● Los Angeles, CA 90046

www.genesisfinancial.biz sam@genesisfinancial.biz

From: **Maureen Tabor** <maureentabor@maureentabor.com>
Date: Sun, Dec 9, 2012 at 8:56 PM
Subject: In opposition to The Hollywood Millenium Project
To: srimal.hewawitharana@lacity.org

This is a note to express my opposition to The Hollywood Millennium Project.

As a home owner in Beachwood Canyon, this project has an adverse effect on me and on my property value. The traffic created would be unsustainable, dangerous, and ruin the small rise of good small developments in our area. I accept change, but this massiveness contemplated is not the kind of change that will improve the area. 94-1

Thank you for reading.

Maureen Tabor

From: **Alisa Tager** <alisatager@gmail.com>
Date: Sun, Dec 9, 2012 at 6:45 PM
Subject: Extension on Millennium/Capitol Records Project
To: srimal.hewawitharana@lacity.org

I would like to voice my opposition to this project.
I am a long-time resident of Beachwood and I have seen the traffic increase radically over the past decade.
I am concerned there have been no impact studies on the traffic and impact on local infrastructure.
Please postpone this project until further studies have been done to assess the problems and propose solutions.
Thank you,

95-1

Alisa Tager
2731 Woodshire Drive
Los Angeles, CA 90068

From: **Scott Thaler** <scottthaler@mac.com>
Date: Sun, Dec 9, 2012 at 6:58 AM
Subject: ENV-2011-675-EIR Millennium Hollywood Project
To: "Srimal.Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

Please extend public commemt period and allow time for a full traffic survey of the area!!!!! 96-1

Thank you

Sent from my iPad

Scott Thaler
Scottthaler@mac.com
213 500 2930 cell

From: **Scott Thaler** <scottthaler@mac.com>
Date: Sun, Dec 9, 2012 at 8:00 PM
Subject: NO!
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

[Blank] 97-1

Sent from my iPad

Scott Thaler
Scottthaler@mac.com
213 500 2930 cell

From: **Scott Thaler** <scottthaler@mac.com>
Date: Tue, Dec 11, 2012 at 4:29 PM
Subject: Re: NO!
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

Traffic study
Environmental Impact
All need detail study before such an undertaking. 98-1

Thank you
Scott

Sent from my iPhone

Please excuse any typos

Scott Thaler
213 500 2930

From: **Scott Thoelke** <thoelke@sbcglobal.net>
Date: Mon, Dec 10, 2012 at 7:22 PM
Subject: SAVE HOLLYWOOD FROM OVER DEVELOPMENT!!!
To: Srimal.Hewawitharana@lacity.org

Dear Srimal,
My wife and I live in Hollywood. We have lived here for over 20 years and own a home.I'm am strongly against the large scale development ideas being floated to over develop Hollywood. There are already to many empty buildings unoccupied in the Hollywood area to consider adding more. The streets are already over crowded with cars most of the day. The pollution potential is horrifying. Air, ground waist and audio pollution would kill the neighborhood. Hollywood is a Mecca for tourists to visit because it represents "Old Hollywood". A small town where the film industry developed into a huge industry. Allowing expansion would eventually turn Hollywood into a city that would look like many other generic cities across the United States. There would be no reason for tourists to come here any longer as the small town feel would be gone. Please do not allow the large scale development of Hollywood as it would drive long time residents to leave and bring down the tone of Beachwood Canyon and the entire Hollywood area.

99-1

From: **David Turner** <dturner18@sbcglobal.net>
Date: Sat, Dec 8, 2012 at 11:33 AM
Subject: Building
To: srimal.hewawitharana@lacity.org

Dear All,

I agree with my neighbor Jack Rosenfeld on the congestion and further degradation of traffic flow in an area on the brink of gridlock now. That is what erecting these buildings will enact. Are you going to eliminate personal transportation? It sounds to me like it is doomed. Our Mayor wants Hollywood to be like New York City. 100-1

I am a third generation native of Los Angeles. I really don't like the direction this city is taking, and I will fight it religiously. All these electric billboards cheapen and degrade My quality of life and increase driving danger, and they seem to go with tall buildings to help pay the cost. I vote "NO" 100-2

David J. Turner
2279 Fink st
La,Ca 90068

From: **jennifer van zyl** <jennifervanzyl@mac.com>
Date: Sun, Dec 9, 2012 at 5:44 PM
Subject: Millennium Project is not good for Hollywood Residents
To: srimal.hewawitharana@lacity.org

Dear City Planning:

My husband and I are writing you incensed over the proposed Hollywood Millennium Project.....as residents in the district just north of the project we and every neighbor we have talked to are VERY MUCH AGAINST THIS PROJECT...shame on you for even considering such a ugly, out of place and road-clogging development. Our comments below: 101-1

-These buildings are a good 400 feet too high from a visual standpoint; 101-2

-Have you been to the Franklin/Vine/Cahuenga area lately during rush hour? The other night it took me 40 minutes!!! to get from Santa Monica & Vine Street into my Hollywood Dell neighborhood...two almost 600 feet buildings will only worsen that situation; 101-3

-What about improving infrastructure in the area? We need better freeway entrance/exits and better maintained roads and sidewalks and public parking lots like Beverly Hills and Santa Monica; 101-4

-We need real green space and open areas in Hollywood area-- virtual green space with vines on the side of 600 feet towers is not green space! 101-5

-If you think residents in these buildings will use the Metro, you are mistaken. The Metro still does not go to the places where people go-- the airport, Beverly Hills, Century City, the Hollywood Bow (another shameful failure by our City officials that there is not a stop at the Bowl...wish I could send all those buses to your neighborhood); 101-6

-What about the poorly maintained and developed Cahuenga Pass? The ghetto-inspired chainlink fences should instead be sound walls to contain the heavy traffic on the streets and not spill into surrounding residential area. We need a bike/walk path OFF THE STREET so people can walk and ride between Hollywood and the Valley...if this were the Westside/Sepulveda Pass, it would be much safer, more beautiful and functional as sadly that is were the City and State spends it's infrastructure funds. Meanwhile, the reason most tourists visit LA is to come to Hollywood...and when they do it's filled with garbage, chainlink fences, the homeless, stripper clothing stores, souvenir shops and pedestrian unfriendly streets. 101-7

-We do not want Vine Street area of Hollywood to become like the awful user-unfriendly Hollywood & Highland complex! I don't know a single neighbor who goes there and instead we all drive by and go the the well-developed Grove. WE DO NOT WANT OUR NEIGHBORHOOD TO BECOME ANOTHER TIMES SQUARE! 101-8

We are amazed at how this project has gotten so far and that City officials will even consider 101-9

Comment No. 101

such a project...they even misrepresented the surrounding area in their renders by making the Hollywood Dell look like a flatland loaded with housing projects! 101-10

We will fight this project and urge others to do the same. This is not responsible growth for Hollywood. 101-11

Most sincerely,

Jennifer and Rudy van Zyl
2775 Rinconia Drive
Hollywood 90068

On Sun, Oct 28, 2012 at 9:41 AM, ellen vinitsky <evedeane@earthlink.net> wrote:

Dear Srimal:

I have a great many concerns about the proposed Millennium Project. 102-1

I am concerned about traffic in Hollywood. I live above Franklin, between Vine and Cahuenga and getting anywhere south of Franklin and north of Santa Monica Boulevard has become an ordeal in the last several years and will only get worse. 102-2

I am concerned about the little Ma & Pa stores that have left the Hollywood area or will be forced to, including all the wonderful book stores that lined Hollywood Boulevard, only to be replaced by T-Shirt store, "Smoke Shops" and the likes, because mega-buildings with "retail space" will discourage anyone from patronizing the area businesses other than those manufactured for tourists. 102-3

I am concerned with all of the clubs in Hollywood where patrons park in our sleepy little neighborhoods and trash them and how a mega-building will only increase the population and traffic and visitors and such. 102-4

In Downtown Los Angeles, there was an organic growth, where old buildings were renovated, saved, refurbished and the neighborhoods grew in an inclusive way, not in the way a million-square-foot building will overshadow everything in its path. Look at the old Bank District as an example. 102-5

I worry about the residents who have been displaced, the businesses displaced and more so - the incredible loss of Hollywood history that has been torn down building by building. 102-6 102-7 102-8

I worry about the loss of a view, a beautiful view for those of us above Franklin. 102-9

It seems to me that as usual - big business and developers have been favored far beyond us tax payers and residents. It seems like favoritism for the connected few who got in on the project and will make a ton of money for themselves - like payola. It appears that anyone able to jump on this wagon will get to put their mouth on the government tit at the expense of anyone else and we - the residents and taxpayers- will have to pick up the tab for decades to come. 102-10

I am deeply opposed to this project. 102-11

Please submit my name as one of opposition.

Sincerely,

Ellen Vinitsky
6359 Primrose Avenue
Los Angeles 90068

From: **Yvonne Westbrook** <yvonnewestbrook@sbcglobal.net>
Date: Sun, Dec 9, 2012 at 8:55 PM
Subject: Millenium Capitol Records Project
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

I have read the reports and heard both sides, pro and con; I believe it is in the best interest of both Hollywood residents and those proposing the plan to do more research before moving ahead. This seems a prudent decision, since many residents, who live day in and day out in the area will be affected in some way. I have been a resident and home owner in Hollywoodland for 40 years, am not opposed to change and have seen and felt the negative impact on traffic and air quality. Our infrastructure cannot handle more traffic; I had an office in the Taft Building at Hollywood and Vine...I moved my office after The W Hotel was finished because the traffic became intolerable, as did the parking and I was losing client's as a result. This is true of the intersection at Hollywood and Highland, it's true of the project on the north east corner of Vine and Sunset. The very thing that made Hollywood livable, the ease of movement, has been lost and we cannot afford to support similar projects. I don't think that business and financial interests should rule the community--a community should be ruled by the heart.

103-1

103-2

Sincerely,

Yvonne L. Westbrook, M.A., MFT

From: <judithwhitm@aim.com>
Date: Mon, Dec 10, 2012 at 9:53 AM
Subject: Vine Street highrises unacceptable
To: Srimal.Hewawitharana@lacity.org

Cui bono? The residents of this already congested area don't benefit. The city services which will be overloaded and thus increase fees paid by those who don't benefit? The number of feeder streets that are already parking lots ?. 104-1

The hundreds of thousands of property taxpayers who PAY for a view don't benefit. 104-2

Gee, who benefits? Politicians who get campaign donations? From the builders who get zone variance without citizen approval?

The list goes on. Doesn't it? 104-3

Don't do this without voter approval. Please. 104-4

From: **Edward Hunt** <edvhunt@earthlink.net>
Date: Fri, Feb 1, 2013 at 10:02 PM
Subject: Response to Draft EIR for Hollywood Millennium Project
To: srimal.hewawitharana@lacity.org

THE MELROSE HILL NEIGHBORHOOD ASSOCIATION

4928 West Melrose Hill, Los Angeles, CA 90029

323-646-6287, edvhunt@earthlink.net

To Srimal Hewawitharana

Environmental Specialist, LA Dept. of City Planning

201 North Figueroa Street, #4

Los Angeles CA 90012

RE: Response to Draft EIR for Hollywood Millennium Project

Dear Ms. Hewawitharana,

We are concerned about adding this substantial Millennium Project population to Park starved Hollywood without adding a commensurate amount of additional parkland. We understand this project has a requirement to pay Quimby fees.

Our recommendation is that the Quimby Fees be directed toward the Construction of the first phase of the Proposed Hollywood Central Park to be constructed over the nearby 101 Freeway.

105-1

Sincerely,

Edward Villareal Hunt, AIA, ASLA

President, Melrose Hill Neighborhood Association

Appendix B

Transportation Modeling Procedures and Results

Crain and Associates
February 1, 2013

Millennium Hollywood Project
Transportation Modeling Procedures and Results

The Traffic Study prepared for the Draft EIR determined that the Project impacts to freeway segments would be less than significant based on the Los Angeles County Congestion Management Program (CMP) criteria. The analysis and the methodology (CMP criteria) were approved by the Los Angeles Department of Transportation (LADOT). Further support is provided by the Hollywood Community Plan Update Environmental Impact Report as the Hollywood Community Plan Update was also determined not to have a significant impact on the freeway system. To further verify these conclusions, an additional model analysis was conducted. The analysis used the current Southern California Association of Governments (SCAG) model for year 2035, as refined by LADOT for use in the City of Los Angeles, for the initial future projections (the Base Model).

To determine the Project impacts based on the Base Model, it was necessary to determine the demographic characteristics of the Project. A set of demographic density rates of the different Project land uses are included in Table 1. The Los Angeles County rates from *The Employment Density Study Summary, The Natelson Company, October 31, 2001*, prepared for SCAG were used to estimate the employee density in terms of building area for the Project commercial uses (except hotel, which was specified by room, rather than building area). For residential uses, data on daily trip generation from the ITE Land Use Code 220 was reviewed and the weekday trip generation ratio indicated 2.01 persons per unit. To be conservative, ratios of 2.5 persons and 1.2 workers per unit were assumed (e.g., those used in other studies for single family housing units). For hotel rooms, data on daily trip generation from the ITE Land Use Code 310 was reviewed and the weekday trip generation ratio indicated 0.57 employees per room. Table 2 shows the rates utilized and the resulting demographic estimates.

The Project impacts were analyzed using the Base Model rerun for scenarios assuming two different conditions. Those scenarios addressed the case that the Project, or similar land-uses for the Project Site, was included within the Base Model assumptions and, alternatively, the case that the Project was an incremental addition to the Base Model assumptions. The two cases were examined since the Base Model zones each contain a larger area than the Project Site and greater amount of land-uses than the Project. This was further complicated by the Project Site being partially within each of two zones. Table 3 shows the Model Demographic data split between the two zones.

To create the model demographics input data for the two reruns, 1) the demographics for the Project land uses were subtracted from the Base Model demographics for the Central Hollywood zones that included the Project Site, and 2) the Project demographics were added to the Base Model demographics for the those zones. The results from the model reruns were compared to the Base Model results to determine the Project impact.

Table 1

Model Demographic Rates and Overall Estimates

Source	Land Use	ITE Daily Trip Rate				Density Rate	Size	Estimate	
Residential									
ITE LU 220	Apartment	[A]	6.65	trips/	dwelling unit				
		[B]	3.31	trips/	person				
		[A]/[B]	**2.01**	**person/**	**dwelling unit**	**2.5 person/du**	461	1,153	persons
						1.2 worker/du	461	553	workers
Office									
SCAG	General Office					**1 emp. / 440 sf**	264,303	601	other emp.
Other Commercial									
SCAG	Health/Fitness Club					**1 emp. / 424 sf**	80,000	189	service emp.
SCAG	Retail					**1 emp. / 424 sf**	100,000	236	retail emp.
SCAG	Quality Restaurant					**1 emp. / 424 sf**	25,000	59	retail emp.
ITE LU 310	Hotel	[A]	8.17	trips/	room				
		[B]	14.3	trips/	employee				
		[A]/[B]	**0.57**	**employee/**	**room**	**0.57 emp./room**	254	145	service emp.

Table 2

Demographic Estimates by Model Variable

							Demographics					
							Population			Employees		
LU	Use/Description	Size	Units	Rate(s)		Source	TotPop	ResdPop	Workers	Retail	Service	Other
Proposed Uses												
220	Apartments	461	MDU	2.5	1.2	ITE	1153	1153	553			
310	Hotel	254	rooms		0.6	ITE					145	
492	Health/Fitness Club	80,000	bldg sf	1/	424	SCAG					189	
710	General Office	264,303	bldg sf	1/	440	SCAG						601
820	Retail	100,000	bldg sf	1/	424	SCAG				236		
931	Quality Restaurant	25,000	bldg sf	1/	424	SCAG				59		
Existing Uses												
710	General Office	114,303	bldg sf	1/	440	SCAG						260

The anticipated volumes of the Hollywood freeway segments nearest to, but beyond, the Project access points were compared between the scenarios. The results from the model runs for the most impacted segments (those immediately north and south of the Project Site access) are shown and compared in the Table 4. Table 4 demonstrates that the Project will have lower impacts than the less than significant impacts shown in the Draft EIR (i.e. lower impacts than conservatively analyzed in the Traffic Study and the Draft EIR).

Table 3
Project Demographic Estimates by Site

2010 to 2035 Minimum Data Increment (Entire Site):				County	Los Angeles			Residential	100%
								Office	100%
TotPop	1153	TOTHH	461	TotJobs	969	K12Sch	0	Other Com.	100%
ResPop	1153	SDU	0	RetJobs	295	ColeNR	0		
GRPQ	0	MDU	461	SrvJobs	333				
Workers	553			OthJobs	341				
2010 to 2035 Minimum Data Increment (East Site):				County	Los Angeles			Residential	40%
								Office	100%
TotPop	461	TOTHH	184	TotJobs	624	K12Sch	0	Other Com.	45%
ResPop	461	SDU	0	RetJobs	133	ColeNR	0		
GRPQ	0	MDU	184	SrvJobs	150				
Workers	221			OthJobs	341				
2010 to 2035 Minimum Data Increment (West Site):				County	Los Angeles			Residential	60%
								Office	0%
TotPop	692	TOTHH	277	TotJobs	345	K12Sch	0	Other Com.	55%
ResPop	692	SDU	0	RetJobs	162	ColeNR	0		
GRPQ	0	MDU	277	SrvJobs	183				
Workers	332			OthJobs	0				

Table 4
Projected Freeway Volumes

		Year 2035 Volumes				
			Base Minus Project		Base Plus Project	
Segment	**Direction**	**Base Model**	**Model Result**	**Project Trips**	**Model Result**	**Project Trips**
AM Peak Hour						
North of Vine St.	Northbound	8,336	8,358	-22	8,362	26
	Southbound	7,718	7,720	-2	7,717	-1
South of Santa Monica Bl.	Northbound	8,534	8,555	-21	8,567	33
	Southbound	7,775	7,779	-4	7,783	8
PM Peak Hour						
North of Vine St.	Northbound	15,031	15,055	-24	15,039	8
	Southbound	9,323	9,328	-5	9,322	-1
South of Santa Monica Bl.	Northbound	14,476	14,501	-25	14,491	15
	Southbound	9,872	9,871	-1	9,892	21

In reviewing Table 4, note that the Project is an infill set of land uses that will intercept a proportion of the trips linked to the Project. This, combined with the mixed use and transit oriented nature of the Project, will result in trip reductions on some segments. Thus, even though the Project will add some trips to the regional system, as demonstrated in Table 4, the

Project will reduce a similar number of trips and will also have limited impacts to the volumes on the regional highway system or trip reductions on some segments. Further, the Project is infill, mixed-use and transit-oriented development as called for by SCAG in the Regional Mobility Plan and the Metropolitan Transportation Authority (Metro) in the Congestion Management Plan (CMP).

In summary, the model demonstrated that the Project will not result in the addition of 150 trips or more to any freeway segment. This analysis verifies that Project traffic impacts on the regional system will be less than significant.

Appendix C

Saturday Project Trip Generation, Crain & Associates
January 11, 2013

The Millennium Hollywood Project
Saturday Trip Generation Estimate

LU	Use/Description	Size	Units	Daily	Saturday Peak Hour I/B	Saturday Peak Hour O/B	Saturday Peak Hour Total
Proposed Uses							
220	Apartments	461	du	3,363	101	101	202
310	Hotel	254	rooms	2,080	102	81	183
492	Health/Fitness Club	80,000	bldg sf	1,670	100	122	222
710	General Office	264,303	bldg sf	584	44	37	81
820	Retail	100,000	bldg sf	9,240	446	411	857
931	Quality Restaurant	25,000	bldg sf	2,359	182	89	271
	Subtotal [A]			**19,296**	**975**	**841**	**1,816**
	Internal Trip Capture						
	Commute						
	Multi-Family Residential	5%		(168)	(5)	(5)	(10)
	Office	(Based on Res.)		(168)	(5)	(5)	(10)
	Support						
	Apts. (Based on support)	(Based on support)		(1,785)	(68)	(83)	(151)
	Hotel	5%		(104)	(5)	(4)	(9)
	Health/Fitness Club	15%		(251)	(15)	(18)	(33)
	Office	(Based on support)		(310)	(30)	(31)	(61)
	Retail	15%		(1,386)	(67)	(62)	(129)
	Quality Restaurant	15%		(354)	(27)	(14)	(41)
	Subtotal [B]			**(4,526)**	**(222)**	**(222)**	**(444)**
	Transit/Walk-in External Trips						
	Apartments	15%		(212)	(4)	(2)	(6)
	Hotel	10%		(198)	(10)	(7)	(17)
	Health/Fitness Club	15%		(213)	(13)	(15)	(28)
	General Office	15%		(16)	(1)	(1)	(2)
	Retail	15%		(1,178)	(57)	(52)	(109)
	Quality Restaurant	15%		(301)	(23)	(12)	(35)
	Subtotal [C]			**(2,118)**	**(108)**	**(89)**	**(197)**
	[D] Driveway ([A]+[B]+[C])			**12,652**	**645**	**530**	**1,175**
	Pass-by Trips (% of External Auto)						
	Health/Fitness Club	20%		(241)	(14)	(18)	(32)
	Retail	30%		(2,003)	(97)	(89)	(186)
	Quality Restaurant	10%		(170)	(13)	(6)	(19)
	Subtotal [E]			**(2,414)**	**(124)**	**(113)**	**(237)**
	[F] Area Intersection Trips (Proposed Uses) ([D]+[E])			**10,238**	**521**	**417**	**938**

The Millennium Hollywood Project
Saturday Trip Generation Estimate

LU	Use/Description	Size	Units	Daily	PM Peak Hour I/B	PM Peak Hour O/B	PM Peak Hour Total
Existing Uses							
710	General Office	114,303	bldg sf	1,479	35	172	207
N/A	Car Rental Facility	8,037	lot sf	0	4	4	8
	Subtotal [G]			**1,479**	**39**	**176**	**215**
	Existing Internal Trip Capture						
	Office	(Based on support)		0	0	(1)	(1)
	Car Rental Facility	15%		0	(1)	0	(1)
	Subtotal [H]			**0**	**(1)**	**(1)**	**(2)**
	Existing Transit/Walk-in Trips						
	Office	15%		(222)	(5)	(26)	(31)
	Car Rental Facility	10%		0	0	0	0
	Subtotal [I]			**(222)**	**(5)**	**(26)**	**(31)**
	[J] Adjacent Intersection Trips ([G]+[H]+[I])			**1,257**	**33**	**149**	**182**
	Pass-by Trips (None)						
	[L] Area Intersection Trips (Existing Uses) ([J]+[K])			**1,257**	**33**	**149**	**182**
Net Site Adjacent Trips ([D]-[J])							
	Residential			1,198	24	11	35
	Office			(1,167)	(22)	(145)	(167)
	Non-Office Commercial			11,364	610	515	1,125
	Total			**11,395**	**612**	**381**	**993**
Net Area Trip Generation ([F]-[L])							
	Residential			1,198	24	11	35
	Office			(1,167)	(22)	(145)	(167)
	Non-Office Commercial			8,950	486	402	888
	Total			**8,981**	**488**	**268**	**756**

Appendix D

Updated Construction Traffic Impacts Including Individual Intersection Impact Analyses, Crain & Associates
January 15, 2013

Millennium Hollywood
Updated Construction Traffic Impacts
Including Individual Intersection Impact Analyses

Introduction

A detailed construction traffic impact analysis has been conducted for the Millennium Hollywood Project (the Project) to assess potential traffic impacts at individual intersections during the construction period. This analysis is in addition to the analyses prepared for the Project traffic impacts upon completion and occupancy, and the construction period trip generation. The procedures, assumptions and results of this updated analysis are detailed below.

Construction Phase Descriptions

The Project construction activities are estimated to occur over a 38 month period, with completion estimated to occur prior to or during 2020. To be conservative, this technical memorandum contains analysis of construction traffic impacts based on both existing (2011) and future (2020) conditions.

The construction activities will be sequenced throughout several phases and are expected to follow the time durations shown in Table 1. It should be noted that some overlap may occur between phases during development, but peak trip generation levels are anticipated to occur mostly during the mid-phase periods. Low levels of construction activity are expected during potential overlap periods as activity levels during any overlap of the phases are anticipated to be less than the peak level for the ending and/or starting phase.

Table 1
Project Construction Phases

Phase	Approximate Time Period	Start Month	End Month
1. Demolition	1 month	1	1
2. Excavation & Shoring	8 month	2	9
3. Foundation & Below Grade	6 month	9	14
4. Building Superstructure	13 month	13	25
5. Exterior Finishing	13 month	16	28
6. Framing / Rough In	13 month	16	28
7. Finishes	17 month	22	38

Please note that adjustments in the above schedule may occur due to currently unforeseen circumstances, however the schedule represents a conservative approach whereby the components on both the East and West Sites are constructed simultaneously.

To reflect the maximum construction traffic generation from the Project Site and to the surrounding streets, it is assumed that all construction-related vehicles, including construction worker private vehicles, would access and park, or be stored on (or within a half-mile) of the Project Site throughout the construction process. Likewise, it is expected that on-site construction activity will

fluctuate on a weekly basis, depending largely on the number of workers and construction trucks needed for the on-going activities during each particular time period. However, to remain conservative, the portion of the Project construction phase generating the highest daily construction-related traffic was analyzed as representing the entire phase.

Based on the total amount of proposed Project construction work and the anticipated durations, the maximum number of delivery/haul trucks and construction workers on-site per day will vary according to the construction phases as shown in Table 2 below.

Table 2
Project Construction Delivery/Haul Trucks and Workers by Phase

Phase	Truck Loads/Day	Workers/Day
1. Demolition	6 trucks	14 workers
2. Excavation & Shoring	120 trucks	75 workers
3. Foundation & Below Grade	40 trucks	100 workers
4. Building Superstructure	60 trucks	175 workers
5. Exterior Finishing	40 trucks	225 workers
6. Framing / Rough In	20 trucks	400 workers
7. Finishes	50 trucks	700 workers

Construction Trip Generation

The traffic-generating characteristics of various land uses have been surveyed and documented in many studies conducted under the auspices of the Institute of Transportation Engineers (ITE). The most recent information is provided in the 9th Edition of the ITE Trip Generation manual, which was used as the basis for calculating the non delivery/haul vehicle trips associated with the construction of the Project. Commute patterns of workers and support needs will be similar to the typical industrial workers. Therefore, the Daily and AM and PM peak hour trip rates used for determining the Project's non delivery/haul vehicle trip generating potential per construction worker is considered to be approximately the same or less than the per employee rates developed for General Light Industrial uses. These rates are shown in Table 3.

Table 3
Project Trip Generation Rates and Equations

General Light Industrial (per employee) – LU 110

Daily:	T = 3.02 (E)
AM Peak Hour:	T = 0.44 (E); I/B = 83%, O/B = 17%
PM Peak Hour:	T = 0.42 (E); I/B = 21%, O/B = 79%

Where:
T = trip ends E = employee
I/B = inbound O/B = outbound

Source: Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington D.C., 2012.

The ITE rates are for ongoing operations of all vehicle trips, including trips from trucks. However, to be conservative, construction delivery/haul truck trips were calculated separately

and added to the trips of construction workers. Further, in order to categorize the traffic impacts of construction trucks, each truck trip was given a Passenger Car Equivalent (PCE) via a standardized multiplier. Using factors in the Interim Materials on Highway Capacity, Circular Number 212, construction truck trips are expected to have a PCE multiplier of 2.5. Using the above conservative assumptions, a construction-related trip generation estimate was calculated for the peak of each phase and is illustrated in Table 4 below.

Table 4
Construction-Related Trip Generation by Phase

Construction Stages			Daily	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total		PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
1. Demolition	Workers	14 /day	42	5	1	6		1	5	6
	Delivery/Haul Trucks *	6 /day	30	2	2	4		2	2	4
	Phase 1 Total		**72**	**7**	**3**	**10**	**0**	**3**	**7**	**10**
2. Excavation & Shoring	Workers	75 /day	227	27	6	33		7	25	32
	Delivery/Haul Trucks **	120 /day	600	0	0	0		0	0	0
	Phase 2 Total		**827**	**27**	**6**	**33**	**0**	**7**	**25**	**32**
3. Foundation & Below Grade	Workers	100 /day	302	37	7	44		9	33	42
	Delivery/Haul Trucks *	40 /day	200	13	13	26		13	13	26
	Phase 3 Total		**502**	**50**	**20**	**70**	**0**	**22**	**46**	**68**
4. Building Superstructure	Workers	175 /day	529	64	13	77		16	58	74
	Delivery/Haul Trucks *	60 /day	300	19	19	38		19	19	38
	Phase 4 Total		**829**	**83**	**32**	**115**	**0**	**35**	**77**	**112**
5. Exterior Finishing	Workers	225 /day	680	82	17	99		20	75	95
	Delivery/Haul Trucks *	40 /day	200	13	13	26		13	13	26
	Phase 5 Total		**880**	**95**	**30**	**125**	**0**	**33**	**88**	**121**
6. Framing / Rough In	Workers	400 /day	1,208	146	30	176		35	133	168
	Delivery/Haul Trucks *	20 /day	100	7	7	14		7	7	14
	Phase 6 Total		**1,308**	**153**	**37**	**190**	**0**	**42**	**140**	**182**
7. Finishes	Workers	700 /day	2,114	256	52	308		62	232	294
	Delivery/Haul Trucks *	50 /day	250	16	16	32		16	16	32
	Phase 7 Total		**2,364**	**272**	**68**	**340**	**0**	**78**	**248**	**326**
Total Maximum Daily Construction Trips			**2,364**	**272**	**68**	**340**	**0**	**78**	**248**	**326**

* In passenger car equivalents (PCEs) using a PCE factor of 2.5 per truck; Truck trips are divided into 8 working hours to calculate hourly trips.

** Soils import/export truck trips are not allowed in the peak hours.

As illustrated in Table 4, the maximum number of construction-related vehicles accessing the Project Site is expected to occur during the maximum intensity time within Phase 7. For the purpose of a conservative study, the following analysis assumes the Phase 7 maximum trip generation (2,364 daily trips with 340 AM Peak Hour trips and 326 PM Peak Hour trips) for the duration of all seven phases.

Since construction workers are expected to live throughout the Los Angeles region, they are also expected to travel to the Project Site from all directions. As such, the construction workers' trip distribution is assumed to be the same as the Project office use distribution in the analysis below, since the distribution is based on the assumption that the Project employees will also live throughout the region. The construction worker trip distribution is shown in Figure 1 of Attachment A.

The local portion of the delivery/haul truck route is mainly from/to the US 101 Freeway. Therefore, a separate distribution was developed and used for the delivery/haul truck route. The distribution of delivery/haul truck trips is shown in Figure 2 of Attachment A. Using these assignment percentages, construction period traffic volumes for the AM and PM peak hours are shown in Figures 3(a) and 3(b) of Attachment A, respectively. These trips are analyzed in the following sections in order to determine the maximum Project traffic impacts expected to occur during the construction period.

Intersection Construction Traffic Impacts of the Project

This technical report analyzes the temporary construction-related traffic impacts at all of the study intersections analyzed in the June 2012 Project's Traffic Study. This analysis utilizes the same methodology used in the June 2012 Traffic Study, which are the procedures outlined in Circular Number 212 of the Transportation Research Board[1]. In the Critical Movement Analysis for signalized intersections (CMA) section of the aforementioned circular, procedures were developed by the Transportation Research Board to determine an intersection's operating characteristics. Standardized categories listing the "Level of Service" considering various traffic volumes, signal phases, etc. were then utilized to make the evaluation of an intersection's operating condition understandable to the public. The term "Level of Service" (LOS) refers to the quality of traffic flow at an intersection. For convenience purposes the various LOS levels have been alpha-numerically indexed from LOS A to LOS F, where LOS A to C represents the best operating conditions and LOS F represents the worst. Specifically, LOS D is the typical maximum level for which a metropolitan area street system is designed. Contrarily, LOS E represents a street system where traffic volumes are at or near its capacity and consequently may result in stoppages of momentary duration and fairly unstable flow. Likewise, LOS F occurs when a facility becomes overloaded and is subsequently characterized by stop-and-go traffic with stoppages of long duration.

A determination of the LOS at an intersection, where traffic volumes are known or have been projected, can be obtained through a summation of the critical movement volumes at that intersection. Once the sum of the critical movement volumes has been obtained, the values in Table 5 can be used to determine the applicable LOS.

[1] Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980

Table 5
Critical Movement Volume Ranges*
For Determining Levels of Service (LOS)

	Maximum Sum of Critical Volumes (VPH)				
Level of Service	Two Phase	Three Phase	Four or More Phases	2-Way STOP Sign Controlled	4-Way STOP Sign Controlled
A	900	855	825	720	600
B	1,050	1,000	965	840	700
C	1,200	1,140	1,100	960	800
D	1,350	1,275	1,225	1,080	900
E	1,500	1,425	1,375	1,200	1,000
F	----------Not Applicable----------				

* For planning applications only, i.e., not appropriate for operations and design applications.

To calculate the applicable LOS at an intersection, a "capacity" for the intersection must be assumed. Capacity is the total maximum hourly volume of vehicles in the intersections critical lanes which has a reasonable expectation of passing through the intersection under the prevailing roadway and traffic conditions. For planning purposes, the capacity for signalized intersections equates to the maximum critical movement value at LOS E, as indicated in Table 5.
By applying the aforementioned analysis procedures to the study intersections, the CMA values and the corresponding LOS for future traffic conditions were calculated. These basic CMA calculations were adjusted, however, to account for traffic signal enhancements that are not considered in the CMA methodology, such as the City of Los Angeles' ATSAC and ATCS System. These computerized control systems have been found by LADOT to substantially increase system capacity and reduce motorist delay. Therefore, per LADOT policy, the CMA values calculated using the standard methodology was reduced by 0.07 at the signalized intersections where the ATSAC system has been implemented. For the signalized intersections with both ATSAC and ATCS, a reduction of 0.10 was applied in order to approximate the improvement in intersection capacity resulting from the ATSAC/ATCS implementation.

The CMA values for signalized intersections describe different traffic flow characteristics. A description of the different LOS and their corresponding CMA values are shown in Table 6. The analysis of existing and future traffic conditions at the study intersections Study was conducted using the same procedures and assumptions described in the June 2012 Traffic Study[2].
Specifically, to be conservative and consistent with previous analyses, the "Existing (2011) Plus Construction" traffic volumes were based on the "Existing (2011) Without Project" traffic volumes from the June 2012 Traffic Study, plus the addition of the volumes from Figures 3(a) and 3(b) that contain the maximum construction-related traffic volumes. The "Future (2020) With Construction" traffic volumes were based on the "Future (2020) Without Project" volumes of the June 2012 Traffic Study, plus the addition of the volumes from Figures 3(a) and 3(b) that contain the maximum construction-related traffic volumes.

[2] Millennium Hollywood Traffic Impact Report, June 2012.

Table 6
Level of Service (LOS)
As a Function of Critical Movement Analysis (CMA) and
Intersection Capacity Utilization (ICU) Values

Level of Service	Description of Operating Characteristics	Range of CMA/ICU Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.60
B	Same as above.	>0.60 < 0.70
C	Light congestion; occasional backups on critical approaches.	>0.70 < 0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80 < 0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90 < 1.00
F	Forced flow with stoppages of long duration.	> 1.00

The existing physical roadway conditions and signal information were based on the June 2012 Traffic Study.

The City of Los Angeles defines a significant traffic impact based on a "stepped scale," with intersections with high volume-to-capacity ratios being more sensitive to additional traffic than intersections operating with more available capacity. According to LADOT policy, a significant impact is identified as an increase in the CMA value (i.e., V/C ratio), due to project-related traffic, of 0.010 or more when the final ("With Project") Level of Service is E or F, a CMA increase of 0.020 or more when the final Level of Service is LOS D, or an increase of 0.040 or more when the final Level of Service is LOS C. No significant impacts are deemed to occur with a final LOS of A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays. These criteria are summarized in Table 7 below.

Table 7
LADOT Criteria for Significant Traffic Impact

LOS	Final CMA Value	Project-Related Increase in CMA Value
C	0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E, F	> 0.900	equal to or greater than 0.010

The Project's maximum construction period impacts on existing and future conditions were calculated and are summarized in Table 8.

Table 8
Existing (2011) and Future (2020) Critical Movement Analysis (CMA)
Without and With Project Construction Trips

			Existing (2011)					Future (2020)					
		Peak	W/O Construction		With Construction			W/O Construction		With Construction			
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact	
1	Cahuenga Boulevard &	AM	0.353	A	0.354	A	0.001	0.409	A	0.411	A	0.002	
	US-101 Fwy. NB Off-Ramp	PM	0.648	B	0.652	B	0.004	0.749	C	0.753	C	0.004	
2	Highland Avenue (North) &	AM	0.734	C	0.744	C	0.010	0.855	D	0.864	D	0.009	
	Franklin Avenue	PM	0.833	D	0.835	D	0.002	0.978	E	0.980	E	0.002	
3	Highland Avenue (South) &	AM	0.763	C	0.763	C	0.000	0.873	D	0.873	D	0.000	
	Franklin Avenue	PM	0.744	C	0.744	C	0.000	0.869	D	0.869	D	0.000	
4	Cahuenga Boulevard &	AM	0.833	D	0.837	D	0.004	0.967	E	0.970	E	0.003	
	Franklin Avenue	PM	0.955	E	0.963	E	0.008	1.104	F	1.113	F	0.009	
5	Vine St. &	AM	0.377	A	0.378	A	0.001	0.435	A	0.435	A	0.000	
	Franklin Ave./US-101 Fwy. SB Off-Ramp	PM	0.628	B	0.632	B	0.004	0.716	C	0.721	C	0.005	
6	Argyle Ave. &	AM	0.669	B	0.680	B	0.011	0.854	D	0.865	D	0.011	
	Franklin Ave./US-101 Fwy. NB On-Ramp	PM	0.789	C	0.807	D	0.018	1.067	F	1.083	F	0.016	*
7	Gower Street &	AM	0.591	A	0.597	A	0.006	0.677	B	0.683	B	0.006	
	Franklin Avenue	PM	0.752	C	0.755	C	0.003	0.867	D	0.871	D	0.004	
8	Beachwood Drive &	AM	0.663	B	0.671	B	0.008	0.755	C	0.763	C	0.008	
	Franklin Avenue	PM	0.664	B	0.670	B	0.006	0.764	C	0.769	C	0.005	
9	Cahuenga Boulevard &	AM	0.447	A	0.448	A	0.001	0.538	A	0.539	A	0.001	
	Yucca Street	PM	0.617	B	0.622	B	0.005	0.723	C	0.729	C	0.006	
10	Ivar Avenue &	AM	0.095	A	0.113	A	0.018	0.125	A	0.149	A	0.024	
	Yucca Street	PM	0.169	A	0.181	A	0.012	0.217	A	0.229	A	0.012	
11	Vine Street &	AM	0.429	A	0.481	A	0.052	0.545	A	0.598	A	0.053	
	Yucca Street	PM	0.378	A	0.420	A	0.042	0.514	A	0.565	A	0.051	
12	Argyle Avenue &	AM	0.111	A	0.163	A	0.052	0.256	A	0.309	A	0.053	
	Yucca Street	PM	0.300	A	0.357	A	0.057	0.533	A	0.590	A	0.057	
13	Fuller Avenue &	AM	0.507	A	0.507	A	0.000	0.642	B	0.643	B	0.001	
	Hollywood Boulevard	PM	0.425	A	0.428	A	0.003	0.585	A	0.588	A	0.003	
14	La Brea Avenue &	AM	0.898	D	0.899	D	0.001	1.099	F	1.103	F	0.004	
	Hollywood Boulevard	PM	0.737	C	0.741	C	0.004	0.984	E	0.988	E	0.004	
15	Highland Avenue &	AM	0.708	C	0.710	C	0.002	0.931	E	0.932	E	0.001	
	Hollywood Boulevard	PM	0.741	C	0.746	C	0.005	1.106	F	1.112	F	0.006	
16	Cahuenga Boulevard &	AM	0.741	C	0.772	C	0.031	1.002	F	1.015	F	0.013	*
	Hollywood Boulevard	PM	0.701	C	0.709	C	0.008	0.947	E	0.955	E	0.008	
17	Ivar Avenue &	AM	0.366	A	0.371	A	0.005	0.535	A	0.541	A	0.006	
	Hollywood Boulevard	PM	0.416	A	0.421	A	0.005	0.607	B	0.613	B	0.006	
18	Vine Street &	AM	0.734	C	0.762	C	0.028	0.972	E	1.000	F	0.028	*
	Hollywood Boulevard	PM	0.703	C	0.723	C	0.020	0.972	E	0.994	E	0.022	*
19	Argyle Avenue &	AM	0.445	A	0.459	A	0.014	0.719	C	0.733	C	0.014	
	Hollywood Boulevard	PM	0.617	B	0.630	B	0.013	0.969	E	0.978	E	0.009	
20	Gower Street &	AM	0.693	B	0.706	C	0.013	0.999	E	1.013	F	0.014	*
	Hollywood Boulevard	PM	0.637	B	0.648	B	0.011	0.913	E	0.925	E	0.012	*

Table 8 (continued)
Existing (2011) and Future (2020) Critical Movement Analysis (CMA)
Without and With Project Construction Trips

No.	Intersection	Peak Hour	Existing (2011) W/O Construction CMA	LOS	With Construction CMA	LOS	Impact		Future (2020) W/O Construction CMA	LOS	With Construction CMA	LOS	Impact	
21	Bronson Avenue &	AM	0.527	A	0.539	A	0.012		0.723	C	0.735	C	0.012	
	Hollywood Boulevard	PM	0.479	A	0.489	A	0.010		0.682	B	0.692	B	0.010	
22	US-101 Fwy. SB Ramps &	AM	0.471	A	0.483	A	0.012		0.661	B	0.673	B	0.012	
	Hollywood Boulevard	PM	0.357	A	0.360	A	0.003		0.532	A	0.534	A	0.002	
23	US-101 Fwy. NB Ramps &	AM	0.340	A	0.353	A	0.013		0.515	A	0.528	A	0.013	
	Hollywood Boulevard	PM	0.311	A	0.313	A	0.002		0.511	A	0.515	A	0.004	
24	Cahuenga Boulevard &	AM	0.468	A	0.469	A	0.001		0.655	B	0.656	B	0.001	
	Selma Avenue	PM	0.561	A	0.562	A	0.001		0.761	C	0.762	C	0.001	
25	Ivar Avenue &	AM	0.121	A	0.125	A	0.004		0.241	A	0.245	A	0.004	
	Selma Avenue	PM	0.294	A	0.297	A	0.003		0.431	A	0.434	A	0.003	
26	Vine Street &	AM	0.467	A	0.471	A	0.004		0.697	B	0.700	C	0.003	
	Selma Avenue	PM	0.512	A	0.516	A	0.004		0.757	C	0.761	C	0.004	
27	Argyle Avenue And	AM	0.256	A	0.261	A	0.005		0.467	A	0.472	A	0.005	
	Selma Avenue	PM	0.338	A	0.343	A	0.005		0.655	B	0.661	B	0.006	
28	Highland Avenue &	AM	0.886	D	0.887	D	0.001		1.170	F	1.171	F	0.001	
	Sunset Boulevard	PM	0.831	D	0.832	D	0.001		1.065	F	1.068	F	0.003	
29	Cahuenga Boulevard &	AM	0.673	B	0.676	B	0.003		0.866	D	0.870	D	0.004	
	Sunset Boulevard	PM	0.703	C	0.707	C	0.004		0.931	E	0.934	E	0.003	
30	Ivar Avenue &	AM	0.355	A	0.365	A	0.010		0.475	A	0.484	A	0.009	
	Sunset Boulevard	PM	0.513	A	0.515	A	0.002		0.661	B	0.664	B	0.003	
31	Vine Street &	AM	0.806	D	0.816	D	0.010	*	1.031	F	1.040	F	0.009	
	Sunset Boulevard	PM	0.737	C	0.740	C	0.003		1.076	F	1.079	F	0.003	
32	Argyle Avenue &	AM	0.439	A	0.443	A	0.004		0.669	B	0.671	B	0.002	
	Sunset Boulevard	PM	0.443	A	0.449	A	0.006		0.773	C	0.778	C	0.005	
33	Cahuenga Boulevard &	AM	0.341	A	0.343	A	0.002		0.435	A	0.437	A	0.002	
	De Longpre Avenue	PM	0.389	A	0.391	A	0.002		0.502	A	0.503	A	0.001	
34	Vine Street &	AM	0.468	A	0.473	A	0.005		0.593	A	0.597	A	0.004	
	De Longpre Avenue	PM	0.585	A	0.597	A	0.012		0.736	C	0.747	C	0.011	
35	Vine Street &	AM	0.684	B	0.690	B	0.006		0.907	E	0.913	E	0.006	
	Fountain Avenue	PM	0.765	C	0.768	C	0.003		1.022	F	1.026	F	0.004	
36	Vine Street &	AM	0.754	C	0.765	C	0.011		0.989	E	1.000	E	0.011	*
	Santa Monica Boulevard	PM	0.797	C	0.804	D	0.007		1.070	F	1.077	F	0.007	
37	Vine Street &	AM	0.747	C	0.752	C	0.005		0.961	E	0.966	E	0.005	
	Melrose Avenue	PM	0.821	D	0.823	D	0.002		1.039	F	1.041	F	0.002	

An * indicates a significant impact (LADOT Revised Scale).

As shown in the Impact columns of Table 8, construction of the Project is expected to significantly impact one study intersection under the Existing (2011) conditions and five study intersections under the Future (2020) conditions. All these study intersections which are significantly impacted by the Project's construction traffic were concluded to be study intersections which are significantly impacted by the Project's traffic analyzed in the June 2012 Traffic Study. The CMA calculation worksheets used to develop this table are included in Attachment B.

By applying the same mitigation measures as proposed in the June 2012 Traffic Study, all of the significant Project construction traffic impacts would be mitigated to less than significant level except one study intersection – Vine Street and Hollywood Boulevard under the Future (2020) conditions. The results are shown in Table 9 for the Existing (2011) conditions and Table 10 for the Future (2020) conditions with the implementation of the recommended mitigation. In the June 2012 Traffic Study, this same intersection and 4 other intersections were reported to have significant impacts remaining with the recommended mitigation measures. The CMA calculation worksheets used to develop this table are included in Attachment B.

Table 9
Existing (2011) Critical Movement Analysis (CMA)
Without and With Mitigation Measure

			Existing (2011)								
			W/O Construction		With Construction				With Construction With Mitigation		
No.	Intersection	Peak Hour	CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact
31	Vine Street & Sunset Boulevard	AM	0.806	D	0.816	D	0.010	*	0.805	D	-0.001
		PM	0.737	C	0.740	C	0.003		0.730	C	-0.007

An * indicates a significant impact (LADOT Revised Scale).

Table 10
Future (2020) Critical Movement Analysis (CMA)
Without and With Project Construction Trips

			Future (2020)								
			W/O Construction		With Construction				With Construction With Mitigation		
No.	Intersection	Peak Hour	CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact
6	Argyle Ave. & Franklin Ave./US-101 Fwy. NB On-Ramp	AM	0.854	D	0.865	D	0.011		0.814	D	-0.040
		PM	1.067	F	1.083	F	0.016	*	1.056	F	-0.011
16	Cahuenga Boulevard & Hollywood Boulevard	AM	1.002	F	1.015	F	0.013	*	1.004	F	0.002
		PM	0.947	E	0.955	E	0.008		0.943	E	-0.004
18	Vine Street & Hollywood Boulevard	AM	0.972	E	1.000	F	0.028	*	0.986	E	0.014 *
		PM	0.972	E	0.994	E	0.022	*	0.981	E	0.009
20	Gower Street & Hollywood Boulevard	AM	0.999	E	1.013	F	0.014	*	1.001	F	0.002
		PM	0.913	E	0.925	E	0.012	*	0.913	E	0.000
36	Vine Street & Santa Monica Boulevard	AM	0.989	E	1.000	E	0.011	*	0.989	E	0.000
		PM	1.070	F	1.077	F	0.007		1.066	F	-0.004

An * indicates a significant impact (LADOT Revised Scale).

Parking During Construction

In the event that both the East and West Sites are built out simultaneously, parking for construction workers will be located off-site with shuttle service if necessary and all staging and lay down areas will be on-site and/or in the sidewalk and parking curb lanes until the below grade parking structure is completed. If the East and West Sites are built out separately, construction worker parking and staging will be at the undeveloped portion of the Project Site. If one Site's development has been completed, worker parking would occur at the completed

parcel. Under both circumstances, should enough on-site parking capacity not exist, construction worker parking will be off-site and off-street.

Two mitigation measures were proposed in the Draft EIR:

> Mitigation Measure K.1-1: To mitigate potential temporary traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Project Applicant shall, prior to construction, develop a Construction Management Plan/Worksite Traffic Control Plan (WTCP) to be approved by LADOT. The WTCP will be designed to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation on the public streets in the area of the Project. The WTCP shall include temporary roadway striping and signage for traffic flow as necessary, elements compliant with conditions xv through xvii in Measure K.1-3, and the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project. The Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Any construction related hauling traffic shall be restricted to off-peak hours.
>
> Mitigation Measure K.2-2: Off-street parking shall be provided for all construction-related employees generated by the Project. No employees or subcontractors shall be allowed to park on surrounding residential streets for the duration of all construction activities. There shall be no staging or parking of heavy construction vehicles on the surrounding street for the duration of all construction activities. There shall be no staging or parking of construction vehicles, including vehicles that transport workers, on any residential street in the immediate area. All construction vehicles shall be stored on-site unless returned to the base of operations.

With implementation of the above mitigation measures, parking impacts associated with construction worker parking would be less than significant.

ATTACHMENT A

Figures

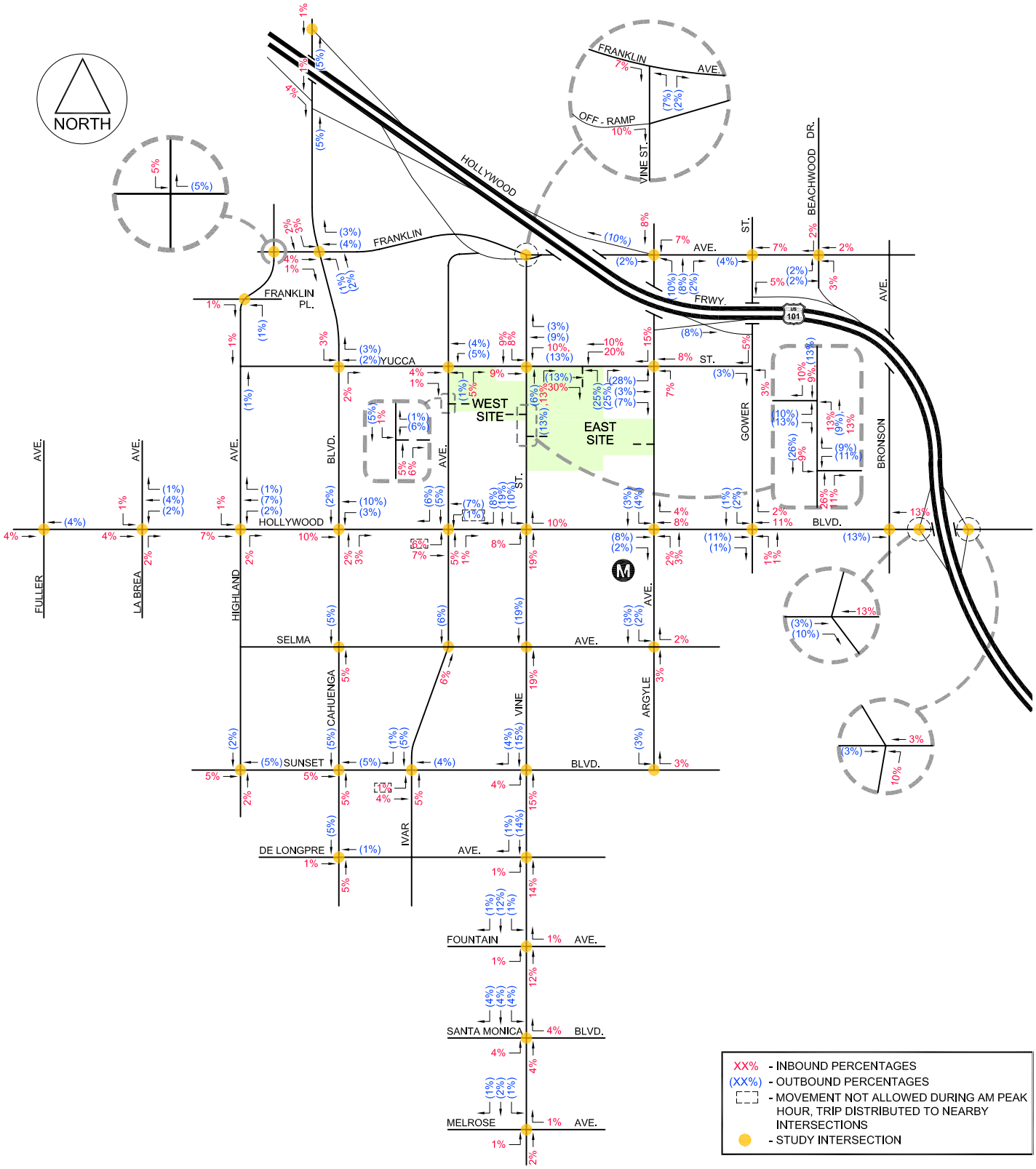


FIGURE 1

6/15/2012

Millennium Hollywood - Capitol Records\2012-12 CONSTRUCTION\ PROJ-DIST-A2(b).dwg

CONSTRUCTION WORKER DISTRIBUTION PERCENTAGES

CRAIN & ASSOCIATES
Transportation Planning
Traffic Engineering
300 Corporate Pointe, Suite 470
Culver City, California 90230
PH (310) 473 6508 F (310) 444 9771
www.crainandassociates.com

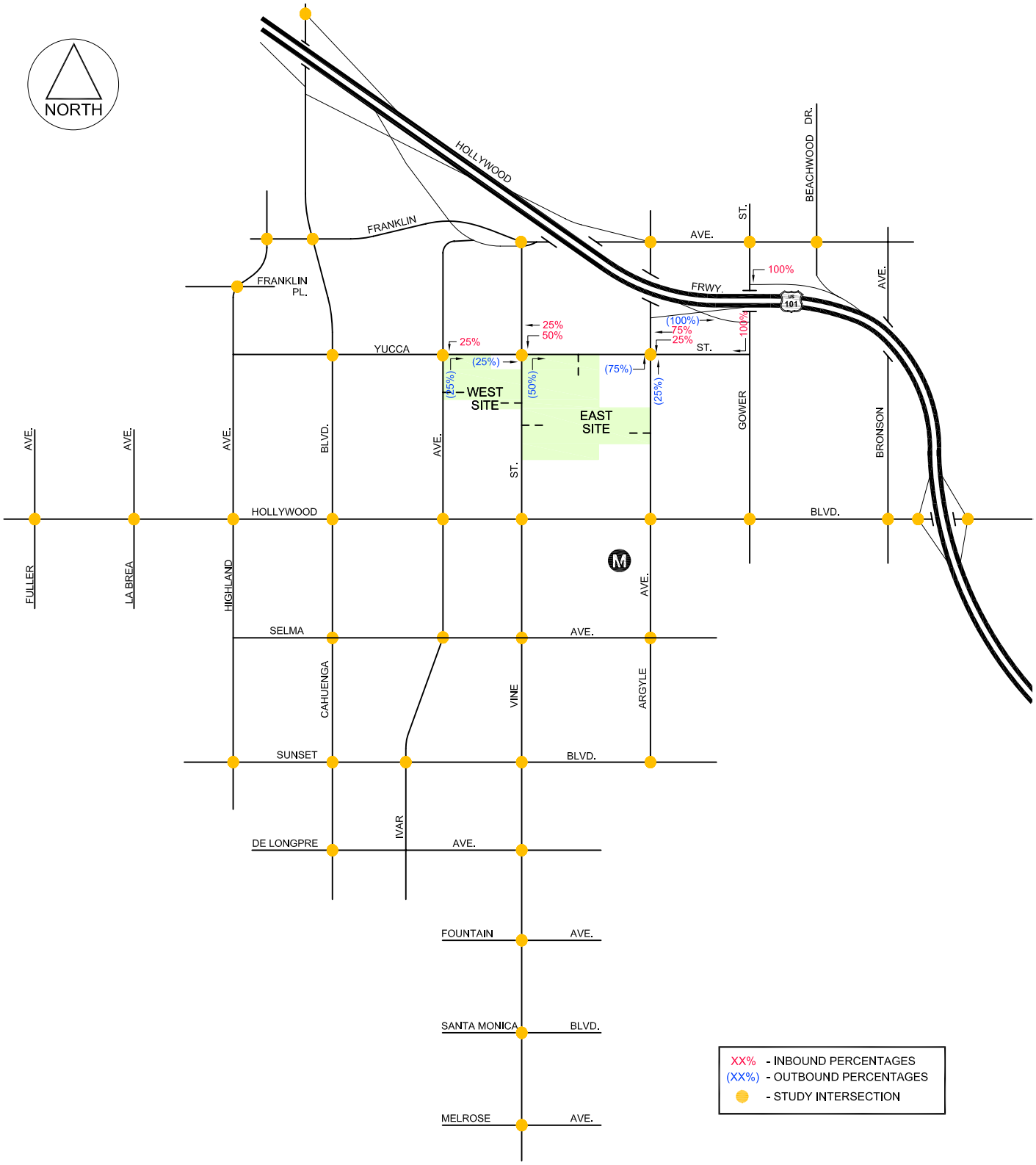


FIGURE 2

6/15/2012

Millennium Hollywood - Capitol Records\2012-12 CONSTRUCTION\ PROJ-DIST-TRUCK.dwg

TRUCK DISTRIBUTION PERCENTAGES

CRAIN & ASSOCIATES
Transportation Planning
Traffic Engineering
300 Corporate Pointe, Suite 470
Culver City, California 90230
PH (310) 473 6508 F (310) 444 9771
www.crainandassociates.com

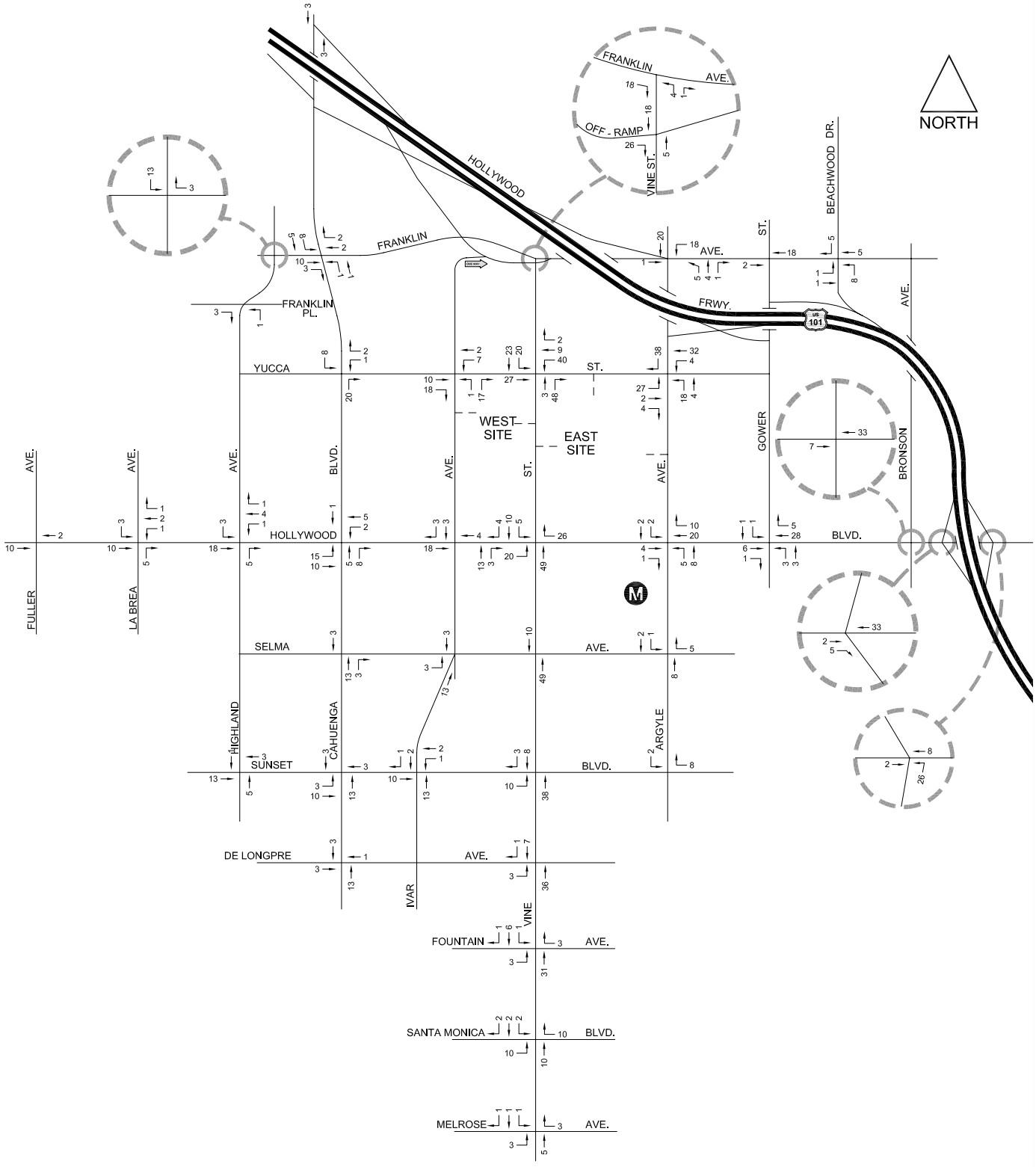


FIGURE 3(a)

12/27/2012

Millennium Hollywood - Capitol Records\2012-12 CONSTRUCTION\AMCONSTRUCTION

STICK(FUTURE)

PROJECT CONSTRUCTION TRAFFIC VOLUMES
AM PEAK HOUR

CRAIN & ASSOCIATES
Transportation Planning
Traffic Engineering
300 Corporate Pointe, Suite 470
Culver City, California 90230
PH (310) 473 6508 F (310) 444 9771
www.crainandassociates.com

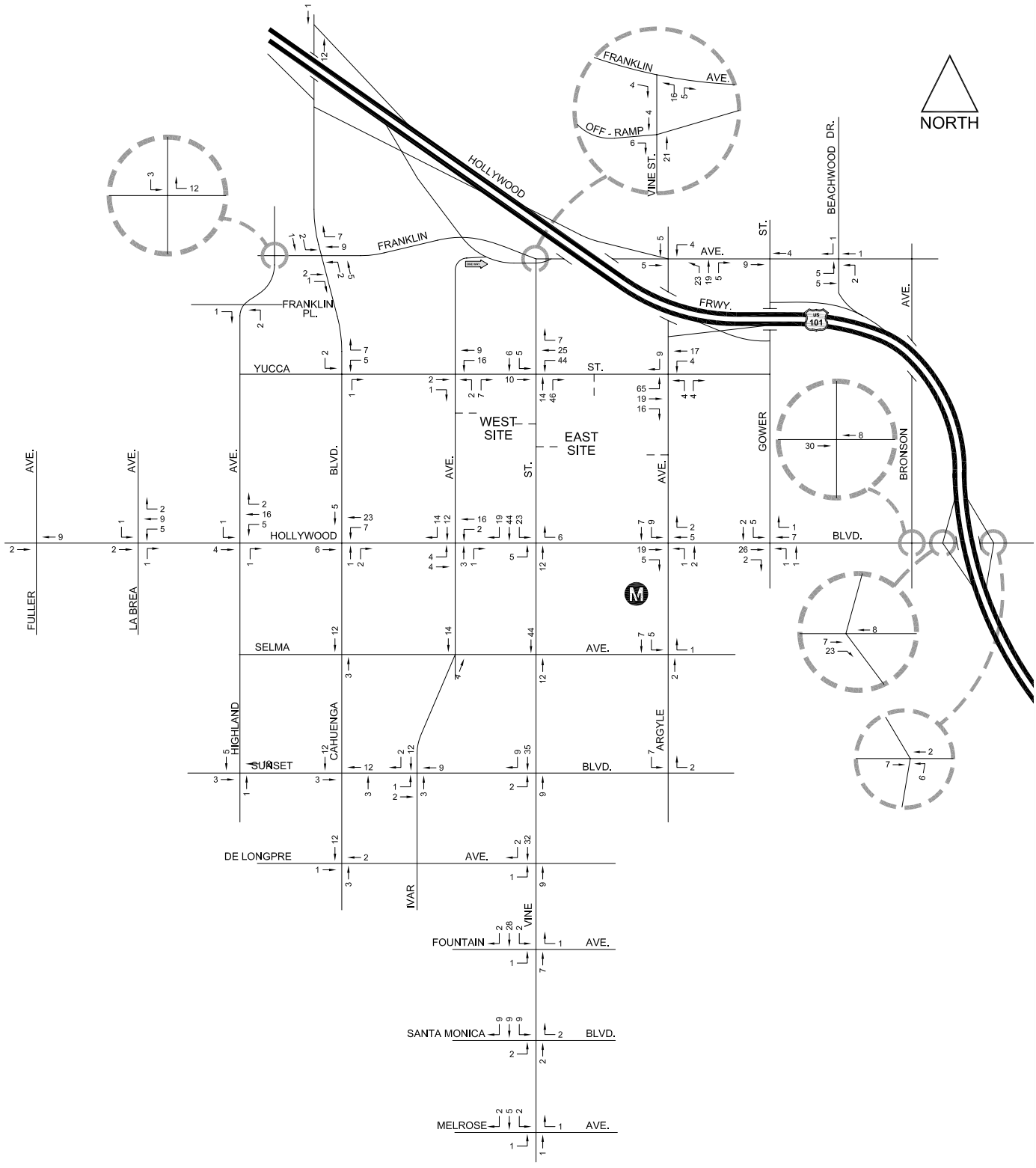


FIGURE 3(b)

12/27/2012

Millennium Hollywood - Capitol Records\2012-12 CONSTRUCTION\PMCONSTRUCTION

STICK(FUTURE)

PROJECT CONSTRUCTION TRAFFIC VOLUMES
PM PEAK HOUR

CRAIN & ASSOCIATES
Transportation Planning
Traffic Engineering
300 Corporate Pointe, Suite 470
Culver City, California 90230
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www.crainandassociates.com

ATTACHMENT B

Critical Movement Analysis (CMA) Worksheets

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
1	East-West Street:	US-101 FWY. NB OFF-RAMP	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	1035	2	**518**	3	1038	**519**	38	1170	2	**585**	3	1173	2	**587**		1173		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
Left-Through		0							0				0					
Through	845	2	423	3	848	424	0	924	2	462	3	927	2	464		927		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	277	1	**162**	0	277	**162**	4	307	1	**179**	0	307	1	**179**		307		**0**
Left-Through		0							0				0					
Through	0	0	162	0	0	162	0	0	0	179	0	0	0	179		0		0
Through-Right		0							0				0					
Right	46	0	0	0	46	0	0	50	0	0	0	50	0	0		50		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		518	*North-South:*		519	*North-South:*			585	*North-South:*			587	*North-South:*			0
	East-West:		162	*East-West:*		162	*East-West:*			179	*East-West:*			179	*East-West:*			0
	SUM:		680	*SUM:*		681	*SUM:*			764	*SUM:*			766	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.453			0.454				0.509				0.511				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.353**			**0.354**				**0.409**				**0.411**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2
Override Capacity	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.409
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
1	East-West Street:	US-101 FWY. NB OFF-RAMP	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	2068	2	**1034**	12	2080	**1040**	86	2348	2	**1174**	12	2360	2	**1180**		2360		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
Left-Through		0							0				0					
Through	326	2	163	1	327	164	0	357	2	179	1	358	2	179		358		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	117	1	**88**	0	117	**88**	6	134	1	**99**	0	134	1	**99**		134		**0**
Left-Through		0							0				0					
Through	0	0	88	0	0	88	0	0	0	99	0	0	0	99		0		0
Through-Right		0							0				0					
Right	58	0	0	0	58	0	0	63	0	0	0	63	0	0		63		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		1034	*North-South:*		1040	*North-South:*			1174	*North-South:*			1180	*North-South:*			0
	East-West:		88	*East-West:*		88	*East-West:*			99	*East-West:*			99	*East-West:*			0
	SUM:		1122	*SUM:*		1128	*SUM:*			1273	*SUM:*			1279	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.748			0.752				0.849				0.853				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.648**			**0.652**				**0.749**				**0.753**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**C**				**A**

	NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--	
No. of Phases					2					2					2					2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0					0					0					0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?					2					2					2					2
Override Capacity					0					0					0					0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.749
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	**North-South Street:**	HIGHLAND AVENUE (NORTH)	**Year of Count:** 2011	**Ambient Growth: (%):** 1	**Conducted by:**	**Date:**	12/27/2012
2	**East-West Street:**	FRANKLIN AVENUE	**Projection Year:** 2020	**Peak Hour:** AM	**Reviewed by:** HS	**Project:**	

No. of Phases	3	3	3	3	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	*NB--* 3 *SB--* 0 *EB--* 0 *WB--* 3	*NB--* 3 *SB--* 0 *EB--* 0 *WB--* 3	*NB--* 3 *SB--* 0 *EB--* 0 *WB--* 3	*NB--* 3 *SB--* 0 *EB--* 0 *WB--* 3	*NB--* *SB--* *EB--* *WB--*
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

	MOVEMENT	**EXISTING CONDITION**			**EXISTING PLUS PROJECT**			**FUTURE CONDITION W/O PROJECT**				**FUTURE CONDITION W/ PROJECT**				**FUTURE W/ PROJECT W/ MITIGATION**			
		Volume	**No. of Lanes**	**Lane Volume**	**Project Traffic**	**Total Volume**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**
NORTHBOUND	**Left**	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	2316	3	772	0	2316	772	111	2644	3	881	0	2644	3	881		2644		0
	Through-Right		0							0				0					
	Right	148	1	0	0	148	0	14	176	1	0	0	176	1	0		176		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	**Left**	68	1	68	13	81	81	0	74	1	74	13	87	1	87		87		0
	Left-Through		0							0				0					
	Through	2390	3	797	0	2390	797	150	2764	3	921	0	2764	3	921		2764		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	**Left**	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	**Left**	634	2	349	0	634	349	46	739	2	406	0	739	2	406		739		0
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	58	1	0	3	61	0	1	64	1	0	3	67	1	0		67		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	840		*North-South:*	853			*North-South:*	955			*North-South:*	968			*North-South:*	0
			East-West:	349		*East-West:*	349			*East-West:*	406			*East-West:*	406			*East-West:*	0
			SUM:	1189		*SUM:*	1202			*SUM:*	1361			*SUM:*	1374			*SUM:*	0
VOLUME/CAPACITY *(V/C)* RATIO:				0.834			0.844				0.955				0.964				0.000
***V/C* LESS ATSAC/ATCS ADJUSTMENT:**				0.734			0.744				0.855				0.864				0.000
LEVEL OF SERVICE (LOS):				C			C				D				D				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	**Δ*v/c* after mitigation:**	-0.855
Significant impacted?	NO	**Fully mitigated?**	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (NORTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
2	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	2847	3	**949**	0	2847	**949**	166	3280	3	**1093**	0	3280	3	**1093**		3280		0
Through-Right		0							0				0					
Right	333	1	104	0	333	104	30	394	1	117	0	394	1	117		394		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	152	1	**152**	3	155	**155**	0	166	1	**166**	3	169	1	**169**		169		0
Left-Through		0							0				0					
Through	2243	3	748	0	2243	748	162	2615	3	872	0	2615	3	872		2615		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	417	2	**229**	0	417	**229**	47	503	2	**277**	0	503	2	**277**		503		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	219	1	67	12	231	76	1	241	1	75	12	253	1	84		253		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		1101	*North-South:*		1104	*North-South:*			1259	*North-South:*			1262	*North-South:*			0
	East-West:		229	*East-West:*		229	*East-West:*			277	*East-West:*			277	*East-West:*			0
	SUM:		1330	*SUM:*		1333	*SUM:*			1536	*SUM:*			1539	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.933			0.935				1.078				1.080				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.833**			**0.835**				**0.978**				**0.980**				0.000
LEVEL OF SERVICE (LOS):			**D**			**D**				**E**				**E**				**A**

	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--
No. of Phases				3				3				3				3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0				0				0				0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	3	0	0	3	3	0	0	3	3	0	0	3	3	0	0	3				
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				
Override Capacity				0				0				0				0				

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.978
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (SOUTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
3	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--						
	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	**0**	1	1	**0**	30	30	0	**0**	1	31	0	**0**		31		**0**
Left-Through		0							0				0					
Through	1489	2	502	0	1489	502	120	1748	2	589	0	1748	2	589		1748		0
Through-Right		1							1				1					
Right	16	0	16	0	16	16	2	19	0	19	0	19	0	19		19		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	2087	3	696	0	2087	696	176	2459	3	**820**	0	2459	3	**820**		2459		**0**
Through-Right		0							0				0					
Right	1286	1	**712**	0	1286	**712**	13	1419	1	788	0	1419	1	788		1419		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	1136	1	**574**	0	1136	**574**	5	1247	1	**631**	0	1247	1	**631**		1247		0
Left-Through		1							1				1					
Through	12	0	574	0	12	574	1	14	0	631	0	14	0	631		14		**0**
Through-Right		0							0				0					
Right	49	1	49	3	52	52	32	86	1	86	3	89	1	89		89		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	8	1	**8**	0	8	**8**	0	9	1	**9**	0	9	1	**9**		9		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		712	*North-South:*		712	*North-South:*			820	*North-South:*			820	*North-South:*			0
	East-West:		582	*East-West:*		582	*East-West:*			640	*East-West:*			640	*East-West:*			0
	SUM:		1294	*SUM:*		1294	*SUM:*			1460	*SUM:*			1460	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.863			0.863				0.973				0.973				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.763**			**0.763**				**0.873**				**0.873**				0.000
LEVEL OF SERVICE (LOS):			C			C				D				D				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.000	Δ*v/c* after mitigation:	-0.873
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (SOUTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
3	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--						
	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	2	2	0	42	42	0	0	2	44	0	0		44		**0**
	Left-Through		0							0				0					
	Through	1690	2	**567**	0	1690	**567**	180	2028	2	**681**	0	2028	2	**681**		2028		0
	Through-Right		1							1				1					
	Right	11	0	11	0	11	11	2	14	0	14	0	14	0	14		14		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
	Left-Through		0							0				0					
	Through	1678	3	559	0	1678	559	186	2021	3	674	0	2021	3	674		2021		**0**
	Through-Right		0							0				0					
	Right	1206	1	544	0	1206	544	15	1334	1	602	0	1334	1	602		1334		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	1306	1	**662**	0	1306	**662**	15	1443	1	**732**	0	1443	1	**732**		1443		0
	Left-Through		1							1				1					
	Through	18	0	662	0	18	662	1	21	0	732	0	21	0	732		21		**0**
	Through-Right		0							0				0					
	Right	81	1	81	1	82	82	45	134	1	134	1	135	1	135		135		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	37	1	**37**	0	37	**37**	0	40	1	**40**	0	40	1	**40**		40		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		567	*North-South:*		567	*North-South:*			681	*North-South:*			681	*North-South:*			0
		East-West:		699	*East-West:*		699	*East-West:*			772	*East-West:*			772	*East-West:*			0
		SUM:		1266	*SUM:*		1266	*SUM:*			1453	*SUM:*			1453	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.844			0.844				0.969				0.969				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.744**			**0.744**				**0.869**				**0.869**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**D**				**D**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.000	Δ*v/c* after mitigation:	-0.869
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
4	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	19	1	**19**	1	20	**20**	10	31	1	**31**	1	32	1	**32**		32		**0**
	Left-Through		0							0				0					
	Through	663	2	332	1	664	332	32	757	2	379	1	758	2	379		758		0
	Through-Right		0							0				0					
	Right	39	1	0	0	39	0	14	57	1	0	0	57	1	0		57		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	110	1	110	8	118	118	3	123	1	123	8	131	1	131		131		0
	Left-Through		0							0				0					
	Through	1194	1	**637**	5	1199	**639**	54	1360	1	**724**	5	1365	1	**726**		1365		**0**
	Through-Right		1							1				1					
	Right	79	0	79	0	79	79	1	87	0	87	0	87	0	87		87		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	177	1	**177**	0	177	**177**	0	194	1	**194**	0	194	1	**194**		194		0
	Left-Through		0							0				0					
	Through	245	0	307	10	255	320	18	286	0	357	10	296	0	370		296		**0**
	Through-Right		1							1				1					
	Right	62	0	0	3	65	0	3	71	0	0	3	74	0	0		74		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	156	1	156	0	156	156	10	181	1	181	0	181	1	181		181		**0**
	Left-Through		0							0				0					
	Through	567	1	**567**	2	569	**569**	31	651	1	**651**	2	653	1	**653**		653		0
	Through-Right		0							0				0					
	Right	166	1	111	2	168	109	7	189	1	128	2	191	1	126		191		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		656	*North-South:*		659	*North-South:*			755	*North-South:*			758	*North-South:*			0
		East-West:		744	*East-West:*		746	*East-West:*			845	*East-West:*			847	*East-West:*			0
		SUM:		1400	*SUM:*		1405	*SUM:*			1600	*SUM:*			1605	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.933			0.937				1.067				1.070				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.833**			**0.837**				**0.967**				**0.970**				0.000
LEVEL OF SERVICE (LOS):				**D**			**D**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	**0.003**	**Δ*v/c* after mitigation:**	**-0.967**
Significant impacted?	**NO**	**Fully mitigated?**	**N/A**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
4	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0		NB-- 0	SB-- 0	0		NB--	SB--		
	EB-- 0	WB-- 2	2	EB-- 0	WB-- 2	2	EB-- 0	WB-- 2	2		EB-- 0	WB-- 2	2		EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	67	1	67	2	69	69	12	85	1	85	2	87	1	87		87		**0**
	Left-Through		0							0				0					
	Through	1433	2	**717**	5	1438	**719**	70	1637	2	**819**	5	1642	2	**821**		1642		0
	Through-Right		0							0				0					
	Right	89	1	36	0	89	36	15	112	1	43	0	112	1	43		112		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	112	1	**112**	2	114	**114**	9	131	1	**131**	2	133	1	**133**		133		0
	Left-Through		0							0				0					
	Through	560	1	295	1	561	296	54	666	1	350	1	667	1	351		667		**0**
	Through-Right		1							1				1					
	Right	30	0	30	0	30	30	1	34	0	34	0	34	0	34		34		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	196	1	**196**	0	196	**196**	0	214	1	**214**	0	214	1	**214**		214		0
	Left-Through		0							0				0					
	Through	495	1	279	2	497	280	26	567	1	322	2	569	1	324		569		**0**
	Through-Right		1							1				1					
	Right	62	0	62	1	63	63	9	77	0	77	1	78	0	78		78		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	106	1	106	0	106	106	22	138	1	138	0	138	1	138		138		**0**
	Left-Through		0							0				0					
	Through	557	1	**557**	9	566	**566**	33	642	1	**642**	9	651	1	**651**		651		0
	Through-Right		0							0				0					
	Right	474	1	474	7	481	481	7	525	1	525	7	532	1	532		532		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		829	*North-South:*		833	*North-South:*			950	*North-South:*			954	*North-South:*			0
		East-West:		753	*East-West:*		762	*East-West:*			856	*East-West:*			865	*East-West:*			0
		SUM:		1582	*SUM:*		1595	*SUM:*			1806	*SUM:*			1819	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			1.055			1.063				1.204				1.213				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.955**			**0.963**				**1.104**				**1.113**				0.000
	LEVEL OF SERVICE (LOS):			**E**			**E**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-1.104
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE ST.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
5	East-West Street:	FRANKLIN AVE./US-101 FWY. SB OFF	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	133	1	133	4	137	137	9	154	1	154	4	158	1	158		158		0
Through-Right		1							1				1					
Right	266	0	**266**	1	267	**267**	1	292	0	**292**	1	293	0	**293**		293		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	340	2	**187**	0	340	**187**	31	403	2	**222**	0	403	2	**222**		403		0
Left-Through		0							0				0					
Through	58	1	58	18	76	76	2	65	1	65	18	83	1	83		83		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	227	1	**227**	0	227	**227**	0	248	1	**248**	0	248	1	**248**		248		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	736	2	218	0	736	218	40	845	2	243	0	845	2	243		845		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		453	*North-South:*		454	*North-South:*			514	*North-South:*			515	*North-South:*			0
	East-West:		227	*East-West:*		227	*East-West:*			248	*East-West:*			248	*East-West:*			0
	SUM:		680	*SUM:*		681	*SUM:*			762	*SUM:*			763	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.477			0.478				0.535				0.535				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.377**			**0.378**				**0.435**				**0.435**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.000 **Δ*v/c* after mitigation:** -0.435

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE ST.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
5	East-West Street:	FRANKLIN AVE./US-101 FWY. SB OFF	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3				3				3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0				0				0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--		0	NB-- 0	SB--		0	NB--	SB--		
	EB-- 1	WB--	3	EB-- 1	WB--	3	EB-- 1	WB--		3	EB-- 1	WB--		3	EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				
Override Capacity			0			0				0				0				

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	383	1	383	16	399	**399**	7	426	1	426	16	442	1	**441**		442		0
	Through-Right		1							1				1					
	Right	394	0	**394**	5	399	399	3	434	0	**434**	5	439	0	439		439		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	600	2	**330**	0	600	**330**	46	702	2	**386**	0	702	2	**386**		702		0
	Left-Through		0							0				0					
	Through	64	1	64	4	68	68	5	75	1	75	4	79	1	79		79		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	314	1	**314**	0	314	**314**	0	343	1	**343**	0	343	1	**343**		343		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	712	2	62	0	712	62	54	833	2	72	0	833	2	72		833		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		724	North-South:		729	North-South:			820	North-South:			827	North-South:			0
		East-West:		314	East-West:		314	East-West:			343	East-West:			343	East-West:			0
		SUM:		1038	SUM:		1043	SUM:			1163	SUM:			1170	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.728			0.732				0.816				0.821				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.628			0.632				0.716				0.721				0.000
LEVEL OF SERVICE (LOS):				B			B				C				C				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.005 — Δ*v/c* after mitigation: -0.716

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVE.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
6	East-West Street:	FRANKLIN AVE./US-101 FWY. NB ON	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	165	1	**97**	5	170	**101**	179	359	1	**199**	5	364	1	**204**	0	364	2	**200**
Left-Through		1							1				1				0	
Through	28	0	97	4	32	101	8	39	0	199	4	43	0	204	-1	42	0	96
Through-Right		0							0				0				1	
Right	36	1	0	1	37	0	14	53	1	0	1	54	1	0	0	54	0	0
Left-Through-Right		0							0				0				0	
Left-Right																		
SOUTHBOUND																		
Left	76	1	76	0	76	76	0	83	1	83	0	83	1	83	0	83	1	83
Left-Through		0							0				0				0	
Through	128	1	**111**	20	148	**121**	15	155	1	**129**	20	175	1	**139**	-3	172	2	**86**
Through-Right		1							1				1				0	
Right	94	0	94	0	94	94	0	103	0	103	0	103	0	103	0	103	1	0
Left-Through-Right		0							0				0				0	
Left-Right																		
EASTBOUND																		
Left	188	1	**188**	0	188	**188**	0	206	1	**206**	0	206	1	**206**	0	206	1	**206**
Left-Through		0							0				0				0	
Through	525	2	263	1	526	263	24	598	2	299	1	599	2	300	0	599	2	300
Through-Right		0							0				0				0	
Right	120	1	72	0	120	70	8	139	1	40	0	139	1	37	0	139	1	39
Left-Through-Right		0							0				0				0	
Left-Right																		
WESTBOUND																		
Left	171	1	171	18	189	189	20	207	1	207	18	225	1	225	-3	222	1	222
Left-Through		0							0				0				0	
Through	731	1	**662**	0	731	**662**	31	830	1	**778**	0	830	1	**778**	0	830	1	**778**
Through-Right		1							1				1				1	
Right	593	0	593	0	593	593	76	725	0	725	0	725	0	725	0	725	0	725
Left-Through-Right		0							0				0				0	
Left-Right																		
CRITICAL VOLUMES	North-South:		208	North-South:		222	North-South:			328	North-South:			343	North-South:			286
	East-West:		850	East-West:		850	East-West:			984	East-West:			984	East-West:			984
	SUM:		1058	SUM:		1072	SUM:			1312	SUM:			1327	SUM:			1270
VOLUME/CAPACITY (V/C) RATIO:			0.769			0.780				0.954				0.965				0.924
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.669			0.680				0.854				0.865	With Imp.+TDM			0.824
LEVEL OF SERVICE (LOS):			B			B				D				D				D

	EXISTING CONDITION	EXISTING PLUS PROJECT	FUTURE CONDITION W/O PROJECT	FUTURE CONDITION W/ PROJECT	FUTURE W/ PROJECT W/ MITIGATION
No. of Phases	4	4	4	4	4
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	1	1	1	1	1
Right Turns: FREE-1, NRTOR-2 or OLA-3? NB--	3	3	3	3	3
Right Turns: FREE-1, NRTOR-2 or OLA-3? SB--	0	0	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3? EB--	0	0	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3? WB--	0	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	2
Override Capacity	0	0	0	0	0

REMARKS:

With Imp.+TDM+Signal Imp. 0.814 D

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.011 — Δ*v/c* after mitigation: -0.040

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVE.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
6	East-West Street:	FRANKLIN AVE./US-101 FWY. NB ON	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			4			4				4				4				4
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1				1				1				1
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 3 SB--		0	NB-- 3 SB--		0	NB-- 3 SB--			0	NB-- 3 SB--			0	NB-- 3 SB--			0
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--			0	EB-- 0 WB--			0	EB-- 0 WB--			0
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				2
Override Capacity			0			0				0				0				0
NORTHBOUND Left	522	1	**289**	23	545	**310**	276	847	1	**463**	23	870	1	**484**	-4	866	2	**476**
Left-Through		1							1				1				0	
Through	56	0	289	19	75	310	18	79	0	463	19	98	0	484	-3	95	0	314
Through-Right		0							0				0				1	
Right	182	1	65	5	187	66	16	215	1	68	5	220	1	69	-1	219	0	0
Left-Through-Right		0							0				0				0	
Left-Right																		
SOUTHBOUND Left	55	1	55	0	55	55	0	60	1	60	0	60	1	60	0	60	1	**60**
Left-Through		0							0				0				0	
Through	77	1	**61**	5	82	**64**	14	98	1	**74**	5	103	1	**76**	-1	102	2	51
Through-Right		1							1				1				0	
Right	45	0	45	0	45	45	0	49	0	49	0	49	0	49	0	49	1	0
Left-Through-Right		0							0				0				0	
Left-Right																		
EASTBOUND Left	209	1	**209**	0	209	**209**	0	229	1	**229**	0	229	1	**229**	0	229	1	**229**
Left-Through		0							0				0				0	
Through	1005	2	503	5	1010	505	35	1134	2	567	5	1139	2	570	-1	1138	2	569
Through-Right		0							0				0				0	
Right	58	1	0	0	58	0	14	77	1	0	0	77	1	0	0	77	1	0
Left-Through-Right		0							0				0				0	
Left-Right																		
WESTBOUND Left	117	1	117	4	121	121	19	147	1	147	4	151	1	151	-1	150	1	150
Left-Through		0							0				0				0	
Through	678	1	**664**	0	678	**664**	41	783	1	783	0	783	1	783	0	783	1	783
Through-Right		1							1				1				1	
Right	649	0	649	0	649	649	158	868	0	**838**	0	868	0	**838**	0	868	0	**838**
Left-Through-Right		0							0				0				0	
Left-Right																		
CRITICAL VOLUMES	*North-South:*		350	*North-South:*		374	*North-South:*			537	*North-South:*			560	*North-South:*			536
	East-West:		873	*East-West:*		873	*East-West:*			1067	*East-West:*			1067	*East-West:*			1067
	SUM:		1223	*SUM:*		1247	*SUM:*			1604	*SUM:*			1627	*SUM:*			1603
VOLUME/CAPACITY *(V/C)* RATIO:			0.889			0.907				1.167				1.183				1.166
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.789			0.807				1.067				1.083	*With Imp.+TDM*			1.066
LEVEL OF SERVICE (LOS):			C			D				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.056 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.016 | Δ*v/c* after mitigation: -0.011

Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
7	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1			1			1			1				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	177	1	106	0	177	106	19	213	1	**126**	0	213	1	**126**		213		**0**
Left-Through		1							1				1					
Through	34	0	106	0	34	106	2	39	0	126	0	39	0	126		39		0
Through-Right		0							0				0					
Right	244	1	**113**	0	244	**113**	1	268	1	124	0	268	1	124		268		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	39	0	39	0	39	39	0	43	0	43	0	43	0	43		43		0
Left-Through		0							0				0					
Through	114	0	**187**	0	114	**187**	0	125	0	**205**	0	125	0	**205**		125		**0**
Through-Right		0							0				0					
Right	34	0	0	0	34	0	0	37	0	0	0	37	0	0		37		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	13	1	**13**	0	13	**13**	2	16	1	**16**	0	16	1	**16**		16		0
Left-Through		0							0				0					
Through	671	1	371	2	673	372	41	775	1	427	2	777	1	428		777		**0**
Through-Right		1							1				1					
Right	71	0	71	0	71	71	0	78	0	78	0	78	0	78		78		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	263	1	263	0	263	263	0	288	1	288	0	288	1	288		288		**0**
Left-Through		0							0				0					
Through	1337	1	**671**	18	1355	**680**	53	1515	1	**760**	18	1533	1	**769**		1533		0
Through-Right		1							1				1					
Right	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		300	*North-South:*		300	*North-South:*			331	*North-South:*			331	*North-South:*			0
	East-West:		684	*East-West:*		693	*East-West:*			776	*East-West:*			785	*East-West:*			0
	SUM:		984	*SUM:*		993	*SUM:*			1107	*SUM:*			1116	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.691			0.697				0.777				0.783				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.591**			**0.597**				**0.677**				**0.683**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	**0.006**	**Δ*v/c* after mitigation:**	**-0.677**
Significant impacted?	**NO**	**Fully mitigated?**	**N/A**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
7	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1			1			1			1				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	371	1	**259**	0	371	**259**	42	448	1	**305**	0	448	1	**305**		448		**0**
Left-Through		1							1				1					
Through	147	0	259	0	147	259	1	162	0	305	0	162	0	305		162		0
Through-Right		0							0				0					
Right	354	1	247	0	354	247	2	389	1	272	0	389	1	272		389		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	18	0	18	0	18	18	0	20	0	20	0	20	0	20		20		0
Left-Through		0							0				0					
Through	104	0	**152**	0	104	**152**	1	115	0	**168**	0	115	0	**168**		115		**0**
Through-Right		0							0				0					
Right	30	0	0	0	30	0	0	33	0	0	0	33	0	0		33		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	12	1	12	0	12	12	1	14	1	14	0	14	1	14		14		0
Left-Through		0							0				0					
Through	1108	1	**588**	9	1117	**593**	54	1266	1	**670**	9	1275	1	**675**		1275		**0**
Through-Right		1							1				1					
Right	68	0	68	0	68	68	0	74	0	74	0	74	0	74		74		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	215	1	**215**	0	215	**215**	0	235	1	**235**	0	235	1	**235**		235		**0**
Left-Through		0							0				0					
Through	984	1	503	4	988	505	64	1140	1	582	4	1144	1	584		1144		0
Through-Right		1							1				1					
Right	21	0	21	0	21	21	0	23	0	23	0	23	0	23		23		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		411	*North-South:*		411	*North-South:*			473	*North-South:*			473	*North-South:*			0
	East-West:		803	*East-West:*		808	*East-West:*			905	*East-West:*			910	*East-West:*			0
	SUM:		1214	*SUM:*		1219	*SUM:*			1378	*SUM:*			1383	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.852			0.855				0.967				0.971				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.752**			**0.755**				**0.867**				**0.871**				0.000
LEVEL OF SERVICE (LOS):			C			C				D				D				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.867
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BEACHWOOD DRIVE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
8	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 3		NB-- 0	SB-- 3		NB-- 0	SB-- 3			NB-- 0	SB-- 3			NB--	SB--		
	EB-- 0	WB-- 0		EB-- 0	WB-- 0		EB-- 0	WB-- 0			EB-- 0	WB-- 0			EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	8	0	8	8	16	16	4	13	0	13	8	21	0	21		21		**0**
	Left-Through		0							0				0					
	Through	32	0	**58**	0	32	**66**	0	35	0	**69**	0	35	0	**77**		35		0
	Through-Right		0							0				0					
	Right	18	0	0	0	18	0	1	21	0	0	0	21	0	0		21		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	204	1	**204**	0	204	**204**	0	223	1	**223**	0	223	1	**223**		223		0
	Left-Through		0							0				0					
	Through	0	0	240	0	0	245	0	0	0	262	0	0	0	267		0		**0**
	Through-Right		1							1				1					
	Right	240	0	0	5	245	0	0	262	0	0	5	267	0	0		267		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	110	1	**110**	1	111	**111**	0	120	1	**120**	1	121	1	**121**		121		0
	Left-Through		0							0				0					
	Through	665	1	335	1	666	335	43	770	1	387	1	771	1	388		771		**0**
	Through-Right		1							1				1					
	Right	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	4	1	4	0	4	4	5	9	1	9	0	9	1	9		9		**0**
	Left-Through		0							0				0					
	Through	1321	1	**715**	5	1326	**718**	48	1493	1	**806**	5	1498	1	**809**		1498		0
	Through-Right		1							1				1					
	Right	109	0	109	0	109	109	0	119	0	119	0	119	0	119		119		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		262	*North-South:*		270	*North-South:*			292	*North-South:*			300	*North-South:*			0
		East-West:		825	*East-West:*		829	*East-West:*			926	*East-West:*			930	*East-West:*			0
		SUM:		1087	*SUM:*		1099	*SUM:*			1218	*SUM:*			1230	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.763			0.771				0.855				0.863				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.663**			**0.671**				**0.755**				**0.763**				0.000
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.755
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BEACHWOOD DRIVE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
8	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	22	0	22	2	24	24	5	29	0	29	2	31	0	31		31		**0**
	Left-Through		0							0				0					
	Through	51	0	**111**	0	51	**113**	0	56	0	**131**	0	56	0	**133**		56		0
	Through-Right		0							0				0					
	Right	38	0	0	0	38	0	4	46	0	0	0	46	0	0		46		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	162	1	**162**	0	162	**162**	0	177	1	**177**	0	177	1	**177**		177		0
	Left-Through		0							0				0					
	Through	0	0	182	0	0	183	0	0	0	199	0	0	0	200		0		**0**
	Through-Right		1							1				1					
	Right	182	0	0	1	183	0	0	199	0	0	1	200	0	0		200		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	259	1	**259**	5	264	**264**	0	283	1	**283**	5	288	1	**288**		288		0
	Left-Through		0							0				0					
	Through	1254	1	631	5	1259	633	53	1424	1	716	5	1429	1	719		1429		**0**
	Through-Right		1							1				1					
	Right	7	0	7	0	7	7	0	8	0	8	0	8	0	8		8		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	6	1	6	0	6	6	1	8	1	8	0	8	1	8		8		**0**
	Left-Through		0							0				0					
	Through	936	1	**557**	1	937	**558**	60	1084	1	**640**	1	1085	1	**640**		1085		0
	Through-Right		1							1				1					
	Right	178	0	178	0	178	178	0	195	0	195	0	195	0	195		195		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		273	*North-South:*		275	*North-South:*			308	*North-South:*			310		*North-South:*		0
		East-West:		816	*East-West:*		822	*East-West:*			923	*East-West:*			928		*East-West:*		0
		SUM:		1089	*SUM:*		1097	*SUM:*			1231	*SUM:*			1238		*SUM:*		0
VOLUME/CAPACITY *(V/C)* RATIO:				0.764			0.770				0.864				0.869				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.664**			**0.670**				**0.764**				**0.769**				0.000
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	**0.005**	**Δ*v/c* after mitigation:**	**-0.764**
Significant impacted?	**NO**	**Fully mitigated?**	**N/A**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
9	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	9	1	**9**	0	9	**9**	1	11	1	**11**	0	11	1	**11**		11		**0**
Left-Through		0							0				0					
Through	589	1	304	0	589	314	39	683	1	354	0	683	1	364		683		0
Through-Right		1							1				1					
Right	18	0	18	20	38	38	4	24	0	24	20	44	0	44		44		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	64	1	64	8	72	72	19	89	1	89	8	97	1	97		97		0
Left-Through		0							0				0					
Through	1350	1	**690**	0	1350	**690**	44	1520	1	**777**	0	1520	1	**777**		1520		**0**
Through-Right		1							1				1					
Right	29	0	29	0	29	29	1	33	0	33	0	33	0	33		33		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	49	0	49	0	49	49	5	59	0	59	0	59	0	59		59		0
Left-Through		0							0				0					
Through	31	0	**93**	0	31	**93**	23	57	0	**133**	0	57	0	**133**		57		**0**
Through-Right		0							0				0					
Right	13	0	0	0	13	0	3	17	0	0	0	17	0	0		17		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	29	1	**29**	1	30	**30**	4	36	1	**36**	1	37	1	**37**		37		**0**
Left-Through		0							0				0					
Through	35	1	35	0	35	35	11	49	1	49	0	49	1	49		49		0
Through-Right		0							0				0					
Right	69	1	37	2	71	35	2	77	1	33	2	79	1	31		79		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		699	*North-South:*		699	*North-South:*			788	*North-South:*			788	*North-South:*			0
	East-West:		122	*East-West:*		123	*East-West:*			169	*East-West:*			170	*East-West:*			0
	SUM:		821	*SUM:*		822	*SUM:*			957	*SUM:*			958	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.547			0.548				0.638				0.639				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.447**			**0.448**				**0.538**				**0.539**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--
No. of Phases																				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?																				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
ATSAC-1 or ATSAC+ATCS-2?																				
Override Capacity																				

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.001	Δ*v/c* after mitigation:	-0.538
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
9	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0				NB-- 0 SB-- 0 EB-- 0 WB-- 0				NB-- SB-- EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	46	1	46	0	46	46	4	54	1	54	0	54	1	54		54		**0**
Left-Through		0							0				0					
Through	1236	1	**637**	0	1236	**637**	72	1424	1	**735**	0	1424	1	**736**		1424		0
Through-Right		1							1				1					
Right	37	0	37	1	38	38	6	46	0	46	1	47	0	47		47		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	80	1	**80**	2	82	**82**	28	115	1	**115**	2	117	1	**117**		117		0
Left-Through		0							0				0					
Through	656	1	344	0	656	344	35	752	1	396	0	752	1	396		752		**0**
Through-Right		1							1				1					
Right	31	0	31	0	31	31	5	39	0	39	0	39	0	39		39		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	152	0	**152**	0	152	**152**	3	169	0	**169**	0	169	0	**169**		169		0
Left-Through		0							0				0					
Through	53	0	223	0	53	223	26	84	0	273	0	84	0	273		84		**0**
Through-Right		0							0				0					
Right	18	0	0	0	18	0	0	20	0	0	0	20	0	0		20		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	22	1	22	5	27	27	4	28	1	28	5	33	1	33		33		**0**
Left-Through		0							0				0					
Through	58	1	58	0	58	58	23	86	1	86	0	86	1	86		86		0
Through-Right		0							0				0					
Right	246	1	**206**	7	253	**212**	3	272	1	**215**	7	279	1	**221**		279		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		717	*North-South:*		719	*North-South:*			850	*North-South:*			853	*North-South:*			0
	East-West:		358	*East-West:*		364	*East-West:*			384	*East-West:*			390	*East-West:*			0
	SUM:		1075	*SUM:*		1083	*SUM:*			1234	*SUM:*			1243	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.717			0.722				0.823				0.829				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.617**			**0.622**				**0.723**				**0.729**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.723
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
10	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	24	0	24	1	25	25	1	27	0	27	1	28	0	28		28		**0**
Left-Through		0							0				0					
Through	3	0	**75**	0	3	**93**	0	3	0	**82**	0	3	0	**100**		3		0
Through-Right		0							0				0					
Right	48	0	0	17	65	0	0	52	0	0	17	69	0	0		69		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	7	0	**7**	0	7	**7**	0	8	0	**8**	0	8	0	**8**		8		0
Left-Through		0							0				0					
Through	2	0	12	0	2	12	0	2	0	13	0	2	0	13		2		**0**
Through-Right		0							0				0					
Right	3	0	0	0	3	0	0	3	0	0	0	3	0	0		3		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	3	1	3	0	3	3	0	3	1	3	0	3	1	3		3		0
Left-Through		0							0				0					
Through	66	1	**66**	10	76	**76**	27	99	1	**99**	10	109	1	**109**		109		**0**
Through-Right		0							0				0					
Right	34	1	34	18	52	52	18	55	1	55	18	73	1	73		73		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	136	1	**136**	7	143	**143**	0	149	1	**149**	7	156	1	**156**		156		**0**
Left-Through		0							0				0					
Through	112	1	112	2	114	114	16	138	1	138	2	140	1	140		140		0
Through-Right		0							0				0					
Right	16	1	16	0	16	16	0	17	1	17	0	17	1	17		17		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		82	*North-South:*		100	*North-South:*			90	*North-South:*			108	*North-South:*			0
	East-West:		202	*East-West:*		219	*East-West:*			248	*East-West:*			265	*East-West:*			0
	SUM:		284	*SUM:*		319	*SUM:*			338	*SUM:*			373	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.189			0.213				0.225				0.249				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.095**			**0.113**				**0.125**				**0.149**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0

	No. of Phases	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	ATSAC-1 or ATSAC+ATCS-2?	Override Capacity
EXISTING CONDITION	2	0	2	0
EXISTING PLUS PROJECT	2	0	2	0
FUTURE CONDITION W/O PROJECT	2	0	2	0
FUTURE CONDITION W/ PROJECT	2	0	2	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.024 — Δ*v/c* after mitigation: -0.125

Significant impacted? NO — Fully mitigated? N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
10	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	82	0	82	2	84	84	0	90	0	90	2	92	0	92		92		**0**
Left-Through		0							0				0					
Through	6	0	**165**	0	6	**174**	0	7	0	**181**	0	7	0	**190**		7		0
Through-Right		0							0				0					
Right	77	0	0	7	84	0	0	84	0	0	7	91	0	0		91		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	4	0	**4**	0	4	**4**	0	4	0	**4**	0	4	0	**4**		4		0
Left-Through		0							0				0					
Through	4	0	19	0	4	19	0	4	0	20	0	4	0	20		4		**0**
Through-Right		0							0				0					
Right	11	0	0	0	11	0	0	12	0	0	0	12	0	0		12		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	12	1	**12**	0	12	**12**	0	13	1	**13**	0	13	1	**13**		13		0
Left-Through		0							0				0					
Through	107	1	107	2	109	109	48	165	1	165	2	167	1	167		167		**0**
Through-Right		0							0				0					
Right	35	1	35	1	36	36	10	48	1	48	1	49	1	49		49		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	30	1	30	16	46	46	0	33	1	33	16	49	1	49		49		**0**
Left-Through		0							0				0					
Through	222	1	**222**	9	231	**231**	35	278	1	**278**	9	287	1	**287**		287		0
Through-Right		0							0				0					
Right	23	1	23	0	23	23	0	25	1	25	0	25	1	25		25		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		169	*North-South:*		178	*North-South:*			185	*North-South:*			194	*North-South:*			0
	East-West:		234	*East-West:*		243	*East-West:*			291	*East-West:*			300	*East-West:*			0
	SUM:		403	*SUM:*		421	*SUM:*			476	*SUM:*			494	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.269			0.281				0.317				0.329				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.169**			**0.181**				**0.217**				**0.229**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--	
No. of Phases					2					2					2					2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0					0					0					0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?					2					2					2					2
Override Capacity					0					0					0					0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.012 — Δ*v/c* after mitigation: -0.217

Significant impacted? NO — Fully mitigated? N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	43	1	**43**	0	43	**43**	1	48	1	**48**	0	48	1	**48**		48		**0**
Left-Through		0							0				0					
Through	354	1	210	3	357	236	7	394	1	239	3	397	1	265		397		0
Through-Right		1							1				1					
Right	66	0	66	48	114	114	12	84	0	84	48	132	0	132		132		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	96	1	96	20	116	116	84	189	1	189	20	209	1	209		209		0
Left-Through		0							0				0					
Through	1148	2	**574**	23	1171	**586**	120	1376	2	**688**	23	1399	2	**700**		1399		**0**
Through-Right		0							0				0					
Right	140	1	135	0	140	135	0	153	1	147	0	153	1	147		153		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	11	1	11	0	11	11	0	12	1	12	0	12	1	12		12		0
Left-Through		0							0				0					
Through	58	1	**58**	27	85	**85**	24	87	1	**87**	27	114	1	**114**		114		**0**
Through-Right		0							0				0					
Right	32	1	11	0	32	11	2	37	1	13	0	37	1	13		37		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	118	1	**118**	40	158	**158**	16	145	1	**145**	40	185	1	**185**		185		**0**
Left-Through		0							0				0					
Through	95	2	48	9	104	52	15	119	2	60	9	128	2	64		128		0
Through-Right		0							0				0					
Right	6	1	0	2	8	0	3	10	1	0	2	12	1	0		12		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		617	*North-South:*		629	*North-South:*			736	*North-South:*			748	*North-South:*			0
	East-West:		176	*East-West:*		243	*East-West:*			232	*East-West:*			299	*East-West:*			0
	SUM:		793	*SUM:*		872	*SUM:*			968	*SUM:*			1047	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.529			0.581				0.645				0.698				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.429**			**0.481**				**0.545**				**0.598**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.053 **Δ*v/c* after mitigation:** -0.545

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	165	1	**165**	0	165	165	6	186	1	**186**	0	186	1	186		186		**0**
Left-Through		0							0				0					
Through	690	1	451	14	704	**481**	8	763	1	513	14	777	1	**543**		777		0
Through-Right		1							1				1					
Right	212	0	212	46	258	258	30	262	0	262	46	308	0	308		308		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	38	1	38	5	43	**43**	84	126	1	126	5	131	1	**131**		131		0
Left-Through		0							0				0					
Through	700	2	**350**	6	706	353	163	929	2	**465**	6	935	2	468		935		**0**
Through-Right		0							0				0					
Right	36	1	19	0	36	19	0	39	1	21	0	39	1	21		39		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	34	1	34	0	34	34	0	37	1	37	0	37	1	37		37		0
Left-Through		0							0				0					
Through	124	1	**124**	10	134	**134**	39	175	1	**175**	10	185	1	**185**		185		**0**
Through-Right		0							0				0					
Right	51	1	0	0	51	0	8	64	1	0	0	64	1	0		64		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	78	1	**78**	44	122	**122**	10	95	1	**95**	44	139	1	**139**		139		**0**
Left-Through		0							0				0					
Through	87	2	44	25	112	56	29	124	2	62	25	149	2	75		149		0
Through-Right		0							0				0					
Right	11	1	0	7	18	0	2	14	1	0	7	21	1	0		21		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		515	*North-South:*		524	*North-South:*			651	*North-South:*			674	*North-South:*			0
	East-West:		202	*East-West:*		256	*East-West:*			270	*East-West:*			324	*East-West:*			0
	SUM:		717	*SUM:*		780	*SUM:*			921	*SUM:*			998	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.478			0.520				0.614				0.665				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.378**			**0.420**				**0.514**				**0.565**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--	
No. of Phases					2					2					2					2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0					0					0					0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?					2					2					2					2
Override Capacity					0					0					0					0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.051 — Δ*v/c* after mitigation: -0.514

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
12	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	16	0	**16**	18	34	**34**	8	25	0	25	18	43	0	43		43		**0**
Left-Through		1							1				1					
Through	170	0	103	4	174	123	256	442	0	**248**	4	446	0	**268**		446		0
Through-Right		1							1				1					
Right	3	0	103	0	3	123	0	3	0	248	0	3	0	268		3		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	1	0	1	0	1	1	2	3	0	**3**	0	3	0	**3**		3		0
Left-Through		1							1				1					
Through	236	1	**119**	0	236	**119**	52	310	1	158	0	310	1	158		310		**0**
Through-Right		0							0				0					
Right	126	1	0	38	164	0	12	150	1	0	38	188	1	0		188		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	96	1	**96**	27	123	**123**	61	166	1	**166**	27	193	1	**193**		193		0
Left-Through		0							0				0					
Through	40	1	40	2	42	42	9	53	1	53	2	55	1	55		55		**0**
Through-Right		0							0				0					
Right	73	1	73	4	77	77	81	161	1	161	4	165	1	165		165		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	15	1	15	4	19	19	26	42	1	42	4	46	1	46		46		**0**
Left-Through		0							0				0					
Through	59	0	**86**	32	91	**118**	3	68	0	**117**	32	100	0	**149**		100		0
Through-Right		1							1				1					
Right	27	0	0	0	27	0	19	49	0	0	0	49	0	0		49		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		135	*North-South:*		153	*North-South:*			251	*North-South:*			271	*North-South:*			0
	East-West:		182	*East-West:*		241	*East-West:*			283	*East-West:*			342	*East-West:*			0
	SUM:		317	*SUM:*		394	*SUM:*			534	*SUM:*			613	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.211			0.263				0.356				0.409				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.111**			**0.163**				**0.256**				**0.309**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--		NB--	SB--	EB--	WB--	
No. of Phases					2					2					2					2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0					0					0					0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	1	0	0		0	1	0	0		0	1	0	0		0	1	0	0						
ATSAC-1 or ATSAC+ATCS-2?					2					2					2					2					
Override Capacity					0					0					0					0					

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.053	Δ*v/c* after mitigation:	-0.256
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
12	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 1	NB--	0	SB-- 1	NB--	0	SB-- 1	NB--	0	SB-- 1	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	44	0	44	4	48	48	17	65	0	65	4	69	0	69		69		**0**
	Left-Through		1							1				1					
	Through	536	0	**294**	0	536	**298**	375	961	0	**520**	0	961	0	**524**		961		0
	Through-Right		1							1				1					
	Right	8	0	294	4	12	298	4	13	0	520	4	17	0	524		17		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	12	0	**12**	0	12	**12**	3	16	0	**16**	0	16	0	**16**		16		0
	Left-Through		1							1				1					
	Through	100	1	62	0	100	62	57	166	1	115	0	166	1	115		166		**0**
	Through-Right		0							0				0					
	Right	80	1	0	9	89	0	15	102	1	0	9	111	1	0		111		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	216	1	**216**	65	281	**281**	54	290	1	**290**	65	355	1	**355**		355		0
	Left-Through		0							0				0					
	Through	73	1	73	19	92	92	3	83	1	83	19	102	1	102		102		**0**
	Through-Right		0							0				0					
	Right	78	1	78	16	94	94	89	174	1	174	16	190	1	190		190		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	4	1	4	4	8	8	35	39	1	39	4	43	1	43		43		**0**
	Left-Through		0							0				0					
	Through	36	0	**78**	17	53	**95**	20	59	0	**123**	17	76	0	**140**		76		0
	Through-Right		1							1				1					
	Right	42	0	0	0	42	0	18	64	0	0	0	64	0	0		64		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	306		*North-South:*	310		*North-South:*		536		*North-South:*		540		*North-South:*		0
			East-West:	294		*East-West:*	376		*East-West:*		413		*East-West:*		495		*East-West:*		0
			SUM:	600		*SUM:*	686		*SUM:*		949		*SUM:*		1035		*SUM:*		0
VOLUME/CAPACITY *(V/C)* RATIO:				0.400			0.457				0.633				0.690				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.300**			**0.357**				**0.533**				**0.590**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.057	Δ*v/c* after mitigation:	-0.533
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	FULLER AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
13	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	29	0	**29**	0	29	**29**	0	32	0	**32**	0	32	0	**32**		32		**0**
Left-Through		0							0				0					
Through	49	0	123	0	49	123	0	54	0	135	0	54	0	135		54		0
Through-Right		0							0				0					
Right	45	0	0	0	45	0	0	49	0	0	0	49	0	0		49		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through		0							0				0					
Through	54	0	**172**	0	54	**172**	0	59	0	**188**	0	59	0	**188**		59		**0**
Through-Right		0							0				0					
Right	87	0	0	0	87	0	0	95	0	0	0	95	0	0		95		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	43	1	**43**	0	43	**43**	0	47	1	**47**	0	47	1	**47**		47		0
Left-Through		0							0				0					
Through	788	1	423	10	798	428	279	1141	1	602	10	1151	1	607		1151		**0**
Through-Right		1							1				1					
Right	57	0	57	0	57	57	0	62	0	62	0	62	0	62		62		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	55	1	55	0	55	55	0	60	1	60	0	60	1	60		60		**0**
Left-Through		0							0				0					
Through	1332	2	**666**	2	1334	**667**	234	1691	2	**846**	2	1693	2	**847**		1693		0
Through-Right		0							0				0					
Right	30	1	30	0	30	30	0	33	1	33	0	33	1	33		33		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		201	*North-South:*		201	*North-South:*			220	*North-South:*			220	*North-South:*			0
	East-West:		709	*East-West:*		710	*East-West:*			893	*East-West:*			894	*East-West:*			0
	SUM:		910	*SUM:*		911	*SUM:*			1113	*SUM:*			1114	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.607			0.607				0.742				0.743				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.507**			**0.507**				**0.642**				**0.643**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2
Override Capacity	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.001 — Δ*v/c* after mitigation: -0.642

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	FULLER AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
13	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	42	0	42	0	42	42	0	46	0	46	0	46	0	46		46		**0**
Left-Through		0							0				0					
Through	141	0	**222**	0	141	**222**	0	154	0	**243**	0	154	0	**243**		154		0
Through-Right		0							0				0					
Right	39	0	0	0	39	0	0	43	0	0	0	43	0	0		43		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	42	0	**42**	0	42	**42**	0	46	0	**46**	0	46	0	**46**		46		0
Left-Through		0							0				0					
Through	64	0	146	0	64	146	0	70	0	160	0	70	0	160		70		**0**
Through-Right		0							0				0					
Right	40	0	0	0	40	0	0	44	0	0	0	44	0	0		44		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	82	1	**82**	0	82	**82**	0	90	1	**90**	0	90	1	**90**		90		0
Left-Through		0							0				0					
Through	924	1	478	2	926	479	321	1332	1	683	2	1334	1	684		1334		**0**
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	40	1	40	0	40	40	0	44	1	44	0	44	1	44		44		**0**
Left-Through		0							0				0					
Through	882	2	**441**	9	891	**446**	332	1297	2	**649**	9	1306	2	**653**		1306		0
Through-Right		0							0				0					
Right	45	1	45	0	45	45	0	49	1	49	0	49	1	49		49		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		264	*North-South:*		264	*North-South:*			289	*North-South:*			289	*North-South:*			0
	East-West:		523	*East-West:*		528	*East-West:*			739	*East-West:*			743	*East-West:*			0
	SUM:		787	*SUM:*		792	*SUM:*			1028	*SUM:*			1032	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.525			0.528				0.685				0.688				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.425**			**0.428**				**0.585**				**0.588**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	Right Turns: FREE-1, NRTOR-2 or OLA-3?				ATSAC-1 or ATSAC+ATCS-2?	Override Capacity
EXISTING CONDITION	0	NB-- 0	SB-- 0	EB-- 0	WB-- 0	2	0
EXISTING PLUS PROJECT	0	NB-- 0	SB-- 0	EB-- 0	WB-- 0	2	0
FUTURE CONDITION W/O PROJECT	0	NB-- 0	SB-- 0	EB-- 0	WB-- 0	2	0
FUTURE CONDITION W/ PROJECT	0	NB-- 0	SB-- 0	EB-- 0	WB-- 0	2	0
FUTURE W/ PROJECT W/ MITIGATION	0	NB--	SB--	EB--	WB--	2	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.003 **Δ*v/c* after mitigation:** -0.585

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	LA BREA AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
14	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	76	1	**76**	0	76	**76**	0	83	1	**83**	0	83	1	**83**		83		**0**
	Left-Through		0							0				0					
	Through	750	1	382	0	750	384	48	868	1	460	0	868	1	463		868		0
	Through-Right		1							1				1					
	Right	13	0	13	5	18	18	38	52	0	52	5	57	0	57		57		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	33	1	33	3	36	36	5	41	1	41	3	44	1	44		44		0
	Left-Through		0							0				0					
	Through	798	1	**669**	0	798	**669**	67	940	1	**765**	0	940	1	**765**		940		**0**
	Through-Right		1							1				1					
	Right	539	0	539	0	539	539	0	589	0	589	0	589	0	589		589		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	284	1	**284**	0	284	**284**	0	311	1	311	0	311	1	311		311		0
	Left-Through		0							0				0					
	Through	570	1	335	10	580	340	279	902	1	**506**	10	912	1	**511**		912		**0**
	Through-Right		1							1				1					
	Right	100	0	100	0	100	100	0	109	0	109	0	109	0	109		109		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	290	1	290	1	291	291	37	354	1	**354**	1	355	1	**355**		355		**0**
	Left-Through		0							0				0					
	Through	766	1	**393**	2	768	**395**	234	1072	1	549	2	1074	1	551		1074		0
	Through-Right		1							1				1					
	Right	20	0	20	1	21	21	4	26	0	26	1	27	0	27		27		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		745	*North-South:*		745	*North-South:*			848	*North-South:*			848		*North-South:*		0
		East-West:		677	*East-West:*		679	*East-West:*			860	*East-West:*			866		*East-West:*		0
		SUM:		1422	*SUM:*		1424	*SUM:*			1708	*SUM:*			1714		*SUM:*		0
VOLUME/CAPACITY *(V/C)* RATIO:				0.998			0.999				1.199				1.203				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.898**			**0.899**				**1.099**				**1.103**				0.000
LEVEL OF SERVICE (LOS):				**D**			**D**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-1.099
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	LA BREA AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
14	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	114	1	**114**	0	114	**114**	0	125	1	**125**	0	125	1	**125**		125		**0**
	Left-Through		0							0				0					
	Through	906	1	468	0	906	468	82	1073	1	582	0	1073	1	583		1073		0
	Through-Right		1							1				1					
	Right	29	0	29	1	30	30	59	91	0	91	1	92	0	92		92		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	37	1	37	1	38	38	6	46	1	46	1	47	1	47		47		0
	Left-Through		0							0				0					
	Through	740	1	**602**	0	740	**602**	67	876	1	**692**	0	876	1	**692**		876		**0**
	Through-Right		1							1				1					
	Right	464	0	464	0	464	464	0	507	0	507	0	507	0	507		507		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	336	1	336	0	336	336	0	367	1	367	0	367	1	367		367		0
	Left-Through		0							0				0					
	Through	628	1	**364**	2	630	**365**	321	1008	1	**559**	2	1010	1	**560**		1010		**0**
	Through-Right		1							1				1					
	Right	100	0	100	0	100	100	0	109	0	109	0	109	0	109		109		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	113	1	**113**	5	118	**118**	44	168	1	**168**	5	173	1	**173**		173		**0**
	Left-Through		0							0				0					
	Through	120	1	70	9	129	76	332	463	1	246	9	472	1	251		472		0
	Through-Right		1							1				1					
	Right	20	0	20	2	22	22	6	28	0	28	2	30	0	30		30		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		716	*North-South:*		716	*North-South:*			817	*North-South:*			817	*North-South:*			0
		East-West:		477	*East-West:*		483	*East-West:*			727	*East-West:*			733	*East-West:*			0
		SUM:		1193	*SUM:*		1199	*SUM:*			1544	*SUM:*			1550	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.837			0.841				1.084				1.088				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.737**			**0.741**				**0.984**				**0.988**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.984
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
15	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0		NB-- 0	SB-- 0		NB-- 0	SB-- 0			NB-- 0	SB-- 0			NB--	SB--		
	EB-- 0	WB-- 0		EB-- 0	WB-- 0		EB-- 0	WB-- 0			EB-- 0	WB-- 0			EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	21	1	**21**	0	21	**21**	11	34	1	**34**	0	34	1	**34**		34		**0**
	Left-Through		0							0				0					
	Through	1459	2	504	0	1459	505	126	1722	2	611	0	1722	2	612		1722		0
	Through-Right		1							1				1					
	Right	52	0	52	5	57	57	53	110	0	110	5	115	0	115		115		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	53	1	53	3	56	56	63	121	1	121	3	124	1	124		124		0
	Left-Through		0							0				0					
	Through	1617	2	**604**	0	1617	**604**	212	1980	2	**743**	0	1980	2	**743**		1980		**0**
	Through-Right		1							1				1					
	Right	196	0	196	0	196	196	35	249	0	249	0	249	0	249		249		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	155	1	**155**	0	155	**155**	12	182	1	**182**	0	182	1	**182**		182		0
	Left-Through		0							0				0					
	Through	434	2	217	18	452	226	236	711	2	356	18	729	2	365		729		**0**
	Through-Right		0							0				0					
	Right	59	1	49	0	59	49	24	89	1	72	0	89	1	72		89		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	179	1	179	1	180	180	57	253	1	253	1	254	1	254		254		**0**
	Left-Through		0							0				0					
	Through	743	2	**372**	4	747	**374**	206	1019	2	**510**	4	1023	2	**512**		1023		0
	Through-Right		0							0				0					
	Right	132	1	106	1	133	105	42	186	1	126	1	187	1	125		187		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		625	*North-South:*		625	*North-South:*			777	*North-South:*			777	*North-South:*			0
		East-West:		527	*East-West:*		529	*East-West:*			692	*East-West:*			694	*East-West:*			0
		SUM:		1152	*SUM:*		1154	*SUM:*			1469	*SUM:*			1471	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.808			0.810				1.031				1.032				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.708**			**0.710**				**0.931**				**0.932**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.001	Δ*v/c* after mitigation:	-0.931
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
15	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0		NB-- 0	SB-- 0		NB-- 0	SB-- 0			NB-- 0	SB-- 0			NB--	SB--		
	EB-- 0	WB-- 0		EB-- 0	WB-- 0		EB-- 0	WB-- 0			EB-- 0	WB-- 0			EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	88	1	88	0	88	88	28	124	1	124	0	124	1	124		124		**0**
	Left-Through		0							0				0					
	Through	1738	2	**614**	0	1738	**614**	240	2141	2	**801**	0	2141	2	**801**		2141		0
	Through-Right		1							1				1					
	Right	104	0	104	1	105	105	148	262	0	262	1	263	0	263		263		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	72	1	**72**	1	73	**73**	76	155	1	**155**	1	156	1	**156**		156		0
	Left-Through		0							0				0					
	Through	1293	2	500	0	1293	500	198	1612	2	621	0	1612	2	621		1612		**0**
	Through-Right		1							1				1					
	Right	207	0	207	0	207	207	24	250	0	250	0	250	0	250		250		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	240	1	240	0	240	240	35	297	1	297	0	297	1	297		297		0
	Left-Through		0							0				0					
	Through	840	2	**420**	4	844	**422**	290	1209	2	**605**	4	1213	2	**607**		1213		**0**
	Through-Right		0							0				0					
	Right	103	1	59	0	103	59	24	137	1	75	0	137	1	75		137		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	92	1	**92**	5	97	**97**	57	158	1	**158**	5	163	1	**163**		163		**0**
	Left-Through		0							0				0					
	Through	502	2	251	16	518	259	277	826	2	413	16	842	2	421		842		0
	Through-Right		0							0				0					
	Right	97	1	61	2	99	63	53	159	1	82	2	161	1	83		161		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		686	North-South:		687	North-South:			956	North-South:			957	North-South:			0
		East-West:		512	East-West:		519	East-West:			763	East-West:			770	East-West:			0
		SUM:		1198	SUM:		1206	SUM:			1719	SUM:			1727	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.841			0.846				1.206				1.212				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.741**			**0.746**				**1.106**				**1.112**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-1.106
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
16	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					3
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- 0 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	18	0	**18**	0	18	**18**	34	54	0	**54**	0	54	0	**54**	0	54	0	**54**
	Left-Through		1							1				1				1	
	Through	569	0	350	5	574	357	15	637	0	512	5	642	0	519	-1	641	0	518
	Through-Right		1							1				1				1	
	Right	23	0	350	8	31	357	38	63	0	512	8	71	0	519	-1	70	0	518
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	25	0	25	0	25	25	12	39	0	39	0	39	0	39	0	39	0	39
	Left-Through		1							1				1				1	
	Through	1146	0	**689**	1	1147	**715**	25	1278	0	**825**	1	1279	0	**826**	0	1279	0	**826**
	Through-Right		1							1				1				1	
	Right	182	0	689	0	182	715	17	216	0	825	0	216	0	826	0	216	0	826
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	48	1	**48**	15	63	**63**	17	69	1	**69**	15	84	1	**84**	-2	82	1	**82**
	Left-Through		0							0				0				0	
	Through	473	2	237	10	483	242	292	809	2	405	10	819	2	410	-1	818	2	409
	Through-Right		0							0				0				0	
	Right	28	1	28	0	28	28	26	57	1	57	0	57	1	57	0	57	1	57
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	50	1	50	2	52	52	35	90	1	90	2	92	1	92	0	92	1	92
	Left-Through		0							0				0				0	
	Through	888	2	**444**	5	893	**447**	274	1245	2	**623**	5	1250	2	**625**	-1	1249	2	**625**
	Through-Right		0							0				0				0	
	Right	33	1	33	0	33	33	17	53	1	53	0	53	1	53	0	53	1	53
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	707		*North-South:*	733		*North-South:*	879			*North-South:*	880			*North-South:*	880	
			East-West:	492		*East-West:*	510		*East-West:*	692			*East-West:*	709			*East-West:*	707	
			SUM:	1199		*SUM:*	1243		*SUM:*	1571			*SUM:*	1589			*SUM:*	1587	
	VOLUME/CAPACITY *(V/C)* RATIO:			0.841			0.872			1.102				1.115					1.114
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.741			0.772			1.002				1.015			*With Imp.+TDM*		1.014
	LEVEL OF SERVICE (LOS):			C			C			F				F					F

REMARKS:

With Imp.+TDM+Signal Imp. 1.004 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.013 | Δ*v/c* after mitigation: 0.002

Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
16	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	3	0	3	0	3	3	0	3	0	3	0	3	0	3	0	3	0	3
	Left-Through		1							1				1				1	
	Through	1133	0	**611**	1	1134	**613**	41	1280	0	**709**	1	1281	0	**710**	0	1281	0	**710**
	Through-Right		1							1				1				1	
	Right	77	0	611	2	79	613	41	125	0	709	2	127	0	710	0	127	0	710
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	3	0	**3**	0	3	**3**	0	3	0	**3**	0	3	0	**3**	0	3	0	**3**
	Left-Through		1							1				1				1	
	Through	637	0	374	5	642	377	10	707	0	428	5	712	0	431	-1	711	0	430
	Through-Right		1							1				1				1	
	Right	93	0	374	0	93	377	29	131	0	428	0	131	0	431	0	131	0	430
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	125	1	125	0	125	125	21	158	1	158	0	158	1	158	0	158	1	158
	Left-Through		0							0				0				0	
	Through	955	2	**478**	6	961	**481**	333	1377	2	**689**	6	1383	2	**692**	-1	1382	2	**691**
	Through-Right		0							0				0				0	
	Right	52	1	52	0	52	52	33	90	1	90	0	90	1	90	0	90	1	90
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	49	1	**49**	7	56	**56**	37	91	1	**91**	7	98	1	**98**	-1	97	1	**97**
	Left-Through		0							0				0				0	
	Through	747	2	374	23	770	385	369	1186	2	593	23	1209	2	605	-3	1206	2	603
	Through-Right		0							0				0				0	
	Right	101	1	101	0	101	101	29	139	1	139	0	139	1	139	0	139	1	139
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		614	North-South:		616	North-South:			712	North-South:			713	North-South:			713
		East-West:		527	East-West:		537	East-West:			780	East-West:			790	East-West:			788
		SUM:		1141	SUM:		1153	SUM:			1492	SUM:			1503	SUM:			1501
	VOLUME/CAPACITY (V/C) RATIO:			0.801			0.809				1.047				1.055				1.053
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.701			0.709				0.947				0.955	With Imp.+TDM			0.953
	LEVEL OF SERVICE (LOS):			C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.943 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.008 | Δ*v/c* after mitigation: -0.006

Significant impacted? NO | Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
17	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases		2			2			2			2							
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0			0							
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0			NB-- 0 SB--	0			NB-- SB--			
		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0			EB-- 0 WB--	0			EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?		2			2			2			2							
	Override Capacity		0			0			0			0							
NORTHBOUND	Left	14	0	**14**	0	14	**14**	15	30	0	**30**	0	30	0	**30**		30		**0**
	Left-Through		1							1				1					
	Through	37	0	51	13	50	64	1	41	0	71	13	54	0	84		54		0
	Through-Right		0							0				0					
	Right	23	1	0	3	26	2	1	26	1	0	3	29	1	3		29		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	9	0	9	0	9	9	5	15	0	15	0	15	0	15		15		0
	Left-Through		0							0				0					
	Through	89	0	**141**	3	92	**147**	13	110	0	**172**	3	113	0	**178**		113		**0**
	Through-Right		0							0				0					
	Right	43	0	0	3	46	0	0	47	0	0	3	50	0	0		50		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		0
	Left-Through		0							0				0					
	Through	487	2	244	18	505	253	298	831	2	416	18	849	2	425		849		**0**
	Through-Right		0							0				0					
	Right	24	1	24	0	24	24	26	52	1	52	0	52	1	52		52		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	48	1	48	0	48	48	0	52	1	52	0	52	1	52		52		**0**
	Left-Through		0							0				0					
	Through	977	1	**514**	4	981	**516**	312	1381	1	**718**	4	1385	1	**720**		1385		0
	Through-Right		1							1				1					
	Right	50	0	50	0	50	50	0	55	0	55	0	55	0	55		55		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		155	*North-South:*		161	*North-South:*			202	*North-South:*			208		*North-South:*		0
		East-West:		544	*East-West:*		546	*East-West:*			751	*East-West:*			753		*East-West:*		0
		SUM:		699	*SUM:*		707	*SUM:*			953	*SUM:*			961		*SUM:*		0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.466			0.471				0.635				0.641				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.366**			**0.371**				**0.535**				**0.541**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.006 **Δ*v/c* after mitigation:** -0.535

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
17	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0		NB-- 0	SB-- 0		NB-- 0	SB-- 0			NB-- 0	SB-- 0			NB--	SB--		
	EB-- 0	WB-- 0		EB-- 0	WB-- 0		EB-- 0	WB-- 0			EB-- 0	WB-- 0			EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	31	0	31	0	31	31	28	62	0	62	0	62	0	62		62		**0**
	Left-Through		0							0				0					
	Through	104	0	**239**	3	107	**243**	6	120	0	**299**	3	123	0	**303**		123		0
	Through-Right		0							0				0					
	Right	104	0	0	1	105	0	3	117	0	0	1	118	0	0		118		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	12	0	**12**	0	12	**12**	2	15	0	**15**	0	15	0	**15**		15		0
	Left-Through		0							0				0					
	Through	39	0	73	12	51	99	3	46	0	90	12	58	0	116		58		**0**
	Through-Right		0							0				0					
	Right	22	0	0	14	36	0	5	29	0	0	14	43	0	0		43		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	32	1	32	4	36	36	0	35	1	35	4	39	1	39		39		0
	Left-Through		0							0				0					
	Through	1000	2	**500**	4	1004	**502**	348	1442	2	**721**	4	1446	2	**723**		1446		**0**
	Through-Right		0							0				0					
	Right	42	1	42	0	42	42	13	59	1	59	0	59	1	59		59		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	23	1	**23**	2	25	**25**	1	26	1	**26**	2	28	1	**28**		28		**0**
	Left-Through		0							0				0					
	Through	808	1	419	16	824	427	420	1304	1	669	16	1320	1	677		1320		0
	Through-Right		1							1				1					
	Right	30	0	30	0	30	30	0	33	0	33	0	33	0	33		33		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		251	*North-South:*		255	*North-South:*			314	*North-South:*			318		*North-South:*		0
		East-West:		523	*East-West:*		527	*East-West:*			747	*East-West:*			751		*East-West:*		0
		SUM:		774	*SUM:*		782	*SUM:*			1061	*SUM:*			1069		*SUM:*		0
VOLUME/CAPACITY *(V/C)* RATIO:				0.516			0.521				0.707				0.713				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.416**			**0.421**				**0.607**				**0.613**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.607
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					3
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 3 WB--		0	EB-- 3 WB--		0	EB-- 3 WB--		0		EB-- 3 WB--		0		EB-- 3 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	79	1	**79**	0	79	**79**	32	118	1	**118**	0	118	1	**118**	0	118	1	**118**
	Left-Through		0							0				0				0	
	Through	468	2	234	49	517	259	17	529	2	265	49	578	2	289	-7	571	2	286
	Through-Right		0							0				0				0	
	Right	127	1	71	0	127	71	23	162	1	82	0	162	1	82	0	162	1	82
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	26	1	26	5	31	31	19	47	1	47	5	52	1	52	-1	51	1	51
	Left-Through		0							0				0				0	
	Through	1165	1	**634**	10	1175	**641**	104	1378	1	**757**	10	1388	1	**764**	-1	1387	1	**763**
	Through-Right		1							1				1				1	
	Right	103	0	103	4	107	107	22	135	0	135	4	139	0	139	-1	138	0	138
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	11	1	**11**	20	31	**31**	8	20	1	**20**	20	40	1	**40**	-3	37	1	**37**
	Left-Through		0							0				0				0	
	Through	454	2	227	0	454	227	289	786	2	393	0	786	2	393	0	786	2	393
	Through-Right		0							0				0				0	
	Right	102	1	23	0	102	23	36	148	1	30	0	148	1	30	0	148	1	30
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	112	1	112	0	112	112	39	161	1	161	0	161	1	161	0	161	1	161
	Left-Through		0							0				0				0	
	Through	909	1	**464**	0	909	**477**	248	1242	1	**633**	0	1242	1	**646**	0	1242	1	**644**
	Through-Right		1							1				1				1	
	Right	18	0	18	26	44	44	3	23	0	23	26	49	0	49	-4	45	0	45
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		713	*North-South:*		720	*North-South:*			875	*North-South:*			882	*North-South:*			881
		East-West:		475	*East-West:*		508	*East-West:*			653	*East-West:*			686	*East-West:*			681
		SUM:		1188	*SUM:*		1228	*SUM:*			1528	*SUM:*			1568	*SUM:*			1562
	VOLUME/CAPACITY *(V/C)* RATIO:			0.834			0.862				1.072				1.100				1.096
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.734			0.762				0.972				1.000	*With Imp.+TDM*			0.996
	LEVEL OF SERVICE (LOS):			C			C				E				F				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.986 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.028 | *Δv/c* after mitigation: 0.014

Significant impacted? YES | Fully mitigated? NO

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	121	1	121	0	121	121	54	186	1	**186**	0	186	1	**186**	0	186	1	**186**
	Left-Through		0							0				0				0	
	Through	973	2	**487**	12	985	**493**	37	1101	2	551	12	1113	2	557	-2	1111	2	556
	Through-Right		0							0				0				0	
	Right	187	1	136	0	187	136	63	268	1	193	0	268	1	193	0	268	1	193
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	23	87	**87**	34	104	1	104	23	127	1	127	-3	124	1	124
	Left-Through		0							0				0				0	
	Through	728	1	399	44	772	431	119	915	1	**509**	44	959	1	**541**	-7	952	1	**536**
	Through-Right		1							1				1				1	
	Right	70	0	70	19	89	89	26	103	0	103	19	122	0	122	-3	119	0	119
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	51	1	51	5	56	56	10	66	1	66	5	71	1	71	-1	70	1	70
	Left-Through		0							0				0				0	
	Through	980	2	**490**	0	980	**490**	291	1363	2	**682**	0	1363	2	**682**	0	1363	2	**682**
	Through-Right		0							0				0				0	
	Right	119	1	0	0	119	0	43	173	1	0	0	173	1	0	0	173	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	103	1	**103**	0	103	**103**	37	150	1	**150**	0	150	1	**150**	0	150	1	**150**
	Left-Through		0							0				0				0	
	Through	705	1	390	0	705	393	362	1133	1	609	0	1133	1	612	0	1133	1	612
	Through-Right		1							1				1				1	
	Right	75	0	75	6	81	81	3	85	0	85	6	91	0	91	-1	90	0	90
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		551	*North-South:*		580	*North-South:*			695	*North-South:*			727	*North-South:*			722
		East-West:		593	*East-West:*		593	*East-West:*			832	*East-West:*			832	*East-West:*			832
		SUM:		1144	*SUM:*		1173	*SUM:*			1527	*SUM:*			1559	*SUM:*			1554
VOLUME/CAPACITY *(V/C)* RATIO:				0.803			0.823				1.072				1.094				1.091
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.703			0.723				0.972				0.994		*With Imp.+TDM*		0.991
LEVEL OF SERVICE (LOS):				C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.981 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.022 — Δ*v/c* after mitigation: 0.009

Significant impacted? YES — Fully mitigated? YES

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	20	1	**20**	5	25	**25**	19	41	1	**41**	5	46	1	**46**		46		**0**
Left-Through		0							0				0					
Through	142	1	142	8	150	150	94	249	1	249	8	257	1	257		257		0
Through-Right		0							0				0					
Right	23	1	0	0	23	0	11	36	1	0	0	36	1	0		36		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	27	1	27	2	29	29	24	54	1	54	2	56	1	56		56		0
Left-Through		0							0				0					
Through	251	1	**251**	2	253	**253**	81	356	1	**356**	2	358	1	**358**		358		**0**
Through-Right		0							0				0					
Right	41	1	26	0	41	26	39	84	1	32	0	84	1	32		84		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	30	1	**30**	0	30	**30**	71	104	1	**104**	0	104	1	**104**		104		0
Left-Through		0							0				0					
Through	433	2	217	4	437	219	213	687	2	344	4	691	2	346		691		**0**
Through-Right		0							0				0					
Right	44	1	34	1	45	33	55	103	1	83	1	104	1	81		104		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	131	1	131	0	131	131	35	178	1	178	0	178	1	178		178		**0**
Left-Through		0							0				0					
Through	995	1	**516**	20	1015	**531**	239	1327	1	**727**	20	1347	1	**742**		1347		0
Through-Right		1							1				1					
Right	36	0	36	10	46	46	87	126	0	126	10	136	0	136		136		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		271	*North-South:*		278	*North-South:*			397	*North-South:*			404	*North-South:*			0
	East-West:		546	*East-West:*		561	*East-West:*			831	*East-West:*			846	*East-West:*			0
	SUM:		817	*SUM:*		839	*SUM:*			1228	*SUM:*			1250	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.545			0.559				0.819				0.833				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.445**			**0.459**				**0.719**				**0.733**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.014 **Δ*v/c* after mitigation:** -0.719

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	67	1	67	1	68	68	56	129	1	129	1	130	1	130		130		**0**
Left-Through		0							0				0					
Through	440	1	**440**	2	442	**442**	198	679	1	**679**	2	681	1	**681**		681		0
Through-Right		0							0				0					
Right	41	1	4	0	41	4	38	83	1	33	0	83	1	33		83		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	45	1	**45**	9	54	**54**	46	95	1	**95**	9	104	1	**104**		104		0
Left-Through		0							0				0					
Through	144	1	144	7	151	151	85	242	1	242	7	249	1	249		249		**0**
Through-Right		0							0				0					
Right	37	1	0	0	37	0	50	90	1	0	0	90	1	0		90		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	83	1	83	0	83	83	92	183	1	**183**	0	183	1	**183**		183		0
Left-Through		0							0				0					
Through	1031	2	**516**	19	1050	**525**	268	1396	2	698	19	1415	2	708		1415		**0**
Through-Right		0							0				0					
Right	89	1	56	5	94	60	39	136	1	72	5	141	1	76		141		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	74	1	**74**	0	74	**74**	19	100	1	100	0	100	1	100		100		**0**
Left-Through		0							0				0					
Through	753	1	418	5	758	422	298	1122	1	**646**	5	1127	1	**649**		1127		0
Through-Right		1							1				1					
Right	83	0	83	2	85	85	78	169	0	169	2	171	0	171		171		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		485	*North-South:*		496	*North-South:*			774	*North-South:*			785	*North-South:*			0
	East-West:		590	*East-West:*		599	*East-West:*			829	*East-West:*			832	*East-West:*			0
	SUM:		1075	*SUM:*		1095	*SUM:*			1603	*SUM:*			1617	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.717			0.730				1.069				1.078				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.617**			**0.630**				**0.969**				**0.978**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**E**				**E**				**A**

	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--
No. of Phases				2				2				2				2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0				0				0				0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				
Override Capacity				0				0				0				0				

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-0.969
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
20	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	24	1	**24**	3	27	**27**	21	47	1	**47**	3	50	1	**50**	0	50	1	**50**
	Left-Through		0							0				0				0	
	Through	275	1	168	3	278	169	92	393	1	237	3	396	1	239	0	396	1	239
	Through-Right		1							1				1				1	
	Right	60	0	60	0	60	60	15	81	0	81	0	81	0	81	0	81	0	81
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	84	1	84	1	85	85	2	94	1	94	1	95	1	95	0	95	1	95
	Left-Through		0							0				0				0	
	Through	673	1	**673**	1	674	**674**	174	910	1	**910**	1	911	1	**911**	0	911	1	**911**
	Through-Right		0							0				0				0	
	Right	271	1	248	0	271	248	21	317	1	290	0	317	1	290	0	317	1	290
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	46	1	**46**	0	46	**46**	4	54	1	**54**	0	54	1	**54**	0	54	1	**54**
	Left-Through		0							0				0				0	
	Through	444	1	250	6	450	253	253	739	1	405	6	745	1	409	-1	744	1	408
	Through-Right		1							1				1				1	
	Right	55	0	55	1	56	56	11	71	0	71	1	72	0	72	0	72	0	72
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	90	1	90	0	90	90	37	135	1	135	0	135	1	135	0	135	1	135
	Left-Through		0							0				0				0	
	Through	867	1	**446**	28	895	**462**	298	1246	1	**638**	28	1274	1	**654**	-4	1270	1	**652**
	Through-Right		1							1				1				1	
	Right	24	0	24	5	29	29	3	29	0	29	5	34	0	34	-1	33	0	33
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		697	*North-South:*		701	*North-South:*			957	*North-South:*			961	*North-South:*			961
		East-West:		492	*East-West:*		508	*East-West:*			692	*East-West:*			708	*East-West:*			706
		SUM:		1189	*SUM:*		1209	*SUM:*			1649	*SUM:*			1669	*SUM:*			1667
	VOLUME/CAPACITY *(V/C)* RATIO:			0.793			0.806				1.099				1.113				1.111
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.693			0.706				0.999				1.013	*With Imp.+TDM*			1.011
	LEVEL OF SERVICE (LOS):			B			C				E				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.001
F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.014 | *Δv/c* after mitigation: 0.002
Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
20	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					2
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- 0 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	66	1	**66**	1	67	**67**	23	95	1	**95**	1	96	1	**96**	0	96	1	**96**
	Left-Through		0							0				0				0	
	Through	695	1	395	1	696	395	182	942	1	540	1	943	1	540	0	943	1	540
	Through-Right		1							1				1				1	
	Right	94	0	94	0	94	94	34	137	0	137	0	137	0	137	0	137	0	137
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	71	1	71	5	76	76	3	81	1	81	5	86	1	86	-1	85	1	85
	Left-Through		0							0				0				0	
	Through	443	1	**443**	2	445	**445**	102	587	1	**587**	2	589	1	**589**	0	589	1	**589**
	Through-Right		0							0				0				0	
	Right	101	1	51	0	101	51	19	129	1	69	0	129	1	69	0	129	1	69
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	101	1	101	0	101	101	10	120	1	120	0	120	1	120	0	120	1	120
	Left-Through		0							0				0				0	
	Through	1004	1	**534**	26	1030	**548**	317	1415	1	**750**	26	1441	1	**764**	-4	1437	1	**762**
	Through-Right		1							1				1				1	
	Right	63	0	63	2	65	65	15	84	0	84	2	86	0	86	0	86	0	86
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	62	1	**62**	0	62	**62**	20	88	1	**88**	0	88	1	**88**	0	88	1	**88**
	Left-Through		0							0				0				0	
	Through	789	1	422	7	796	426	369	1232	1	647	7	1239	1	651	-1	1238	1	651
	Through-Right		1							1				1				1	
	Right	54	0	54	1	55	55	3	62	0	62	1	63	0	63	0	63	0	63
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		509	*North-South:*		512	*North-South:*			682	*North-South:*			685	*North-South:*			685
		East-West:		596	*East-West:*		610	*East-West:*			838	*East-West:*			852	*East-West:*			850
		SUM:		1105	*SUM:*		1122	*SUM:*			1520	*SUM:*			1537	*SUM:*			1535
	VOLUME/CAPACITY *(V/C)* RATIO:			0.737			0.748				1.013				1.025				1.023
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.637			0.648				0.913				0.925		*With Imp.+TDM*		0.923
	LEVEL OF SERVICE (LOS):			B			B				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.913 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.012 — Δ*v/c* after mitigation: 0.000

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BRONSON AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
21	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		**0**
	Left-Through		0							0				0					
	Through	125	0	212	0	125	212	5	142	0	238	0	142	0	238		142		0
	Through-Right		1							1				1					
	Right	87	0	0	0	87	0	1	96	0	0	0	96	0	0		96		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	81	0	81	0	81	81	0	89	0	89	0	89	0	89		89		0
	Left-Through		0							0				0					
	Through	252	0	**380**	0	252	**380**	36	312	0	**452**	0	312	0	**452**		312		**0**
	Through-Right		0							0				0					
	Right	47	0	0	0	47	0	0	51	0	0	0	51	0	0		51		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		0
	Left-Through		0							0				0					
	Through	486	1	262	7	493	266	339	871	1	460	7	878	1	464		878		**0**
	Through-Right		1							1				1					
	Right	38	0	38	0	38	38	7	49	0	49	0	49	0	49		49		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	84	1	84	0	84	84	14	106	1	106	0	106	1	106		106		**0**
	Left-Through		0							0				0					
	Through	954	1	**501**	33	987	**518**	336	1379	1	**717**	33	1412	1	**734**		1412		0
	Through-Right		1							1				1					
	Right	48	0	48	0	48	48	3	55	0	55	0	55	0	55		55		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		410	*North-South:*		410	*North-South:*			485	*North-South:*			485		*North-South:*		0
		East-West:		531	*East-West:*		548	*East-West:*			750	*East-West:*			767		*East-West:*		0
		SUM:		941	*SUM:*		958	*SUM:*			1235	*SUM:*			1252		*SUM:*		0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.627			0.639				0.823				0.835				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.527**			**0.539**				**0.723**				**0.735**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.012 **Δ*v/c* after mitigation:** -0.723

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BRONSON AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
21	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB--	SB--	
	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB--	WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	72	1	72	0	72	72	3	82	1	82	0	82	1	82		82		0
	Left-Through		0							0				0					
	Through	232	0	314	0	232	314	31	285	0	381	0	285	0	381		285		0
	Through-Right		1							1				1					
	Right	82	0	0	0	82	0	6	96	0	0	0	96	0	0		96		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	74	0	74	0	74	74	0	81	0	81	0	81	0	81		81		0
	Left-Through		0							0				0					
	Through	150	0	256	0	150	256	6	170	0	286	0	170	0	286		170		0
	Through-Right		0							0				0					
	Right	32	0	0	0	32	0	0	35	0	0	0	35	0	0		35		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	76	1	76	0	76	76	0	83	1	83	0	83	1	83		83		0
	Left-Through		0							0				0					
	Through	760	1	403	30	790	418	366	1197	1	624	30	1227	1	639		1227		0
	Through-Right		1							1				1					
	Right	45	0	45	0	45	45	1	50	0	50	0	50	0	50		50		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	77	1	77	0	77	77	3	87	1	87	0	87	1	87		87		0
	Left-Through		0							0				0					
	Through	634	1	359	8	642	363	434	1127	1	619	8	1135	1	623		1135		0
	Through-Right		1							1				1					
	Right	84	0	84	0	84	84	19	111	0	111	0	111	0	111		111		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		388	North-South:		388	North-South:			462	North-South:			462	North-South:			0
		East-West:		480	East-West:		495	East-West:			711	East-West:			726	East-West:			0
		SUM:		868	SUM:		883	SUM:			1173	SUM:			1188	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.579			0.589				0.782				0.792				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.479			0.489				0.682				0.692				0.000
LEVEL OF SERVICE (LOS):				A			A				B				B				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.010	Δ*v/c* after mitigation:	-0.682
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. SB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
22	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	No. of Phases		3			3			3				3					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0	NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- SB--		
		EB-- 0 WB--	0	EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- WB--		
	ATSAC-1 or ATSAC+ATCS-2?		2			2			2				2					
	Override Capacity		0			0			0				0					

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	414	1	235	0	414	235	46	499	1	287	0	499	1	287		499		0
	Left-Through		0							0				0					
	Through	1	0	**235**	0	1	**235**	0	1	0	**287**	0	1	0	**287**		1		**0**
	Through-Right		0							0				0					
	Right	54	0	0	0	54	0	14	73	0	0	0	73	0	0		73		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
	Left-Through		0							0				0					
	Through	450	2	225	2	452	226	220	712	2	356	2	714	2	357		714		**0**
	Through-Right		0							0				0					
	Right	158	1	158	5	163	163	100	273	1	273	5	278	1	278		278		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	47	1	47	0	47	47	27	78	1	78	0	78	1	78		78		**0**
	Left-Through		0							0				0					
	Through	1158	2	**579**	33	1191	**596**	330	1596	2	**798**	33	1629	2	**815**		1629		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	235		*North-South:*	235			*North-South:*	287			*North-South:*	287			*North-South:*	0
			East-West:	579		*East-West:*	596			*East-West:*	798			*East-West:*	815			*East-West:*	0
			SUM:	814		*SUM:*	831			*SUM:*	1085			*SUM:*	1102			*SUM:*	0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.571			0.583				0.761				0.773				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.471**			**0.483**				**0.661**				**0.673**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.012 **Δ*v/c* after mitigation:** -0.661

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. SB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
22	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	No. of Phases		3			3			3				3					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0	NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- SB--		
		EB-- 0 WB--	0	EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- WB--		
	ATSAC-1 or ATSAC+ATCS-2?		2			2			2				2					
	Override Capacity		0			0			0				0					

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	354	1	197	0	354	197	41	428	1	248	0	428	1	248		428		0
	Left-Through		0							0				0					
	Through	1	0	**197**	0	1	**197**	0	1	0	**248**	0	1	0	**248**		1		**0**
	Through-Right		0							0				0					
	Right	38	0	0	0	38	0	24	66	0	0	0	66	0	0		66		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	836	2	**418**	7	843	**422**	280	1194	2	**597**	7	1201	2	**601**		1201		**0**
	Through-Right		0							0				0					
	Right	203	1	203	23	226	226	112	334	1	334	23	357	1	357		357		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	36	1	**36**	0	36	**36**	16	55	1	**55**	0	55	1	**55**		55		**0**
	Left-Through		0							0				0					
	Through	803	2	402	8	811	406	394	1272	2	636	8	1280	2	640		1280		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		197	*North-South:*		197	*North-South:*			248	*North-South:*			248	*North-South:*			0
		East-West:		454	*East-West:*		458	*East-West:*			652	*East-West:*			656	*East-West:*			0
		SUM:		651	*SUM:*		655	*SUM:*			900	*SUM:*			904	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.457			0.460				0.632				0.634				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.357**			**0.360**				**0.532**				**0.534**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	**Δ*v/c* after mitigation:**	-0.532
Significant impacted?	NO	**Fully mitigated?**	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. NB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
23	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0		NB-- 0	SB-- 0	0		NB--	SB--		
	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0		EB-- 0	WB-- 0	0		EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	291	2	**160**	26	317	**174**	105	423	2	**233**	26	449	2	**247**		449		**0**
	Left-Through		0							0				0					
	Through	2	0	0	0	2	0	0	2	0	0	0	2	0	0		2		0
	Through-Right		0							0				0					
	Right	57	1	57	0	57	57	0	62	1	62	0	62	1	62		62		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	68	1	**68**	0	68	**68**	32	106	1	**106**	0	106	1	**106**		106		0
	Left-Through		0							0				0					
	Through	582	2	291	2	584	292	224	861	2	431	2	863	2	432		863		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	16	16	0	0	0	16	0	0		16		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	798	2	**399**	8	806	**403**	203	1076	2	**538**	8	1084	2	**542**		1084		0
	Through-Right		0							0				0					
	Right	336	1	336	0	336	336	59	426	1	426	0	426	1	426		426		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		160	*North-South:*		174	*North-South:*			233	*North-South:*			247	*North-South:*			0
		East-West:		467	*East-West:*		471	*East-West:*			644	*East-West:*			648	*East-West:*			0
		SUM:		627	*SUM:*		645	*SUM:*			877	*SUM:*			895	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.440			0.453				0.615				0.628				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.340**			**0.353**				**0.515**				**0.528**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.013 **Δ*v/c* after mitigation:** -0.515

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. NB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
23	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	209	2	**115**	6	215	**118**	165	394	2	**217**	6	400	2	**220**		400		**0**
Left-Through		0							0				0					
Through	3	0	0	0	3	0	0	3	0	0	0	3	0	0		3		0
Through-Right		0							0				0					
Right	79	1	79	0	79	79	0	86	1	86	0	86	1	86		86		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	64	1	**64**	0	64	64	39	109	1	109	0	109	1	109		109		0
Left-Through		0							0				0					
Through	935	2	468	7	942	**471**	282	1305	2	**653**	7	1312	2	**656**		1312		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	702	2	351	2	704	352	229	997	2	499	2	999	2	500		999		0
Through-Right		0							0				0					
Right	407	1	**407**	0	407	407	34	479	1	479	0	479	1	479		479		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		115	*North-South:*		118	*North-South:*			217	*North-South:*			220	*North-South:*			0
	East-West:		471	*East-West:*		471	*East-West:*			653	*East-West:*			656	*East-West:*			0
	SUM:		586	*SUM:*		589	*SUM:*			870	*SUM:*			876	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.411			0.413				0.611				0.615				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.311**			**0.313**				**0.511**				**0.515**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.511
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
24	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	26	0	**26**	0	26	**26**	36	64	0	**64**	0	64	0	**64**		64		**0**
	Left-Through		1							1				1					
	Through	598	0	388	13	611	396	75	729	0	579	13	742	0	587		742		0
	Through-Right		1							1				1					
	Right	21	0	388	3	24	396	21	44	0	579	3	47	0	587		47		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	24	0	24	0	24	24	15	41	0	41	0	41	0	41		41		0
	Left-Through		1							1				1					
	Through	1160	0	**657**	3	1163	**659**	69	1338	0	**784**	3	1341	0	**786**		1341		**0**
	Through-Right		1							1				1					
	Right	58	0	657	0	58	659	3	66	0	784	0	66	0	786		66		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	12	0	**12**	0	12	**12**	2	15	0	**15**	0	15	0	**15**		15		0
	Left-Through		0							0				0					
	Through	73	0	105	0	73	105	64	144	0	206	0	144	0	206		144		**0**
	Through-Right		0							0				0					
	Right	20	0	0	0	20	0	25	47	0	0	0	47	0	0		47		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	15	0	15	0	15	15	16	32	0	32	0	32	0	32		32		**0**
	Left-Through		0							0				0					
	Through	118	0	**157**	0	118	**157**	71	200	0	**269**	0	200	0	**269**		200		0
	Through-Right		0							0				0					
	Right	24	0	0	0	24	0	11	37	0	0	0	37	0	0		37		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		683	*North-South:*		685	*North-South:*			848	*North-South:*			850	*North-South:*			0
		East-West:		169	*East-West:*		169	*East-West:*			284	*East-West:*			284	*East-West:*			0
		SUM:		852	*SUM:*		854	*SUM:*			1132	*SUM:*			1134	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.568			0.569				0.755				0.756				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.468**			**0.469**				**0.655**				**0.656**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.001	Δ*v/c* after mitigation:	-0.655
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
24	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	14	0	14	0	14	14	0	15	0	15	0	15	0	15		15		**0**
	Left-Through		1							1				1					
	Through	1127	0	**615**	3	1130	**616**	45	1278	0	**705**	3	1281	0	**707**		1281		0
	Through-Right		1							1				1					
	Right	46	0	615	0	46	616	22	72	0	705	0	72	0	707		72		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	32	0	**32**	0	32	**32**	0	35	0	**35**	0	35	0	**35**		35		0
	Left-Through		1							1				1					
	Through	664	0	457	12	676	463	70	796	0	539	12	808	0	545		808		**0**
	Through-Right		1							1				1					
	Right	58	0	457	0	58	463	9	72	0	539	0	72	0	545		72		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	49	0	49	0	49	49	5	59	0	59	0	59	0	59		59		0
	Left-Through		0							0				0					
	Through	239	0	**318**	0	239	**318**	88	349	0	**493**	0	349	0	**493**		349		**0**
	Through-Right		0							0				0					
	Right	30	0	0	0	30	0	52	85	0	0	0	85	0	0		85		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	27	0	**27**	0	27	**27**	28	58	0	**58**	0	58	0	**58**		58		**0**
	Left-Through		0							0				0					
	Through	146	0	227	0	146	227	89	249	0	397	0	249	0	397		249		0
	Through-Right		0							0				0					
	Right	54	0	0	0	54	0	31	90	0	0	0	90	0	0		90		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		North-South:		647	North-South:		648	North-South:			740	North-South:			742	North-South:			0
		East-West:		345	East-West:		345	East-West:			551	East-West:			551	East-West:			0
		SUM:		992	SUM:		993	SUM:			1291	SUM:			1293	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.661			0.662				0.861				0.862				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.561**			**0.562**				**0.761**				**0.762**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	**0.001**	**Δ*v/c* after mitigation:**	**-0.761**
Significant impacted?	**NO**	**Fully mitigated?**	**N/A**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
25	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	14	0	**14**	0	14	**14**	0	15	0	**15**	0	15	0	**15**		15		**0**
Left-Through		1							1				1					
Through	59	0	73	13	72	86	13	78	0	93	13	91	0	106		91		0
Through-Right		0							0				0					
Right	11	1	11	0	11	11	8	20	1	20	0	20	1	20		20		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	7	0	7	0	7	7	28	36	0	36	0	36	0	36		36		0
Left-Through		0							0				0					
Through	122	0	**146**	3	125	**149**	13	146	0	**201**	3	149	0	**204**		149		**0**
Through-Right		0							0				0					
Right	17	0	0	0	17	0	0	19	0	0	0	19	0	0		19		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	4	0	**4**	3	7	**7**	0	4	0	**4**	3	7	0	**7**		7		0
Left-Through		0							0				0					
Through	88	0	117	0	88	120	100	196	0	227	0	196	0	230		196		**0**
Through-Right		0							0				0					
Right	25	0	0	0	25	0	0	27	0	0	0	27	0	0		27		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	36	0	36	0	36	36	5	44	0	44	0	44	0	44		44		**0**
Left-Through		0							0				0					
Through	111	0	**168**	0	111	**168**	100	221	0	**292**	0	221	0	**292**		221		0
Through-Right		0							0				0					
Right	21	0	0	0	21	0	4	27	0	0	0	27	0	0		27		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		160	*North-South:*		163	*North-South:*			216	*North-South:*			219	*North-South:*			0
	East-West:		172	*East-West:*		175	*East-West:*			296	*East-West:*			299	*East-West:*			0
	SUM:		332	*SUM:*		338	*SUM:*			512	*SUM:*			518	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.221			0.225				0.341				0.345				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.121**			**0.125**				**0.241**				**0.245**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.241
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
25	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	33	0	33	0	33	33	0	36	0	36	0	36	0	36		36		**0**
Left-Through		0							0				0					
Through	175	0	**236**	4	179	**240**	16	207	0	**279**	4	211	0	**283**		211		0
Through-Right		0							0				0					
Right	28	0	0	0	28	0	5	36	0	0	0	36	0	0		36		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	9	0	**9**	0	9	**9**	7	17	0	**17**	0	17	0	**17**		17		0
Left-Through		0							0				0					
Through	44	0	90	14	58	104	10	58	0	115	14	72	0	129		72		**0**
Through-Right		0							0				0					
Right	37	0	0	0	37	0	0	40	0	0	0	40	0	0		40		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	12	0	12	0	12	12	0	13	0	13	0	13	0	13		13		0
Left-Through		0							0				0					
Through	209	0	**292**	0	209	**292**	110	339	0	**430**	0	339	0	**430**		339		**0**
Through-Right		0							0				0					
Right	71	0	0	0	71	0	0	78	0	0	0	78	0	0		78		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	54	0	**54**	0	54	**54**	12	71	0	**71**	0	71	0	**71**		71		**0**
Left-Through		0							0				0					
Through	149	0	234	0	149	234	148	311	0	436	0	311	0	436		311		0
Through-Right		0							0				0					
Right	31	0	0	0	31	0	20	54	0	0	0	54	0	0		54		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		245	*North-South:*		249	*North-South:*			296	*North-South:*			300	*North-South:*			0
	East-West:		346	*East-West:*		346	*East-West:*			501	*East-West:*			501	*East-West:*			0
	SUM:		591	*SUM:*		595	*SUM:*			797	*SUM:*			801	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.394			0.397				0.531				0.534				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.294**			**0.297**				**0.431**				**0.434**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--
No. of Phases																				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?																				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
ATSAC-1 or ATSAC+ATCS-2?																				
Override Capacity																				

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.431
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	39	1	**39**	0	39	**39**	49	92	1	**92**	0	92	1	**92**		92		**0**
Left-Through		0							0				0					
Through	589	2	295	49	638	319	63	707	2	354	49	756	2	378		756		0
Through-Right		0							0				0					
Right	82	1	50	0	82	50	86	176	1	124	0	176	1	124		176		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	45	1	45	0	45	45	3	52	1	52	0	52	1	52		52		0
Left-Through		0							0				0					
Through	1258	1	**643**	10	1268	**648**	108	1484	1	**791**	10	1494	1	**796**		1494		**0**
Through-Right		1							1				1					
Right	28	0	28	0	28	28	67	98	0	98	0	98	0	98		98		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	21	1	21	0	21	21	8	31	1	31	0	31	1	31		31		0
Left-Through		0							0				0					
Through	58	0	**105**	0	58	**105**	71	134	0	**208**	0	134	0	**208**		134		**0**
Through-Right		1							1				1					
Right	47	0	0	0	47	0	23	74	0	0	0	74	0	0		74		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	64	1	**64**	0	64	**64**	34	104	1	**104**	0	104	1	**104**		104		**0**
Left-Through		0							0				0					
Through	52	0	89	0	52	89	88	145	0	185	0	145	0	185		145		0
Through-Right		1							1				1					
Right	37	0	0	0	37	0	0	40	0	0	0	40	0	0		40		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		682	*North-South:*		687	*North-South:*			883	*North-South:*			888	*North-South:*			0
	East-West:		169	*East-West:*		169	*East-West:*			312	*East-West:*			312	*East-West:*			0
	SUM:		851	*SUM:*		856	*SUM:*			1195	*SUM:*			1200	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.567			0.571				0.797				0.800				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.467			0.471				0.697				0.700				0.000
LEVEL OF SERVICE (LOS):			A			A				B				C				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.003 **Δ*v/c* after mitigation:** -0.697

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	80	1	80	0	80	80	43	130	1	130	0	130	1	130		130		**0**
	Left-Through		0							0				0					
	Through	1082	2	**541**	12	1094	**547**	113	1296	2	**648**	12	1308	2	**654**		1308		0
	Through-Right		0							0				0					
	Right	152	1	109	0	152	109	111	277	1	201	0	277	1	201		277		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	0	64	**64**	9	79	1	**79**	0	79	1	**79**		79		0
	Left-Through		0							0				0					
	Through	833	1	432	44	877	454	183	1094	1	573	44	1138	1	595		1138		**0**
	Through-Right		1							1				1					
	Right	31	0	31	0	31	31	17	51	0	51	0	51	0	51		51		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	73	1	73	0	73	73	41	121	1	121	0	121	1	121		121		0
	Left-Through		0							0				0					
	Through	126	0	**226**	0	126	**226**	107	245	0	**406**	0	245	0	**406**		245		**0**
	Through-Right		1							1				1					
	Right	100	0	0	0	100	0	52	161	0	0	0	161	0	0		161		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	87	1	**87**	0	87	**87**	58	153	1	**153**	0	153	1	**153**		153		**0**
	Left-Through		0							0				0					
	Through	87	0	181	0	87	181	95	190	0	293	0	190	0	293		190		0
	Through-Right		1							1				1					
	Right	94	0	0	0	94	0	0	103	0	0	0	103	0	0		103		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		605	North-South:		611	North-South:			727	North-South:			733	North-South:			0
		East-West:		313	East-West:		313	East-West:			559	East-West:			559	East-West:			0
		SUM:		918	SUM:		924	SUM:			1286	SUM:			1292	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.612			0.616				0.857				0.861				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.512**			**0.516**				**0.757**				**0.761**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.004 **Δ*v/c* after mitigation:** -0.757

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	20	1	**20**	0	20	**20**	11	33	1	**33**	0	33	1	**33**		33		**0**
Left-Through		0							0				0					
Through	81	0	91	8	89	99	60	149	0	197	8	157	0	205		157		0
Through-Right		1							1				1					
Right	10	0	0	0	10	0	37	48	0	0	0	48	0	0		48		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	23	1	23	1	24	24	46	71	1	71	1	72	1	72		72		0
Left-Through		0							0				0					
Through	303	0	**362**	2	305	**364**	41	372	0	**458**	2	374	0	**460**		374		**0**
Through-Right		1							1				1					
Right	59	0	0	0	59	0	21	86	0	0	0	86	0	0		86		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	58	1	**58**	0	58	**58**	70	133	1	**133**	0	133	1	**133**		133		0
Left-Through		0							0				0					
Through	50	0	108	0	50	108	89	144	0	209	0	144	0	209		144		**0**
Through-Right		1							1				1					
Right	58	0	0	0	58	0	2	65	0	0	0	65	0	0		65		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	28	1	28	0	28	28	18	49	1	49	0	49	1	49		49		**0**
Left-Through		0							0				0					
Through	42	0	**94**	0	42	**99**	90	136	0	**227**	0	136	0	**232**		136		0
Through-Right		1							1				1					
Right	52	0	0	5	57	0	34	91	0	0	5	96	0	0		96		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		382	*North-South:*		384	*North-South:*			491	*North-South:*			493	*North-South:*			0
	East-West:		152	*East-West:*		157	*East-West:*			360	*East-West:*			365	*East-West:*			0
	SUM:		534	*SUM:*		541	*SUM:*			851	*SUM:*			858	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.356			0.361				0.567				0.572				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.256**			**0.261**				**0.467**				**0.472**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--	EXISTING CONDITION	EXISTING PLUS PROJECT	FUTURE CONDITION W/O PROJECT	FUTURE CONDITION W/ PROJECT	FUTURE W/ PROJECT W/ MITIGATION
No. of Phases					2	2	2	2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	
ATSAC-1 or ATSAC+ATCS-2?					2	2	2	2	
Override Capacity					0	0	0	0	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.467
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	43	1	**43**	0	43	**43**	3	50	1	**50**	0	50	1	**50**		50		**0**
	Left-Through		0							0				0					
	Through	262	0	274	2	264	276	64	351	0	387	2	353	0	389		353		0
	Through-Right		1							1				1					
	Right	12	0	0	0	12	0	23	36	0	0	0	36	0	0		36		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	17	1	17	5	22	22	40	59	1	59	5	64	1	64		64		0
	Left-Through		0							0				0					
	Through	165	0	**261**	7	172	**268**	97	277	0	**430**	7	284	0	**437**		284		**0**
	Through-Right		1							1				1					
	Right	96	0	0	0	96	0	48	153	0	0	0	153	0	0		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	150	1	**150**	0	150	**150**	115	279	1	**279**	0	279	1	**279**		279		0
	Left-Through		0							0				0					
	Through	118	0	205	0	118	205	110	239	0	346	0	239	0	346		239		**0**
	Through-Right		1							1				1					
	Right	87	0	0	0	87	0	12	107	0	0	0	107	0	0		107		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	23	1	23	0	23	23	35	60	1	60	0	60	1	60		60		**0**
	Left-Through		0							0				0					
	Through	103	0	**203**	0	103	**204**	102	215	0	**374**	0	215	0	**375**		215		0
	Through-Right		1							1				1					
	Right	100	0	0	1	101	0	50	159	0	0	1	160	0	0		160		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		304	*North-South:*		311	*North-South:*			480	*North-South:*			487	*North-South:*			0
		East-West:		353	*East-West:*		354	*East-West:*			653	*East-West:*			654	*East-West:*			0
		SUM:		657	*SUM:*		665	*SUM:*			1133	*SUM:*			1141	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.438			0.443				0.755				0.761				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.338**			**0.343**				**0.655**				**0.661**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.655
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
28	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	26	1	**26**	0	26	**26**	1	29	1	**29**	0	29	1	**29**		29		**0**
Left-Through		0							0				0					
Through	1157	2	423	5	1162	424	196	1461	2	530	5	1466	2	532		1466		0
Through-Right		1							1				1					
Right	111	0	111	0	111	111	9	130	0	130	0	130	0	130		130		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	60	1	60	0	60	60	55	121	1	121	0	121	1	121		121		0
Left-Through		0							0				0					
Through	1500	2	**603**	1	1501	**603**	195	1836	2	**745**	1	1837	2	**745**		1837		**0**
Through-Right		1							1				1					
Right	308	0	308	0	308	308	62	399	0	399	0	399	0	399		399		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	268	1	**268**	0	268	**268**	82	375	1	**375**	0	375	1	**375**		375		0
Left-Through		0							0				0					
Through	1115	2	388	13	1128	392	189	1408	2	489	13	1421	2	493		1421		**0**
Through-Right		1							1				1					
Right	48	0	48	0	48	48	6	58	0	58	0	58	0	58		58		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	146	1	146	0	146	146	17	177	1	177	0	177	1	177		177		**0**
Left-Through		0							0				0					
Through	1340	2	**459**	3	1343	**460**	211	1677	2	**597**	3	1680	2	**598**		1680		0
Through-Right		1							1				1					
Right	37	0	37	0	37	37	73	113	0	113	0	113	0	113		113		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		629	*North-South:*		629	*North-South:*			774	*North-South:*			774	*North-South:*			0
	East-West:		727	*East-West:*		728	*East-West:*			972	*East-West:*			973	*East-West:*			0
	SUM:		1356	*SUM:*		1357	*SUM:*			1746	*SUM:*			1747	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.986			0.987				1.270				1.271				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.886**			**0.887**				**1.170**				**1.171**				0.000
LEVEL OF SERVICE (LOS):			**D**			**D**				**F**				**F**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.001	Δ*v/c* after mitigation:	-1.170
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
28	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	31	1	**31**	0	31	**31**	5	39	1	**39**	0	39	1	**39**		39		**0**
Left-Through		0							0				0					
Through	1123	2	405	1	1124	405	252	1480	2	535	1	1481	2	536		1481		0
Through-Right		1							1				1					
Right	92	0	92	0	92	92	25	126	0	126	0	126	0	126		126		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	108	1	108	0	108	108	81	199	1	199	0	199	1	199		199		0
Left-Through		0							0				0					
Through	1311	2	**553**	5	1316	**554**	229	1663	2	**712**	5	1668	2	**714**		1668		**0**
Through-Right		1							1				1					
Right	347	0	347	0	347	347	93	473	0	473	0	473	0	473		473		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	172	1	172	0	172	172	91	279	1	279	0	279	1	**279**		279		0
Left-Through		0							0				0					
Through	1619	2	**556**	3	1622	**557**	203	1974	2	**677**	3	1977	2	678		1977		**0**
Through-Right		1							1				1					
Right	50	0	50	0	50	50	1	56	0	56	0	56	0	56		56		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	140	1	**140**	0	140	**140**	21	174	1	**174**	0	174	1	174		174		**0**
Left-Through		0							0				0					
Through	1206	2	427	12	1218	431	244	1563	2	570	12	1575	2	**574**		1575		0
Through-Right		1							1				1					
Right	76	0	76	0	76	76	65	148	0	148	0	148	0	148		148		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		584	*North-South:*		585	*North-South:*			751	*North-South:*			753	*North-South:*			0
	East-West:		696	*East-West:*		697	*East-West:*			851	*East-West:*			853	*East-West:*			0
	SUM:		1280	*SUM:*		1282	*SUM:*			1602	*SUM:*			1606	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.931			0.932				1.165				1.168				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.831**			**0.832**				**1.065**				**1.068**				0.000
LEVEL OF SERVICE (LOS):			**D**			**D**				**F**				**F**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			4			4			4			4						
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2						
Override Capacity			0			0			0			0						

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-1.065
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
29	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	30	1	**30**	0	30	**30**	3	36	1	**36**	0	36	1	**36**		36		**0**
Left-Through		0							0				0					
Through	376	1	200	13	389	206	124	535	1	288	13	548	1	295		548		0
Through-Right		1							1				1					
Right	23	0	23	0	23	23	16	41	0	41	0	41	0	41		41		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	44	1	44	0	44	44	17	65	1	65	0	65	1	65		65		0
Left-Through		0							0				0					
Through	876	1	**535**	3	879	**536**	117	1075	1	**647**	3	1078	1	**648**		1078		**0**
Through-Right		1							1				1					
Right	193	0	193	0	193	193	7	218	0	218	0	218	0	218		218		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	100	1	**100**	3	103	**103**	20	129	1	**129**	3	132	1	**132**		132		0
Left-Through		0							0				0					
Through	1051	2	368	10	1061	371	244	1393	2	485	10	1403	2	489		1403		**0**
Through-Right		1							1				1					
Right	52	0	52	0	52	52	6	63	0	63	0	63	0	63		63		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	67	1	67	0	67	67	24	97	1	97	0	97	1	97		97		**0**
Left-Through		0							0				0					
Through	1269	2	**436**	3	1272	**437**	242	1630	2	**565**	3	1633	2	**566**		1633		0
Through-Right		1							1				1					
Right	39	0	39	0	39	39	23	66	0	66	0	66	0	66		66		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		565	*North-South:*		566	*North-South:*			683	*North-South:*			684	*North-South:*			0
	East-West:		536	*East-West:*		540	*East-West:*			694	*East-West:*			698	*East-West:*			0
	SUM:		1101	*SUM:*		1106	*SUM:*			1377	*SUM:*			1382	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.773			0.776				0.966				0.970				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.673**			**0.676**				**0.866**				**0.870**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**D**				**D**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			3			3			3			3			3			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			
Override Capacity			0			0			0			0			0			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.866
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
29	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	45	1	45	0	45	45	87	136	1	136	0	136	1	136		136		**0**
Left-Through		0							0				0					
Through	779	1	**423**	3	782	**425**	92	944	1	**523**	3	947	1	**524**		947		0
Through-Right		1							1				1					
Right	67	0	67	0	67	67	28	101	0	101	0	101	0	101		101		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	66	1	**66**	0	66	**66**	24	96	1	**96**	0	96	1	**96**		96		0
Left-Through		0							0				0					
Through	458	1	273	12	470	279	149	650	1	377	12	662	1	383		662		**0**
Through-Right		1							1				1					
Right	87	0	87	0	87	87	8	103	0	103	0	103	0	103		103		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	230	1	**230**	0	230	**230**	8	260	1	**260**	0	260	1	**260**		260		0
Left-Through		0							0				0					
Through	1362	2	467	3	1365	468	314	1804	2	617	3	1807	2	618		1807		**0**
Through-Right		1							1				1					
Right	39	0	39	0	39	39	4	47	0	47	0	47	0	47		47		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	41	1	41	0	41	41	26	71	1	71	0	71	1	71		71		**0**
Left-Through		0							0				0					
Through	1209	2	**425**	12	1221	**429**	375	1697	2	**590**	12	1709	2	**594**		1709		0
Through-Right		1							1				1					
Right	66	0	66	0	66	66	0	72	0	72	0	72	0	72		72		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		489	*North-South:*		491	*North-South:*			619	*North-South:*			620	*North-South:*			0
	East-West:		655	*East-West:*		659	*East-West:*			850	*East-West:*			854	*East-West:*			0
	SUM:		1144	*SUM:*		1150	*SUM:*			1469	*SUM:*			1474	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.803			0.807				1.031				1.034				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.703**			**0.707**				**0.931**				**0.934**				0.000
LEVEL OF SERVICE (LOS):			**C**			**C**				**E**				**E**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0

No. of Phases	3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0
ATSAC-1 or ATSAC+ATCS-2?	2
Override Capacity	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.931
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
30	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	10	1	10	0	10	10	0	11	1	11	0	11	1	11		11		**0**
Left-Through		0							0				0					
Through	51	0	**99**	13	64	**112**	15	71	0	**123**	13	84	0	**136**		84		0
Through-Right		1							1				1					
Right	48	0	0	0	48	0	0	52	0	0	0	52	0	0		52		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	12	1	**12**	0	12	**12**	5	18	1	**18**	0	18	1	**18**		18		0
Left-Through		0							0				0					
Through	41	0	62	2	43	65	8	53	0	78	2	55	0	81		55		**0**
Through-Right		1							1				1					
Right	21	0	0	1	22	0	2	25	0	0	1	26	0	0		26		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	22	1	**22**	0	22	**22**	0	24	1	**24**	0	24	1	**24**		24		0
Left-Through		0							0				0					
Through	933	2	318	10	943	322	278	1298	2	441	10	1308	2	444		1308		**0**
Through-Right		1							1				1					
Right	22	0	22	0	22	22	0	24	0	24	0	24	0	24		24		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	44	1	44	1	45	45	0	48	1	48	1	49	1	49		49		**0**
Left-Through		0							0				0					
Through	1619	2	**550**	2	1621	**551**	287	2058	2	**697**	2	2060	2	**698**		2060		0
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		111	*North-South:*		124	*North-South:*			141	*North-South:*			154	*North-South:*			0
	East-West:		572	*East-West:*		573	*East-West:*			721	*East-West:*			722	*East-West:*			0
	SUM:		683	*SUM:*		697	*SUM:*			862	*SUM:*			876	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.455			0.465				0.575				0.584				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.355**			**0.365**				**0.475**				**0.484**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.009 **Δ*v/c* after mitigation:** -0.475

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
30	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	46	1	46	0	46	46	0	50	1	50	0	50	1	50		50		**0**
Left-Through		0							0				0					
Through	166	0	**297**	3	169	**300**	11	193	0	**336**	3	196	0	**339**		196		0
Through-Right		1							1				1					
Right	131	0	0	0	131	0	0	143	0	0	0	143	0	0		143		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	59	1	**59**	0	59	**59**	5	70	1	**70**	0	70	1	**70**		70		0
Left-Through		0							0				0					
Through	66	0	127	12	78	141	8	80	0	157	12	92	0	171		92		**0**
Through-Right		1							1				1					
Right	61	0	0	2	63	0	10	77	0	0	2	79	0	0		79		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	35	1	35	1	36	36	3	41	1	41	1	42	1	42		42		0
Left-Through		0							0				0					
Through	1390	2	**487**	2	1392	**488**	362	1882	2	**653**	2	1884	2	**654**		1884		**0**
Through-Right		1							1				1					
Right	71	0	71	0	71	71	0	78	0	78	0	78	0	78		78		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	76	1	**76**	0	76	**76**	0	83	1	**83**	0	83	1	**83**		83		**0**
Left-Through		0							0				0					
Through	1209	2	418	9	1218	421	382	1704	2	586	9	1713	2	589		1713		0
Through-Right		1							1				1					
Right	44	0	44	0	44	44	6	54	0	54	0	54	0	54		54		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		356	*North-South:*		359	*North-South:*			406	*North-South:*			409	*North-South:*			0
	East-West:		563	*East-West:*		564	*East-West:*			736	*East-West:*			737	*East-West:*			0
	SUM:		919	*SUM:*		923	*SUM:*			1142	*SUM:*			1146	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.613			0.615				0.761				0.764				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.513**			**0.515**				**0.661**				**0.664**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.661
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
31	East-West Street:	VINE STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 3 SB--		3	NB-- 3 SB--		3	NB-- 3 SB--		3		NB-- 3 SB--		3		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	64	1	**64**	0	64	**64**	2	72	1	**72**	0	72	1	**72**		72		**0**
Left-Through		0							0				0					
Through	625	2	313	38	663	332	141	825	2	413	38	863	2	432		863		0
Through-Right		0							0				0					
Right	155	1	29	0	155	29	33	203	1	23	0	203	1	23		203		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	52	1	52	0	52	52	58	115	1	115	0	115	1	115		115		0
Left-Through		0							0				0					
Through	1338	2	**669**	8	1346	**673**	156	1619	2	**810**	8	1627	2	**814**		1627		**0**
Through-Right		0							0				0					
Right	95	1	36	3	98	29	27	131	1	50	3	134	1	43		134		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	59	1	**59**	10	69	**69**	16	81	1	**81**	10	91	1	**91**		91		0
Left-Through		0							0				0					
Through	949	2	340	0	949	340	265	1303	2	461	0	1303	2	461		1303		**0**
Through-Right		1							1				1					
Right	70	0	70	0	70	70	2	79	0	79	0	79	0	79		79		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	126	1	126	0	126	126	42	180	1	180	0	180	1	180		180		**0**
Left-Through		0							0				0					
Through	1397	2	**499**	0	1397	**499**	258	1786	2	**648**	0	1786	2	**648**		1786		0
Through-Right		1							1				1					
Right	100	0	100	0	100	100	49	158	0	158	0	158	0	158		158		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		733	*North-South:*		737	*North-South:*			882	*North-South:*			886	*North-South:*			0
	East-West:		558	*East-West:*		568	*East-West:*			729	*East-West:*			739	*East-West:*			0
	SUM:		1291	*SUM:*		1305	*SUM:*			1611	*SUM:*			1625	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.906			0.916				1.131				1.140				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.806**			**0.816**				**1.031**				**1.040**				0.000
LEVEL OF SERVICE (LOS):			**D**			**D**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-1.031
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
31	East-West Street:	VINE STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	84	1	84	0	84	84	3	95	1	95	0	95	1	95		95		**0**
Left-Through		0							0				0					
Through	1065	2	**533**	9	1074	**537**	218	1383	2	**692**	9	1392	2	**696**		1392		0
Through-Right		0							0				0					
Right	160	1	11	0	160	11	43	218	1	9	0	218	1	9		218		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	61	1	**61**	0	61	**61**	113	180	1	**180**	0	180	1	**180**		180		0
Left-Through		0							0				0					
Through	823	2	412	35	858	429	209	1109	2	555	35	1144	2	572		1144		**0**
Through-Right		0							0				0					
Right	80	1	0	9	89	0	47	134	1	0	9	143	1	0		143		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	95	1	95	2	97	97	56	160	1	160	2	162	1	162		162		0
Left-Through		0							0				0					
Through	1264	2	**450**	0	1264	**450**	307	1689	2	**595**	0	1689	2	**595**		1689		**0**
Through-Right		1							1				1					
Right	86	0	86	0	86	86	3	97	0	97	0	97	0	97		97		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	149	1	**149**	0	149	**149**	46	209	1	**209**	0	209	1	**209**		209		**0**
Left-Through		0							0				0					
Through	1174	2	423	0	1174	423	338	1622	2	615	0	1622	2	615		1622		0
Through-Right		1							1				1					
Right	95	0	95	0	95	95	119	223	0	223	0	223	0	223		223		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		594	*North-South:*		598	*North-South:*			872	*North-South:*			876	*North-South:*			0
	East-West:		599	*East-West:*		599	*East-West:*			804	*East-West:*			804	*East-West:*			0
	SUM:		1193	*SUM:*		1197	*SUM:*			1676	*SUM:*			1680	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.837			0.840				1.176				1.179				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.737			0.740				1.076				1.079				0.000
LEVEL OF SERVICE (LOS):			C			C				F				F				A

	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--
No. of Phases																				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?																				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	3	3	0	0	3	3	0	0	3	3	0	0	3	3	0	0				
ATSAC-1 or ATSAC+ATCS-2?																				
Override Capacity																				

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-1.076
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

31

PROJECT TITLE:
North-South Street: SUNSET BOULEVARD **East-West Street:** VINE STREET
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 12/27/2012

			AM PEAK HOUR			PM PEAK HOUR		
		No. of Phases			3			3
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0
		Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB -- 3 SB --		3	NB -- 3 SB --		3
			EB -- 0 WB --		0	EB -- 0 WB --		0
		ATSAC-1 or ATSAC+ATCS-2?			2			2
		Override Capacity			0			0
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND		Left	64	1	**64**	84	1	84
		Left-Through		0			0	
		Through	657	2	329	1073	2	**537**
		Through-Right		0			0	
		Right	155	1	29	160	1	11
		Left-Through-Right		0			0	
		Left-Right						
SOUTHBOUND		Left	52	1	52	61	1	**61**
		Left-Through		0			0	
		Through	1345	2	**673**	853	2	427
		Through-Right		0			0	
		Right	98	1	30	88	1	0
		Left-Through-Right		0			0	
		Left-Right						
EASTBOUND		Left	68	1	**68**	97	1	97
		Left-Through		0			0	
		Through	949	2	340	1264	2	**450**
		Through-Right		1			1	
		Right	70	0	70	86	0	86
		Left-Through-Right		0			0	
		Left-Right						
WESTBOUND		Left	126	1	126	149	1	**149**
		Left-Through		0			0	
		Through	1397	2	**499**	1174	2	423
		Through-Right		1			1	
		Right	100	0	100	95	0	95
		Left-Through-Right		0			0	
		Left-Right						
	CRITICAL VOLUMES			*North-South:*	737		*North-South:*	598
				East-West:	567		*East-West:*	599
				SUM:	1304		*SUM:*	1197
	VOLUME/CAPACITY *(V/C)* RATIO:				0.915			0.840
	V/C LESS ATSAC/ATCS ADJUSTMENT:			*With TDM*	**0.815**		*With TDM*	**0.740**
	LEVEL OF SERVICE (LOS):				**D**			**C**
				With TDM+Signal Imp.	**0.805**		*With TDM+Signal Imp.*	**0.730**
					D			**C**

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
32	East-West Street:	ARGYLE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	**0**	0	0	**0**	23	23	0	**23**	0	23	0	**23**		23		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	10	10	0	56	0	10	0	56		10		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	23	23	0	0	0	23	0	0		23		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	74	0	74	2	76	76	11	92	0	92	2	94	0	94		94		0
Left-Through		0							0				0					
Through	0	0	**171**	0	0	**173**	2	2	0	**246**	0	2	0	**248**		2		**0**
Through-Right		0							0				0					
Right	97	0	0	0	97	0	46	152	0	0	0	152	0	0		152		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	95	1	**95**	0	95	**95**	73	177	1	**177**	0	177	1	**177**		177		0
Left-Through		0							0				0					
Through	1103	2	368	0	1103	368	279	1485	2	497	0	1485	2	497		1485		**0**
Through-Right		1							1				1					
Right	0	0	0	0	0	0	5	5	0	5	0	5	0	5		5		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	0	0	0	0	5	5	0	5	0	5	0	5		5		**0**
Left-Through		1							1				1					
Through	1563	1	**543**	0	1563	**546**	282	1991	1	**707**	0	1991	1	**709**		1991		0
Through-Right		1							1				1					
Right	67	0	543	8	75	546	26	99	0	707	8	107	0	709		107		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		171	*North-South:*		173	*North-South:*			269	*North-South:*			271	*North-South:*			0
	East-West:		638	*East-West:*		641	*East-West:*			884	*East-West:*			886	*East-West:*			0
	SUM:		809	*SUM:*		814	*SUM:*			1153	*SUM:*			1157	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.539			0.543				0.769				0.771				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.439**			**0.443**				**0.669**				**0.671**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.669
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
32	East-West Street:	ARGYLE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	0	0	**0**	18	18	0	**18**	0	18	0	**18**		18		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	8	8	0	44	0	8	0	44		8		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	18	18	0	0	0	18	0	0		18		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	91	0	91	7	98	98	35	135	0	135	7	142	0	142		142		0
	Left-Through		0							0				0					
	Through	0	0	**200**	0	0	**207**	13	13	0	**356**	0	13	0	**363**		13		**0**
	Through-Right		0							0				0					
	Right	109	0	0	0	109	0	89	208	0	0	0	208	0	0		208		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	143	1	**143**	0	143	**143**	63	219	1	**219**	0	219	1	**219**		219		0
	Left-Through		0							0				0					
	Through	1381	2	460	0	1381	460	367	1877	2	635	0	1877	2	635		1877		**0**
	Through-Right		1							1				1					
	Right	0	0	0	0	0	0	29	29	0	29	0	29	0	29		29		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	29	29	0	29	0	29	0	29		29		**0**
	Left-Through		1							1				1					
	Through	1316	1	**472**	0	1316	**473**	401	1840	1	**716**	0	1840	1	**717**		1840		0
	Through-Right		1							1				1					
	Right	101	0	472	2	103	473	24	134	0	716	2	136	0	717		136		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		200	*North-South:*		207	*North-South:*			374	*North-South:*			381	*North-South:*			0
		East-West:		615	*East-West:*		616	*East-West:*			935	*East-West:*			936	*East-West:*			0
		SUM:		815	*SUM:*		823	*SUM:*			1309	*SUM:*			1317	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.543			0.549				0.873				0.878				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.443**			**0.449**				**0.773**				**0.778**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.773
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
33	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	8	1	**8**	0	8	**8**	0	9	1	**9**	0	9	1	**9**		9		**0**
Left-Through		0							0				0					
Through	539	1	272	13	552	279	135	724	1	365	13	737	1	371		737		0
Through-Right		1							1				1					
Right	5	0	5	0	5	5	0	5	0	5	0	5	0	5		5		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	13	0	13	0	13	13	0	14	0	14	0	14	0	14		14		0
Left-Through		1							1				1					
Through	972	0	**521**	3	975	**523**	121	1184	0	**644**	3	1187	0	**646**		1187		**0**
Through-Right		1							1				1					
Right	44	0	521	0	44	523	0	48	0	644	0	48	0	646		48		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	12	0	**12**	0	12	**12**	0	13	0	**13**	0	13	0	**13**		13		0
Left-Through		0							0				0					
Through	43	0	69	3	46	72	5	52	0	80	3	55	0	83		55		**0**
Through-Right		0							0				0					
Right	14	0	0	0	14	0	0	15	0	0	0	15	0	0		15		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	16	0	16	0	16	16	0	17	0	17	0	17	0	17		17		**0**
Left-Through		0							0				0					
Through	76	0	**120**	1	77	**121**	5	88	0	**136**	1	89	0	**137**		89		0
Through-Right		0							0				0					
Right	28	0	0	0	28	0	0	31	0	0	0	31	0	0		31		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		529	*North-South:*		531	*North-South:*			653	*North-South:*			655	*North-South:*			0
	East-West:		132	*East-West:*		133	*East-West:*			149	*East-West:*			150	*East-West:*			0
	SUM:		661	*SUM:*		664	*SUM:*			802	*SUM:*			805	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.441			0.443				0.535				0.537				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.341**			**0.343**				**0.435**				**0.437**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.002 **Δ*v/c* after mitigation:** -0.435

Significant impacted? NO **Fully mitigated?** N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
33	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	10	1	10	0	10	10	0	11	1	11	0	11	1	11		11		**0**
Left-Through		0							0				0					
Through	795	1	**406**	3	798	**408**	185	1054	1	**537**	3	1057	1	**538**		1057		0
Through-Right		1							1				1					
Right	17	0	17	0	17	17	0	19	0	19	0	19	0	19		19		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	31	0	**31**	0	31	**31**	0	34	0	**34**	0	34	0	**34**		34		0
Left-Through		1							1				1					
Through	555	0	358	12	567	364	172	779	0	512	12	791	0	518		791		**0**
Through-Right		1							1				1					
Right	37	0	358	0	37	364	0	40	0	512	0	40	0	518		40		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	60	0	60	0	60	60	0	66	0	66	0	66	0	66		66		0
Left-Through		0							0				0					
Through	173	0	**272**	1	174	**273**	7	196	0	**305**	1	197	0	**306**		197		**0**
Through-Right		0							0				0					
Right	39	0	0	0	39	0	0	43	0	0	0	43	0	0		43		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	25	0	**25**	0	25	**25**	0	27	0	**27**	0	27	0	**27**		27		**0**
Left-Through		0							0				0					
Through	92	0	185	2	94	187	9	110	0	211	2	112	0	213		112		0
Through-Right		0							0				0					
Right	68	0	0	0	68	0	0	74	0	0	0	74	0	0		74		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		437	*North-South:*		439	*North-South:*			571	*North-South:*			572	*North-South:*			0
	East-West:		297	*East-West:*		298	*East-West:*			332	*East-West:*			333	*East-West:*			0
	SUM:		734	*SUM:*		737	*SUM:*			903	*SUM:*			905	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.489			0.491				0.602				0.603				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.389**			**0.391**				**0.502**				**0.503**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			2			2			2			2			2			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			
Override Capacity			0			0			0			0			0			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.001	Δ*v/c* after mitigation:	-0.502
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
34	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	59	1	**59**	0	59	**59**	0	65	1	**65**	0	65	1	**65**		65		**0**
Left-Through		0							0				0					
Through	718	1	368	36	754	386	183	968	1	494	36	1004	1	512		1004		0
Through-Right		1							1				1					
Right	18	0	18	0	18	18	0	20	0	20	0	20	0	20		20		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	23	1	23	0	23	23	3	28	1	28	0	28	1	28		28		0
Left-Through		0							0				0					
Through	1182	1	**621**	7	1189	**625**	194	1487	1	**779**	7	1494	1	**783**		1494		**0**
Through-Right		1							1				1					
Right	60	0	60	1	61	61	5	71	0	71	1	72	0	72		72		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	45	1	**45**	3	48	**48**	5	54	1	**54**	3	57	1	**57**		57		0
Left-Through		0							0				0					
Through	33	0	94	0	33	94	0	36	0	103	0	36	0	103		36		**0**
Through-Right		1							1				1					
Right	61	0	0	0	61	0	0	67	0	0	0	67	0	0		67		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	26	0	26	0	26	26	0	28	0	28	0	28	0	28		28		**0**
Left-Through		0							0				0					
Through	74	0	**127**	0	74	**127**	0	81	0	**141**	0	81	0	**141**		81		0
Through-Right		0							0				0					
Right	27	0	0	0	27	0	2	32	0	0	0	32	0	0		32		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		680	*North-South:*		684	*North-South:*			844	*North-South:*			848	*North-South:*			0
	East-West:		172	*East-West:*		175	*East-West:*			195	*East-West:*			198	*East-West:*			0
	SUM:		852	*SUM:*		859	*SUM:*			1039	*SUM:*			1046	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.568			0.573				0.693				0.697				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.468**			**0.473**				**0.593**				**0.597**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.593
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
34	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	101	1	**101**	0	101	**101**	0	110	1	**110**	0	110	1	**110**		110		**0**
Left-Through		0							0				0					
Through	1265	1	648	9	1274	653	242	1626	1	830	9	1635	1	835		1635		0
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	37	1	37	0	37	37	6	46	1	46	0	46	1	46		46		0
Left-Through		0							0				0					
Through	1112	1	**641**	32	1144	**658**	253	1469	1	**832**	32	1501	1	**849**		1501		**0**
Through-Right		1							1				1					
Right	170	0	170	2	172	172	9	195	0	195	2	197	0	197		197		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	121	1	121	1	122	122	7	139	1	139	1	140	1	140		140		0
Left-Through		0							0				0					
Through	121	0	**261**	0	121	**261**	0	132	0	**285**	0	132	0	**285**		132		**0**
Through-Right		1							1				1					
Right	140	0	0	0	140	0	0	153	0	0	0	153	0	0		153		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	25	0	**25**	0	25	**25**	0	27	0	**27**	0	27	0	**27**		27		**0**
Left-Through		0							0				0					
Through	61	0	106	0	61	106	0	67	0	123	0	67	0	123		67		0
Through-Right		0							0				0					
Right	20	0	0	0	20	0	7	29	0	0	0	29	0	0		29		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		742	*North-South:*		759	*North-South:*			942	*North-South:*			959	*North-South:*			0
	East-West:		286	*East-West:*		286	*East-West:*			312	*East-West:*			312	*East-West:*			0
	SUM:		1028	*SUM:*		1045	*SUM:*			1254	*SUM:*			1271	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.685			0.697				0.836				0.847				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.585**			**0.597**				**0.736**				**0.747**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.011	Δ*v/c* after mitigation:	-0.736
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
35	East-West Street:	FOUNTAIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	39	1	**39**	0	39	**39**	1	44	1	**44**	0	44	1	**44**		44		**0**
Left-Through		0							0				0					
Through	917	2	459	31	948	474	175	1178	2	589	31	1209	2	605		1209		0
Through-Right		0							0				0					
Right	79	1	26	0	79	26	0	86	1	28	0	86	1	28		86		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	15	1	15	1	16	16	4	20	1	20	1	21	1	21		21		0
Left-Through		0							0				0					
Through	1281	2	**641**	6	1287	**644**	183	1584	2	**792**	6	1590	2	**795**		1590		**0**
Through-Right		0							0				0					
Right	56	1	34	1	57	34	6	67	1	40	1	68	1	40		68		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	44	1	**44**	3	47	**47**	6	54	1	**54**	3	57	1	**57**		57		0
Left-Through		0							0				0					
Through	308	0	352	0	308	352	113	450	0	500	0	450	0	500		450		**0**
Through-Right		1							1				1					
Right	44	0	0	0	44	0	2	50	0	0	0	50	0	0		50		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	106	1	106	0	106	106	0	116	1	116	0	116	1	116		116		**0**
Left-Through		0							0				0					
Through	416	0	**452**	0	416	**455**	125	580	0	**621**	0	580	0	**624**		580		0
Through-Right		1							1				1					
Right	36	0	0	3	39	0	2	41	0	0	3	44	0	0		44		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		680	*North-South:*		683	*North-South:*			836	*North-South:*			839	*North-South:*			0
	East-West:		496	*East-West:*		502	*East-West:*			675	*East-West:*			681	*East-West:*			0
	SUM:		1176	*SUM:*		1185	*SUM:*			1511	*SUM:*			1520	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.784			0.790				1.007				1.013				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.684**			**0.690**				**0.907**				**0.913**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.907
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
35	East-West Street:	FOUNTAIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	74	1	74	0	74	74	2	83	1	83	0	83	1	83		83		**0**
	Left-Through		0							0				0					
	Through	1249	2	**625**	7	1256	**628**	226	1592	2	**796**	7	1599	2	**800**		1599		0
	Through-Right		0							0				0					
	Right	54	1	15	0	54	15	0	59	1	17	0	59	1	17		59		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	73	1	**73**	2	75	**75**	7	87	1	**87**	2	89	1	**89**		89		0
	Left-Through		0							0				0					
	Through	1137	2	569	28	1165	583	236	1480	2	740	28	1508	2	754		1508		**0**
	Through-Right		0							0				0					
	Right	48	1	7	2	50	8	9	61	1	11	2	63	1	13		63		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	83	1	83	1	84	84	9	100	1	100	1	101	1	101		101		0
	Left-Through		0							0				0					
	Through	477	0	**521**	0	477	**521**	144	666	0	**715**	0	666	0	**715**		666		**0**
	Through-Right		1							1				1					
	Right	44	0	0	0	44	0	1	49	0	0	0	49	0	0		49		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	78	1	**78**	0	78	**78**	0	85	1	**85**	0	85	1	**85**		85		**0**
	Left-Through		0							0				0					
	Through	308	0	363	0	308	364	144	481	0	549	0	481	0	550		481		0
	Through-Right		1							1				1					
	Right	55	0	0	1	56	0	8	68	0	0	1	69	0	0		69		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		698	North-South:		703	North-South:			883	North-South:			889	North-South:			0
		East-West:		599	East-West:		599	East-West:			800	East-West:			800	East-West:			0
		SUM:		1297	SUM:		1302	SUM:			1683	SUM:			1689	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.865			0.868				1.122				1.126				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.765**			**0.768**				**1.022**				**1.026**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-1.022
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
36	East-West Street:	SANTA MONICA BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					2
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- 0 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	64	1	**64**	0	64	**64**	25	95	1	**95**	0	95	1	**95**	0	95	1	**95**
	Left-Through		0							0				0				0	
	Through	906	2	453	10	916	458	155	1146	2	573	10	1156	2	578	-1	1155	2	578
	Through-Right		0							0				0				0	
	Right	71	1	4	0	71	4	2	80	1	3	0	80	1	3	0	80	1	3
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	68	1	68	2	70	70	24	98	1	98	2	100	1	100	0	100	1	100
	Left-Through		0							0				0				0	
	Through	1116	2	**558**	2	1118	**559**	149	1370	2	**685**	2	1372	2	**686**	0	1372	2	**686**
	Through-Right		0							0				0				0	
	Right	97	1	76	2	99	73	13	119	1	91	2	121	1	88	0	121	1	88
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	42	1	**42**	10	52	**52**	11	57	1	**57**	10	67	1	**67**	-1	66	1	**66**
	Left-Through		0							0				0				0	
	Through	780	1	417	0	780	417	203	1056	1	566	0	1056	1	566	0	1056	1	566
	Through-Right		1							1				1				1	
	Right	53	0	53	0	53	53	18	76	0	76	0	76	0	76	0	76	0	76
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	135	1	135	0	135	135	7	155	1	155	0	155	1	155	0	155	1	155
	Left-Through		0							0				0				0	
	Through	1195	1	**617**	0	1195	**622**	235	1542	1	**797**	0	1542	1	**802**	0	1542	1	**802**
	Through-Right		1							1				1				1	
	Right	39	0	39	10	49	49	9	52	0	52	10	62	0	62	-1	61	0	61
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		622	North-South:		623	North-South:			780	North-South:			781	North-South:			781
		East-West:		659	East-West:		674	East-West:			854	East-West:			869	East-West:			868
		SUM:		1281	SUM:		1297	SUM:			1634	SUM:			1650	SUM:			1649
	VOLUME/CAPACITY (V/C) RATIO:			0.854			0.865				1.089				1.100				1.099
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.754			0.765				0.989				1.000	With Imp.+TDM			0.999
	LEVEL OF SERVICE (LOS):			C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.989 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.011 — Δ*v/c* after mitigation: 0.000

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
36	East-West Street:	SANTA MONICA BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	83	1	83	0	83	83	27	118	1	118	0	118	1	118	0	118	1	118
	Left-Through		0							0				0				0	
	Through	1122	2	**561**	2	1124	**562**	179	1406	2	**703**	2	1408	2	**704**	0	1408	2	**704**
	Through-Right		0							0				0				0	
	Right	94	1	38	0	94	38	8	111	1	47	0	111	1	47	0	111	1	47
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	73	1	**73**	9	82	**82**	20	100	1	**100**	9	109	1	**109**	-1	108	1	**108**
	Left-Through		0							0				0				0	
	Through	993	2	497	9	1002	501	199	1285	2	643	9	1294	2	647	-1	1293	2	647
	Through-Right		0							0				0				0	
	Right	57	1	9	9	66	17	20	82	1	20	9	91	1	28	-1	90	1	27
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	96	1	96	2	98	98	19	124	1	124	2	126	1	126	0	126	1	126
	Left-Through		0							0				0				0	
	Through	1139	1	**600**	0	1139	**600**	302	1548	1	**824**	0	1548	1	**824**	0	1548	1	**824**
	Through-Right		1							1				1				1	
	Right	61	0	61	0	61	61	32	99	0	99	0	99	0	99	0	99	0	99
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	112	1	**112**	0	112	**112**	6	128	1	**128**	0	128	1	**128**	0	128	1	**128**
	Left-Through		0							0				0				0	
	Through	989	1	523	0	989	524	279	1361	1	728	0	1361	1	729	0	1361	1	729
	Through-Right		1							1				1				1	
	Right	57	0	57	2	59	59	33	95	0	95	2	97	0	97	0	97	0	97
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	634		*North-South:*	644		*North-South:*	803			*North-South:*	813			*North-South:*	812
			East-West:	712		*East-West:*	712		*East-West:*	952			*East-West:*	952			*East-West:*	952
			SUM:	1346		*SUM:*	1356		*SUM:*	1755			*SUM:*	1765			*SUM:*	1764
	VOLUME/CAPACITY *(V/C)* RATIO:			0.897			0.904			1.170				1.177				1.176
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.797			0.804			1.070				1.077			*With Imp.+TDM*	1.076
	LEVEL OF SERVICE (LOS):			C			D			F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.066 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.007 | *Δv/c* after mitigation: -0.004

Significant impacted? NO | Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
37	East-West Street:	MELROSE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	103	1	103	0	103	103	8	121	1	121	0	121	1	121		121		**0**
	Left-Through		0							0				0					
	Through	984	1	**519**	5	989	**521**	185	1261	1	**661**	5	1266	1	**663**		1266		0
	Through-Right		1							1				1					
	Right	53	0	53	0	53	53	2	60	0	60	0	60	0	60		60		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	96	1	**96**	1	97	**97**	20	125	1	**125**	1	126	1	**126**		126		0
	Left-Through		0							0				0					
	Through	998	2	499	1	999	500	145	1236	2	618	1	1237	2	619		1237		**0**
	Through-Right		0							0				0					
	Right	123	1	90	1	124	89	8	143	1	104	1	144	1	103		144		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	67	1	**67**	3	70	**70**	6	79	1	**79**	3	82	1	**82**		82		0
	Left-Through		0							0				0					
	Through	993	1	530	0	993	530	79	1165	1	619	0	1165	1	619		1165		**0**
	Through-Right		1							1				1					
	Right	66	0	66	0	66	66	1	73	0	73	0	73	0	73		73		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	80	1	80	0	80	80	1	88	1	88	0	88	1	88		88		**0**
	Left-Through		0							0				0					
	Through	1085	1	**589**	0	1085	**590**	149	1336	1	**727**	0	1336	1	**728**		1336		0
	Through-Right		1							1				1					
	Right	92	0	92	3	95	95	16	117	0	117	3	120	0	120		120		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		615	*North-South:*		618	*North-South:*			786	*North-South:*			789	*North-South:*			0
		East-West:		656	*East-West:*		660	*East-West:*			806	*East-West:*			810	*East-West:*			0
		SUM:		1271	*SUM:*		1278	*SUM:*			1592	*SUM:*			1599	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.847			0.852				1.061				1.066				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.747**			**0.752**				**0.961**				**0.966**				0.000
LEVEL OF SERVICE (LOS):				C			C				E				E				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.961
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/27/2012
37	East-West Street:	MELROSE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	112	1	112	0	112	112	1	123	1	123	0	123	1	123		123		0
	Left-Through		0							0				0					
	Through	1131	1	590	1	1132	591	193	1430	1	743	1	1431	1	743		1431		0
	Through-Right		1							1				1					
	Right	49	0	49	0	49	49	1	55	0	55	0	55	0	55		55		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	102	1	102	2	104	104	22	134	1	134	2	136	1	136		136		0
	Left-Through		0							0				0					
	Through	861	2	431	5	866	433	222	1164	2	582	5	1169	2	585		1169		0
	Through-Right		0							0				0					
	Right	103	1	51	2	105	52	9	122	1	60	2	124	1	61		124		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	105	1	105	1	106	106	10	125	1	125	1	126	1	126		126		0
	Left-Through		0							0				0					
	Through	1159	1	619	0	1159	619	145	1413	1	752	0	1413	1	752		1413		0
	Through-Right		1							1				1					
	Right	78	0	78	0	78	78	6	91	0	91	0	91	0	91		91		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	71	1	71	0	71	71	2	80	1	80	0	80	1	80		80		0
	Left-Through		0							0				0					
	Through	897	1	524	0	897	524	120	1101	1	638	0	1101	1	638		1101		0
	Through-Right		1							1				1					
	Right	150	0	150	1	151	151	10	174	0	174	1	175	0	175		175		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		692	North-South:		695	North-South:			877	North-South:			879	North-South:			0
		East-West:		690	East-West:		690	East-West:			832	East-West:			832	East-West:			0
		SUM:		1382	SUM:		1385	SUM:			1709	SUM:			1711	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.921			0.923				1.139				1.141				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.821			0.823				1.039				1.041				0.000
	LEVEL OF SERVICE (LOS):			D			D				F				F				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-1.039
Significant impacted?	NO	Fully mitigated?	N/A

Appendix E

Final EIR Added Intersection Analysis, Crain & Associates
January 15, 2013

Millennium Hollywood Project
Final EIR Added Intersections Analysis

Introduction

The detailed Millennium Hollywood project (the Project) operational and construction traffic, parking and transit impacts are addressed in the June 2012 Traffic Impact Report (Traffic Study). However, in comments on the Draft EIR, concerns were raised about significant Project impacts extending beyond the northern boundary of the area analyzed in the Traffic Study. Two intersections located on the northern boundary of the study area were considered to be significantly impacted - Highland Avenue/Franklin Avenue (north) and Argyle Avenue/Franklin Avenue/I-101 Freeway Northbound On-Ramp in the Traffic Study. This analysis addresses the impacts of the Project at additional intersections beyond the current study area, which are immediately north of the significantly impacted intersections in the Traffic Study in order to clarify the analysis presented in the Draft EIR.

Methodology

Two signalized intersections immediately north of the significantly impacted intersections on the northern boundary of the study area are:

- Highland Avenue/Camrose Drive/Milner Road, and
- Argyle Avenue/Vine Street/Dix Street.

Counts of the existing traffic volumes at these two intersections were conducted on January 9, 2013, when the majority of schools were in session. The intersections lane configuration and signal information were obtained from a field check conducted at the same time. The counts are included in Attachment A.

To determine the Existing (2013) and Future (2020) conditions, the same analysis methodology used in the Traffic Study in Appendix IV.K.1 of the Draft EIR were applied to this analysis. The CMA analysis in the Traffic Study included using an ambient growth factor and related projects assumptions for the 2020 conditions. The Project volumes were then added to the Existing (2013) and Future (2020) Without Project volumes, and the CMA analysis was conducted for the resulting “With Project” conditions.

Conclusions

The analysis results are included in Table 1. The CMA calculation sheets are included in Attachment B. As shown in Table 1, neither of these two intersections is significantly impacted by the Project traffic. Therefore, the analysis demonstrates that Project impacts do not extend north beyond the current study area.

Table 1

Critical Movement Analysis ("CMA") Summary

For Project Impacts at Intersections to the North of the Study Area

			Existing (2013)					Future (2020)				
		Peak	Existing		Existing + Project			Without Project		With Project		
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact
38	Highland Avenue &	AM	0.581	A	0.585	A	0.004	0.664	B	0.668	B	0.004
	Camrose Drive/Milner Road	PM	0.607	B	0.613	B	0.006	0.694	B	0.701	C	0.007
39	Argyle Avenue &	AM	0.089	A	0.092	A	0.003	0.098	A	0.103	A	0.005
	Vine Street/Dix Street	PM	0.080	A	0.087	A	0.007	0.091	A	0.099	A	0.008

An * indicates a significant impact (LADOT Revised Scale).

ATTACHMENT A

TWO ADDED INTERSECTIONS COUNTS

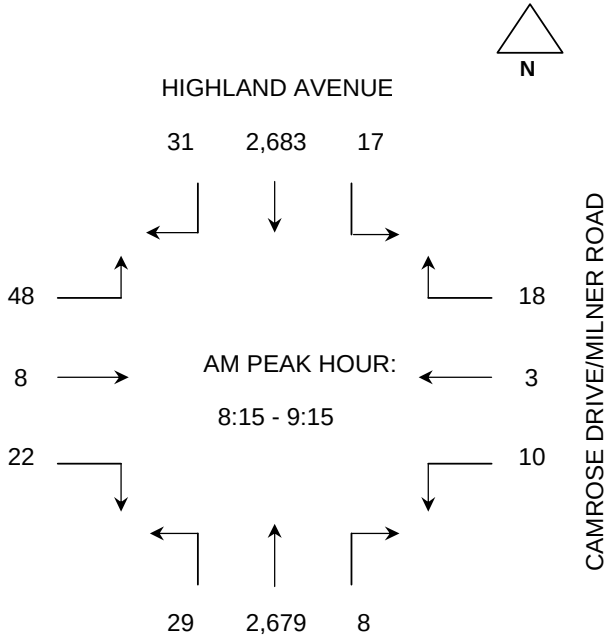
VEHICLE TURNING MOVEMENT COUNT SUMMARY

Crain & Associates
300 Corporate Pointe, Suite 470
Culver City, CA 90230
Tel: (310) 473-6508

N/S STREET: HIGHLAND AVENUE **E/W STREET:** CAMROSE DRIVE/MILNER ROAD
PERIOD: AM PEAK HOUR **DATE:** Wed January 9, 2013

15-MINUTE	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
7:00 - 7:15	1	0	4	4	0	0	0	276	0	1	659	1	946
7:15 - 7:30	0	0	2	2	1	2	1	349	1	2	671	0	1,031
7:30 - 7:45	2	1	1	7	0	1	0	496	0	3	770	3	1,284
7:45 - 8:00	3	2	6	11	2	6	5	546	4	7	728	9	1,329
8:00 - 8:15	1	3	7	12	0	7	8	585	3	9	618	11	1,264
8:15 - 8:30	4	0	5	10	1	6	7	619	3	4	725	10	1,394
8:30 - 8:45	2	1	6	9	3	4	4	680	2	5	594	8	1,318
8:45 - 9:00	1	0	4	17	4	4	8	689	1	6	633	7	1,374
9:00 - 9:15	3	2	3	12	0	8	10	691	2	2	731	6	1,470
9:15 - 9:30	2	1	2	9	0	3	7	667	0	1	694	6	1,392
9:30 - 9:45	0	0	1	8	0	2	3	605	2	3	669	4	1,297
9:45 - 10:00	1	1	1	4	0	2	4	576	1	1	645	7	1,243

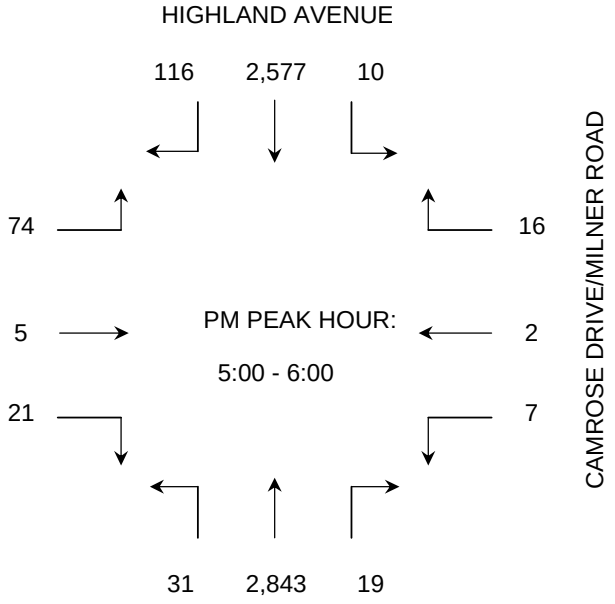
1-HOUR	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
7:00 - 8:00	6	3	13	24	3	9	6	1,667	5	13	2,828	13	4,590
7:15 - 8:15	6	6	16	32	3	16	14	1,976	8	21	2,787	23	4,908
7:30 - 8:30	10	6	19	40	3	20	20	2,246	10	23	2,841	33	5,271
7:45 - 8:45	10	6	24	42	6	23	24	2,430	12	25	2,665	38	5,305
8:00 - 9:00	8	4	22	48	8	21	27	2,573	9	24	2,570	36	5,350
8:15 - 9:15	10	3	18	48	8	22	29	2,679	8	17	2,683	31	5,556 *
8:30 - 9:30	8	4	15	47	7	19	29	2,727	5	14	2,652	27	5,554
8:45 - 9:45	6	3	10	46	4	17	28	2,652	5	12	2,727	23	5,533
9:00 - 10:00	6	4	7	33	0	15	24	2,539	5	7	2,739	23	5,402



PERIOD: PM PEAK HOUR **DATE:** Wed January 9, 2013

15-MINUTE	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
3:00 - 3:15	2	2	8	18	1	8	5	682	1	2	580	13	1,322
3:15 - 3:30	1	0	1	22	2	2	9	652	5	2	555	13	1,264
3:30 - 3:45	2	1	4	23	1	4	6	694	3	3	575	20	1,336
3:45 - 4:00	3	0	6	25	2	4	5	700	2	5	569	24	1,345
4:00 - 4:15	2	0	8	17	0	4	4	768	2	2	629	12	1,448
4:15 - 4:30	3	0	9	21	1	6	6	747	2	3	613	11	1,422
4:30 - 4:45	1	1	5	24	2	3	7	772	4	4	568	13	1,404
4:45 - 5:00	2	1	5	30	4	6	7	737	7	7	556	17	1,379
5:00 - 5:15	1	0	4	31	2	7	9	719	4	6	614	27	1,424
5:15 - 5:30	2	0	2	11	1	3	8	695	1	1	628	31	1,383
5:30 - 5:45	0	1	4	14	0	6	6	707	6	1	675	30	1,450
5:45 - 6:00	4	1	6	18	2	5	8	722	8	2	660	28	1,464

1-HOUR	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
3:00 - 4:00	8	3	19	88	6	18	25	2,728	11	12	2,279	70	5,267
3:15 - 4:15	8	1	19	87	5	14	24	2,814	12	12	2,328	69	5,393
3:30 - 4:30	10	1	27	86	4	18	21	2,909	9	13	2,386	67	5,551
3:45 - 4:45	9	1	28	87	5	17	22	2,987	10	14	2,379	60	5,619
4:00 - 5:00	8	2	27	92	7	19	24	3,024	15	16	2,366	53	5,653
4:15 - 5:15	7	2	23	106	9	22	29	2,975	17	20	2,351	68	5,629
4:30 - 5:30	6	2	16	96	9	19	31	2,923	16	18	2,366	88	5,590
4:45 - 5:45	5	2	15	86	7	22	30	2,858	18	15	2,473	105	5,636
5:00 - 6:00	7	2	16	74	5	21	31	2,843	19	10	2,577	116	5,721 *



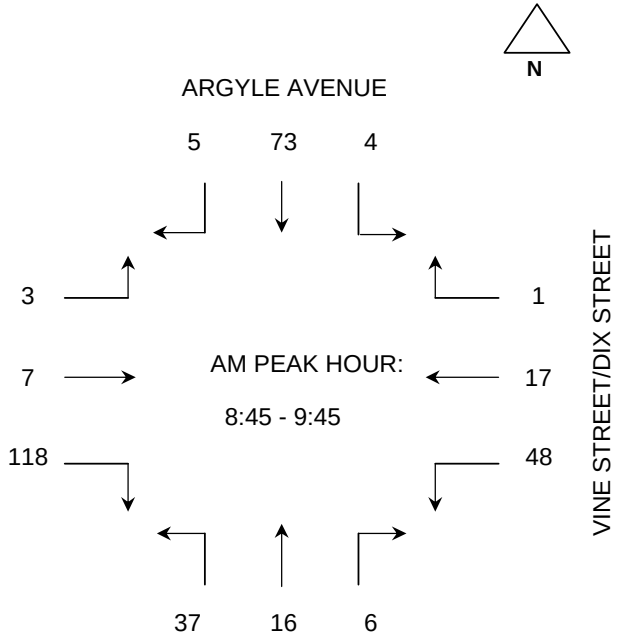
VEHICLE TURNING MOVEMENT COUNT SUMMARY

Crain & Associates
300 Corporate Pointe, Suite 470
Culver City, CA 90230
Tel: (310) 473-6508

N/S STREET: ARGYLE AVENUE **E/W STREET:** VINE STREET/DIX STREET
PERIOD: AM PEAK HOUR **DATE:** Wed January 9, 2013

15-MINUTE	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
7:00 - 7:15	5	4	1	1	1	10	5	1	2	3	11	5	49
7:15 - 7:30	5	6	1	1	2	10	5	0	2	0	10	3	45
7:30 - 7:45	5	6	0	0	0	21	4	1	0	4	10	1	52
7:45 - 8:00	10	3	0	0	0	24	4	3	1	2	19	4	70
8:00 - 8:15	12	11	0	0	0	30	7	5	0	4	19	3	91
8:15 - 8:30	15	3	0	1	0	22	4	5	3	4	14	2	73
8:30 - 8:45	9	9	0	0	1	22	6	3	1	2	14	1	68
8:45 - 9:00	15	3	0	0	3	22	8	2	2	1	25	1	82
9:00 - 9:15	12	6	1	0	0	32	8	8	1	0	16	1	85
9:15 - 9:30	11	3	0	2	1	34	11	4	2	2	16	2	88
9:30 - 9:45	10	5	0	1	3	30	10	2	1	1	16	1	80
9:45 - 10:00	12	4	0	1	1	24	9	4	0	0	14	2	71

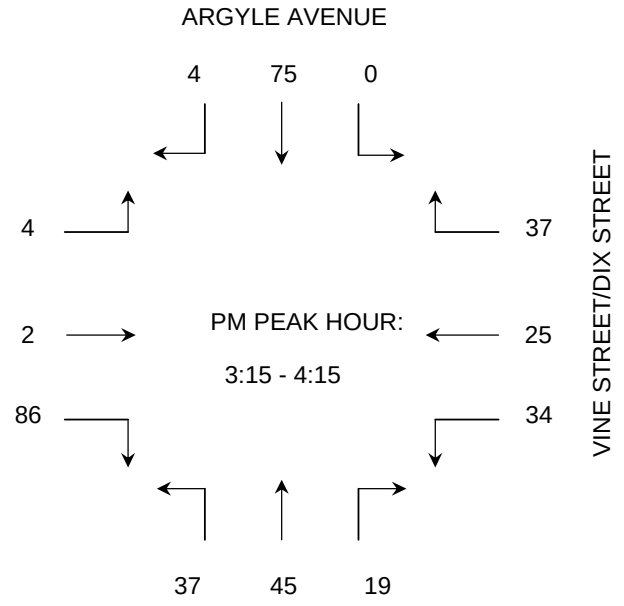
1-HOUR	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
7:00 - 8:00	25	19	2	2	3	65	18	5	5	9	50	13	216
7:15 - 8:15	32	26	1	1	2	85	20	9	3	10	58	11	258
7:30 - 8:30	42	23	0	1	0	97	19	14	4	14	62	10	286
7:45 - 8:45	46	26	0	1	1	98	21	16	5	12	66	10	302
8:00 - 9:00	51	26	0	1	4	96	25	15	6	11	72	7	314
8:15 - 9:15	51	21	1	1	4	98	26	18	7	7	69	5	308
8:30 - 9:30	47	21	1	2	5	110	33	17	6	5	71	5	323
8:45 - 9:45	48	17	1	3	7	118	37	16	6	4	73	5	335 *
9:00 - 10:00	45	18	1	4	5	120	38	18	4	3	62	6	324



PERIOD: PM PEAK HOUR **DATE:** Wed January 9, 2013

15-MINUTE	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
3:00 - 3:15	7	13	4	0	0	20	8	5	1	0	11	2	71
3:15 - 3:30	7	0	10	2	0	20	10	7	6	0	17	1	80
3:30 - 3:45	8	7	10	0	2	22	6	14	4	0	23	2	98
3:45 - 4:00	8	9	10	1	0	21	11	11	4	0	21	1	97
4:00 - 4:15	11	9	7	1	0	23	10	13	5	0	14	0	93
4:15 - 4:30	7	10	5	0	0	20	11	10	0	0	8	2	73
4:30 - 4:45	3	10	4	0	1	29	11	7	1	0	11	2	79
4:45 - 5:00	9	6	9	1	2	18	8	8	3	1	13	0	78
5:00 - 5:15	10	8	8	2	0	30	11	12	2	1	19	2	105
5:15 - 5:30	6	5	4	0	2	19	9	9	1	0	11	0	66
5:30 - 5:45	8	0	7	1	2	17	4	7	0	0	9	1	56
5:45 - 6:00	4	1	3	0	0	14	3	6	1	0	10	0	42

1-HOUR	WESTBOUND			EASTBOUND			NORTHBOUND			SOUTHBOUND			
TOTALS	L	T	R	L	T	R	L	T	R	L	T	R	TOTAL
3:00 - 4:00	30	29	34	3	2	83	35	37	15	0	72	6	346
3:15 - 4:15	34	25	37	4	2	86	37	45	19	0	75	4	368 *
3:30 - 4:30	34	35	32	2	2	86	38	48	13	0	66	5	361
3:45 - 4:45	29	38	26	2	1	93	43	41	10	0	54	5	342
4:00 - 5:00	30	35	25	2	3	90	40	38	9	1	46	4	323
4:15 - 5:15	29	34	26	3	3	97	41	37	6	2	51	6	335
4:30 - 5:30	28	29	25	3	5	96	39	36	7	2	54	4	328
4:45 - 5:45	33	19	28	4	6	84	32	36	6	2	52	3	305
5:00 - 6:00	28	14	22	3	4	80	27	34	4	1	49	3	269



ATTACHMENT B

CMA CALCULATION SHEETS

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2013	Ambient Growth: (%):	1	Conducted by:		Date:	1/14/2013
38	East-West Street:	CAMROSE DRIVE/MILNER ROAD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	29	1	**29**	0	29	**29**	0	31	1	**31**	0	31	1	**31**		31		**0**
Left-Through		0							0				0					
Through	2679	2	896	16	2695	901	113	2985	2	998	16	3001	2	1003		3001		0
Through-Right		1							1				1					
Right	8	0	8	0	8	8	0	9	0	9	0	9	0	9		9		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	17	1	17	0	17	17	0	18	1	18	0	18	1	18		18		0
Left-Through		0							0				0					
Through	2683	2	**905**	18	2701	**911**	150	3027	2	**1020**	18	3045	2	**1026**		3045		**0**
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	33	0	33	0	33	0	33		33		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	48	0	48	0	48	48	0	51	0	51	0	51	0	51		51		0
Left-Through		0							0				0					
Through	8	0	**78**	0	8	**78**	0	9	0	**84**	0	9	0	**84**		9		**0**
Through-Right		0							0				0					
Right	22	0	0	0	22	0	0	24	0	0	0	24	0	0		24		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	10	0	**10**	0	10	**10**	0	11	0	**11**	0	11	0	**11**		11		**0**
Left-Through		0							0				0					
Through	3	0	31	0	3	31	0	3	0	33	0	3	0	33		3		0
Through-Right		0							0				0					
Right	18	0	0	0	18	0	0	19	0	0	0	19	0	0		19		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	North-South:		934	North-South:		940	North-South:			1051	North-South:			1057	North-South:			0
	East-West:		88	East-West:		88	East-West:			95	East-West:			95	East-West:			0
	SUM:		1022	SUM:		1028	SUM:			1146	SUM:			1152	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:			0.681			0.685				0.764				0.768				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.581**			**0.585**				**0.664**				**0.668**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.664
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2013	Ambient Growth: (%):	1	Conducted by:		Date:	1/14/2013
38	East-West Street:	CAMROSE DRIVE/MILNER ROAD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--				
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--				
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	31	1	31	0	31	31	0	33	1	33	0	33	1	33		33		**0**
	Left-Through		0							0				0					
	Through	2843	2	**954**	26	2869	**963**	168	3216	2	**1079**	26	3242	2	**1087**		3242		0
	Through-Right		1							1				1					
	Right	19	0	19	0	19	19	0	20	0	20	0	20	0	20		20		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	10	1	**10**	0	10	**10**	0	11	1	**11**	0	11	1	**11**		11		0
	Left-Through		0							0				0					
	Through	2577	2	898	29	2606	907	162	2925	2	1016	29	2954	2	1026		2954		**0**
	Through-Right		1							1				1					
	Right	116	0	116	0	116	116	0	124	0	124	0	124	0	124		124		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	74	0	74	0	74	74	0	79	0	79	0	79	0	79		79		0
	Left-Through		0							0				0					
	Through	5	0	**100**	0	5	**100**	0	5	0	**107**	0	5	0	**107**		5		**0**
	Through-Right		0							0				0					
	Right	21	0	0	0	21	0	0	23	0	0	0	23	0	0		23		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	7	0	**7**	0	7	**7**	0	8	0	**8**	0	8	0	**8**		8		**0**
	Left-Through		0							0				0					
	Through	2	0	25	0	2	25	0	2	0	27	0	2	0	27		2		0
	Through-Right		0							0				0					
	Right	16	0	0	0	16	0	0	17	0	0	0	17	0	0		17		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		964	*North-South:*		973	*North-South:*			1090	*North-South:*			1098	*North-South:*			0
		East-West:		107	*East-West:*		107	*East-West:*			115	*East-West:*			115	*East-West:*			0
		SUM:		1071	*SUM:*		1080	*SUM:*			1205	*SUM:*			1213	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.714			0.720				0.803				0.809				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.614**			**0.620**				**0.703**				**0.709**				0.000
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.703
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2013	Ambient Growth: (%):	1	Conducted by:		Date:	1/14/2013
39	East-West Street:	VINE STREET/DIX STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3							
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0							
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	37	0	**37**	0	37	**37**	0	40	0	**40**	0	40	0	**40**		40		**0**
	Left-Through		0							0				0					
	Through	16	0	59	8	24	67	8	25	0	71	8	33	0	79		33		0
	Through-Right		0							0				0					
	Right	6	0	0	0	6	0	0	6	0	0	0	6	0	0		6		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
	Left-Through		1							1				1					
	Through	73	0	**41**	18	91	**50**	15	93	0	**51**	18	111	0	**60**		111		**0**
	Through-Right		1							1				1					
	Right	5	0	41	0	5	50	0	5	0	51	0	5	0	60		5		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	3	0	3	0	3	3	0	3	0	3	0	3	0	3		3		0
	Left-Through		0							0				0					
	Through	7	0	**128**	0	7	**128**	0	8	0	**138**	0	8	0	**138**		8		**0**
	Through-Right		0							0				0					
	Right	118	0	0	0	118	0	0	127	0	0	0	127	0	0		127		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	48	0	**48**	0	48	**48**	0	51	0	**51**	0	51	0	**51**		51		**0**
	Left-Through		0							0				0					
	Through	17	0	66	0	17	66	0	18	0	70	0	18	0	70		18		0
	Through-Right		0							0				0					
	Right	1	0	0	0	1	0	0	1	0	0	0	1	0	0		1		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		North-South:		78	North-South:		87	North-South:			91	North-South:			100	North-South:			0
		East-West:		176	East-West:		176	East-West:			189	East-West:			189	East-West:			0
		SUM:		254	SUM:		263	SUM:			280	SUM:			289	SUM:			0
VOLUME/CAPACITY (*V/C*) RATIO:				0.178			0.185				0.196				0.203				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.089**			**0.092**				**0.098**				**0.103**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.098
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2013	Ambient Growth: (%):	1	Conducted by:		Date:	1/14/2013
39	East-West Street:	VINE STREET/DIX STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	37	0	37	0	37	37	0	40	0	40	0	40	0	40		40		**0**
Left-Through		0							0				0					
Through	45	0	**101**	21	66	**122**	18	66	0	**126**	21	87	0	**147**		87		0
Through-Right		0							0				0					
Right	19	0	0	0	19	0	0	20	0	0	0	20	0	0		20		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
Left-Through		1							1				1					
Through	75	0	40	21	96	50	14	94	0	49	21	115	0	60		115		**0**
Through-Right		1							1				1					
Right	4	0	40	0	4	50	0	4	0	49	0	4	0	60		4		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
Left-Through		0							0				0					
Through	2	0	**92**	0	2	**92**	0	2	0	**98**	0	2	0	**98**		2		**0**
Through-Right		0							0				0					
Right	86	0	0	0	86	0	0	92	0	0	0	92	0	0		92		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	34	0	**34**	0	34	**34**	0	36	0	**36**	0	36	0	**36**		36		**0**
Left-Through		0							0				0					
Through	25	0	96	0	25	96	0	27	0	103	0	27	0	103		27		0
Through-Right		0							0				0					
Right	37	0	0	0	37	0	0	40	0	0	0	40	0	0		40		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	North-South:		101	North-South:		122	North-South:			126	North-South:			147	North-South:			0
	East-West:		126	East-West:		126	East-West:			134	East-West:			134	East-West:			0
	SUM:		227	SUM:		248	SUM:			260	SUM:			281	SUM:			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.159			0.174				0.182				0.197				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.080			0.087				0.091				0.099				0.000
LEVEL OF SERVICE (LOS):			A			A				A				A				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.008 — Δ*v/c* after mitigation: -0.091

Significant impacted? NO — Fully mitigated? N/A

Appendix F

Concept Plan and Residential Scenario Traffic Impact Analysis, Crain & Associates, January 15, 2013

Millennium Hollywood
Concept Plan and Residential Scenario
Traffic Impact Analysis

Introduction

The Millennium Hollywood Project (the "Project") is proposed for development as a mixed-use project, including residential and commercial uses, on opposite sides of Vine Street between Yucca Street and Hollywood Boulevard, and Ivar Avenue and Argyle Avenue, in the Hollywood Community of Los Angeles. The "Project Site" consists of two sites bisected by Vine Street, the West Site and East Site, respectively, and includes the historic Capitol Records Building and Gogerty Building (the "Capitol Records Complex"). The Conceptual Site Plan for the Project is included in Attachment A.

This document is a supplement to the Traffic Impact Report, dated June 2012, prepared for the Project by Crain and Associates and included in Appendix K.1 of the Draft EIR (the "Traffic Study"). In the Traffic Study, Project development is anticipated to be completed by the year 2020. The Traffic Study analyzed the mix of proposed land uses with the greatest traffic generation, the Commercial Scenario. A trip generation cap is proposed to limit Project Site development to that level of trip generation (the "Trip Cap"). To be conservative, this supplemental analysis utilizes data from the Traffic Study to assess the traffic impacts that would arise if the Concept Plan or Residential Scenario is instead developed. The Commercial Scenario, the Concept Plan, and the Residential Scenario are referred to collectively herein as the “Project EIR Scenarios”.

Project EIR Scenarios

Commercial Scenario – This scenario is analyzed in the Traffic Study. This was found to be the mix of proposed land uses with the greatest traffic generation, which was used to develop the proposed Trip Cap to limit Project Site development. A detailed calculation was prepared of the net Project trip generation for this scenario. The calculation worksheets are included in Appendix B and summarized in Table 1. The trip generation calculation worksheet for this scenario is taken directly from Table 5 on pages 30 and 31 of the Traffic Study in Appendix IV.K of the Draft EIR.

Concept Plan –Flexibility is contemplated in the Development Agreement with regard to particular land uses, siting, and massing characteristics. Therefore, a conceptual plan has been prepared as an illustrative scenario to demonstrate a potential development program that implements the Development Agreement land use and development standards (the Concept Plan). Thus, the Concept Plan represents one scenario that may result from the approval of the proposed Development Agreement. The Concept Plan provides an illustrative assemblage of land uses and developed floor area that conforms to the terms of the Development Agreement. The Concept Plan is based on the 2008 Entitlement Application that was initially filed with the City in 2008. A summary of the net Project trip generation for this scenario is included in Table 1 and the detailed trip generation is included in Attachment B. The trip generation worksheet for the Concept Plan contains

assumptions that are consistent with the approved Traffic Study for the Commercial Scenario.

Residential Scenario –The proposed Residential Scenario establishes the maximum residential development that is envisioned for the Project. The Residential Scenario is analyzed below with the impacts compared to those for the Concept Plan and the Commercial Scenario in order to accurately identify the Project's upper limits of potential impacts under the Equivalency Program. The Residential Scenario, like the Commercial Scenario and Concept Plan, is an illustrative scenario to demonstrate a potential development program that implements the Development Agreement. A summary of the net Project trip generation is included in Table 1 and the detailed trip generation is included in Attachment B. The trip generation worksheet for the Residential Scenario contains assumptions that are consistent with the approved Traffic Study for the Commercial Scenario.

Table 1
Project EIR Scenarios Net Trip Generation Summary

		AM Peak Hour			PM Peak Hour		
Scenario	**Daily**	**I/B**	**O/B**	**Total**	**I/B**	**O/B**	**Total**
Traffic Study Project (Commercial Scenario)	9,922	321	253	574	486	438	924
Concept Plan	7,271	230	229	459	377	286	663
Residential Scenario	5,747	79	296	375	342	185	527

As shown in Table 1, the Commercial Scenario analyzed in the Traffic Study has the greatest peak hour traffic generation. The Concept Plan would generate lower traffic volumes than the Commercial Scenario. The Residential Scenario would have lowest traffic volumes among the scenarios.

Existing (2011) Plus Project EIR Scenarios Traffic Conditions

The Project EIR Scenarios traffic assignment patterns are based on the roadway network assumptions and the project distribution patterns from the Traffic Study. The separate assignment patterns for the residential, office and other commercial uses that were used in the Traffic Study were also used for this analysis. The AM and PM peak hours Project trip values at each intersection were calculated by applying the inbound and outbound distribution percentages from the Traffic Study and the Future (2020) conditions were determined using the procedures from the that report.

Specifically, the distributions from Figures 5(a) through 5(c) of the Traffic Study were applied to the net Project trip generation as shown in Appendix B for each Project EIR Scenario. The total net AM and PM peak-hour traffic volumes at the 37 study intersections for each Project EIR Scenario are depicted in Figures 1 and 2 of Attachment C. Adding the Project EIR Scenario volumes shown in Attachment C to the existing volumes shown in Figure 4 of the Traffic Study (Existing (2011) Without Project conditions), the Existing Plus Project EIR Scenarios volumes were developed for each Scenario. The resulting volumes are shown in Figures 3 and 4 of Attachment C.

Existing Plus Project EIR Scenarios traffic conditions were analyzed using the following assumptions:

- The Critical Movement Analysis (CMA) methodology used in the Traffic Study analysis was used in the Project EIR Scenarios traffic impacts analyses;
- The lane configurations from the Traffic Study were also utilized in the CMA calculations; and
- The LADOT significance criteria utilized in the Traffic Study were utilized for this analysis. These criteria are shown in Table 2.

Table 2
LADOT Criteria for Significant Traffic Impact

LOS	Final CMA Value	Project-Related Increase in CMA Value
C	> 0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E, F	> 0.900	equal to or greater than 0.010

As shown in Table 3, the Concept Plan and Residential Scenario would generate fewer significant traffic impacts relative to Existing (2011) Plus Project EIR Scenarios conditions than the Commercial Scenario, which was studied in the Traffic Study. The Commercial Scenario would have significant impacts at three intersections in the AM peak hour and four intersections in the PM peak hour. The Concept Plan would have significant impacts at two intersections in the AM peak hour and three intersections in the PM peak hour. The Residential Scenario would have significant impacts at two intersections in the AM peak hour and no intersections in the PM peak hour. All of the significant impacts under the Concept Plan and Residential Scenarios would be at intersections significantly impacted under the Commercial Scenario.

The CMA calculation worksheets are included in Attachment D.

Future (2020) With Project EIR Scenarios Traffic Conditions

As for Existing (2011) conditions, Future (2020) traffic impact estimates for the Project EIR Scenarios were prepared utilizing the same roadway network assumptions and the project distribution patterns used in the Traffic Study. The Future (2020) Without Project traffic volumes from the Traffic Study were combined with the net Project EIR Scenarios traffic volumes to develop the Future (2020) With Project EIR Scenarios. The resulting traffic volumes are shown in Figures 5 and 6 of Attachment C.

Table 3
Critical Movement Analysis ("CMA") Summary
Existing (2011) Plus Project EIR Scenarios Traffic Conditions

			Existing		Existing + EIR Scenarios										
					+ Commercial Scenario (Traffic Study)				+ Concept Plan				+ Residential Scenario		
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact	
1	Cahuenga Boulevard &	AM	0.353	A	0.359	A	0.006		0.357	A	0.004		0.357	A	0.004	
	US-101 Fwy. NB Off-Ramp	PM	0.648	B	0.661	B	0.013		0.655	B	0.007		0.652	B	0.004	
2	Highland Avenue (North) &	AM	0.734	C	0.746	C	0.012		0.744	C	0.010		0.738	C	0.004	
	Franklin Avenue	PM	0.833	D	0.852	D	0.019		0.847	D	0.014		0.845	D	0.012	
3	Highland Avenue (South) &	AM	0.763	C	0.763	C	0.000		0.763	C	0.000		0.763	C	0.000	
	Franklin Avenue	PM	0.744	C	0.745	C	0.001		0.745	C	0.001		0.745	C	0.001	
4	Cahuenga Boulevard &	AM	0.833	D	0.848	D	0.015		0.845	D	0.012		0.845	D	0.012	
	Franklin Avenue	PM	0.955	E	0.981	E	0.026	*	0.970	E	0.015	*	0.964	E	0.009	
5	Vine St. & Franklin Ave.	AM	0.377	A	0.379	A	0.002		0.379	A	0.002		0.379	A	0.002	
	/US-101 Fwy. SB Off-Ramp	PM	0.628	B	0.636	B	0.008		0.632	B	0.004		0.630	B	0.002	
6	Argyle Ave. & Franklin Ave.	AM	0.669	B	0.686	B	0.017		0.683	B	0.014		0.677	B	0.008	
	/US-101 Fwy. NB On-Ramp	PM	0.789	C	0.820	D	0.031	*	0.809	D	0.020	*	0.797	C	0.008	
7	Gower Street &	AM	0.591	A	0.598	A	0.007		0.597	A	0.006		0.593	A	0.002	
	Franklin Avenue	PM	0.752	C	0.759	C	0.007		0.757	C	0.005		0.755	C	0.003	
8	Beachwood Drive &	AM	0.663	B	0.673	B	0.010		0.671	B	0.008		0.667	B	0.004	
	Franklin Avenue	PM	0.664	B	0.682	B	0.018		0.680	B	0.016		0.679	B	0.015	
9	Cahuenga Boulevard &	AM	0.447	A	0.451	A	0.004		0.450	A	0.003		0.449	A	0.002	
	Yucca Street	PM	0.617	B	0.655	B	0.038		0.639	B	0.022		0.630	B	0.013	
10	Ivar Avenue &	AM	0.095	A	0.130	A	0.035		0.108	A	0.013		0.099	A	0.004	
	Yucca Street	PM	0.169	A	0.215	A	0.046		0.194	A	0.025		0.186	A	0.017	
11	Vine Street &	AM	0.429	A	0.484	A	0.055		0.468	A	0.039		0.445	A	0.016	
	Yucca Street	PM	0.378	A	0.467	A	0.089		0.441	A	0.063		0.424	A	0.046	
12	Argyle Avenue &	AM	0.111	A	0.161	A	0.050		0.149	A	0.038		0.136	A	0.025	
	Yucca Street	PM	0.300	A	0.393	A	0.093		0.359	A	0.059		0.337	A	0.037	
13	Fuller Avenue &	AM	0.507	A	0.510	A	0.003		0.509	A	0.002		0.511	A	0.004	
	Hollywood Boulevard	PM	0.425	A	0.431	A	0.006		0.429	A	0.004		0.427	A	0.002	
14	La Brea Avenue &	AM	0.898	D	0.902	E	0.004		0.902	E	0.004		0.904	E	0.006	
	Hollywood Boulevard	PM	0.737	C	0.751	C	0.014		0.746	C	0.009		0.745	C	0.008	
15	Highland Avenue &	AM	0.708	C	0.715	C	0.007		0.714	C	0.006		0.715	C	0.007	
	Hollywood Boulevard	PM	0.741	C	0.765	C	0.024		0.758	C	0.017		0.755	C	0.014	
16	Cahuenga Boulevard &	AM	0.741	C	0.784	C	0.043	*	0.779	C	0.038		0.755	C	0.014	
	Hollywood Boulevard	PM	0.701	C	0.745	C	0.044	*	0.736	C	0.035		0.734	C	0.033	
17	Ivar Avenue &	AM	0.366	A	0.402	A	0.036		0.398	A	0.032		0.404	A	0.038	
	Hollywood Boulevard	PM	0.416	A	0.468	A	0.052		0.455	A	0.039		0.451	A	0.035	
18	Vine Street &	AM	0.734	C	0.786	C	0.052	*	0.779	C	0.045	*	0.778	C	0.044	*
	Hollywood Boulevard	PM	0.703	C	0.762	C	0.059	*	0.744	C	0.041	*	0.734	C	0.031	
19	Argyle Avenue &	AM	0.445	A	0.461	A	0.016		0.459	A	0.014		0.456	A	0.011	
	Hollywood Boulevard	PM	0.617	B	0.635	B	0.018		0.632	B	0.015		0.633	B	0.016	
20	Gower Street &	AM	0.693	B	0.705	C	0.012		0.701	C	0.008		0.695	B	0.002	
	Hollywood Boulevard	PM	0.637	B	0.653	B	0.016		0.649	B	0.012		0.644	B	0.007	
21	Bronson Avenue &	AM	0.527	A	0.537	A	0.010		0.535	A	0.008		0.529	A	0.002	
	Hollywood Boulevard	PM	0.479	A	0.490	A	0.011		0.487	A	0.008		0.483	A	0.004	
22	US-101 Fwy. SB Ramps &	AM	0.471	A	0.482	A	0.011		0.480	A	0.009		0.473	A	0.002	
	Hollywood Boulevard	PM	0.357	A	0.361	A	0.004		0.360	A	0.003		0.360	A	0.003	

Table 3 (continued)
Critical Movement Analysis ("CMA") Summary
Existing (2011) Plus Project EIR Scenarios Traffic Conditions

			Existing		Existing + EIR Scenarios										
					+ Commercial Scenario (Traffic Study)				+ Concept Plan				+ Residential Scenario		
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact	
23	US-101 Fwy. NB Ramps &	AM	0.340	A	0.352	A	0.012		0.349	A	0.009		0.342	A	0.002	
	Hollywood Boulevard	PM	0.311	A	0.322	A	0.011		0.319	A	0.008		0.317	A	0.006	
24	Cahuenga Boulevard &	AM	0.468	A	0.479	A	0.011		0.479	A	0.011		0.483	A	0.015	
	Selma Avenue	PM	0.561	A	0.578	A	0.017		0.576	A	0.015		0.577	A	0.016	
25	Ivar Avenue &	AM	0.121	A	0.144	A	0.023		0.139	A	0.018		0.139	A	0.018	
	Selma Avenue	PM	0.294	A	0.332	A	0.038		0.322	A	0.028		0.318	A	0.024	
26	Vine Street &	AM	0.467	A	0.487	A	0.020		0.485	A	0.018		0.491	A	0.024	
	Selma Avenue	PM	0.512	A	0.549	A	0.037		0.539	A	0.027		0.535	A	0.023	
27	Argyle Avenue And	AM	0.256	A	0.263	A	0.007		0.263	A	0.007		0.263	A	0.007	
	Selma Avenue	PM	0.338	A	0.347	A	0.009		0.346	A	0.008		0.345	A	0.007	
28	Highland Avenue &	AM	0.886	D	0.890	D	0.004		0.890	D	0.004		0.891	D	0.005	
	Sunset Boulevard	PM	0.831	D	0.832	D	0.001		0.834	D	0.003		0.834	D	0.003	
29	Cahuenga Boulevard &	AM	0.673	B	0.689	B	0.016		0.687	B	0.014		0.687	B	0.014	
	Sunset Boulevard	PM	0.703	C	0.718	C	0.015		0.715	C	0.012		0.715	C	0.012	
30	Ivar Avenue &	AM	0.355	A	0.367	A	0.012		0.365	A	0.010		0.360	A	0.005	
	Sunset Boulevard	PM	0.513	A	0.530	A	0.017		0.526	A	0.013		0.525	A	0.012	
31	Vine Street &	AM	0.806	D	0.826	D	0.020	*	0.823	D	0.017	*	0.823	D	0.017	*
	Sunset Boulevard	PM	0.737	C	0.774	C	0.037		0.763	C	0.026		0.758	C	0.021	
32	Argyle Avenue &	AM	0.439	A	0.445	A	0.006		0.445	A	0.006		0.445	A	0.006	
	Sunset Boulevard	PM	0.443	A	0.451	A	0.008		0.450	A	0.007		0.449	A	0.006	
33	Cahuenga Boulevard &	AM	0.341	A	0.349	A	0.008		0.349	A	0.008		0.353	A	0.012	
	De Longpre Avenue	PM	0.389	A	0.403	A	0.014		0.400	A	0.011		0.401	A	0.012	
34	Vine Street &	AM	0.468	A	0.484	A	0.016		0.483	A	0.015		0.485	A	0.017	
	De Longpre Avenue	PM	0.585	A	0.608	B	0.023		0.601	B	0.016		0.596	A	0.011	
35	Vine Street &	AM	0.684	B	0.698	B	0.014		0.695	B	0.011		0.697	B	0.013	
	Fountain Avenue	PM	0.765	C	0.787	C	0.022		0.782	C	0.017		0.779	C	0.014	
36	Vine Street &	AM	0.754	C	0.769	C	0.015		0.767	C	0.013		0.761	C	0.007	
	Santa Monica Boulevard	PM	0.797	C	0.815	D	0.018		0.809	D	0.012		0.807	D	0.010	
37	Vine Street &	AM	0.747	C	0.753	C	0.006		0.753	C	0.006		0.751	C	0.004	
	Melrose Avenue	PM	0.821	D	0.828	D	0.007		0.827	D	0.006		0.825	D	0.004	

An * indicates a significant impact (LADOT Revised Scale).

Table 4
Critical Movement Analysis ("CMA") Summary
Future (2020) With Project EIR Scenarios Traffic Conditions

			Future (2020)		Future (2020) With EIR Scenarios										
					+ Commercial Scenario (Traffic Study)				+ Concept Plan				+ Residential Scenario		
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact	
1	Cahuenga Boulevard &	AM	0.409	A	0.415	A	0.006		0.413	A	0.004		0.413	A	0.004	
	US-101 Fwy. NB Off-Ramp	PM	0.749	C	0.761	C	0.012		0.756	C	0.007		0.753	C	0.004	
2	Highland Avenue (North) &	AM	0.855	D	0.867	D	0.012		0.864	D	0.009		0.859	D	0.004	
	Franklin Avenue	PM	0.978	E	0.997	E	0.019	*	0.992	E	0.014	*	0.990	E	0.012	*
3	Highland Avenue (South) &	AM	0.873	D	0.873	D	0.000		0.873	D	0.000		0.873	D	0.000	
	Franklin Avenue	PM	0.869	D	0.869	D	0.000		0.869	D	0.000		0.869	D	0.000	
4	Cahuenga Boulevard &	AM	0.967	E	0.981	E	0.014	*	0.978	E	0.011	*	0.978	E	0.011	*
	Franklin Avenue	PM	1.104	F	1.130	F	0.026	*	1.119	F	0.015	*	1.113	F	0.009	
5	Vine St. & Franklin Ave.	AM	0.435	A	0.437	A	0.002		0.437	A	0.002		0.437	A	0.002	
	/US-101 Fwy. SB Off-Ramp	PM	0.716	C	0.725	C	0.009		0.721	C	0.005		0.718	C	0.002	
6	Argyle Ave. & Franklin Ave.	AM	0.854	D	0.871	D	0.017		0.867	D	0.013		0.863	D	0.009	
	/US-101 Fwy. NB On-Ramp	PM	1.067	F	1.096	F	0.029	*	1.086	F	0.019	*	1.075	F	0.008	
7	Gower Street &	AM	0.677	B	0.685	B	0.008		0.683	B	0.006		0.679	B	0.002	
	Franklin Avenue	PM	0.867	D	0.874	D	0.007		0.872	D	0.005		0.870	D	0.003	
8	Beachwood Drive &	AM	0.755	C	0.765	C	0.010		0.763	C	0.008		0.759	C	0.004	
	Franklin Avenue	PM	0.764	C	0.782	C	0.018		0.779	C	0.015		0.778	C	0.014	
9	Cahuenga Boulevard &	AM	0.538	A	0.542	A	0.004		0.541	A	0.003		0.539	A	0.001	
	Yucca Street	PM	0.723	C	0.761	C	0.038		0.745	C	0.022		0.736	C	0.013	
10	Ivar Avenue &	AM	0.125	A	0.158	A	0.033		0.143	A	0.018		0.133	A	0.008	
	Yucca Street	PM	0.217	A	0.263	A	0.046		0.243	A	0.026		0.235	A	0.018	
11	Vine Street &	AM	0.545	A	0.601	B	0.056		0.585	A	0.040		0.561	A	0.016	
	Yucca Street	PM	0.514	A	0.609	B	0.095		0.577	A	0.063		0.559	A	0.045	
12	Argyle Avenue &	AM	0.256	A	0.312	A	0.056		0.301	A	0.045		0.293	A	0.037	
	Yucca Street	PM	0.533	A	0.647	B	0.114		0.614	B	0.081		0.591	A	0.058	
13	Fuller Avenue &	AM	0.642	B	0.645	B	0.003		0.645	B	0.003		0.646	B	0.004	
	Hollywood Boulevard	PM	0.585	A	0.591	A	0.006		0.589	A	0.004		0.587	A	0.002	
14	La Brea Avenue &	AM	1.099	F	1.106	F	0.007		1.105	F	0.006		1.104	F	0.005	
	Hollywood Boulevard	PM	0.984	E	0.997	E	0.013	*	0.993	E	0.009		0.991	E	0.007	
15	Highland Avenue &	AM	0.931	E	0.937	E	0.006		0.936	E	0.005		0.938	E	0.007	
	Hollywood Boulevard	PM	1.106	F	1.130	F	0.024	*	1.124	F	0.018	*	1.120	F	0.014	*
16	Cahuenga Boulevard &	AM	1.002	F	1.026	F	0.024	*	1.022	F	0.020	*	1.016	F	0.014	*
	Hollywood Boulevard	PM	0.947	E	0.991	E	0.044	*	0.982	E	0.035	*	0.981	E	0.034	*
17	Ivar Avenue &	AM	0.535	A	0.571	A	0.036		0.567	A	0.032		0.574	A	0.039	
	Hollywood Boulevard	PM	0.607	B	0.663	B	0.056		0.646	B	0.039		0.643	B	0.036	
18	Vine Street &	AM	0.972	E	1.024	F	0.052	*	1.017	F	0.045	*	1.016	F	0.044	*
	Hollywood Boulevard	PM	0.972	E	1.014	F	0.042	*	1.001	F	0.029	*	0.993	E	0.021	*
19	Argyle Avenue &	AM	0.719	C	0.735	C	0.016		0.733	C	0.014		0.730	C	0.011	
	Hollywood Boulevard	PM	0.969	E	0.989	E	0.020	*	0.989	E	0.020	*	0.993	E	0.024	*
20	Gower Street &	AM	0.999	E	1.011	F	0.012	*	1.008	F	0.009		1.002	F	0.003	
	Hollywood Boulevard	PM	0.913	E	0.930	E	0.017	*	0.925	E	0.012	*	0.921	E	0.008	
21	Bronson Avenue &	AM	0.723	C	0.733	C	0.010		0.731	C	0.008		0.725	C	0.002	
	Hollywood Boulevard	PM	0.682	B	0.693	B	0.011		0.690	B	0.008		0.687	B	0.005	
22	US-101 Fwy. SB Ramps &	AM	0.661	B	0.672	B	0.011		0.670	B	0.009		0.664	B	0.003	
	Hollywood Boulevard	PM	0.532	A	0.536	A	0.004		0.535	A	0.003		0.534	A	0.002	

Table 4 (continued)
Critical Movement Analysis ("CMA") Summary
Future (2020) With Project EIR Scenarios Traffic Conditions

			Future (2020)		Future (2020) With EIR Scenarios									
					+ Commercial Scenario (Traffic Study)				+ Concept Plan			+ Residential Scenario		
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact	CMA	LOS	Impact	
23	US-101 Fwy. NB Ramps &	AM	0.515	A	0.527	A	0.012		0.525	A	0.010	0.518	A	0.003	
	Hollywood Boulevard	PM	0.511	A	0.524	A	0.013		0.520	A	0.009	0.518	A	0.007	
24	Cahuenga Boulevard &	AM	0.655	B	0.665	B	0.010		0.665	B	0.010	0.670	B	0.015	
	Selma Avenue	PM	0.761	C	0.778	C	0.017		0.775	C	0.014	0.777	C	0.016	
25	Ivar Avenue &	AM	0.241	A	0.264	A	0.023		0.259	A	0.018	0.259	A	0.018	
	Selma Avenue	PM	0.431	A	0.469	A	0.038		0.459	A	0.028	0.455	A	0.024	
26	Vine Street &	AM	0.697	B	0.716	C	0.019		0.714	C	0.017	0.721	C	0.024	
	Selma Avenue	PM	0.757	C	0.794	C	0.037		0.785	C	0.028	0.781	C	0.024	
27	Argyle Avenue And	AM	0.467	A	0.474	A	0.007		0.474	A	0.007	0.474	A	0.007	
	Selma Avenue	PM	0.655	B	0.665	B	0.010		0.663	B	0.008	0.662	B	0.007	
28	Highland Avenue &	AM	1.170	F	1.174	F	0.004		1.173	F	0.003	1.175	F	0.005	
	Sunset Boulevard	PM	1.065	F	1.067	F	0.002		1.067	F	0.002	1.068	F	0.003	
29	Cahuenga Boulevard &	AM	0.866	D	0.884	D	0.018		0.881	D	0.015	0.881	D	0.015	
	Sunset Boulevard	PM	0.931	E	0.946	E	0.015	*	0.944	E	0.013	* 0.943	E	0.012	*
30	Ivar Avenue &	AM	0.475	A	0.487	A	0.012		0.484	A	0.009	0.479	A	0.004	
	Sunset Boulevard	PM	0.661	B	0.679	B	0.018		0.675	B	0.014	0.674	B	0.013	
31	Vine Street &	AM	1.031	F	1.050	F	0.019	*	1.047	F	0.016	* 1.047	F	0.016	*
	Sunset Boulevard	PM	1.076	F	1.113	F	0.037	*	1.102	F	0.026	* 1.097	F	0.021	*
32	Argyle Avenue &	AM	0.669	B	0.674	B	0.005		0.674	B	0.005	0.675	B	0.006	
	Sunset Boulevard	PM	0.773	C	0.781	C	0.008		0.779	C	0.006	0.778	C	0.005	
33	Cahuenga Boulevard &	AM	0.435	A	0.443	A	0.008		0.443	A	0.008	0.447	A	0.012	
	De Longpre Avenue	PM	0.502	A	0.515	A	0.013		0.513	A	0.011	0.513	A	0.011	
34	Vine Street &	AM	0.593	A	0.609	B	0.016		0.607	B	0.014	0.610	B	0.017	
	De Longpre Avenue	PM	0.736	C	0.759	C	0.023		0.751	C	0.015	0.747	C	0.011	
35	Vine Street &	AM	0.907	E	0.921	E	0.014	*	0.919	E	0.012	* 0.921	E	0.014	*
	Fountain Avenue	PM	1.022	F	1.045	F	0.023	*	1.040	F	0.018	* 1.037	F	0.015	*
36	Vine Street &	AM	0.989	E	1.005	F	0.016	*	1.002	F	0.013	* 0.997	E	0.008	
	Santa Monica Boulevard	PM	1.070	F	1.088	F	0.018	*	1.082	F	0.012	* 1.079	F	0.009	
37	Vine Street &	AM	0.961	E	0.967	E	0.006		0.967	E	0.006	0.965	E	0.004	
	Melrose Avenue	PM	1.039	F	1.046	F	0.007		1.045	F	0.006	1.043	F	0.004	

An * indicates a significant impact (LADOT Revised Scale).

As shown in Table 4, the Concept Plan and the Residential Scenario would generate significant traffic impacts at fewer locations than the Commercial Scenario analyzed in the Traffic Study. The Commercial Scenario would have significant impacts at seven intersections in the AM peak hour and thirteen intersections in the PM peak hour. The Concept Plan would have significant impacts at six intersections in the AM peak hour and twelve intersections in the PM peak hour. The Residential Scenario would have significant impacts at five intersections in the AM peak hour and eight intersections in the PM peak hour. All of the significant impacts under the Concept Plan and Residential Scenario would be at intersections significantly impacted under the Commercial Scenario.

The CMA calculation worksheets are included in Attachment D.

Congestion Management Program (CMP) Impact Analysis

The CMP impact analysis for the Project EIR Scenarios assumed the same analysis methodology as found in the Traffic Study. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. As shown in Table 5, none of the Scenarios would add 50 or more trips to any of the analyzed CMP intersections during either peak hour. Therefore, no further CMP intersection analysis is warranted.

Table 5
Project EIR Scenarios Traffic Volume Contributions to CMP Monitoring Intersections

		EIR Scenarios		
CMP Monitoring Intersection	**Peak Hour**	**Traffic Study Commercial Scenario**	**Concept Plan Scenario**	**Residential Scenario**
Santa Monica Blvd. &	AM	11	9	8
Highland Ave.	PM	19	14	11
Santa Monica Blvd. &	AM	11	9	8
Western Ave.	PM	19	14	11

In addition, any CMP freeway monitoring segment where a project is expected to add 150 or more trips in any direction during the peak hours is required to be analyzed. As shown in Table 6, none of the Project EIR Scenarios would add 150 or more trips in any direction during either peak hour. Therefore, no potential significant Project impacts to any CMP freeway monitoring locations are anticipated and no additional freeway analysis is warranted.

Table 6
Project EIR Scenarios Traffic Volume Contributions to CMP Monitoring Freeway Segments

CMP Monitoring Freeway Segment	Peak Hour	Dir.	EIR Scenarios: Traffic Study Commercial Scenario	Concept Plan Scenario	Residential Scenario
Hollywood Fwy.	AM	NB	45	35	13
(US-101), south of		SB	39	39	54
Santa Monica Blvd.	PM	NB	57	51	56
		SB	57	43	26

CMP Transit Impacts

The Project EIR Scenarios transit impact analysis assumed the same analysis methodology as the Traffic Study. The Project EIR Scenarios transit trips are calculated in Table 7.

Table 7
Project EIR Scenarios Transit Trip Summary

Scenario		Daily	AM Peak Hr.	PM Peak Hr.
Traffic Study	Proposed Project Transit Trips	2,224	136	220
Commercial Scenario	*Less Existing Site Transit Trips*	*(229)*	*(31)*	*(31)*
	Subtotal:	**1,995**	**105**	**189**
Concept Plan Scenario	Proposed Alternative Transit Trips	1,619	112	161
	Less Existing Site Transit Trips	*(229)*	*(31)*	*(31)*
	Subtotal:	**1,390**	**81**	**130**
Residential Scenario	Proposed Alternative Transit Trips	1,461	104	146
	Less Existing Site Transit Trips	*(229)*	*(31)*	*(31)*
	Subtotal:	**1,232**	**73**	**115**

The Project EIR Scenarios transit impacts are calculated in Table 8. As shown in Table 8, adequate transit capacity is available for all of the Project EIR Scenarios since none of the scenarios would utilize more than 2.3 percent of the available transit capacity during either peak hour.

Table 8
Project EIR Scenarios Transit Impacts

Scenario	Peak Hour	Project Area Transit Ridership	Project Area Transit Capacity[1]	Project Area Ridership-to-Capacity Ratio	Available Area Transit Capacity[2]	Project Transit Demand	
						Person Trips	Percent to Available Capacity
Traffic Study	AM	1,162	9,381	12.4%	8,219	105	1.3%
Commercial Scenario	PM	1,422	9,571	14.9%	8,149	189	2.3%
Concept Plan	AM	1,162	9,381	12.4%	8,219	81	1.0%
	PM	1,422	9,571	14.9%	8,149	130	1.6%
Residential Scenario	AM	1,162	9,381	12.4%	8,219	73	0.9%
	PM	1,422	9,571	14.9%	8,149	115	1.4%

Notes:
[1] Seated plus standing capacity for transit lines serving the Project area.
[2] Project area transit capacity minus Project area transit ridership.

Mitigation Measures

The same mitigation measures as proposed in the Traffic Study and in the Draft EIR were applied to the intersections with significant Project traffic impacts under the Concept Plan and the Residential Scenario. As concluded in the Traffic Study, the Commercial Scenario has significant impacts remaining at 2 intersections under Existing (2011) conditions and 5 intersections under Future (2020) conditions after applying the mitigation measures. As shown in Table 9, by applying the same mitigation measures to the Concept Plan and the Residential Scenario impacts for Existing (2011) conditions, all of the significant Project traffic impacts would be mitigated to a less than significant level. As such, there would be no significant and unavoidable traffic impacts for the Concept Plan or the Residential Scenario under Existing (2011) conditions.

Table 10 shows the CMA calculations and resulting impacts for the Future (2020) conditions with mitigation measures. For the Concept Plan under the Future (2020) conditions, significant Project traffic impacts would remain at 3 intersections, which were also concluded to remain significant for the Commercial Scenario analyzed in the Traffic Study. The remaining significantly impacted intersections are:

16. Cahuenga Boulevard and Hollywood Boulevard (PM Peak Hour);
18. Vine Street and Hollywood Boulevard (AM and PM Peak Hours); and
31. Vine Street and Sunset Boulevard (PM Peak Hour).

For the Residential Scenario under the Future (2020) conditions, significant Project traffic impacts would remain significant at 3 intersections, which are intersections concluded to remain significant in the the Draft EIR. The remaining significantly impacted intersections are:

16. Cahuenga Boulevard and Hollywood Boulevard (PM Peak Hour);

18. Vine Street and Hollywood Boulevard (AM Peak Hour); and
19. Argyle Avenue and Hollywood Boulevard (PM Peak Hour).

. Two of these 3 intersections were concluded to remain significant under the Commercial Scenario analyzed in the Traffic Study. One additional significant and unavoidable impact at the intersection of Argyle Avenue and Hollywood Boulevard would remain after implementation of the mitigation measures in the Traffic Study. This intersection was concluded to be mitigated to a less than significant level with the recommended mitigation measures for the Commercial Scenario analyzed in the Traffic Study. However, Appendix L of the Traffic Study, containing the results of the impact analysis for the Project Component Location Shifting as well as the Draft EIR, reported that the intersection of Argyle Avenue and Hollywood Boulevard would remain significantly impacted with implementation of the mitigation measures under the Maximum East Site Development Scenario.[1]

A mitigation measure has been developed to mitigate the significant impact at this intersection to a less than significant level under the Residential Scenario and that measure has been added to the recommended mitigation measures. The added measure would limit the allowed residential development on the East Site to 450 units and the allowed reserved residential parking on the East Site to 675 spaces (equivalent to the 450 units). This equates to approximately 50% of the total maximum of 897 units for the Residential Scenario. This measure would not affect the impact analysis of the remaining Project EIR Scenarios (the Commercial Scenario and the Concept Plan) as they have less than 450 residential units on the East Site.

Accordingly, the following mitigation measure shall be added:

> East Site Residential Unit and Reserved Residential Parking Cap. On the East Site, residential development shall be limited to 450 residential units and 675 reserved residential parking spaces.

To reflect this added mitigation measure, the residential distribution percentages at the East and West Sites adjacent intersections (listed below) were revised for an analysis of the Residential Scenario With Added Mitigation. The revised residential distribution percentages are included in Figure 7 of Attachment C. The intersections affected by the East Site residential unit and reserved residential parking limitation are:

11. Vine Street and Yucca Street
12. Argyle Avenue and Yucca Street
18. Vine Street and Hollywood Boulevard
19. Argyle Avenue and Hollywood Boulevard
26. Vine Street and Selma Avenue
27. Argyle Avenue and Selma Avenue

[1] This significant and unavoidable impact at Intersection 19, Arygle Avenue and Hollywood Boulevard, was also reported on page IV.K.1-121 of the Draft EIR.

Utilizing the updated distribution percentages, the Project impacts under Existing (2011) and Future (2020) conditions were calculated for the Residential Scenario Plus Added Mitigation. The CMA values and the resulting traffic impacts are summarized in Table 11. As shown in Table 11, with the mitigation measure above, the significant impact at the intersection of Argyle Avenue and Hollywood Boulevard under the Future (2020) conditions under the Residential Scenario would be mitigated to a less than significant level. The CMA calculation worksheets used to develop Table 11 are included in Attachment E.

Table 9
Critical Movement Analysis ("CMA") Summary
Existing (2011) Plus Project EIR Scenarios Traffic Conditions
With Mitigation Measures

					Existing + EIR Scenarios																				
					Traffic Study - Commercial Scenario							Concept Plan						Residential Scenario							
			Existing		With Project			With Project+Mitigation				With Project			With Project+Mitigation			With Project			With Project+Mitigation				
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact		CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact	CMA	LOS	Impact		
4	Cahuenga Boulevard &	AM	0.833	D	0.848	D	0.015	0.836	D	0.003		0.845	D	0.012	0.833	D	-0.001	0.845	D	0.012					
	Franklin Avenue	PM	0.955	E	0.981	E	0.026 *	0.967	E	0.012 *		0.970	E	0.015 *	0.958	E	0.003	0.964	E	0.009					
6	Argyle Ave. & Franklin Ave.	AM	0.669	B	0.686	B	0.017	0.674	B	0.005		0.683	B	0.014	0.670	B	0.001	0.677	B	0.008					
	/US-101 Fwy. NB On-Ramp	PM	0.789	C	0.820	D	0.031 *	0.806	D	0.016		0.809	D	0.020 *	0.796	D	0.007	0.797	C	0.008					
16	Cahuenga Boulevard &	AM	0.741	C	0.784	C	0.043 *	0.770	C	0.029		0.779	C	0.038				0.755	C	0.014					
	Hollywood Boulevard	PM	0.701	C	0.745	C	0.044 *	0.728	C	0.027		0.736	C	0.035				0.734	C	0.033					
18	Vine Street &	AM	0.734	C	0.786	C	0.052 *	0.768	C	0.034		0.779	C	0.045 *	0.762	C	0.029	0.778	C	0.044 *	0.762	C	0.028		
	Hollywood Boulevard	PM	0.703	C	0.762	C	0.059 *	0.744	C	0.041 *		0.744	C	0.041 *	0.728	C	0.025	0.734	C	0.031	0.719	C	0.017		
31	Vine Street &	AM	0.806	D	0.826	D	0.020 *	0.812	D	0.006		0.823	D	0.017 *	0.810	D	0.004	0.823	D	0.017 *	0.811	D	0.005		
	Sunset Boulevard	PM	0.737	C	0.774	C	0.037	0.759	C	0.022		0.763	C	0.026	0.750	C	0.012	0.758	C	0.021	0.745	C	0.008		

An * indicates a significant impact (LADOT Revised Scale).

Table 10
Critical Movement Analysis ("CMA") Summary
Future (2020) With Project EIR Scenarios Traffic Conditions
With Mitigation Measures

			Future (2020)	Future (2020) + EIR Scenarios																							
				Traffic Study - Commercial Scenario								Concept Plan							Residential Scenario							
				With Project				With Project+Mitigation				With Project				With Project+Mitigation			With Project				With Project+Mitigation			
No.	Intersection	Peak Hour	w/o Project CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact		CMA	LOS	Impact	
2	Highland Avenue (North) &	AM	0.855	D	0.867	D	0.012		0.856	D	0.001		0.864	D	0.009		0.853	D	-0.002		0.859	D	0.004		0.848	D	-0.007	
	Franklin Avenue	PM	0.978	E	0.997	E	0.019	*	0.983	E	0.005		0.992	E	0.014	*	0.980	E	0.002		0.990	E	0.012	*	0.978	E	0.001	
4	Cahuenga Boulevard &	AM	0.967	E	0.981	E	0.014	*	0.969	E	0.003		0.978	E	0.011	*	0.966	E	-0.001		0.978	E	0.011	*	0.967	E	0.000	
	Franklin Avenue	PM	1.104	F	1.130	F	0.026	*	1.116	F	0.012	*	1.119	F	0.015	*	1.107	F	0.003		1.113	F	0.009		1.102	F	-0.002	
6	Argyle Ave. & Franklin Ave.	AM	0.854	D	0.871	D	0.017		0.818	D	-0.036		0.867	D	0.013		0.815	D	-0.039		0.863	D	0.009					
	/US-101 Fwy. NB On-Ramp	PM	1.067	F	1.096	F	0.029	*	1.062	F	-0.004		1.086	F	0.019	*	1.057	F	-0.009		1.075	F	0.008					
14	La Brea Avenue &	AM	1.099	F	1.106	F	0.007		1.095	F	-0.004		1.105	F	0.006						1.104	F	0.005					
	Hollywood Boulevard	PM	0.984	E	0.997	E	0.013	*	0.985	E	0.001		0.993	E	0.009						0.991	E	0.007					
15	Highland Avenue &	AM	0.931	E	0.937	E	0.006		0.926	E	-0.005		0.936	E	0.005		0.926	E	-0.005		0.938	E	0.007		0.927	E	-0.004	
	Hollywood Boulevard	PM	1.106	F	1.130	F	0.024	*	1.117	F	0.010	*	1.124	F	0.018	*	1.111	F	0.005		1.120	F	0.014	*	1.109	F	0.003	
16	Cahuenga Boulevard &	AM	1.002	F	1.026	F	0.024	*	1.013	F	0.010	*	1.022	F	0.020	*	1.009	F	0.007		1.016	F	0.014	*	1.004	F	0.001	
	Hollywood Boulevard	PM	0.947	E	0.991	E	0.044	*	0.974	E	0.026	*	0.982	E	0.035	*	0.966	E	0.019	*	0.981	E	0.034	*	0.966	E	0.019	*
18	Vine Street &	AM	0.972	E	1.024	F	0.052	*	1.006	F	0.034	*	1.017	F	0.045	*	1.001	F	0.029	*	1.016	F	0.044	*	1.000	F	0.028	*
	Hollywood Boulevard	PM	0.972	E	1.014	F	0.042	*	0.998	E	0.026	*	1.001	F	0.029	*	0.987	E	0.015	*	0.993	E	0.021	*	0.980	E	0.008	
19	Argyle Avenue &	AM	0.719	C	0.735	C	0.016		0.722	C	0.003		0.733	C	0.014		0.721	C	0.003		0.730	C	0.011		0.718	C	-0.001	
	Hollywood Boulevard	PM	0.969	E	0.989	E	0.020	*	0.976	E	0.007		0.989	E	0.020	*	0.976	E	0.007		0.993	E	0.024	*	0.979	E	0.010	*
20	Gower Street &	AM	0.999	E	1.011	F	0.012	*	1.000	E	0.001		1.008	F	0.009		0.997	E	-0.002		1.002	F	0.003					
	Hollywood Boulevard	PM	0.913	E	0.930	E	0.017	*	0.917	E	0.004		0.925	E	0.012	*	0.913	E	0.000		0.921	E	0.008					
29	Cahuenga Boulevard &	AM	0.866	D	0.884	D	0.018		0.871	D	0.005		0.881	D	0.015		0.869	D	0.003		0.881	D	0.015		0.870	D	0.003	
	Sunset Boulevard	PM	0.931	E	0.946	E	0.015	*	0.934	E	0.003		0.944	E	0.013	*	0.931	E	0.001		0.943	E	0.012	*	0.931	E	0.000	
31	Vine Street &	AM	1.031	F	1.050	F	0.019	*	1.037	F	0.006		1.047	F	0.016	*	1.034	F	0.003		1.047	F	0.016	*	1.035	F	0.004	
	Sunset Boulevard	PM	1.076	F	1.113	F	0.037	*	1.098	F	0.022	*	1.102	F	0.026	*	1.089	F	0.012	*	1.097	F	0.021	*	1.084	F	0.008	
35	Vine Street &	AM	0.907	E	0.921	E	0.014	*	0.910	E	0.003		0.919	E	0.012	*	0.908	E	0.001		0.921	E	0.014	*	0.909	E	0.002	
	Fountain Avenue	PM	1.022	F	1.045	F	0.023	*	1.031	F	0.009		1.040	F	0.018	*	1.027	F	0.005		1.037	F	0.015	*	1.025	F	0.003	
36	Vine Street &	AM	0.989	E	1.005	F	0.016	*	0.993	E	0.003		1.002	F	0.013	*	0.991	E	0.002		0.997	E	0.008					
	Santa Monica Boulevard	PM	1.070	F	1.088	F	0.018	*	1.075	F	0.005		1.082	F	0.012	*	1.070	F	0.000		1.079	F	0.009					

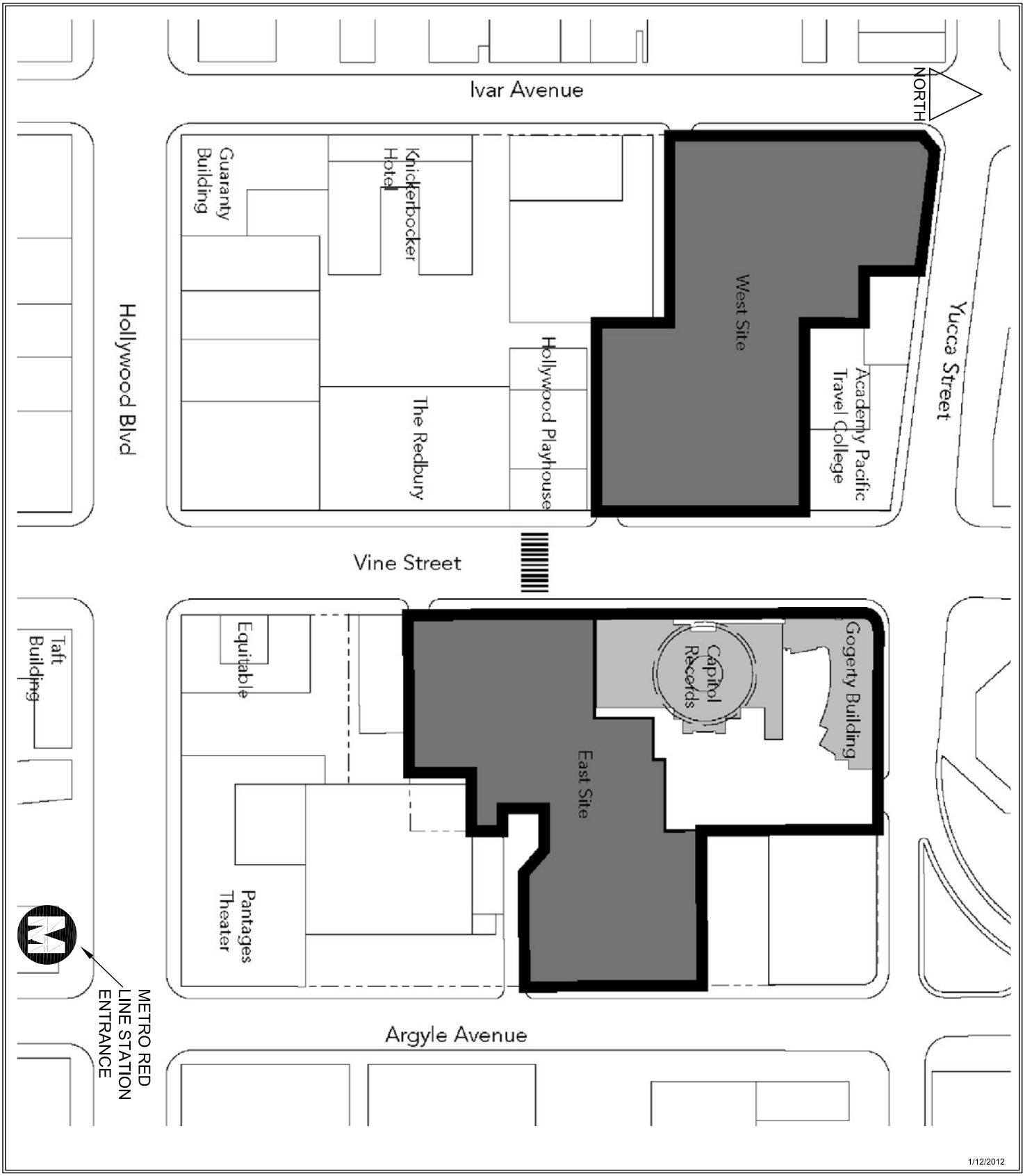
An * indicates a significant impact (LADOT Revised Scale).

Table 11
Critical Movement Analysis ("CMA") Summary
Existing (2011) and Future (2020) With Residential Scenario Traffic Conditions
With Added Mitigation of Limited Residential Units and Reserved Parking on the East Site

			Existing (2011)										Future (2020)								
		Peak	Existing		Existing + Project			WP + Mitigation			Without Project		With Project			WP + Mitigation				
No.	Intersection	Hour	CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact	
11	Vine Street &	AM	0.429	A	0.445	A	0.016					0.545	A	0.562	A	0.017					
	Yucca Street	PM	0.378	A	0.427	A	0.049					0.514	A	0.563	A	0.049					
12	Argyle Avenue &	AM	0.111	A	0.141	A	0.030					0.256	A	0.296	A	0.040					
	Yucca Street	PM	0.300	A	0.341	A	0.041					0.533	A	0.595	A	0.062					
18	Vine Street &	AM	0.734	C	0.780	C	0.046	*	0.763	C	0.029	0.972	E	1.018	F	0.046	*	1.001	F	0.029	*
	Hollywood Boulevard	PM	0.703	C	0.736	C	0.033		0.722	C	0.019	0.972	E	0.993	E	0.021	*	0.980	E	0.008	
19	Argyle Avenue &	AM	0.445	A	0.454	A	0.009					0.719	C	0.728	C	0.009		0.717	C	-0.002	
	Hollywood Boulevard	PM	0.617	B	0.629	B	0.012					0.969	E	0.989	E	0.020	*	0.976	E	0.007	
26	Vine Street &	AM	0.467	A	0.491	A	0.024					0.697	B	0.721	C	0.024					
	Selma Avenue	PM	0.512	A	0.536	A	0.024					0.757	C	0.781	C	0.024					
27	Argyle Avenue And	AM	0.256	A	0.263	A	0.007					0.467	A	0.475	A	0.008					
	Selma Avenue	PM	0.338	A	0.344	A	0.006					0.655	B	0.661	B	0.006					

An * indicates a significant impact (LADOT Revised Scale).

ATTACHMENT A
Conceptual Site Plan



FN: CAPITOL RECORDS\2012-06 MAIN REPORT\SITEPLAN

CONCEPTUAL PROJECT SITE PLAN

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ATTACHMENT B
Project EIR Scenarios Trip Generations

The Millenium Hollywood Development
In Hollywood California
DEIR Concept Project Trip Generation Estimate

LU	Use/Description	Size	Units	Daily	AM Peak Hour I/B	AM Peak Hour O/B	AM Peak Hour Total	PM Peak Hour I/B	PM Peak Hour O/B	PM Peak Hour Total
Proposed Uses										
220	Apartments	492	du	3,105	49	196	245	187	101	288
230	Condominiums	0	du	0	0	0	0	0	0	0
310	Hotel	200	rooms	1,634	68	44	112	63	55	118
492	Health/Fitness Club	35,000	bldg sf	1,153	22	26	48	70	52	122
710	General Office	215,303	bldg sf	2,408	304	42	346	54	266	320
820	Retail	15,000	bldg sf	1,979	31	19	50	87	91	178
931	Quality Restaurant	34,000	bldg sf	3,058	23	5	28	171	84	255
932	High-Turnover Restaurant	0	bldg sf	0	0	0	0	0	0	0
	Subtotal [A]			**13,337**	**497**	**332**	**829**	**632**	**649**	**1,281**
	Internal Trip Capture									
	Apt.s (Based on support)	6% -	18%	(569)	(2)	(12)	(14)	(28)	(13)	(41)
	Condo.s (Based on support)	n/a -	n/a	0	0	0	0	0	0	0
	Hotel	5%		(82)	(3)	(3)	(6)	(3)	(3)	(6)
	Health/Fitness Club	15%		(173)	(3)	(4)	(7)	(11)	(7)	(18)
	Office (Based on support)	3% -	18%	(442)	(9)	(3)	(12)	(8)	(36)	(44)
	Retail	15%		(297)	(5)	(3)	(8)	(13)	(14)	(27)
	Quality Restaurant	15%		(459)	(3)	(1)	(4)	(26)	(12)	(38)
	High-Turnover Restaurant	25%		0	0	0	0	0	0	0
	Subtotal [B]			**(2,022)**	**(25)**	**(26)**	**(51)**	**(89)**	**(85)**	**(174)**
	Transit/Walk-in External Trips									
	Apartments	15%		(380)	(7)	(28)	(35)	(24)	(13)	(37)
	Condominiums	15%		0	0	0	0	0	0	0
	Hotel	10%		(155)	(7)	(4)	(11)	(6)	(5)	(11)
	Health/Fitness Club	15%		(147)	(3)	(3)	(6)	(9)	(7)	(16)
	General Office	15%		(295)	(44)	(6)	(50)	(7)	(34)	(41)
	Retail	15%		(252)	(4)	(2)	(6)	(11)	(12)	(23)
	Quality Restaurant	15%		(390)	(3)	(1)	(4)	(22)	(11)	(33)
	High-Turnover Restaurant	15%		0	0	0	0	0	0	0
	Subtotal [C]			**(1,619)**	**(68)**	**(44)**	**(112)**	**(79)**	**(82)**	**(161)**
	[D] Driveway ([A]+[B]+[C])			**9,696**	**404**	**262**	**666**	**464**	**482**	**946**
	Pass-by Trips (% of External Auto)									
	Health/Fitness Club	20%		(167)	(3)	(4)	(7)	(10)	(8)	(18)
	Retail	50%		(715)	(11)	(7)	(18)	(32)	(33)	(65)
	Quality Restaurant	10%		(221)	(2)	0	(2)	(12)	(6)	(18)
	High-Turnover Restaurant	20%		0	0	0	0	0	0	0
	Subtotal [E]			**(1,103)**	**(16)**	**(11)**	**(27)**	**(54)**	**(47)**	**(101)**
	[F] Area Intersection Trips (Proposed Uses) ([D]+[E])			**8,593**	**388**	**251**	**639**	**410**	**435**	**845**

The Millenium Hollywood Development
In Hollywood California
DEIR Concept Project Trip Generation Estimate

LU	Use/Description	Size	Units	Daily	AM Peak Hour I/B	AM Peak Hour O/B	AM Peak Hour Total	PM Peak Hour I/B	PM Peak Hour O/B	PM Peak Hour Total
Existing Uses										
710	General Office	114,303	bldg sf	1,479	184	25	209	35	172	207
N/A	Car Rental Facility	8,037	lot sf	102	2	2	4	4	4	8
	Subtotal [G]			**1,581**	**186**	**27**	**213**	**39**	**176**	**215**
	Existing Internal Trip Capture									
	Office (Based on support)	0% -	0%	(15)	(1)	0	(1)	0	(1)	(1)
	Car Rental Facility	15%		(15)	0	(1)	(1)	(1)	0	(1)
	Subtotal [H]			**(30)**	**(1)**	**(1)**	**(2)**	**(1)**	**(1)**	**(2)**
	Existing Transit/Walk-in Trips									
	Office	15%		(220)	(27)	(4)	(31)	(5)	(26)	(31)
	Car Rental Facility	10%		(9)	0	0	0	0	0	0
	Subtotal [I]			**(229)**	**(27)**	**(4)**	**(31)**	**(5)**	**(26)**	**(31)**
	[J] Adjacent Intersection Trips ([G]+[H]+[I])			**1,322**	**158**	**22**	**180**	**33**	**149**	**182**
	Pass-by Trips (None)									
	[L] Area Intersection Trips (Existing Uses) ([J]+[K])			**1,322**	**158**	**22**	**180**	**33**	**149**	**182**
Net Site Adjacent Trips ([D]-[J])										
	Residential			2,156	40	156	196	135	75	210
	Office			427	95	12	107	9	51	60
	Non-Office Commercial			5,791	111	72	183	287	207	494
	Total			**8,374**	**246**	**240**	**486**	**431**	**333**	**764**
Net Area Trip Generation ([F]-[L])										
	Residential			2,156	40	156	196	135	75	210
	Office			427	95	12	107	9	51	60
	Non-Office Commercial			4,688	95	61	156	233	160	393
	Total			**7,271**	**230**	**229**	**459**	**377**	**286**	**663**

LU	Use/Description	Size	Units	Daily	AM Peak Hour I/B	AM Peak Hour O/B	AM Peak Hour Total	PM Peak Hour I/B	PM Peak Hour O/B	PM Peak Hour Total
Proposed Uses										
220	Apartments	897	du	5,559	89	354	443	332	179	511
310	Hotel	0	rooms	0	0	0	0	0	0	0
492	Health/Fitness Club	30,000	bldg sf	988	18	23	41	60	46	106
710	General Office	114,303	bldg sf	1,479	184	25	209	35	172	207
820	Retail	25,000	bldg sf	2,758	41	27	68	123	128	251
931	Quality Restaurant	10,000	bldg sf	900	7	1	8	50	25	75
	Subtotal [A]			**11,684**	**339**	**430**	**769**	**600**	**550**	**1,150**
	Internal Trip Capture									
	Commute									
	Multi-Family Residential	5%		(278)	(4)	(18)	(22)	(17)	(9)	(26)
	Office (Based on Res.)	11%	- 19%	(278)	(18)	(4)	(22)	(9)	(17)	(26)
	Support									
	Apts. (Based on support)	2%	- 10%	(551)	(2)	(9)	(11)	(27)	(18)	(45)
	Hotel	5%		0	0	0	0	0	0	0
	Health/Fitness Club	15%		(148)	(3)	(3)	(6)	(9)	(7)	(16)
	Office (Based on support)	3%	- 10%	(146)	(5)	(1)	(6)	(3)	(17)	(20)
	Retail	15%		(414)	(6)	(4)	(10)	(18)	(20)	(38)
	Quality Restaurant	15%		(135)	(1)	0	(1)	(8)	(3)	(11)
	Subtotal [B]			**(1,950)**	**(39)**	**(39)**	**(78)**	**(91)**	**(91)**	**(182)**
	Transit/Walk-in External Trips									
	Apartments	15%		(710)	(12)	(50)	(62)	(43)	(23)	(66)
	Hotel	10%		0	0	0	0	0	0	0
	Health/Fitness Club	15%		(126)	(2)	(3)	(5)	(8)	(6)	(14)
	General Office	15%		(158)	(24)	(3)	(27)	(3)	(21)	(24)
	Retail	15%		(352)	(5)	(4)	(9)	(16)	(16)	(32)
	Quality Restaurant	15%		(115)	(1)	0	(1)	(6)	(4)	(10)
	Subtotal [C]			**(1,461)**	**(44)**	**(60)**	**(104)**	**(76)**	**(70)**	**(146)**
	[D] Driveway ([A]+[B]+[C])			**8,273**	**256**	**331**	**587**	**433**	**389**	**822**
	Pass-by Trips (% of External Auto)									
	Health/Fitness Club	20%		(143)	(3)	(3)	(6)	(9)	(7)	(16)
	Retail	50%		(996)	(15)	(10)	(25)	(45)	(46)	(91)
	Quality Restaurant	10%		(65)	(1)	0	(1)	(4)	(2)	(6)
	Subtotal [E]			**(1,204)**	**(19)**	**(13)**	**(32)**	**(58)**	**(55)**	**(113)**
	[F] Area Intersection Trips (Proposed Uses) ([D]+[E])			**7,069**	**237**	**318**	**555**	**375**	**334**	**709**

LU	Use/Description	Size	Units	Daily	AM Peak Hour I/B	AM Peak Hour O/B	AM Peak Hour Total	PM Peak Hour I/B	PM Peak Hour O/B	PM Peak Hour Total
Existing Uses										
710	General Office	114,303	bldg sf	1,479	184	25	209	35	172	207
N/A	Car Rental Facility	8,037	lot sf	102	2	2	4	4	4	8
	Subtotal [G]			**1,581**	**186**	**27**	**213**	**39**	**176**	**215**
	Existing Internal Trip Capture									
	Office (Based on support)	0% -	1%	(15)	(1)	0	(1)	0	(1)	(1)
	Car Rental Facility	15%		(15)	0	(1)	(1)	(1)	0	(1)
	Subtotal [H]			**(30)**	**(1)**	**(1)**	**(2)**	**(1)**	**(1)**	**(2)**
	Existing Transit/Walk-in Trips									
	Office	15%		(220)	(27)	(4)	(31)	(5)	(26)	(31)
	Car Rental Facility	10%		(9)	0	0	0	0	0	0
	Subtotal [I]			**(229)**	**(27)**	**(4)**	**(31)**	**(5)**	**(26)**	**(31)**
	[J] Adjacent Intersection Trips ([G]+[H]+[I])			**1,322**	**158**	**22**	**180**	**33**	**149**	**182**
	Pass-by Trips (None)									
	[L] Area Intersection Trips (Existing Uses) ([J]+[K])			**1,322**	**158**	**22**	**180**	**33**	**149**	**182**
Net Site Adjacent Trips ([D]-[J])										
	Residential			4,020	71	277	348	245	129	374
	Office			(347)	(19)	(4)	(23)	(10)	(28)	(38)
	Non-Office Commercial			3,278	46	36	82	165	139	304
	Total			**6,951**	**98**	**309**	**407**	**400**	**240**	**640**
Net Area Trip Generation ([F]-[L])										
	Residential			4,020	71	277	348	245	129	374
	Office			(347)	(19)	(4)	(23)	(10)	(28)	(38)
	Non-Office Commercial			2,074	27	23	50	107	84	191
	Total			**5,747**	**79**	**296**	**375**	**342**	**185**	**527**

ATTACHMENT C
Project EIR Scenarios Traffic Volumes Figures

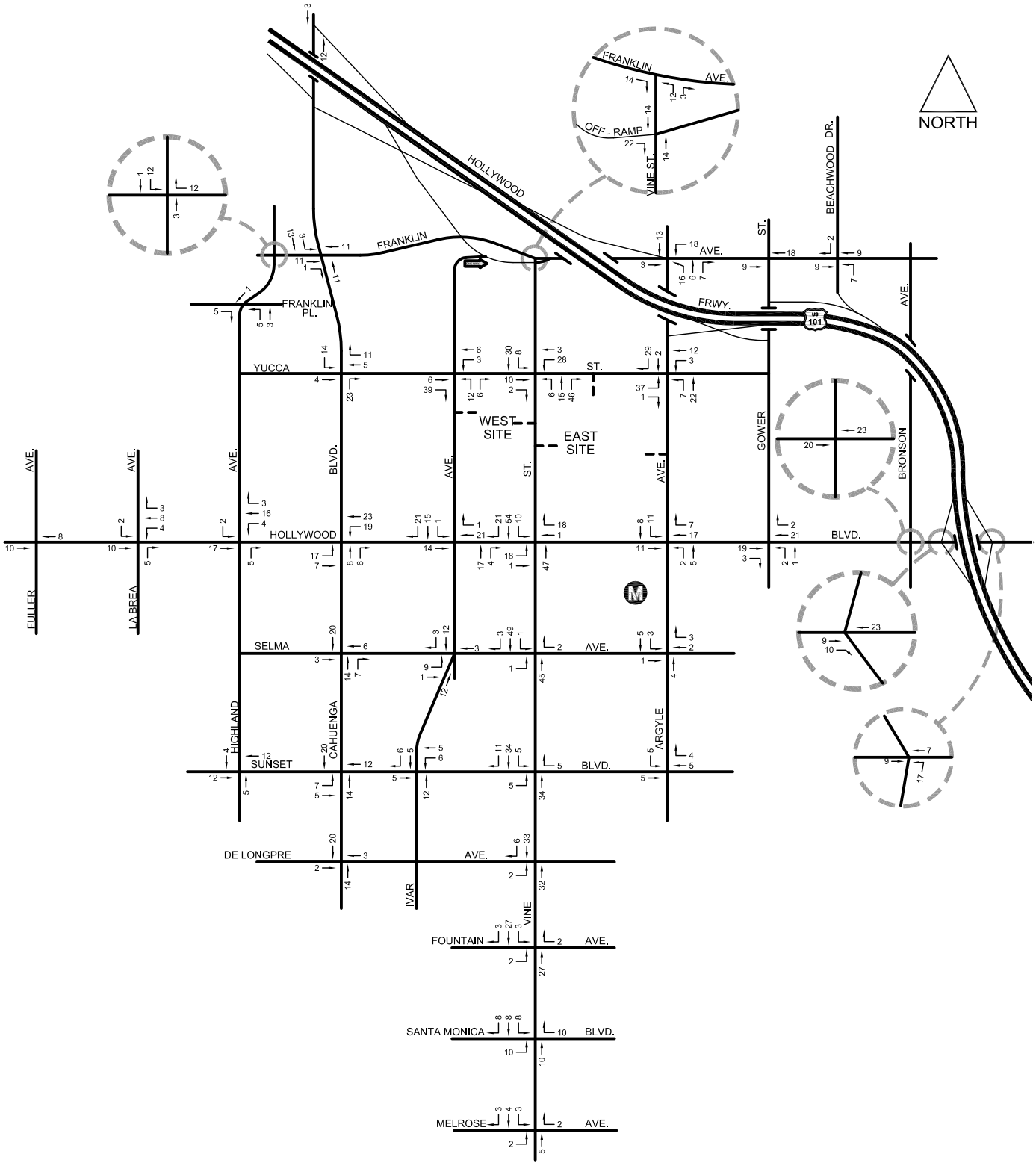

FIGURE 1(a)

12/28/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\AMPRJ-CONCEPT

EIR CONCEPT PLAN SCENARIO
PROJECT TRAFFIC VOLUMES (NET)
AM PEAK HOUR

STICK(FUTURE)

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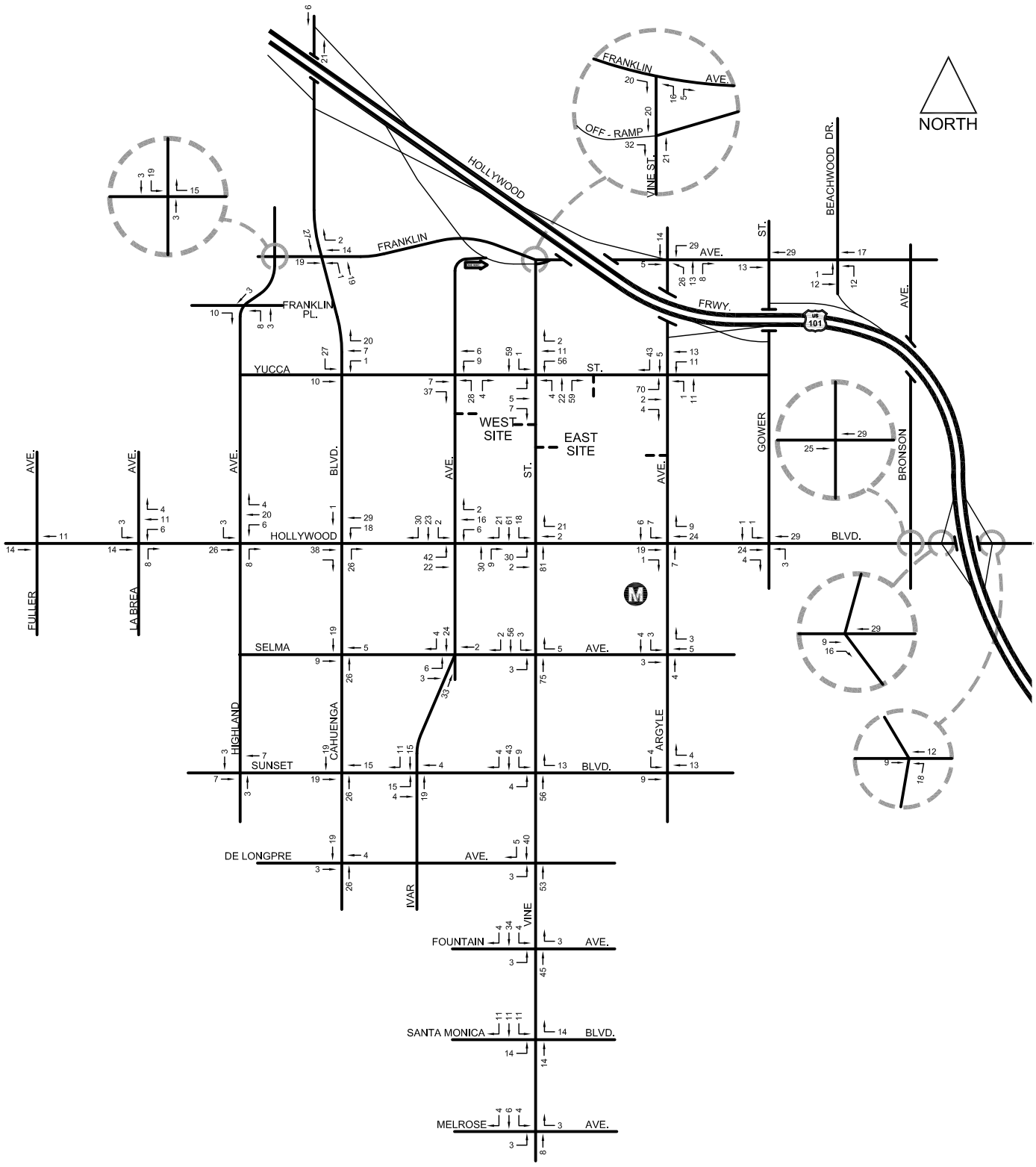

FIGURE 1(b)

12/28/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\PMPRJ-CONCEPT

EIR CONCEPT PLAN SCENARIO
PROJECT TRAFFIC VOLUMES (NET)
PM PEAK HOUR

STICK(FUTURE)

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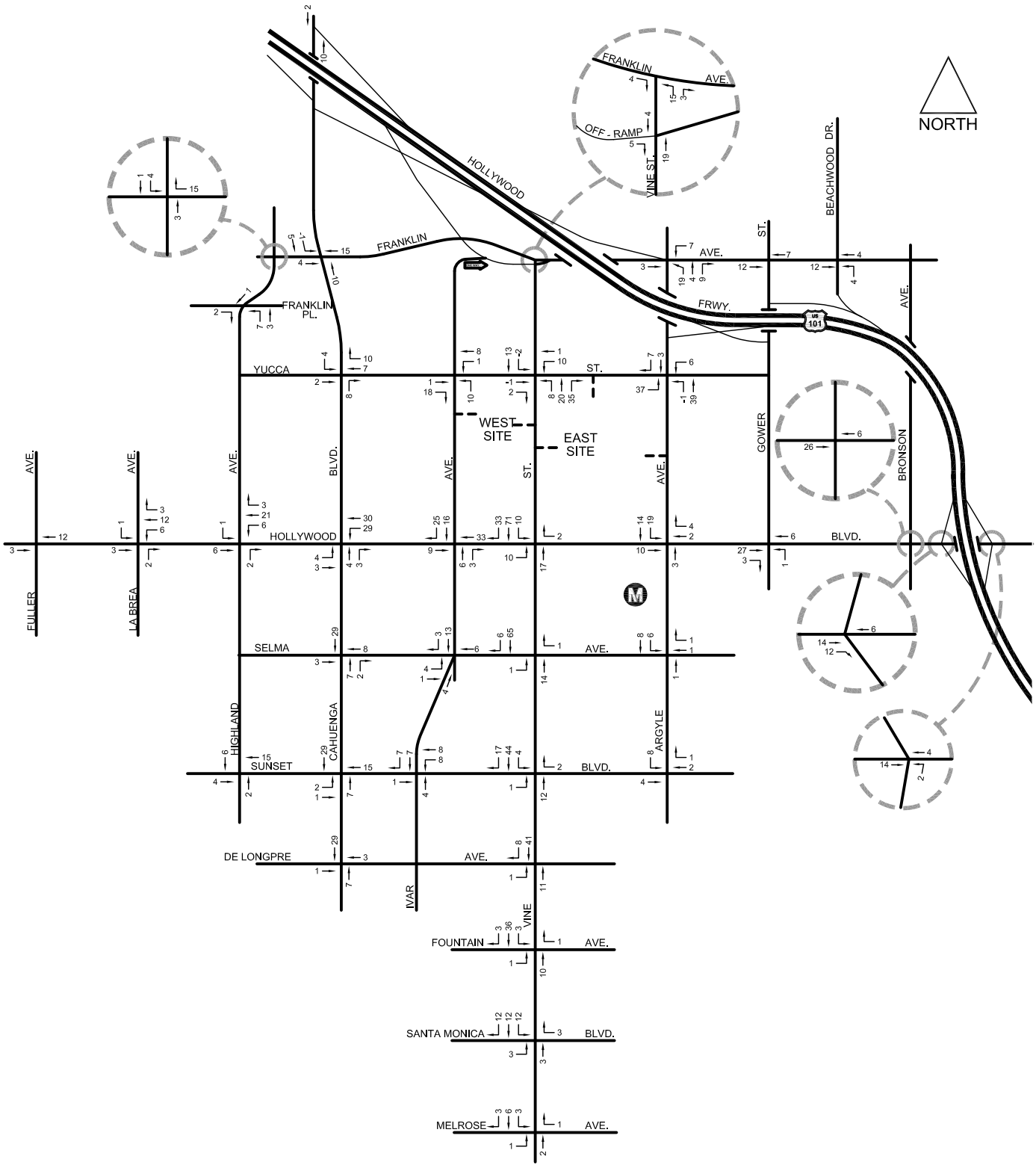

FIGURE 2(a)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\AMPRJ-RESIDENTIAL

STICK(FUTURE)

EIR RESIDENTIAL SCENARIO
PROJECT TRAFFIC VOLUMES (NET)
AM PEAK HOUR

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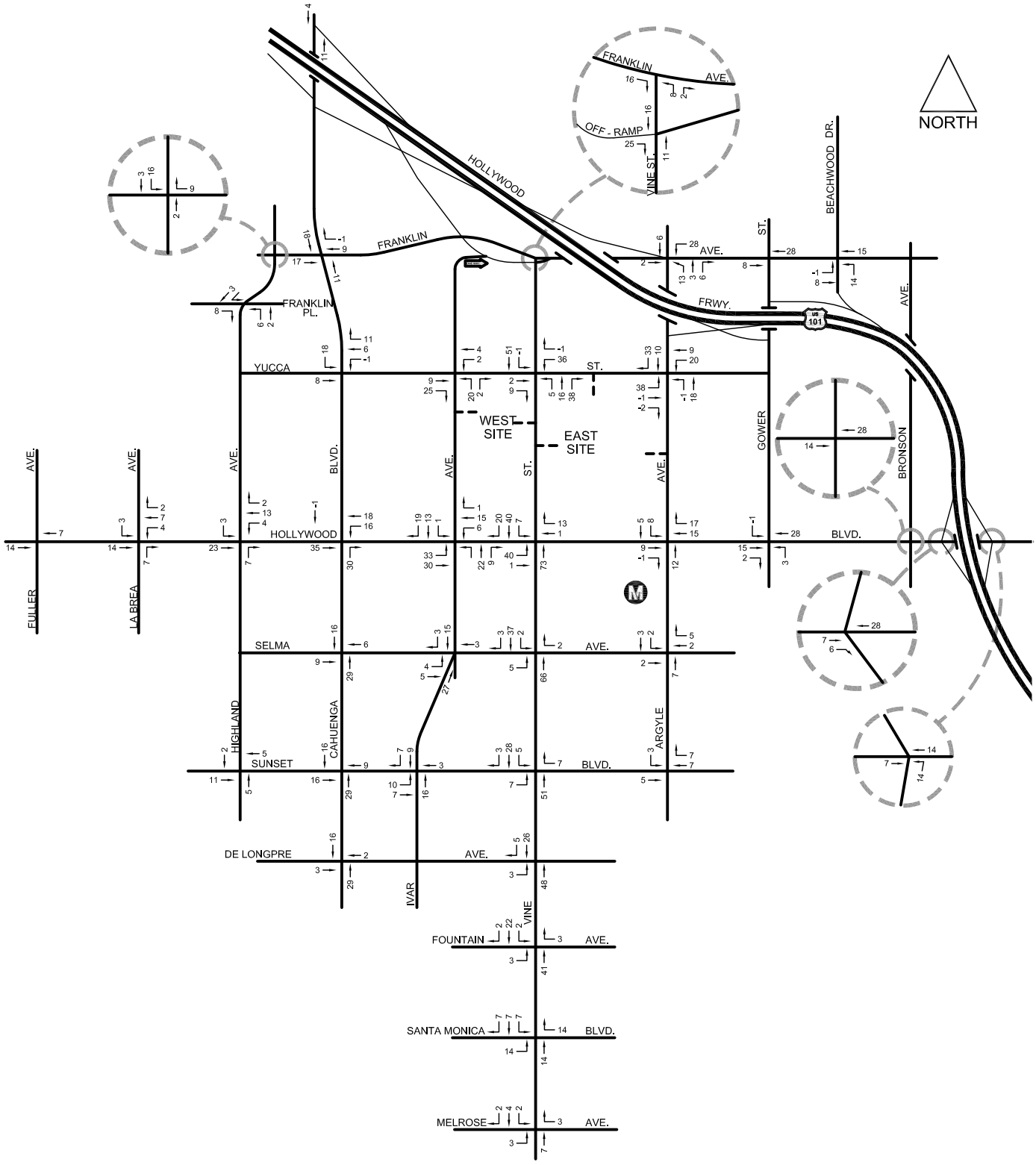

FIGURE 2(b)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\PMPRJ-RESIDENTIAL

STICK(FUTURE)

EIR RESIDENTIAL SCENARIO
PROJECT TRAFFIC VOLUMES (NET)
PM PEAK HOUR

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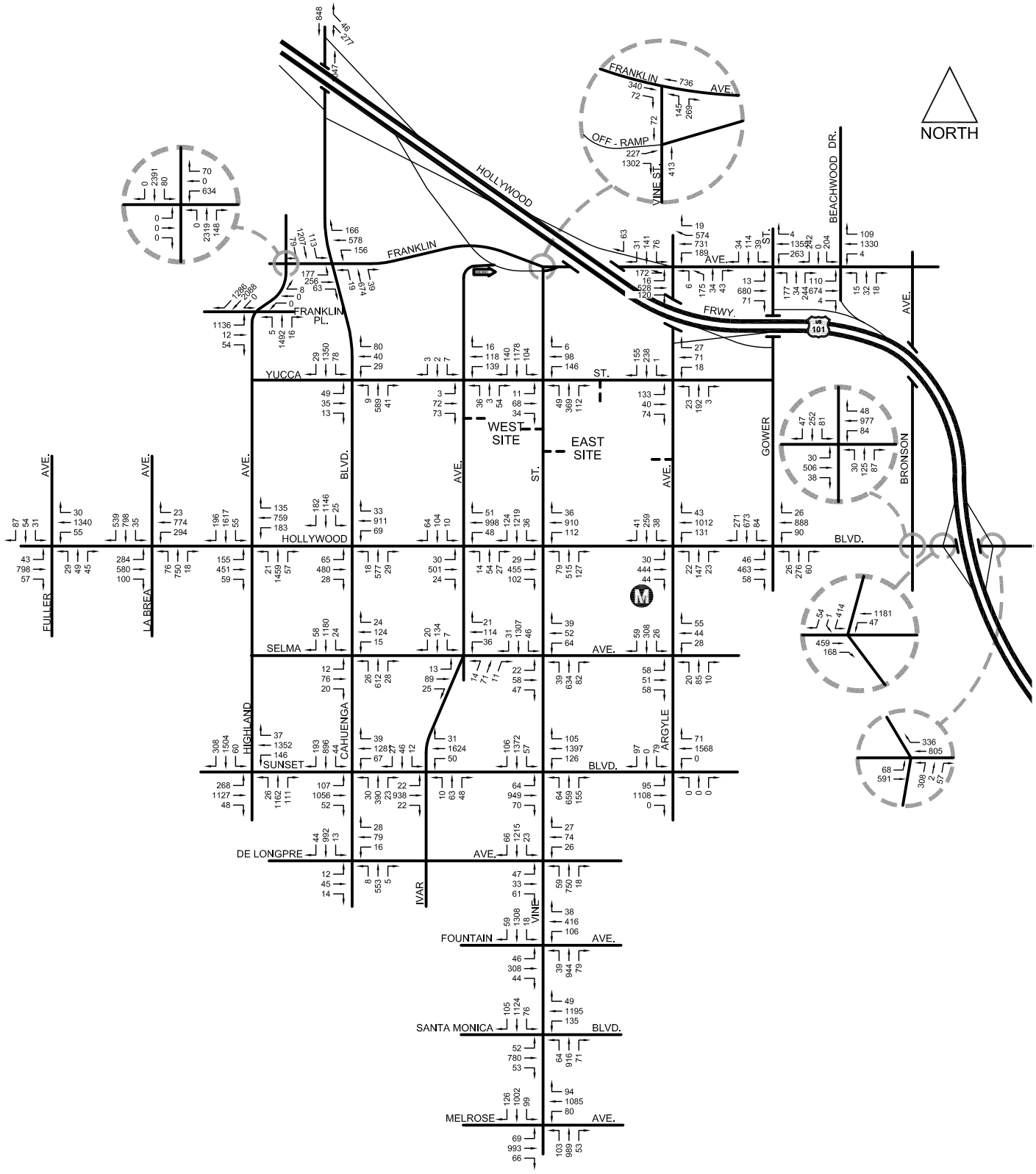

FIGURE 3(a)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\AMEXWP CONCEPT

EXISTING (2011) TRAFFIC VOLUMES WITH PROJECT EIR CONCEPT PLAN SCENARIO AM PEAK HOUR

STICK(FUTURE)

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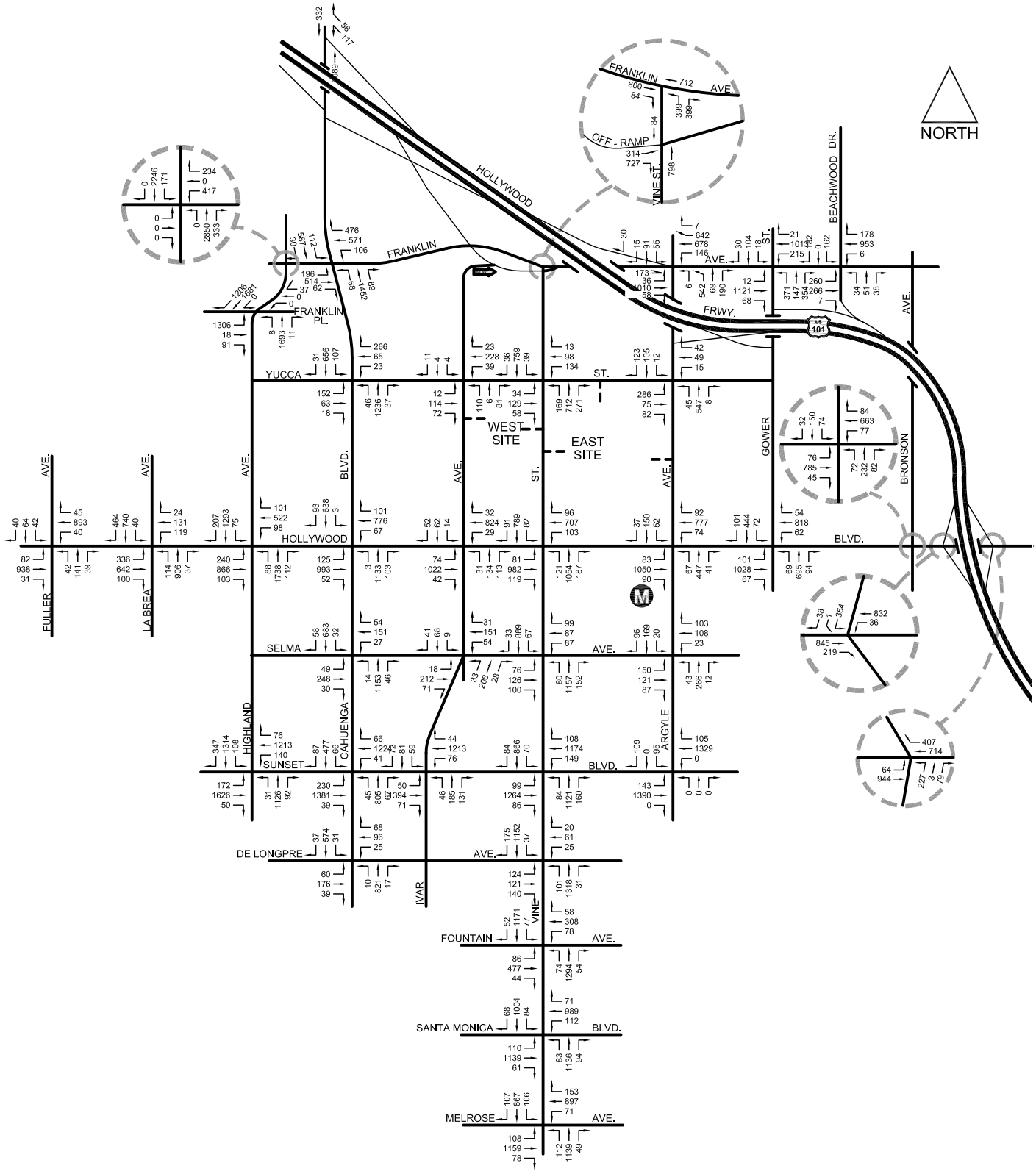

FIGURE 3(b)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\PMEXWP CONCEPT

EXISTING (2011) TRAFFIC VOLUMES WITH PROJECT EIR CONCEPT PLAN SCENARIO PM PEAK HOUR

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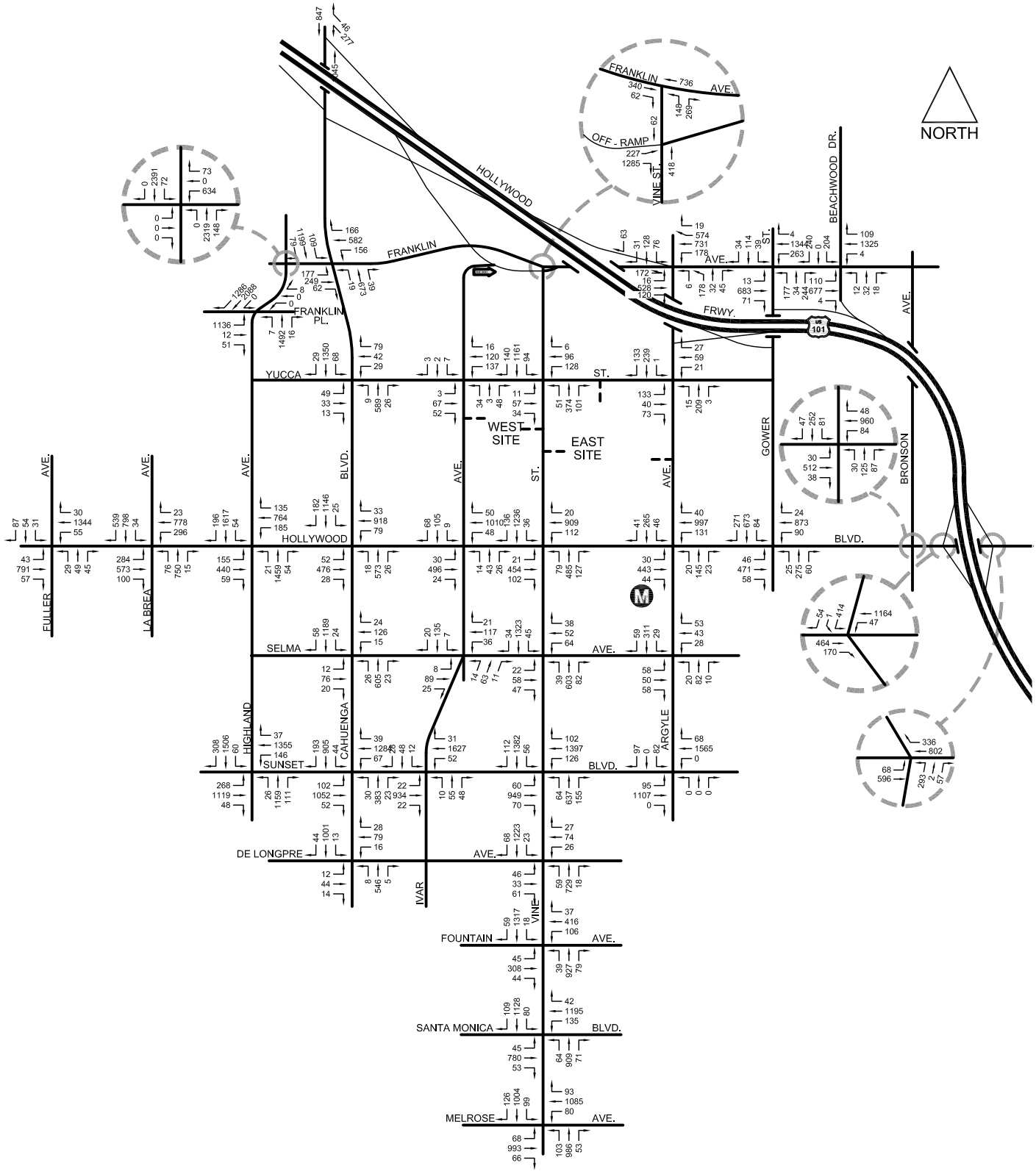

FIGURE 4(a)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\AMEXWP RESIDENTIAL

EXISTING (2011) TRAFFIC VOLUMES
WITH PROJECT EIR RESICENTIAL SCENARIO
AM PEAK HOUR

STICK(FUTURE)

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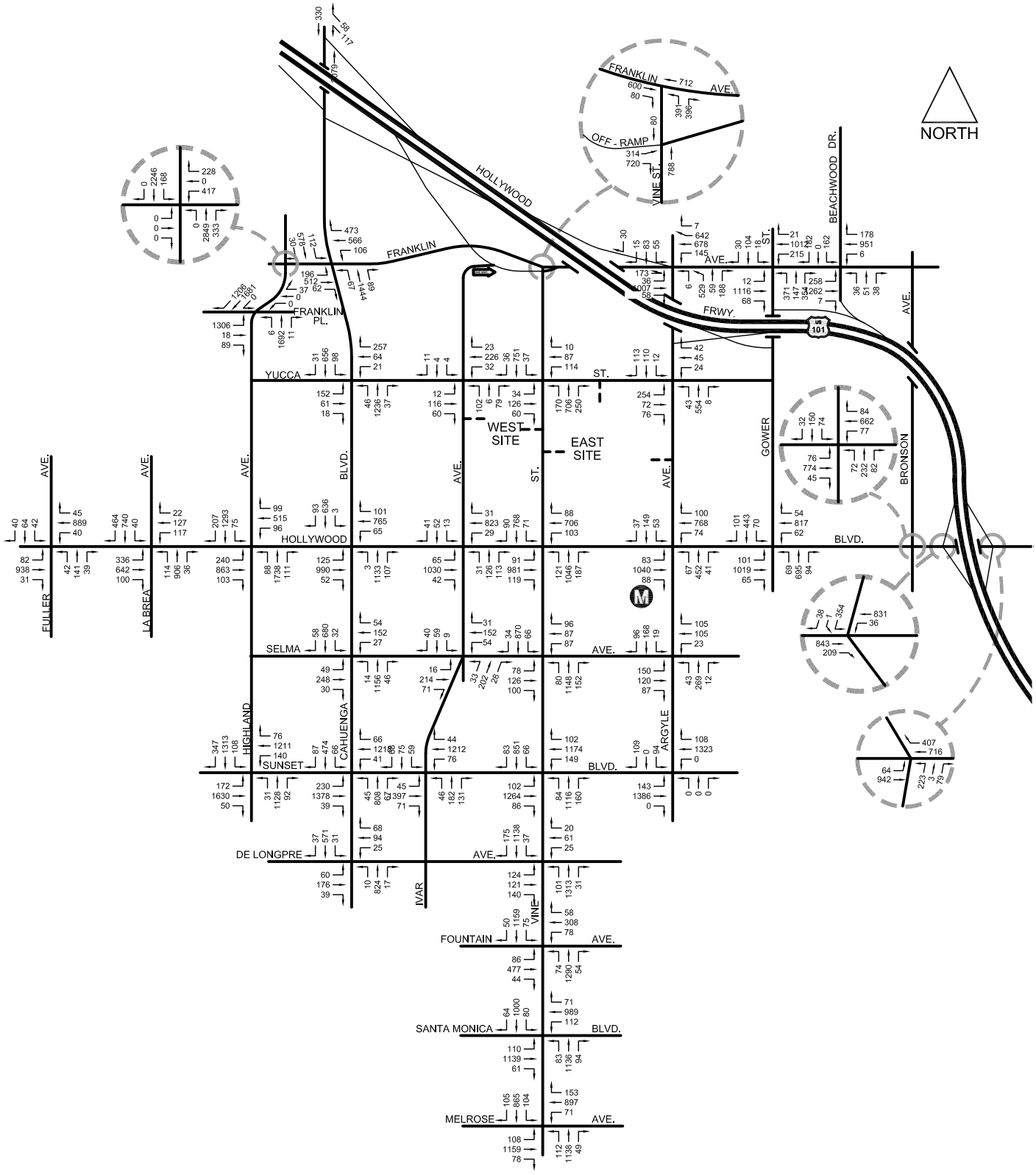

FIGURE 4(b)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\PMEXWP RESIDENTIAL

EXISTING (2011) TRAFFIC VOLUMES WITH PROJECT EIR RESIDENTIAL SCENARIO PM PEAK HOUR

STICK(FUTURE)

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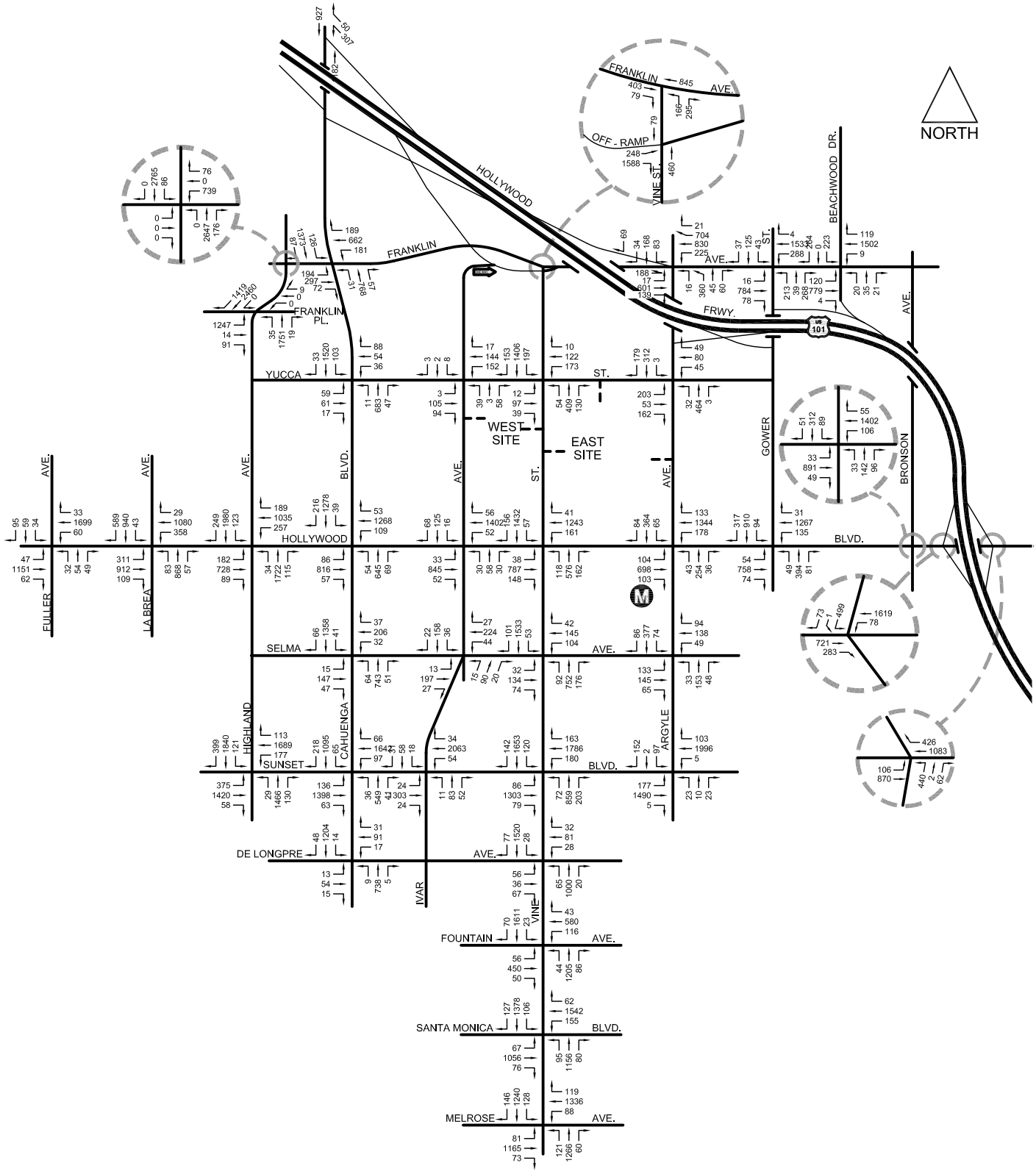

FIGURE 5(a)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\AM2020WP CONCEPT

FUTURE (2020) TRAFFIC VOLUMES WITH PROJECT EIR CONCEPT PLAN SCENARIO AM PEAK HOUR

STICK(FUTURE)

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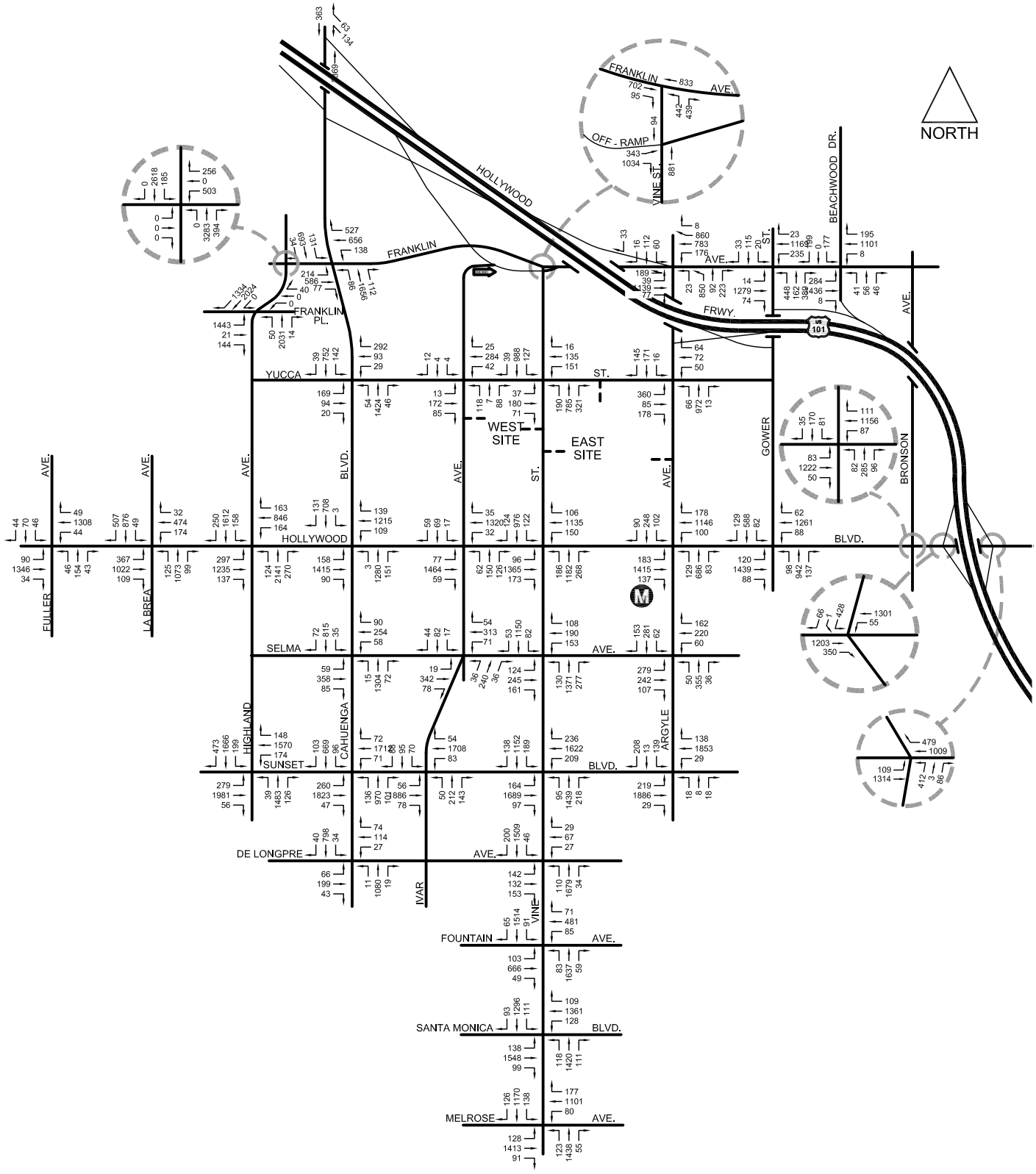

FIGURE 5(b)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\PM2020WP CONCEPT

FUTURE (2020) TRAFFIC VOLUMES WITH PROJECT EIR CONCEPT PLAN SCENARIO PM PEAK HOUR

STICK(FUTURE)

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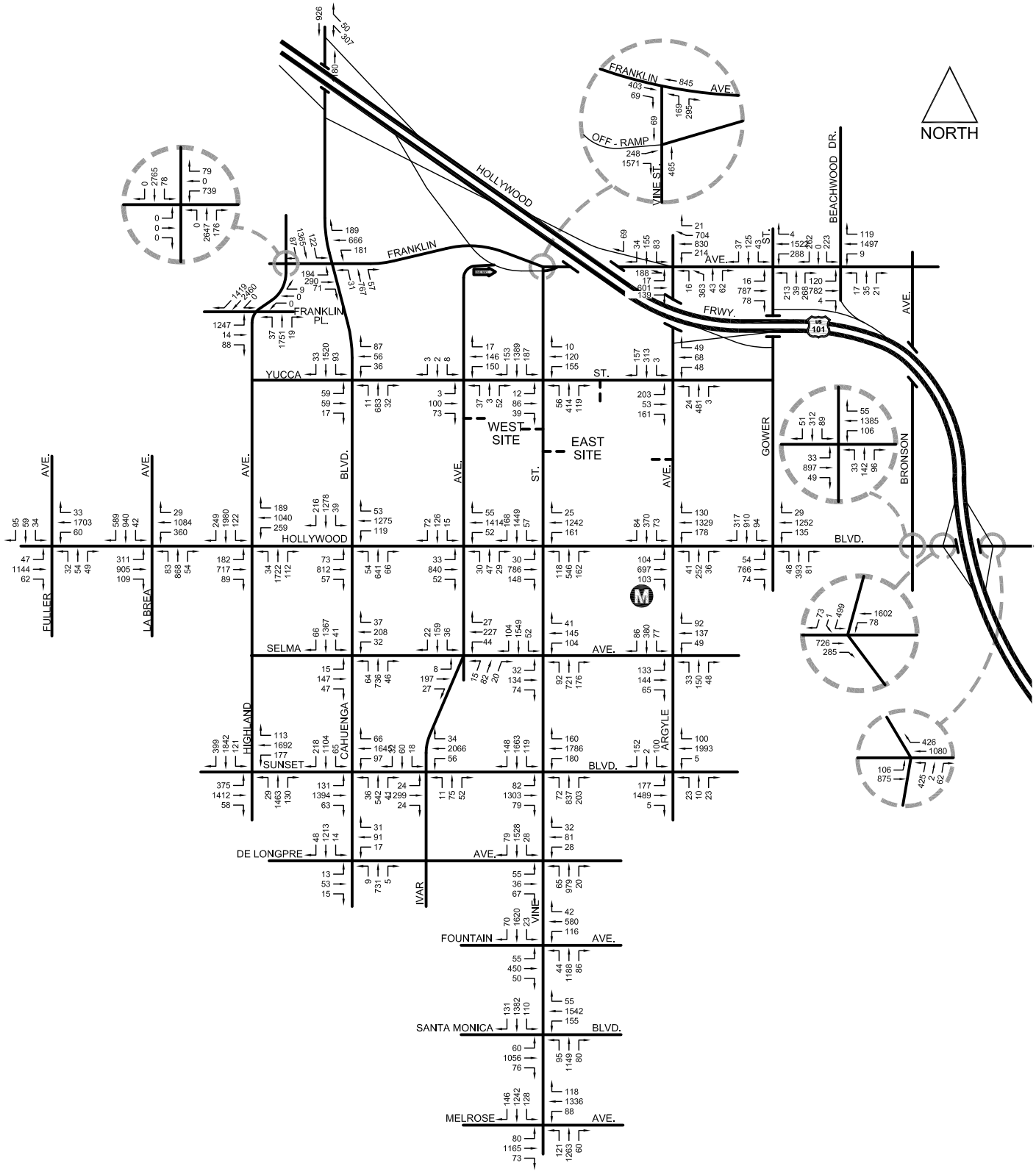

FIGURE 6(a)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\AM2020WP RESIDENTIAL

FUTURE (2020) TRAFFIC VOLUMES WITH PROJECT EIR RESIDENTIAL SCENARIO AM PEAK HOUR

STICK(FUTURE)

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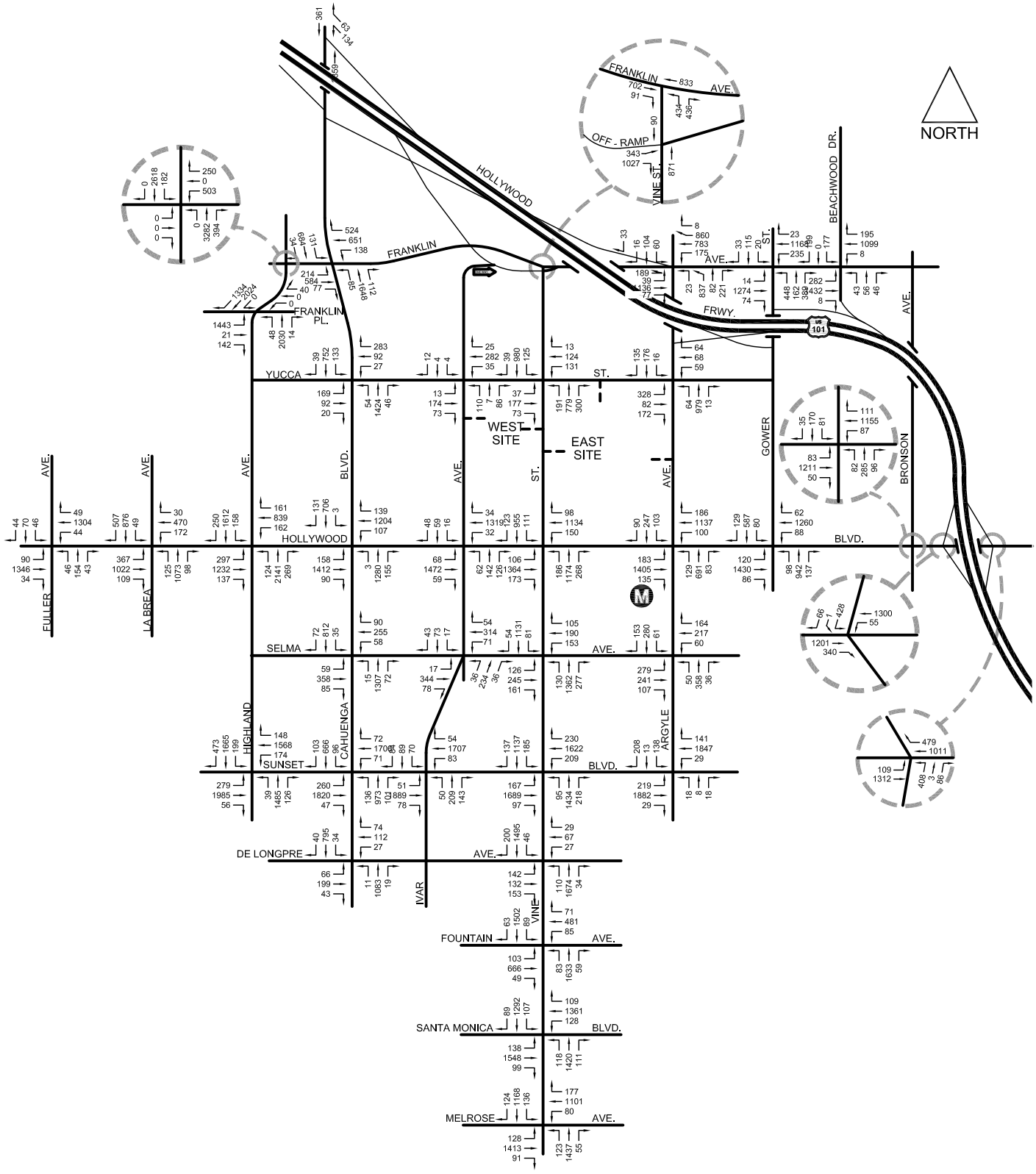

FIGURE 6(b)

12/31/2012

Millennium Hollywood - Capitol Records\2012-12 EIR Scenario\PM2020WP RESIDENTIAL

FUTURE (2020) TRAFFIC VOLUMES WITH PROJECT EIR RESIDENTIAL SCENARIO PM PEAK HOUR

STICK(FUTURE)

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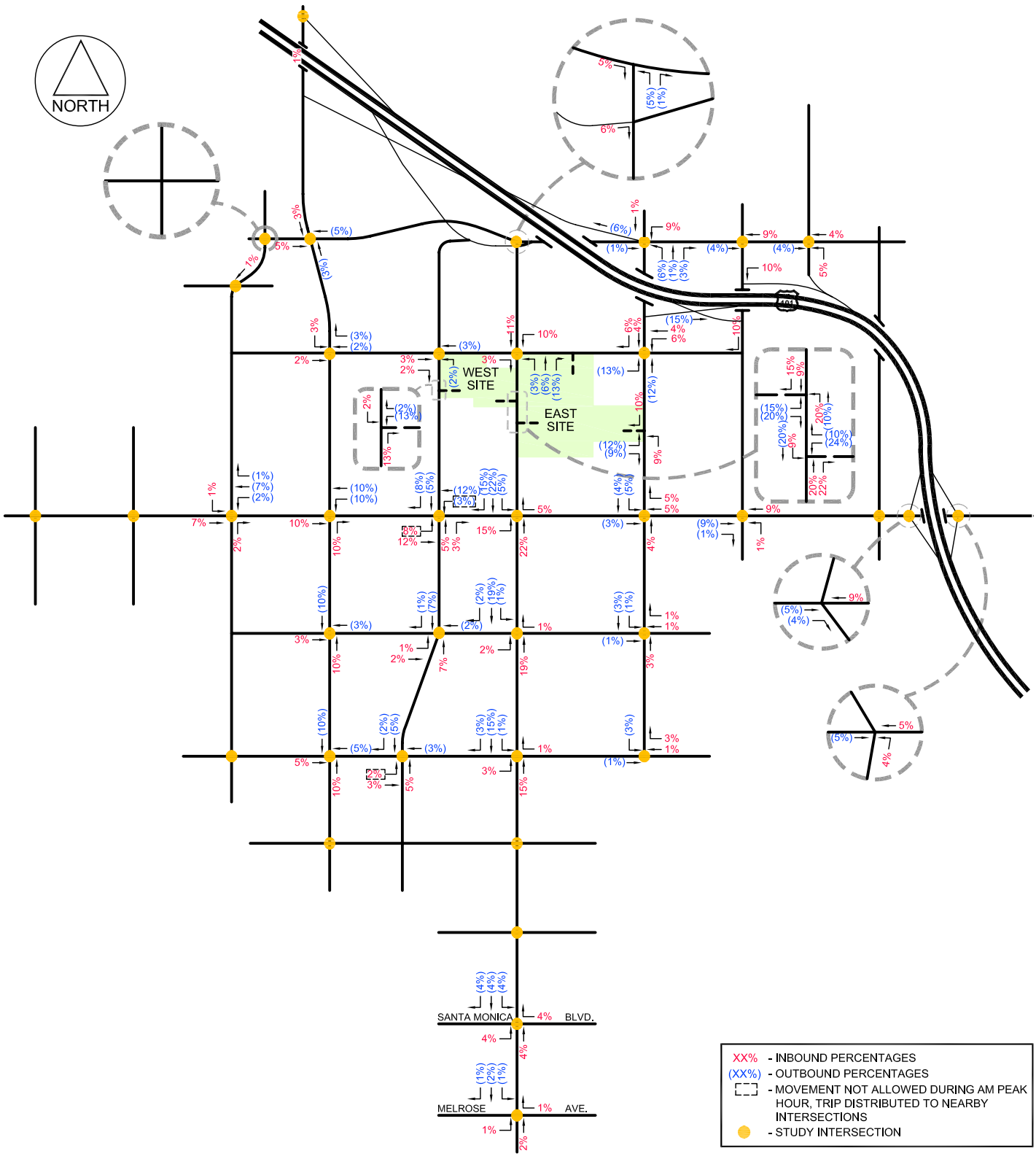

FIGURE 7

6/15/2012

Millennium Hollywood - Capitol Records\2012-06 MAIN REPORT\ PROJ-DIST-A2(a) REVISED.dwg

RESIDENTIAL TRIP DISTRIBUTION PERCENTAGES EAST SITE AND WEST SITE BALANCED (50%/50%)

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ATTACHMENT D
CMA Calculation Worksheets
With and Without Traffic Impact Report Mitigation

EIR Concept Plan Scenario

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
1	East-West Street:	US-101 FWY. NB OFF-RAMP	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0		NB-- 0	SB--	0		NB--	SB--		
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0		EB-- 0	WB--	0		EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	1035	2	**518**	12	1047	**524**	38	1170	2	**585**	12	1182	2	**591**		1182		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
	Left-Through		0							0				0					
	Through	845	2	423	3	848	424	0	924	2	462	3	927	2	464		927		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	277	1	**162**	0	277	**162**	4	307	1	**179**	0	307	1	**179**		307		**0**
	Left-Through		0							0				0					
	Through	0	0	162	0	0	162	0	0	0	179	0	0	0	179		0		0
	Through-Right		0							0				0					
	Right	46	0	0	0	46	0	0	50	0	0	0	50	0	0		50		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	518		*North-South:*	524			*North-South:*	585			*North-South:*	591			*North-South:*	0
			East-West:	162		*East-West:*	162			*East-West:*	179			*East-West:*	179			*East-West:*	0
			SUM:	680		*SUM:*	686			*SUM:*	764			*SUM:*	770			*SUM:*	0
VOLUME/CAPACITY *(V/C)* RATIO:				0.453			0.457				0.509				0.513				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.353**			**0.357**				**0.409**				**0.413**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.409
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
1	East-West Street:	US-101 FWY. NB OFF-RAMP	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	No. of Phases		2			2			2				2			2			
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0				0			0			
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0	NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- SB--		
		EB-- 0 WB--	0	EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- WB--		
	ATSAC-1 or ATSAC+ATCS-2?		2			2			2				2						
	Override Capacity		0			0			0				0						

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	2068	2	**1034**	21	2089	**1045**	86	2348	2	**1174**	21	2369	2	**1185**		2369		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
	Left-Through		0							0				0					
	Through	326	2	163	6	332	166	0	357	2	179	6	363	2	182		363		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	117	1	**88**	0	117	**88**	6	134	1	**99**	0	134	1	**99**		134		**0**
	Left-Through		0							0				0					
	Through	0	0	88	0	0	88	0	0	0	99	0	0	0	99		0		0
	Through-Right		0							0				0					
	Right	58	0	0	0	58	0	0	63	0	0	0	63	0	0		63		0
	Left-Through-Right		1							1				1					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*	1034	*North-South:*	1045		*North-South:*	1174			*North-South:*		1185		*North-South:*		0	
		East-West:	88	*East-West:*	88		*East-West:*	99			*East-West:*		99		*East-West:*		0	
		SUM:	1122	*SUM:*	1133		*SUM:*	1273			*SUM:*		1284		*SUM:*		0	
	VOLUME/CAPACITY *(V/C)* RATIO:		0.748		0.755			0.849					0.856				0.000	
	V/C LESS ATSAC/ATCS ADJUSTMENT:		**0.648**		**0.655**			**0.749**					**0.756**				0.000	
	LEVEL OF SERVICE (LOS):		**B**		**B**			**C**					**C**				**A**	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.007	Δ*v/c* after mitigation:	-0.749
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (NORTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
2	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB--	0	NB--	3	SB--	0	NB--	3	SB--	0	NB--	3	SB--	0	NB--	3	SB--	0
	EB--	0	WB--	3	EB--	0	WB--	3	EB--	0	WB--	3	EB--	0	WB--	3	EB--	0	WB--	3
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	2316	3	**772**	3	2319	**773**	111	2644	3	**881**	3	2647	3	**882**	0	2647	3	**882**
	Through-Right		0							0				0				0	
	Right	148	1	0	0	148	0	14	176	1	0	0	176	1	0	0	176	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	68	1	**68**	12	80	**80**	0	74	1	**74**	12	86	1	**86**	-2	84	1	**84**
	Left-Through		0							0				0				0	
	Through	2390	3	797	1	2391	797	150	2764	3	921	1	2765	3	922	0	2765	3	922
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	634	2	**349**	0	634	**349**	46	739	2	**406**	0	739	2	**406**	0	739	2	**406**
	Left-Through		0							0				0				0	
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through-Right		0							0				0				0	
	Right	58	1	0	12	70	0	1	64	1	0	12	76	1	0	-2	74	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		

CRITICAL VOLUMES	North-South:		840	North-South:		853	North-South:			955	North-South:			968	North-South:				966
	East-West:		349	East-West:		349	East-West:			406	East-West:			406	East-West:				406
	SUM:		1189	SUM:		1202	SUM:			1361	SUM:			1374	SUM:				1372
VOLUME/CAPACITY (V/C) RATIO:			0.834			0.844				0.955				0.964					0.963
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.734			0.744				0.855				0.864	With Imp.+TDM				0.863
LEVEL OF SERVICE (LOS):			C			C				D				D					D

REMARKS:

With Imp.+TDM+Signal Imp. 0.853 D

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — Δ*v/c* after mitigation: -0.002

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (NORTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
2	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB--	0
	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB--	3
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	2847	3	**949**	3	2850	**950**	166	3280	3	**1093**	3	3283	3	**1094**	0	3283	3	**1094**
	Through-Right		0							0				0				0	
	Right	333	1	104	0	333	104	30	394	1	117	0	394	1	117	0	394	1	117
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	152	1	**152**	19	171	**171**	0	166	1	**166**	19	185	1	**185**	-3	182	1	**182**
	Left-Through		0							0				0				0	
	Through	2243	3	748	3	2246	749	162	2615	3	872	3	2618	3	873	0	2618	3	873
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	417	2	**229**	0	417	**229**	47	503	2	**277**	0	503	2	**277**	0	503	2	**277**
	Left-Through		0							0				0				0	
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through-Right		0							0				0				0	
	Right	219	1	67	15	234	63	1	241	1	75	15	256	1	71	-2	254	1	72
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	1101		*North-South:*	1121		*North-South:*		1259		*North-South:*		1279		*North-South:*		1276
			East-West:	229		*East-West:*	229		*East-West:*		277		*East-West:*		277		*East-West:*		277
			SUM:	1330		*SUM:*	1350		*SUM:*		1536		*SUM:*		1556		*SUM:*		1553
VOLUME/CAPACITY *(V/C)* RATIO:				0.933			0.947				1.078				1.092				1.090
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.833**			**0.847**				**0.978**				**0.992**		*With Imp.+TDM*		**0.990**
LEVEL OF SERVICE (LOS):				D			D				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. **0.980** **E**

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: **0.014** Δ*v/c* after mitigation: **0.002**

Significant impacted? **YES** Fully mitigated? **YES**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (SOUTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
3	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2				2				2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0				0				0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	3	NB-- 0	SB--	3	NB-- 0	SB--		3	NB-- 0	SB--		3	NB--	SB--		
	EB-- 0	WB--	1	EB-- 0	WB--	1	EB-- 0	WB--		1	EB-- 0	WB--		1	EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				
Override Capacity			0			0				0				0				

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	5	5	**0**	30	30	0	**0**	5	35	0	**0**		35		**0**
	Left-Through		0							0				0					
	Through	1489	2	502	3	1492	503	120	1748	2	589	3	1751	2	590		1751		0
	Through-Right		1							1				1					
	Right	16	0	16	0	16	16	2	19	0	19	0	19	0	19		19		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	2087	3	696	1	2088	696	176	2459	3	**820**	1	2460	3	**820**		2460		**0**
	Through-Right		0							0				0					
	Right	1286	1	**712**	0	1286	**712**	13	1419	1	788	0	1419	1	788		1419		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	1136	1	**574**	0	1136	**574**	5	1247	1	**631**	0	1247	1	**631**		1247		0
	Left-Through		1							1				1					
	Through	12	0	574	0	12	574	1	14	0	631	0	14	0	631		14		**0**
	Through-Right		0							0				0					
	Right	49	1	49	5	54	54	32	86	1	86	5	91	1	91		91		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	8	1	**8**	0	8	**8**	0	9	1	**9**	0	9	1	**9**		9		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		712	*North-South:*		712	*North-South:*			820	*North-South:*			820	*North-South:*			0
		East-West:		582	*East-West:*		582	*East-West:*			640	*East-West:*			640	*East-West:*			0
		SUM:		1294	*SUM:*		1294	*SUM:*			1460	*SUM:*			1460	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.863			0.863				0.973				0.973				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.763**			**0.763**				**0.873**				**0.873**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**D**				**D**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.000 — Δ*v/c* after mitigation: -0.873

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (SOUTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
3	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--						
	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--	0	WB-- 1	EB--		WB--				
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	8	8	0	42	42	0	0	8	50	0	0		50		**0**
	Left-Through		0							0				0					
	Through	1690	2	**567**	3	1693	**568**	180	2028	2	**681**	3	2031	2	**682**		2031		0
	Through-Right		1							1				1					
	Right	11	0	11	0	11	11	2	14	0	14	0	14	0	14		14		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
	Left-Through		0							0				0					
	Through	1678	3	559	3	1681	560	186	2021	3	674	3	2024	3	675		2024		**0**
	Through-Right		0							0				0					
	Right	1206	1	544	0	1206	544	15	1334	1	602	0	1334	1	602		1334		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	1306	1	**662**	0	1306	**662**	15	1443	1	**732**	0	1443	1	**732**		1443		0
	Left-Through		1							1				1					
	Through	18	0	662	0	18	662	1	21	0	732	0	21	0	732		21		**0**
	Through-Right		0							0				0					
	Right	81	1	81	10	91	91	45	134	1	134	10	144	1	144		144		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	37	1	**37**	0	37	**37**	0	40	1	**40**	0	40	1	**40**		40		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		567	North-South:		568	North-South:			681	North-South:			682	North-South:			0
		East-West:		699	East-West:		699	East-West:			772	East-West:			772	East-West:			0
		SUM:		1266	SUM:		1267	SUM:			1453	SUM:			1454	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.844			0.845				0.969				0.969				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.744**			**0.745**				**0.869**				**0.869**				0.000
LEVEL OF SERVICE (LOS):				C			C				D				D				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.000	Δ*v/c* after mitigation:	-0.869
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
4	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	19	1	**19**	0	19	**19**	10	31	1	**31**	0	31	1	**31**	0	31	1	**31**
	Left-Through		0							0				0				0	
	Through	663	2	332	11	674	337	32	757	2	379	11	768	2	384	-2	766	2	383
	Through-Right		0							0				0				0	
	Right	39	1	0	0	39	0	14	57	1	0	0	57	1	0	0	57	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	110	1	110	3	113	113	3	123	1	123	3	126	1	126	0	126	1	126
	Left-Through		0							0				0				0	
	Through	1194	1	**637**	13	1207	**643**	54	1360	1	**724**	13	1373	1	**730**	-2	1371	1	**729**
	Through-Right		1							1				1				1	
	Right	79	0	79	0	79	79	1	87	0	87	0	87	0	87	0	87	0	87
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	177	1	**177**	0	177	**177**	0	194	1	**194**	0	194	1	**194**	0	194	1	**194**
	Left-Through		0							0				0				0	
	Through	245	0	307	11	256	319	18	286	0	357	11	297	0	369	-2	295	0	367
	Through-Right		1							1				1				1	
	Right	62	0	0	1	63	0	3	71	0	0	1	72	0	0	0	72	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	156	1	156	0	156	156	10	181	1	181	0	181	1	181	0	181	1	181
	Left-Through		0							0				0				0	
	Through	567	1	**567**	11	578	**578**	31	651	1	**651**	11	662	1	**662**	-2	660	1	**660**
	Through-Right		0							0				0				0	
	Right	166	1	111	0	166	110	7	189	1	128	0	189	1	126	0	189	1	126
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		656	*North-South:*		662	*North-South:*			755	*North-South:*			761	*North-South:*			760
		East-West:		744	*East-West:*		755	*East-West:*			845	*East-West:*			856	*East-West:*			854
		SUM:		1400	*SUM:*		1417	*SUM:*			1600	*SUM:*			1617	*SUM:*			1614
VOLUME/CAPACITY *(V/C)* RATIO:				0.933			0.945				1.067				1.078				1.076
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.833			0.845				0.967				0.978				0.976
LEVEL OF SERVICE (LOS):				D			D				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.966 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.011 | Δ*v/c* after mitigation: -0.001

Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
4	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	2	EB--	0	WB--	2	EB--	0	WB--	2	EB--	0	WB--	2	EB--	0	WB--	2
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	67	1	67	1	68	68	12	85	1	85	1	86	1	86	0	86	1	86
	Left-Through		0							0				0				0	
	Through	1433	2	**717**	19	1452	**726**	70	1637	2	**819**	19	1656	2	**828**	-3	1653	2	**827**
	Through-Right		0							0				0				0	
	Right	89	1	36	0	89	36	15	112	1	43	0	112	1	43	0	112	1	43
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	112	1	**112**	0	112	**112**	9	131	1	**131**	0	131	1	**131**	0	131	1	**131**
	Left-Through		0							0				0				0	
	Through	560	1	295	27	587	309	54	666	1	350	27	693	1	364	-4	689	1	362
	Through-Right		1							1				1				1	
	Right	30	0	30	0	30	30	1	34	0	34	0	34	0	34	0	34	0	34
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	196	1	**196**	0	196	**196**	0	214	1	**214**	0	214	1	**214**	0	214	1	**214**
	Left-Through		0							0				0				0	
	Through	495	1	279	19	514	288	26	567	1	322	19	586	1	332	-3	583	1	330
	Through-Right		1							1				1				1	
	Right	62	0	62	0	62	62	9	77	0	77	0	77	0	77	0	77	0	77
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	106	1	106	0	106	106	22	138	1	138	0	138	1	138	0	138	1	138
	Left-Through		0							0				0				0	
	Through	557	1	**557**	14	571	**571**	33	642	1	**642**	14	656	1	**656**	-2	654	1	**654**
	Through-Right		0							0				0				0	
	Right	474	1	474	2	476	476	7	525	1	525	2	527	1	527	0	527	1	527
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		829	*North-South:*		838	*North-South:*			950	*North-South:*			959	*North-South:*			958
		East-West:		753	*East-West:*		767	*East-West:*			856	*East-West:*			870	*East-West:*			868
		SUM:		1582	*SUM:*		1605	*SUM:*			1806	*SUM:*			1829	*SUM:*			1826
	VOLUME/CAPACITY *(V/C)* RATIO:			1.055			1.070				1.204				1.219				1.217
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.955			0.970				1.104				1.119	*With Imp.+TDM*			1.117
	LEVEL OF SERVICE (LOS):			E			E				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.107 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.015 — Δ*v/c* after mitigation: 0.003

Significant impacted? YES — Fully mitigated? YES

Level of Service Worksheet
(Circular 212 Method)

4

PROJECT TITLE:
North-South Street: CAHUENGA BOULEVA **East-West Street:** FRANKLIN AVENUE
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 12/28/2012

		AM PEAK HOUR			PM PEAK HOUR		
	No. of Phases			2			2
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB -- 0	SB --	0	NB -- 0	SB --	0
		EB -- 0	WB --	0	EB -- 0	WB --	2
	ATSAC-1 or ATSAC+ATCS-2?			2			2
	Override Capacity			0			0
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	19	1	**19**	68	1	68
	Left-Through		0			0	
	Through	672	2	336	1449	2	**725**
	Through-Right		0			0	
	Right	39	1	0	89	1	36
	Left-Through-Right		0			0	
	Left-Right						
SOUTHBOUND	Left	113	1	113	112	1	**112**
	Left-Through		0			0	
	Through	1205	1	**642**	583	1	307
	Through-Right		1			1	
	Right	79	0	79	30	0	30
	Left-Through-Right		0			0	
	Left-Right						
EASTBOUND	Left	177	1	**177**	196	1	**196**
	Left-Through		0			0	
	Through	254	0	317	511	1	287
	Through-Right		1			1	
	Right	63	0	0	62	0	62
	Left-Through-Right		0			0	
	Left-Right						
WESTBOUND	Left	156	1	156	106	1	106
	Left-Through		0			0	
	Through	576	1	**576**	569	1	**569**
	Through-Right		0			0	
	Right	166	1	110	476	1	476
	Left-Through-Right		0			0	
	Left-Right						
	CRITICAL VOLUMES		*North-South:*	661		*North-South:*	837
			East-West:	753		*East-West:*	765
			SUM:	1414		*SUM:*	1602
	VOLUME/CAPACITY *(V/C)* RATIO:			0.943			1.068
	V/C LESS ATSAC/ATCS ADJUSTMENT:		*With TDM*	**0.843**		*With TDM*	**0.968**
	LEVEL OF SERVICE (LOS):			**D**			**E**
			With TDM+Signal Imp.	**0.833**		*With TDM+Signal Imp.*	**0.958**
				D			**E**

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE ST.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
5	East-West Street:	FRANKLIN AVE./US-101 FWY. SB OFF	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	133	1	133	12	145	145	9	154	1	154	12	166	1	166		166		0
Through-Right		1							1				1					
Right	266	0	**266**	3	269	**269**	1	292	0	**292**	3	295	0	**295**		295		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	340	2	**187**	0	340	**187**	31	403	2	**222**	0	403	2	**222**		403		0
Left-Through		0							0				0					
Through	58	1	58	14	72	72	2	65	1	65	14	79	1	79		79		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	227	1	**227**	0	227	**227**	0	248	1	**248**	0	248	1	**248**		248		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	736	2	218	0	736	218	40	845	2	243	0	845	2	243		845		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		453	*North-South:*		456	*North-South:*			514	*North-South:*			517	*North-South:*			0
	East-West:		227	*East-West:*		227	*East-West:*			248	*East-West:*			248	*East-West:*			0
	SUM:		680	*SUM:*		683	*SUM:*			762	*SUM:*			765	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.477			0.479				0.535				0.537				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.377**			**0.379**				**0.435**				**0.437**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	1	WB--	3	EB--	1	WB--	3	EB--	1	WB--	3	EB--	1	WB--	3	EB--		WB--	

No. of Phases			3			3			3			3			3			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			
Override Capacity			0			0			0			0			0			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.435
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE ST.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
5	East-West Street:	FRANKLIN AVE./US-101 FWY. SB OFF	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	383	1	383	16	399	**399**	7	426	1	426	16	442	1	**441**		442		0
Through-Right		1							1				1					
Right	394	0	**394**	5	399	399	3	434	0	**434**	5	439	0	439		439		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	600	2	**330**	0	600	**330**	46	702	2	**386**	0	702	2	**386**		702		0
Left-Through		0							0				0					
Through	64	1	64	20	84	84	5	75	1	75	20	95	1	95		95		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	314	1	**314**	0	314	**314**	0	343	1	**343**	0	343	1	**343**		343		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	712	2	62	0	712	62	54	833	2	72	0	833	2	72		833		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		724	*North-South:*		729	*North-South:*			820	*North-South:*			827	*North-South:*			0
	East-West:		314	*East-West:*		314	*East-West:*			343	*East-West:*			343	*East-West:*			0
	SUM:		1038	*SUM:*		1043	*SUM:*			1163	*SUM:*			1170	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.728			0.732				0.816				0.821				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.628**			**0.632**				**0.716**				**0.721**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**C**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	1	WB--	3	EB--	1	WB--	3	EB--	1	WB--	3	EB--	1	WB--	3	EB--		WB--	

No. of Phases			3			3			3			3			3			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			
Override Capacity			0			0			0			0			0			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.716
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVE.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
6	East-West Street:	FRANKLIN AVE./US-101 FWY. NB ON	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			4			4				4				4				4
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1				1				1				1
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 3 SB--		0	NB-- 3 SB--		0	NB-- 3 SB--			0	NB-- 3 SB--			0	NB-- 3 SB--			0
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--			0	EB-- 0 WB--			0	EB-- 0 WB--			0
	ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				2
	Override Capacity			0			0				0				0				0
NORTHBOUND	Left	165	1	**97**	16	181	**108**	179	359	1	**199**	16	375	1	**210**	-2	373	2	**205**
	Left-Through		1							1				1				0	
	Through	28	0	97	6	34	108	8	39	0	199	6	45	0	210	-1	44	0	103
	Through-Right		0							0				0				1	
	Right	36	1	0	7	43	0	14	53	1	0	7	60	1	0	-1	59	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	76	1	76	0	76	76	0	83	1	83	0	83	1	83	0	83	1	**83**
	Left-Through		0							0				0				0	
	Through	128	1	**111**	13	141	**118**	15	155	1	**129**	13	168	1	**136**	-2	166	2	83
	Through-Right		1							1				1				0	
	Right	94	0	94	0	94	94	0	103	0	103	0	103	0	103	0	103	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	188	1	**188**	0	188	**188**	0	206	1	**206**	0	206	1	**206**	0	206	1	**206**
	Left-Through		0							0				0				0	
	Through	525	2	263	3	528	264	24	598	2	299	3	601	2	301	0	601	2	301
	Through-Right		0							0				0				0	
	Right	120	1	72	0	120	66	8	139	1	40	0	139	1	34	0	139	1	37
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	171	1	171	18	189	189	20	207	1	207	18	225	1	225	-3	222	1	222
	Left-Through		0							0				0				0	
	Through	731	1	**662**	0	731	**662**	31	830	1	**778**	0	830	1	**778**	0	830	1	**778**
	Through-Right		1							1				1				1	
	Right	593	0	593	0	593	593	76	725	0	725	0	725	0	725	0	725	0	725
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		208	North-South:		226	North-South:			328	North-South:			346	North-South:			288
		East-West:		850	East-West:		850	East-West:			984	East-West:			984	East-West:			984
		SUM:		1058	SUM:		1076	SUM:			1312	SUM:			1330	SUM:			1272
	VOLUME/CAPACITY (V/C) RATIO:			0.769			0.783				0.954				0.967				0.925
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.669**			**0.683**				**0.854**				**0.867**				**0.825**
	LEVEL OF SERVICE (LOS):			**B**			**B**				**D**				**D**				**D**

REMARKS:

With Imp.+TDM+Signal Imp. **0.815** **D**

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.013	Δ*v/c* after mitigation:	-0.039
Significant impacted?	NO	Fully mitigated?	N/A

With Imp.+TDM **0.825** **D**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVE.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
6	East-West Street:	FRANKLIN AVE./US-101 FWY. NB ON	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			4			4			4			4			4				4
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1			1			1			1				1
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB--	0	NB--	3	SB--	0	NB--	3	SB--	0	NB--	3	SB--	0	NB--	3	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	522	1	**289**	26	548	**309**	276	847	1	**463**	26	873	1	**483**	-4	869	2	**478**
	Left-Through		1							1				1				0	
	Through	56	0	289	13	69	309	18	79	0	463	13	92	0	483	-2	90	0	312
	Through-Right		0							0				0				1	
	Right	182	1	65	8	190	44	16	215	1	68	8	223	1	47	-1	222	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	55	1	55	0	55	55	0	60	1	60	0	60	1	60	0	60	1	**60**
	Left-Through		0							0				0				0	
	Through	77	1	**61**	14	91	**68**	14	98	1	**74**	14	112	1	**81**	-2	110	2	55
	Through-Right		1							1				1				0	
	Right	45	0	45	0	45	45	0	49	0	49	0	49	0	49	0	49	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	209	1	**209**	0	209	**209**	0	229	1	**229**	0	229	1	**229**	0	229	1	**229**
	Left-Through		0							0				0				0	
	Through	1005	2	503	5	1010	505	35	1134	2	567	5	1139	2	570	-1	1138	2	569
	Through-Right		0							0				0				0	
	Right	58	1	0	0	58	0	14	77	1	0	0	77	1	0	0	77	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	117	1	117	29	146	146	19	147	1	147	29	176	1	176	-4	172	1	172
	Left-Through		0							0				0				0	
	Through	678	1	**664**	0	678	**664**	41	783	1	783	0	783	1	783	0	783	1	783
	Through-Right		1							1				1				1	
	Right	649	0	649	0	649	649	158	868	0	**838**	0	868	0	**838**	0	868	0	**838**
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	350		*North-South:*	377		*North-South:*		537		*North-South:*		564		*North-South:*		538
			East-West:	873		*East-West:*	873		*East-West:*		1067		*East-West:*		1067		*East-West:*		1067
			SUM:	1223		*SUM:*	1250		*SUM:*		1604		*SUM:*		1631		*SUM:*		1605
VOLUME/CAPACITY *(V/C)* RATIO:				0.889			0.909				1.167				1.186				1.167
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.789			0.809				1.067				1.086		*With Imp.+TDM*		1.067
LEVEL OF SERVICE (LOS):				C			D				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.057 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.019 | *Δv/c* after mitigation: -0.010

Significant impacted? YES | Fully mitigated? YES

Level of Service Worksheet
(Circular 212 Method)

6

PROJECT TITLE:
North-South Street: ARGYLE AVE. **East-West Street:** FRANKLIN AVE./US-101 FWY. NB (
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 12/28/2012

		AM PEAK HOUR			PM PEAK HOUR		
No. of Phases				4			4
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				1			1
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB -- 3	SB --		0	NB -- 3	SB --	0
	EB -- 0	WB --		0	EB -- 0	WB --	0
ATSAC-1 or ATSAC+ATCS-2?				2			2
Override Capacity				0			0

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	179	1	**106**	544	1	**306**
	Left-Through		1			1	
	Through	33	0	106	67	0	306
	Through-Right		0			0	
	Right	42	1	0	189	1	47
	Left-Through-Right		0			0	
	Left-Right						
SOUTHBOUND	Left	76	1	76	55	1	55
	Left-Through		0			0	
	Through	139	1	**117**	89	1	**67**
	Through-Right		1			1	
	Right	94	0	94	45	0	45
	Left-Through-Right		0			0	
	Left-Right						
EASTBOUND	Left	188	1	**188**	209	1	**209**
	Left-Through		0			0	
	Through	528	2	264	1009	2	505
	Through-Right		0			0	
	Right	120	1	67	58	1	0
	Left-Through-Right		0			0	
	Left-Right						
WESTBOUND	Left	186	1	186	142	1	142
	Left-Through		0			0	
	Through	731	1	**662**	678	1	**664**
	Through-Right		1			1	
	Right	593	0	593	649	0	649
	Left-Through-Right		0			0	
	Left-Right						
CRITICAL VOLUMES			*North-South:*	223		*North-South:*	373
			East-West:	850		*East-West:*	873
			SUM:	1073		*SUM:*	1246
VOLUME/CAPACITY *(V/C)* RATIO:				0.780			0.906
V/C LESS ATSAC/ATCS ADJUSTMENT:			*With TDM*	**0.680**		*With TDM*	**0.806**
LEVEL OF SERVICE (LOS):				**B**			**D**
			With TDM+Signal Imp.	**0.670**		*With TDM+Signal Imp.*	**0.796**
				B			**D**

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
7	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1			1			1			1				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	177	1	106	0	177	106	19	213	1	**126**	0	213	1	**126**		213		**0**
	Left-Through		1							1				1					
	Through	34	0	106	0	34	106	2	39	0	126	0	39	0	126		39		0
	Through-Right		0							0				0					
	Right	244	1	**113**	0	244	**113**	1	268	1	124	0	268	1	124		268		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	39	0	39	0	39	39	0	43	0	43	0	43	0	43		43		0
	Left-Through		0							0				0					
	Through	114	0	**187**	0	114	**187**	0	125	0	**205**	0	125	0	**205**		125		**0**
	Through-Right		0							0				0					
	Right	34	0	0	0	34	0	0	37	0	0	0	37	0	0		37		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	13	1	**13**	0	13	**13**	2	16	1	**16**	0	16	1	**16**		16		0
	Left-Through		0							0				0					
	Through	671	1	371	9	680	376	41	775	1	427	9	784	1	431		784		**0**
	Through-Right		1							1				1					
	Right	71	0	71	0	71	71	0	78	0	78	0	78	0	78		78		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	263	1	263	0	263	263	0	288	1	288	0	288	1	288		288		**0**
	Left-Through		0							0				0					
	Through	1337	1	**671**	18	1355	**680**	53	1515	1	**760**	18	1533	1	**769**		1533		0
	Through-Right		1							1				1					
	Right	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		300	*North-South:*		300	*North-South:*			331	*North-South:*			331	*North-South:*			0
		East-West:		684	*East-West:*		693	*East-West:*			776	*East-West:*			785	*East-West:*			0
		SUM:		984	*SUM:*		993	*SUM:*			1107	*SUM:*			1116	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.691			0.697				0.777				0.783				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.591**			**0.597**				**0.677**				**0.683**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.677
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
7	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1			1			1			1				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	371	1	**259**	0	371	**259**	42	448	1	**305**	0	448	1	**305**		448		**0**
	Left-Through		1							1				1					
	Through	147	0	259	0	147	259	1	162	0	305	0	162	0	305		162		0
	Through-Right		0							0				0					
	Right	354	1	247	0	354	247	2	389	1	272	0	389	1	272		389		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	18	0	18	0	18	18	0	20	0	20	0	20	0	20		20		0
	Left-Through		0							0				0					
	Through	104	0	**152**	0	104	**152**	1	115	0	**168**	0	115	0	**168**		115		**0**
	Through-Right		0							0				0					
	Right	30	0	0	0	30	0	0	33	0	0	0	33	0	0		33		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	12	1	12	0	12	12	1	14	1	14	0	14	1	14		14		0
	Left-Through		0							0				0					
	Through	1108	1	**588**	13	1121	**595**	54	1266	1	**670**	13	1279	1	**677**		1279		**0**
	Through-Right		1							1				1					
	Right	68	0	68	0	68	68	0	74	0	74	0	74	0	74		74		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	215	1	**215**	0	215	**215**	0	235	1	**235**	0	235	1	**235**		235		**0**
	Left-Through		0							0				0					
	Through	984	1	503	29	1013	517	64	1140	1	582	29	1169	1	596		1169		0
	Through-Right		1							1				1					
	Right	21	0	21	0	21	21	0	23	0	23	0	23	0	23		23		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		411	*North-South:*		411	*North-South:*			473	*North-South:*			473	*North-South:*			0
		East-West:		803	*East-West:*		810	*East-West:*			905	*East-West:*			912	*East-West:*			0
		SUM:		1214	*SUM:*		1221	*SUM:*			1378	*SUM:*			1385	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.852			0.857				0.967				0.972				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.752**			**0.757**				**0.867**				**0.872**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**D**				**D**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.867
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BEACHWOOD DRIVE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
8	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 3		NB-- 0	SB-- 3		NB-- 0	SB-- 3			NB-- 0	SB-- 3			NB--	SB--		
	EB-- 0	WB-- 0		EB-- 0	WB-- 0		EB-- 0	WB-- 0			EB-- 0	WB-- 0			EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	8	0	8	7	15	15	4	13	0	13	7	20	0	20		20		**0**
	Left-Through		0							0				0					
	Through	32	0	**58**	0	32	**65**	0	35	0	**69**	0	35	0	**76**		35		0
	Through-Right		0							0				0					
	Right	18	0	0	0	18	0	1	21	0	0	0	21	0	0		21		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	204	1	**204**	0	204	**204**	0	223	1	**223**	0	223	1	**223**		223		0
	Left-Through		0							0				0					
	Through	0	0	240	0	0	242	0	0	0	262	0	0	0	264		0		**0**
	Through-Right		1							1				1					
	Right	240	0	0	2	242	0	0	262	0	0	2	264	0	0		264		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	110	1	**110**	0	110	**110**	0	120	1	**120**	0	120	1	**120**		120		0
	Left-Through		0							0				0					
	Through	665	1	335	9	674	339	43	770	1	387	9	779	1	392		779		**0**
	Through-Right		1							1				1					
	Right	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	4	1	4	0	4	4	5	9	1	9	0	9	1	9		9		**0**
	Left-Through		0							0				0					
	Through	1321	1	**715**	9	1330	**720**	48	1493	1	**806**	9	1502	1	**811**		1502		0
	Through-Right		1							1				1					
	Right	109	0	109	0	109	109	0	119	0	119	0	119	0	119		119		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		262	North-South:		269	North-South:			292	North-South:			299	North-South:			0
		East-West:		825	East-West:		830	East-West:			926	East-West:			931	East-West:			0
		SUM:		1087	SUM:		1099	SUM:			1218	SUM:			1230	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.763			0.771				0.855				0.863				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.663**			**0.671**				**0.755**				**0.763**				0.000
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.755
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BEACHWOOD DRIVE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
8	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		3	NB-- 0 SB--		3	NB-- 0 SB--		3		NB-- 0 SB--		3		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	22	0	22	12	34	34	5	29	0	29	12	41	0	41		41		**0**
	Left-Through		0							0				0					
	Through	51	0	**111**	0	51	**123**	0	56	0	**131**	0	56	0	**143**		56		0
	Through-Right		0							0				0					
	Right	38	0	0	0	38	0	4	46	0	0	0	46	0	0		46		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	162	1	**162**	0	162	**162**	0	177	1	**177**	0	177	1	**177**		177		0
	Left-Through		0							0				0					
	Through	0	0	182	0	0	182	0	0	0	199	0	0	0	199		0		**0**
	Through-Right		1							1				1					
	Right	182	0	0	0	182	0	0	199	0	0	0	199	0	0		199		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	259	1	**259**	1	260	**260**	0	283	1	**283**	1	284	1	**284**		284		0
	Left-Through		0							0				0					
	Through	1254	1	631	12	1266	637	53	1424	1	716	12	1436	1	722		1436		**0**
	Through-Right		1							1				1					
	Right	7	0	7	0	7	7	0	8	0	8	0	8	0	8		8		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	6	1	6	0	6	6	1	8	1	8	0	8	1	8		8		**0**
	Left-Through		0							0				0					
	Through	936	1	**557**	17	953	**566**	60	1084	1	**640**	17	1101	1	**648**		1101		0
	Through-Right		1							1				1					
	Right	178	0	178	0	178	178	0	195	0	195	0	195	0	195		195		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		273	*North-South:*		285	*North-South:*			308	*North-South:*			320		*North-South:*		0
		East-West:		816	*East-West:*		826	*East-West:*			923	*East-West:*			932		*East-West:*		0
		SUM:		1089	*SUM:*		1111	*SUM:*			1231	*SUM:*			1252		*SUM:*		0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.764			0.780				0.864				0.879				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.664**			**0.680**				**0.764**				**0.779**				0.000
	LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.015	Δ*v/c* after mitigation:	-0.764
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
9	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	9	1	**9**	0	9	**9**	1	11	1	**11**	0	11	1	**11**		11		**0**
	Left-Through		0							0				0					
	Through	589	1	304	0	589	315	39	683	1	354	0	683	1	365		683		0
	Through-Right		1							1				1					
	Right	18	0	18	23	41	41	4	24	0	24	23	47	0	47		47		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	64	1	64	14	78	78	19	89	1	89	14	103	1	103		103		0
	Left-Through		0							0				0					
	Through	1350	1	**690**	0	1350	**690**	44	1520	1	**777**	0	1520	1	**777**		1520		**0**
	Through-Right		1							1				1					
	Right	29	0	29	0	29	29	1	33	0	33	0	33	0	33		33		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	49	0	49	0	49	49	5	59	0	59	0	59	0	59		59		0
	Left-Through		0							0				0					
	Through	31	0	**93**	4	35	**97**	23	57	0	**133**	4	61	0	**137**		61		**0**
	Through-Right		0							0				0					
	Right	13	0	0	0	13	0	3	17	0	0	0	17	0	0		17		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	29	1	**29**	0	29	**29**	4	36	1	**36**	0	36	1	**36**		36		**0**
	Left-Through		0							0				0					
	Through	35	1	35	5	40	40	11	49	1	49	5	54	1	54		54		0
	Through-Right		0							0				0					
	Right	69	1	37	11	80	41	2	77	1	33	11	88	1	37		88		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		699	*North-South:*		699	*North-South:*			788	*North-South:*			788	*North-South:*			0
		East-West:		122	*East-West:*		126	*East-West:*			169	*East-West:*			173	*East-West:*			0
		SUM:		821	*SUM:*		825	*SUM:*			957	*SUM:*			961	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.547			0.550				0.638				0.641				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.447**			**0.450**				**0.538**				**0.541**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.538
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
9	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	46	1	46	0	46	46	4	54	1	54	0	54	1	54		54		**0**
Left-Through		0							0				0					
Through	1236	1	**637**	0	1236	**637**	72	1424	1	**735**	0	1424	1	**735**		1424		0
Through-Right		1							1				1					
Right	37	0	37	0	37	37	6	46	0	46	0	46	0	46		46		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	80	1	**80**	27	107	**107**	28	115	1	**115**	27	142	1	**142**		142		0
Left-Through		0							0				0					
Through	656	1	344	0	656	344	35	752	1	396	0	752	1	396		752		**0**
Through-Right		1							1				1					
Right	31	0	31	0	31	31	5	39	0	39	0	39	0	39		39		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	152	0	**152**	0	152	**152**	3	169	0	**169**	0	169	0	**169**		169		0
Left-Through		0							0				0					
Through	53	0	223	10	63	233	26	84	0	273	10	94	0	283		94		**0**
Through-Right		0							0				0					
Right	18	0	0	0	18	0	0	20	0	0	0	20	0	0		20		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	22	1	22	1	23	23	4	28	1	28	1	29	1	29		29		**0**
Left-Through		0							0				0					
Through	58	1	58	7	65	65	23	86	1	86	7	93	1	93		93		0
Through-Right		0							0				0					
Right	246	1	**206**	20	266	**213**	3	272	1	**215**	20	292	1	**221**		292		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		717	*North-South:*		744	*North-South:*			850	*North-South:*			877	*North-South:*			0
	East-West:		358	*East-West:*		365	*East-West:*			384	*East-West:*			390	*East-West:*			0
	SUM:		1075	*SUM:*		1109	*SUM:*			1234	*SUM:*			1267	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.717			0.739				0.823				0.845				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.617**			**0.639**				**0.723**				**0.745**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**C**				**A**

	NB--	SB--	EB--	WB--
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?				
Override Capacity				

	EXISTING CONDITION	EXISTING PLUS PROJECT	FUTURE CONDITION W/O PROJECT	FUTURE CONDITION W/ PROJECT	FUTURE W/ PROJECT W/ MITIGATION
No. of Phases	2	2	2	2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.022	Δ*v/c* after mitigation:	-0.723
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
10	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	24	0	24	12	36	36	1	27	0	27	12	39	0	39		39		**0**
	Left-Through		0							0				0					
	Through	3	0	**75**	0	3	**93**	0	3	0	**82**	0	3	0	**100**		3		0
	Through-Right		0							0				0					
	Right	48	0	0	6	54	0	0	52	0	0	6	58	0	0		58		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	7	0	**7**	0	7	**7**	0	8	0	**8**	0	8	0	**8**		8		0
	Left-Through		0							0				0					
	Through	2	0	12	0	2	12	0	2	0	13	0	2	0	13		2		**0**
	Through-Right		0							0				0					
	Right	3	0	0	0	3	0	0	3	0	0	0	3	0	0		3		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	3	1	3	0	3	3	0	3	1	3	0	3	1	3		3		0
	Left-Through		0							0				0					
	Through	66	1	**66**	6	72	72	27	99	1	**99**	6	105	1	**105**		105		**0**
	Through-Right		0							0				0					
	Right	34	1	34	39	73	**73**	18	55	1	55	39	94	1	94		94		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	136	1	**136**	3	139	**139**	0	149	1	**149**	3	152	1	**152**		152		**0**
	Left-Through		0							0				0					
	Through	112	1	112	6	118	118	16	138	1	138	6	144	1	144		144		0
	Through-Right		0							0				0					
	Right	16	1	16	0	16	16	0	17	1	17	0	17	1	17		17		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		82	*North-South:*		100	*North-South:*			90	*North-South:*			108	*North-South:*			0
		East-West:		202	*East-West:*		212	*East-West:*			248	*East-West:*			257	*East-West:*			0
		SUM:		284	*SUM:*		312	*SUM:*			338	*SUM:*			365	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.189			0.208				0.225				0.243				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.095**			**0.108**				**0.125**				**0.143**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.018	Δ*v/c* after mitigation:	-0.125
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
10	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	82	0	82	28	110	110	0	90	0	90	28	118	0	118		118		**0**
Left-Through		0							0				0					
Through	6	0	**165**	0	6	**197**	0	7	0	**181**	0	7	0	**213**		7		0
Through-Right		0							0				0					
Right	77	0	0	4	81	0	0	84	0	0	4	88	0	0		88		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	4	0	**4**	0	4	**4**	0	4	0	**4**	0	4	0	**4**		4		0
Left-Through		0							0				0					
Through	4	0	19	0	4	19	0	4	0	20	0	4	0	20		4		**0**
Through-Right		0							0				0					
Right	11	0	0	0	11	0	0	12	0	0	0	12	0	0		12		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	12	1	**12**	0	12	**12**	0	13	1	**13**	0	13	1	**13**		13		0
Left-Through		0							0				0					
Through	107	1	107	7	114	114	48	165	1	165	7	172	1	172		172		**0**
Through-Right		0							0				0					
Right	35	1	35	37	72	72	10	48	1	48	37	85	1	85		85		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	30	1	30	9	39	39	0	33	1	33	9	42	1	42		42		**0**
Left-Through		0							0				0					
Through	222	1	**222**	6	228	**228**	35	278	1	**278**	6	284	1	**284**		284		0
Through-Right		0							0				0					
Right	23	1	23	0	23	23	0	25	1	25	0	25	1	25		25		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		169	*North-South:*		201	*North-South:*			185	*North-South:*			217	*North-South:*			0
	East-West:		234	*East-West:*		240	*East-West:*			291	*East-West:*			297	*East-West:*			0
	SUM:		403	*SUM:*		441	*SUM:*			476	*SUM:*			514	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.269			0.294				0.317				0.343				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.169**			**0.194**				**0.217**				**0.243**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.026	Δ*v/c* after mitigation:	-0.217
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	43	1	**43**	6	49	**49**	1	48	1	**48**	6	54	1	**54**		54		**0**
	Left-Through		0							0				0					
	Through	354	1	210	15	369	241	7	394	1	239	15	409	1	270		409		0
	Through-Right		1							1				1					
	Right	66	0	66	46	112	112	12	84	0	84	46	130	0	130		130		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	96	1	96	8	104	104	84	189	1	189	8	197	1	197		197		0
	Left-Through		0							0				0					
	Through	1148	2	**574**	30	1178	**589**	120	1376	2	**688**	30	1406	2	**703**		1406		**0**
	Through-Right		0							0				0					
	Right	140	1	135	0	140	135	0	153	1	147	0	153	1	147		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	11	1	11	0	11	11	0	12	1	12	0	12	1	12		12		0
	Left-Through		0							0				0					
	Through	58	1	**58**	10	68	**68**	24	87	1	**87**	10	97	1	**97**		97		**0**
	Through-Right		0							0				0					
	Right	32	1	11	2	34	10	2	37	1	13	2	39	1	12		39		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	118	1	**118**	28	146	**146**	16	145	1	**145**	28	173	1	**173**		173		**0**
	Left-Through		0							0				0					
	Through	95	2	48	3	98	49	15	119	2	60	3	122	2	61		122		0
	Through-Right		0							0				0					
	Right	6	1	0	0	6	0	3	10	1	0	0	10	1	0		10		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		617	*North-South:*		638	*North-South:*			736	*North-South:*			757	*North-South:*			0
		East-West:		176	*East-West:*		214	*East-West:*			232	*East-West:*			270	*East-West:*			0
		SUM:		793	*SUM:*		852	*SUM:*			968	*SUM:*			1027	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.529			0.568				0.645				0.685				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.429**			**0.468**				**0.545**				**0.585**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.040	Δ*v/c* after mitigation:	-0.545
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	165	1	**165**	4	169	**169**	6	186	1	**186**	4	190	1	**190**		190		**0**
Left-Through		0							0				0					
Through	690	1	451	22	712	492	8	763	1	513	22	785	1	553		785		0
Through-Right		1							1				1					
Right	212	0	212	59	271	271	30	262	0	262	59	321	0	321		321		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	38	1	38	1	39	39	84	126	1	126	1	127	1	127		127		0
Left-Through		0							0				0					
Through	700	2	**350**	59	759	**380**	163	929	2	**465**	59	988	2	**494**		988		**0**
Through-Right		0							0				0					
Right	36	1	19	0	36	19	0	39	1	21	0	39	1	21		39		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	34	1	34	0	34	34	0	37	1	37	0	37	1	37		37		0
Left-Through		0							0				0					
Through	124	1	**124**	5	129	**129**	39	175	1	**175**	5	180	1	**180**		180		**0**
Through-Right		0							0				0					
Right	51	1	0	7	58	0	8	64	1	0	7	71	1	0		71		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	78	1	**78**	56	134	**134**	10	95	1	**95**	56	151	1	**151**		151		**0**
Left-Through		0							0				0					
Through	87	2	44	11	98	49	29	124	2	62	11	135	2	68		135		0
Through-Right		0							0				0					
Right	11	1	0	2	13	0	2	14	1	0	2	16	1	0		16		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		515	*North-South:*		549	*North-South:*			651	*North-South:*			684	*North-South:*			0
	East-West:		202	*East-West:*		263	*East-West:*			270	*East-West:*			331	*East-West:*			0
	SUM:		717	*SUM:*		812	*SUM:*			921	*SUM:*			1015	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.478			0.541				0.614				0.677				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.378**			**0.441**				**0.514**				**0.577**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--	EXISTING CONDITION	EXISTING PLUS PROJECT	FUTURE CONDITION W/O PROJECT	FUTURE CONDITION W/ PROJECT	FUTURE W/ PROJECT W/ MITIGATION
No. of Phases					2	2	2	2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?					0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	
ATSAC-1 or ATSAC+ATCS-2?					2	2	2	2	
Override Capacity					0	0	0	0	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.063	Δ*v/c* after mitigation:	-0.514
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
12	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	16	0	**16**	7	23	**23**	8	25	0	25	7	32	0	32		32		**0**
Left-Through		1							1				1					
Through	170	0	103	22	192	121	256	442	0	**248**	22	464	0	**266**		464		0
Through-Right		1							1				1					
Right	3	0	103	0	3	121	0	3	0	248	0	3	0	266		3		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	1	0	1	0	1	1	2	3	0	**3**	0	3	0	**3**		3		0
Left-Through		1							1				1					
Through	236	1	**119**	2	238	**120**	52	310	1	158	2	312	1	159		312		**0**
Through-Right		0							0				0					
Right	126	1	0	29	155	0	12	150	1	0	29	179	1	0		179		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	96	1	**96**	37	133	**133**	61	166	1	**166**	37	203	1	**203**		203		0
Left-Through		0							0				0					
Through	40	1	40	0	40	40	9	53	1	53	0	53	1	53		53		**0**
Through-Right		0							0				0					
Right	73	1	73	1	74	74	81	161	1	161	1	162	1	162		162		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	15	1	15	3	18	18	26	42	1	42	3	45	1	45		45		**0**
Left-Through		0							0				0					
Through	59	0	**86**	12	71	**98**	3	68	0	**117**	12	80	0	**129**		80		0
Through-Right		1							1				1					
Right	27	0	0	0	27	0	19	49	0	0	0	49	0	0		49		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		135	*North-South:*		143	*North-South:*			251	*North-South:*			269	*North-South:*			0
	East-West:		182	*East-West:*		231	*East-West:*			283	*East-West:*			332	*East-West:*			0
	SUM:		317	*SUM:*		374	*SUM:*			534	*SUM:*			601	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.211			0.249				0.356				0.401				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.111**			**0.149**				**0.256**				**0.301**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	1	0	0
EXISTING CONDITION	0	1	0	0
EXISTING PLUS PROJECT	0	1	0	0
FUTURE CONDITION W/O PROJECT	0	1	0	0
FUTURE CONDITION W/ PROJECT	0	1	0	0
FUTURE W/ PROJECT W/ MITIGATION				

No. of Phases	2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0
ATSAC-1 or ATSAC+ATCS-2?	2
Override Capacity	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.045	Δ*v/c* after mitigation:	-0.256
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
12	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	44	0	44	1	45	45	17	65	0	65	1	66	0	66		66		**0**
Left-Through		1							1				1					
Through	536	0	**294**	11	547	**300**	375	961	0	**520**	11	972	0	**559**		972		0
Through-Right		1							1				1					
Right	8	0	294	0	8	300	4	13	0	520	0	13	0	559		13		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	12	0	**12**	0	12	**12**	3	16	0	**16**	0	16	0	**16**		16		0
Left-Through		1							1				1					
Through	100	1	62	5	105	65	57	166	1	115	5	171	1	118		171		**0**
Through-Right		0							0				0					
Right	80	1	0	43	123	0	15	102	1	0	43	145	1	0		145		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	216	1	**216**	70	286	**286**	54	290	1	**290**	70	360	1	**360**		360		0
Left-Through		0							0				0					
Through	73	1	73	2	75	75	3	83	1	83	2	85	1	85		85		**0**
Through-Right		0							0				0					
Right	78	1	78	4	82	82	89	174	1	174	4	178	1	178		178		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	4	1	4	11	15	15	35	39	1	39	11	50	1	50		50		**0**
Left-Through		0							0				0					
Through	36	0	**78**	13	49	**91**	20	59	0	**123**	13	72	0	**136**		72		0
Through-Right		1							1				1					
Right	42	0	0	0	42	0	18	64	0	0	0	64	0	0		64		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		306	*North-South:*		312	*North-South:*			536	*North-South:*			575	*North-South:*			0
	East-West:		294	*East-West:*		377	*East-West:*			413	*East-West:*			496	*East-West:*			0
	SUM:		600	*SUM:*		689	*SUM:*			949	*SUM:*			1071	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.400			0.459				0.633				0.714				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.300**			**0.359**				**0.533**				**0.614**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**B**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	1	0	0
Existing Plus Project	0	1	0	0
Future Condition W/O Project	0	1	0	0
Future Condition W/ Project	0	1	0	0
Future W/ Project W/ Mitigation		1		0

No. of Phases	2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0
ATSAC-1 or ATSAC+ATCS-2?	2
Override Capacity	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.081	Δ*v/c* after mitigation:	-0.533
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	FULLER AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
13	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	29	0	**29**	0	29	**29**	0	32	0	**32**	0	32	0	**32**		32		**0**
Left-Through		0							0				0					
Through	49	0	123	0	49	123	0	54	0	135	0	54	0	135		54		0
Through-Right		0							0				0					
Right	45	0	0	0	45	0	0	49	0	0	0	49	0	0		49		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through		0							0				0					
Through	54	0	**172**	0	54	**172**	0	59	0	**188**	0	59	0	**188**		59		**0**
Through-Right		0							0				0					
Right	87	0	0	0	87	0	0	95	0	0	0	95	0	0		95		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	43	1	**43**	0	43	**43**	0	47	1	**47**	0	47	1	**47**		47		0
Left-Through		0							0				0					
Through	788	1	423	10	798	428	279	1141	1	602	10	1151	1	607		1151		**0**
Through-Right		1							1				1					
Right	57	0	57	0	57	57	0	62	0	62	0	62	0	62		62		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	55	1	55	0	55	55	0	60	1	60	0	60	1	60		60		**0**
Left-Through		0							0				0					
Through	1332	2	**666**	8	1340	**670**	234	1691	2	**846**	8	1699	2	**850**		1699		0
Through-Right		0							0				0					
Right	30	1	30	0	30	30	0	33	1	33	0	33	1	33		33		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		201	*North-South:*		201	*North-South:*			220	*North-South:*			220	*North-South:*			0
	East-West:		709	*East-West:*		713	*East-West:*			893	*East-West:*			897	*East-West:*			0
	SUM:		910	*SUM:*		914	*SUM:*			1113	*SUM:*			1117	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.607			0.609				0.742				0.745				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.507**			**0.509**				**0.642**				**0.645**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.642
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	FULLER AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
13	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB--	SB--	
	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB--	WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	42	0	42	0	42	42	0	46	0	46	0	46	0	46		46		**0**
	Left-Through		0							0				0					
	Through	141	0	**222**	0	141	**222**	0	154	0	**243**	0	154	0	**243**		154		0
	Through-Right		0							0				0					
	Right	39	0	0	0	39	0	0	43	0	0	0	43	0	0		43		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	42	0	**42**	0	42	**42**	0	46	0	**46**	0	46	0	**46**		46		0
	Left-Through		0							0				0					
	Through	64	0	146	0	64	146	0	70	0	160	0	70	0	160		70		**0**
	Through-Right		0							0				0					
	Right	40	0	0	0	40	0	0	44	0	0	0	44	0	0		44		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	82	1	**82**	0	82	**82**	0	90	1	**90**	0	90	1	**90**		90		0
	Left-Through		0							0				0					
	Through	924	1	478	14	938	485	321	1332	1	683	14	1346	1	690		1346		**0**
	Through-Right		1							1				1					
	Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	40	1	40	0	40	40	0	44	1	44	0	44	1	44		44		**0**
	Left-Through		0							0				0					
	Through	882	2	**441**	11	893	**447**	332	1297	2	**649**	11	1308	2	**654**		1308		0
	Through-Right		0							0				0					
	Right	45	1	45	0	45	45	0	49	1	49	0	49	1	49		49		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		264	*North-South:*		264	*North-South:*			289	*North-South:*			289	*North-South:*			0
		East-West:		523	*East-West:*		529	*East-West:*			739	*East-West:*			744	*East-West:*			0
		SUM:		787	*SUM:*		793	*SUM:*			1028	*SUM:*			1033	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.525			0.529				0.685				0.689				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.425**			**0.429**				**0.585**				**0.589**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.585
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	LA BREA AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
14	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	76	1	**76**	0	76	**76**	0	83	1	**83**	0	83	1	**83**		83		**0**
Left-Through		0							0				0					
Through	750	1	382	0	750	384	48	868	1	460	0	868	1	463		868		0
Through-Right		1							1				1					
Right	13	0	13	5	18	18	38	52	0	52	5	57	0	57		57		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	33	1	33	2	35	35	5	41	1	41	2	43	1	43		43		0
Left-Through		0							0				0					
Through	798	1	**669**	0	798	**669**	67	940	1	**765**	0	940	1	**765**		940		**0**
Through-Right		1							1				1					
Right	539	0	539	0	539	539	0	589	0	589	0	589	0	589		589		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	284	1	**284**	0	284	**284**	0	311	1	311	0	311	1	311		311		0
Left-Through		0							0				0					
Through	570	1	335	10	580	340	279	902	1	**506**	10	912	1	**511**		912		**0**
Through-Right		1							1				1					
Right	100	0	100	0	100	100	0	109	0	109	0	109	0	109		109		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	290	1	290	4	294	294	37	354	1	**354**	4	358	1	**358**		358		**0**
Left-Through		0							0				0					
Through	766	1	**393**	8	774	**399**	234	1072	1	549	8	1080	1	555		1080		0
Through-Right		1							1				1					
Right	20	0	20	3	23	23	4	26	0	26	3	29	0	29		29		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		745	*North-South:*		745	*North-South:*			848	*North-South:*			848	*North-South:*			0
	East-West:		677	*East-West:*		683	*East-West:*			860	*East-West:*			869	*East-West:*			0
	SUM:		1422	*SUM:*		1428	*SUM:*			1708	*SUM:*			1717	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.998			1.002				1.199				1.205				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.898**			**0.902**				**1.099**				**1.105**				0.000
LEVEL OF SERVICE (LOS):			**D**			**E**				**F**				**F**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0

No. of Phases	3	3	3	3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2
Override Capacity	0	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-1.099
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	LA BREA AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
14	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	114	1	**114**	0	114	**114**	0	125	1	**125**	0	125	1	**125**		125		**0**
	Left-Through		0							0				0					
	Through	906	1	468	0	906	472	82	1073	1	582	0	1073	1	586		1073		0
	Through-Right		1							1				1					
	Right	29	0	29	8	37	37	59	91	0	91	8	99	0	99		99		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	37	1	37	3	40	40	6	46	1	46	3	49	1	49		49		0
	Left-Through		0							0				0					
	Through	740	1	**602**	0	740	**602**	67	876	1	**692**	0	876	1	**692**		876		**0**
	Through-Right		1							1				1					
	Right	464	0	464	0	464	464	0	507	0	507	0	507	0	507		507		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	336	1	336	0	336	336	0	367	1	367	0	367	1	367		367		0
	Left-Through		0							0				0					
	Through	628	1	**364**	14	642	**371**	321	1008	1	**559**	14	1022	1	**566**		1022		**0**
	Through-Right		1							1				1					
	Right	100	0	100	0	100	100	0	109	0	109	0	109	0	109		109		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	113	1	**113**	6	119	**119**	44	168	1	**168**	6	174	1	**174**		174		**0**
	Left-Through		0							0				0					
	Through	120	1	70	11	131	78	332	463	1	246	11	474	1	253		474		0
	Through-Right		1							1				1					
	Right	20	0	20	4	24	24	6	28	0	28	4	32	0	32		32		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		716	North-South:		716	North-South:			817	North-South:			817	North-South:			0
		East-West:		477	East-West:		490	East-West:			727	East-West:			740	East-West:			0
		SUM:		1193	SUM:		1206	SUM:			1544	SUM:			1557	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.837			0.846				1.084				1.093				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.737			0.746				0.984				0.993				0.000
	LEVEL OF SERVICE (LOS):			C			C				E				E				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — Δ*v/c* after mitigation: -0.984

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
15	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	21	1	**21**	0	21	**21**	11	34	1	**34**	0	34	1	**34**	0	34	1	**34**
	Left-Through		0							0				0				0	
	Through	1459	2	504	0	1459	505	126	1722	2	611	0	1722	2	612	0	1722	2	612
	Through-Right		1							1				1				1	
	Right	52	0	52	5	57	57	53	110	0	110	5	115	0	115	-1	114	0	114
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	53	1	53	2	55	55	63	121	1	121	2	123	1	123	0	123	1	123
	Left-Through		0							0				0				0	
	Through	1617	2	**604**	0	1617	**604**	212	1980	2	**743**	0	1980	2	**743**	0	1980	2	**743**
	Through-Right		1							1				1				1	
	Right	196	0	196	0	196	196	35	249	0	249	0	249	0	249	0	249	0	249
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	155	1	**155**	0	155	**155**	12	182	1	**182**	0	182	1	**182**	0	182	1	**182**
	Left-Through		0							0				0				0	
	Through	434	2	217	17	451	226	236	711	2	356	17	728	2	364	-3	725	2	363
	Through-Right		0							0				0				0	
	Right	59	1	49	0	59	49	24	89	1	72	0	89	1	72	0	89	1	72
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	179	1	179	4	183	183	57	253	1	253	4	257	1	257	-1	256	1	256
	Left-Through		0							0				0				0	
	Through	743	2	**372**	16	759	**380**	206	1019	2	**510**	16	1035	2	**518**	-2	1033	2	**517**
	Through-Right		0							0				0				0	
	Right	132	1	106	3	135	108	42	186	1	126	3	189	1	128	0	189	1	128
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	625		*North-South:*	625		*North-South:*	777			*North-South:*	777			*North-South:*		777
			East-West:	527		*East-West:*	535		*East-West:*	692			*East-West:*	700			*East-West:*		699
			SUM:	1152		*SUM:*	1160		*SUM:*	1469			*SUM:*	1477			*SUM:*		1476
	VOLUME/CAPACITY *(V/C)* RATIO:			0.808			0.814			1.031				1.036					1.036
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.708			0.714			0.931				0.936			*With Imp.+TDM*		0.936
	LEVEL OF SERVICE (LOS):			C			C			E				E					E

REMARKS:

With Imp.+TDM+Signal Imp. 0.926 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.005 — Δ*v/c* after mitigation: -0.005

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
15	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	88	1	88	0	88	88	28	124	1	124	0	124	1	124	0	124	1	124
	Left-Through		0							0				0				0	
	Through	1738	2	**614**	0	1738	**617**	240	2141	2	**801**	0	2141	2	**804**	0	2141	2	**803**
	Through-Right		1							1				1				1	
	Right	104	0	104	8	112	112	148	262	0	262	8	270	0	270	-1	269	0	269
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	72	1	**72**	3	75	**75**	76	155	1	**155**	3	158	1	**158**	0	158	1	**158**
	Left-Through		0							0				0				0	
	Through	1293	2	500	0	1293	500	198	1612	2	621	0	1612	2	621	0	1612	2	621
	Through-Right		1							1				1				1	
	Right	207	0	207	0	207	207	24	250	0	250	0	250	0	250	0	250	0	250
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	240	1	240	0	240	240	35	297	1	297	0	297	1	297	0	297	1	297
	Left-Through		0							0				0				0	
	Through	840	2	**420**	26	866	**433**	290	1209	2	**605**	26	1235	2	**618**	-4	1231	2	**616**
	Through-Right		0							0				0				0	
	Right	103	1	59	0	103	59	24	137	1	75	0	137	1	75	0	137	1	75
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	92	1	**92**	6	98	**98**	57	158	1	**158**	6	164	1	**164**	-1	163	1	**163**
	Left-Through		0							0				0				0	
	Through	502	2	251	20	522	261	277	826	2	413	20	846	2	423	-3	843	2	422
	Through-Right		0							0				0				0	
	Right	97	1	61	4	101	64	53	159	1	82	4	163	1	84	-1	162	1	83
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	686		*North-South:*	692		*North-South:*		956		*North-South:*		962		*North-South:*		961
			East-West:	512		*East-West:*	531		*East-West:*		763		*East-West:*		782		*East-West:*		779
			SUM:	1198		*SUM:*	1223		*SUM:*		1719		*SUM:*		1744		*SUM:*		1740
	VOLUME/CAPACITY *(V/C)* RATIO:			0.841			0.858				1.206				1.224				1.221
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.741			0.758				1.106				1.124		*With Imp.+TDM*		1.121
	LEVEL OF SERVICE (LOS):			C			C				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.111
F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.018 | Δ*v/c* after mitigation: 0.005
Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
16	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					3
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- 0 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	18	0	**18**	0	18	**18**	34	54	0	**54**	0	54	0	**54**	0	54	0	**54**
	Left-Through		1							1				1				1	
	Through	569	0	350	8	577	357	15	637	0	512	8	645	0	519	-1	644	0	518
	Through-Right		1							1				1				1	
	Right	23	0	350	6	29	357	38	63	0	512	6	69	0	519	-1	68	0	518
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	25	0	25	0	25	25	12	39	0	39	0	39	0	39	0	39	0	39
	Left-Through		1							1				1				1	
	Through	1146	0	**689**	0	1146	**714**	25	1278	0	**825**	0	1278	0	**825**	0	1278	0	**825**
	Through-Right		1							1				1				1	
	Right	182	0	689	0	182	714	17	216	0	825	0	216	0	825	0	216	0	825
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	48	1	**48**	17	65	**65**	17	69	1	**69**	17	86	1	**86**	-3	83	1	**83**
	Left-Through		0							0				0				0	
	Through	473	2	237	7	480	240	292	809	2	405	7	816	2	408	-1	815	2	408
	Through-Right		0							0				0				0	
	Right	28	1	28	0	28	28	26	57	1	57	0	57	1	57	0	57	1	57
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	50	1	50	19	69	69	35	90	1	90	19	109	1	109	-3	106	1	106
	Left-Through		0							0				0				0	
	Through	888	2	**444**	23	911	**456**	274	1245	2	**623**	23	1268	2	**634**	-3	1265	2	**633**
	Through-Right		0							0				0				0	
	Right	33	1	33	0	33	33	17	53	1	53	0	53	1	53	0	53	1	53
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		707	North-South:		732	North-South:			879	North-South:			879	North-South:			879
		East-West:		492	East-West:		521	East-West:			692	East-West:			720	East-West:			716
		SUM:		1199	SUM:		1253	SUM:			1571	SUM:			1599	SUM:			1595
	VOLUME/CAPACITY (V/C) RATIO:			0.841			0.879				1.102				1.122				1.119
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.741			0.779				1.002				1.022	With Imp.+TDM			1.019
	LEVEL OF SERVICE (LOS):			C			C				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.009 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.020 — Δ*v/c* after mitigation: 0.007

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
16	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	3	0	3	0	3	3	0	3	0	3	0	3	0	3	0	3	0	3
	Left-Through		1							1				1				1	
	Through	1133	0	**611**	0	1133	**624**	41	1280	0	**709**	0	1280	0	**722**	0	1280	0	**720**
	Through-Right		1							1				1				1	
	Right	77	0	611	26	103	624	41	125	0	709	26	151	0	722	-4	147	0	720
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	3	0	**3**	0	3	**3**	0	3	0	**3**	0	3	0	**3**	0	3	0	**3**
	Left-Through		1							1				1				1	
	Through	637	0	374	1	638	375	10	707	0	428	1	708	0	429	0	708	0	429
	Through-Right		1							1				1				1	
	Right	93	0	374	0	93	375	29	131	0	428	0	131	0	429	0	131	0	429
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	125	1	125	0	125	125	21	158	1	158	0	158	1	158	0	158	1	158
	Left-Through		0							0				0				0	
	Through	955	2	**478**	38	993	**497**	333	1377	2	**689**	38	1415	2	**708**	-6	1409	2	**705**
	Through-Right		0							0				0				0	
	Right	52	1	52	0	52	52	33	90	1	90	0	90	1	90	0	90	1	90
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	49	1	**49**	18	67	**67**	37	91	1	**91**	18	109	1	**109**	-3	106	1	**106**
	Left-Through		0							0				0				0	
	Through	747	2	374	29	776	388	369	1186	2	593	29	1215	2	608	-4	1211	2	606
	Through-Right		0							0				0				0	
	Right	101	1	101	0	101	101	29	139	1	139	0	139	1	139	0	139	1	139
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		614	North-South:		627	North-South:			712	North-South:			725	North-South:			723
		East-West:		527	East-West:		564	East-West:			780	East-West:			817	East-West:			811
		SUM:		1141	SUM:		1191	SUM:			1492	SUM:			1542	SUM:			1534
	VOLUME/CAPACITY (V/C) RATIO:			0.801			0.836				1.047				1.082				1.076
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.701			0.736				0.947				0.982	With Imp.+TDM			0.976
	LEVEL OF SERVICE (LOS):			C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.966 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.035 — Δ*v/c* after mitigation: 0.019

Significant impacted? YES — Fully mitigated? NO

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
17	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	14	0	**14**	0	14	**14**	15	30	0	**30**	0	30	0	**30**		30		**0**
Left-Through		1							1				1					
Through	37	0	51	17	54	68	1	41	0	71	17	58	0	88		58		0
Through-Right		0							0				0					
Right	23	1	0	4	27	3	1	26	1	0	4	30	1	4		30		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	9	0	9	1	10	10	5	15	0	15	1	16	0	16		16		0
Left-Through		0							0				0					
Through	89	0	**141**	15	104	**178**	13	110	0	**172**	15	125	0	**209**		125		**0**
Through-Right		0							0				0					
Right	43	0	0	21	64	0	0	47	0	0	21	68	0	0		68		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		0
Left-Through		0							0				0					
Through	487	2	244	14	501	251	298	831	2	416	14	845	2	423		845		**0**
Through-Right		0							0				0					
Right	24	1	24	0	24	24	26	52	1	52	0	52	1	52		52		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	48	1	48	0	48	48	0	52	1	52	0	52	1	52		52		**0**
Left-Through		0							0				0					
Through	977	1	**514**	21	998	**525**	312	1381	1	**718**	21	1402	1	**729**		1402		0
Through-Right		1							1				1					
Right	50	0	50	1	51	51	0	55	0	55	1	56	0	56		56		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		155	*North-South:*		192	*North-South:*			202	*North-South:*			239	*North-South:*			0
	East-West:		544	*East-West:*		555	*East-West:*			751	*East-West:*			762	*East-West:*			0
	SUM:		699	*SUM:*		747	*SUM:*			953	*SUM:*			1001	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.466			0.498				0.635				0.667				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.366**			**0.398**				**0.535**				**0.567**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	Right Turns: FREE-1, NRTOR-2 or OLA-3?	ATSAC-1 or ATSAC+ATCS-2?	Override Capacity
EXISTING CONDITION	0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	2	0
EXISTING PLUS PROJECT	0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	2	0
FUTURE CONDITION W/O PROJECT	0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	2	0
FUTURE CONDITION W/ PROJECT	0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	2	0
FUTURE W/ PROJECT W/ MITIGATION	0	NB-- SB-- EB-- WB--		

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.032	Δ*v/c* after mitigation:	-0.535
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
17	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	31	0	31	0	31	31	28	62	0	62	0	62	0	62		62		**0**
Left-Through		0							0				0					
Through	104	0	**239**	30	134	**278**	6	120	0	**299**	30	150	0	**338**		150		0
Through-Right		0							0				0					
Right	104	0	0	9	113	0	3	117	0	0	9	126	0	0		126		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	12	0	**12**	2	14	**14**	2	15	0	**15**	2	17	0	**17**		17		0
Left-Through		0							0				0					
Through	39	0	73	23	62	128	3	46	0	90	23	69	0	145		69		**0**
Through-Right		0							0				0					
Right	22	0	0	30	52	0	5	29	0	0	30	59	0	0		59		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	32	1	32	42	74	74	0	35	1	35	42	77	1	77		77		0
Left-Through		0							0				0					
Through	1000	2	**500**	22	1022	**511**	348	1442	2	**721**	22	1464	2	**732**		1464		**0**
Through-Right		0							0				0					
Right	42	1	42	0	42	42	13	59	1	59	0	59	1	59		59		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	23	1	**23**	6	29	**29**	1	26	1	**26**	6	32	1	**32**		32		**0**
Left-Through		0							0				0					
Through	808	1	419	16	824	428	420	1304	1	669	16	1320	1	678		1320		0
Through-Right		1							1				1					
Right	30	0	30	2	32	32	0	33	0	33	2	35	0	35		35		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		251	*North-South:*		292	*North-South:*			314	*North-South:*			355	*North-South:*			0
	East-West:		523	*East-West:*		540	*East-West:*			747	*East-West:*			764	*East-West:*			0
	SUM:		774	*SUM:*		832	*SUM:*			1061	*SUM:*			1119	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.516			0.555				0.707				0.746				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.416**			**0.455**				**0.607**				**0.646**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.039	Δ*v/c* after mitigation:	-0.607
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	79	1	**79**	0	79	**79**	32	118	1	**118**	0	118	1	**118**	0	118	1	**118**
	Left-Through		0							0				0				0	
	Through	468	2	234	47	515	258	17	529	2	265	47	576	2	288	-7	569	2	285
	Through-Right		0							0				0				0	
	Right	127	1	71	0	127	71	23	162	1	82	0	162	1	82	0	162	1	82
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	26	1	26	10	36	36	19	47	1	47	10	57	1	57	-1	56	1	56
	Left-Through		0							0				0				0	
	Through	1165	1	**634**	54	1219	**672**	104	1378	1	**757**	54	1432	1	**794**	-8	1424	1	**789**
	Through-Right		1							1				1				1	
	Right	103	0	103	21	124	124	22	135	0	135	21	156	0	156	-3	153	0	153
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	11	1	**11**	18	29	**29**	8	20	1	**20**	18	38	1	**38**	-3	35	1	**35**
	Left-Through		0							0				0				0	
	Through	454	2	227	1	455	228	289	786	2	393	1	787	2	394	0	787	2	394
	Through-Right		0							0				0				0	
	Right	102	1	23	0	102	23	36	148	1	30	0	148	1	30	0	148	1	30
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	112	1	112	0	112	112	39	161	1	161	0	161	1	161	0	161	1	161
	Left-Through		0							0				0				0	
	Through	909	1	**464**	1	910	**473**	248	1242	1	**633**	1	1243	1	**642**	0	1243	1	**641**
	Through-Right		1							1				1				1	
	Right	18	0	18	18	36	36	3	23	0	23	18	41	0	41	-3	38	0	38
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		713	*North-South:*		751	*North-South:*			875	*North-South:*			912	*North-South:*			907
		East-West:		475	*East-West:*		502	*East-West:*			653	*East-West:*			680	*East-West:*			676
		SUM:		1188	*SUM:*		1253	*SUM:*			1528	*SUM:*			1592	*SUM:*			1583
	VOLUME/CAPACITY *(V/C)* RATIO:			0.834			0.879				1.072				1.117				1.111
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.734			0.779				0.972				1.017		*With Imp.+TDM*		1.011
	LEVEL OF SERVICE (LOS):			C			C				E				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.001 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.045 | Δ*v/c* after mitigation: 0.029

Significant impacted? YES | Fully mitigated? NO

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	121	1	121	0	121	121	54	186	1	**186**	0	186	1	**186**	0	186	1	**186**
	Left-Through		0							0				0				0	
	Through	973	2	**487**	81	1054	**527**	37	1101	2	551	81	1182	2	591	-12	1170	2	585
	Through-Right		0							0				0				0	
	Right	187	1	136	0	187	136	63	268	1	193	0	268	1	193	0	268	1	193
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	18	82	**82**	34	104	1	104	18	122	1	122	-3	119	1	119
	Left-Through		0							0				0				0	
	Through	728	1	399	61	789	440	119	915	1	**509**	61	976	1	**550**	-9	967	1	**544**
	Through-Right		1							1				1				1	
	Right	70	0	70	21	91	91	26	103	0	103	21	124	0	124	-3	121	0	121
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	51	1	51	30	81	81	10	66	1	66	30	96	1	96	-4	92	1	92
	Left-Through		0							0				0				0	
	Through	980	2	**490**	2	982	**491**	291	1363	2	**682**	2	1365	2	**683**	0	1365	2	**683**
	Through-Right		0							0				0				0	
	Right	119	1	0	0	119	0	43	173	1	0	0	173	1	0	0	173	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	103	1	**103**	0	103	**103**	37	150	1	**150**	0	150	1	**150**	0	150	1	**150**
	Left-Through		0							0				0				0	
	Through	705	1	390	2	707	402	362	1133	1	609	2	1135	1	621	0	1135	1	619
	Through-Right		1							1				1				1	
	Right	75	0	75	21	96	96	3	85	0	85	21	106	0	106	-3	103	0	103
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		551	North-South:		609	North-South:			695	North-South:			736	North-South:			730
		East-West:		593	East-West:		594	East-West:			832	East-West:			833	East-West:			833
		SUM:		1144	SUM:		1203	SUM:			1527	SUM:			1569	SUM:			1563
	VOLUME/CAPACITY (V/C) RATIO:			0.803			0.844				1.072				1.101				1.097
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.703			0.744				0.972				1.001	With Imp.+TDM			0.997
	LEVEL OF SERVICE (LOS):			C			C				E				F				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.987 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.029 — Δ*v/c* after mitigation: 0.015

Significant impacted? YES — Fully mitigated? NO

Level of Service Worksheet
(Circular 212 Method)

18

PROJECT TITLE:
North-South Street: VINE STREET **East-West Street:** HOLLYWOOD BOULEVARD
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 12/28/2012

			AM PEAK HOUR			PM PEAK HOUR		
					3			3
					0			0
			NB -- 0	SB --	0	NB -- 0	SB --	0
			EB -- 3	WB --	0	EB -- 3	WB --	0
					2			2
					0			0
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND		Left	79	1	**79**	121	1	121
		Left-Through		0			0	
		Through	508	2	254	1042	2	**521**
		Through-Right		0			0	
		Right	127	1	71	187	1	136
		Left-Through-Right		0			0	
		Left-Right						
SOUTHBOUND		Left	35	1	35	79	1	**79**
		Left-Through		0			0	
		Through	1211	1	**666**	780	1	434
		Through-Right		1			1	
		Right	121	0	121	88	0	88
		Left-Through-Right		0			0	
		Left-Right						
EASTBOUND		Left	26	1	**26**	77	1	77
		Left-Through		0			0	
		Through	455	2	228	982	2	**491**
		Through-Right		0			0	
		Right	102	1	23	119	1	0
		Left-Through-Right		0			0	
		Left-Right						
WESTBOUND		Left	112	1	112	103	1	**103**
		Left-Through		0			0	
		Through	910	1	**472**	707	1	400
		Through-Right		1			1	
		Right	33	0	33	93	0	93
		Left-Through-Right		0			0	
		Left-Right						
	CRITICAL VOLUMES			*North-South:*	745		*North-South:*	600
				East-West:	498		*East-West:*	594
				SUM:	1243		*SUM:*	1194
	VOLUME/CAPACITY *(V/C)* RATIO:				0.872			0.838
	V/C LESS ATSAC/ATCS ADJUSTMENT:			*With TDM*	**0.772**		*With TDM*	**0.738**
	LEVEL OF SERVICE (LOS):				**C**			**C**
				With TDM+Signal Imp.	**0.762**		*With TDM+Signal Imp.*	**0.728**
					C			**C**

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	20	1	**20**	2	22	**22**	19	41	1	**41**	2	43	1	**43**	0	43	1	**43**
Left-Through		0							0				0				0	
Through	142	1	142	5	147	147	94	249	1	249	5	254	1	254	-1	253	1	253
Through-Right		0							0				0				0	
Right	23	1	0	0	23	0	11	36	1	0	0	36	1	0	0	36	1	0
Left-Through-Right		0							0				0				0	
Left-Right																		
SOUTHBOUND																		
Left	27	1	27	11	38	38	24	54	1	54	11	65	1	65	-2	63	1	63
Left-Through		0							0				0				0	
Through	251	1	**251**	8	259	**259**	81	356	1	**356**	8	364	1	**364**	-1	363	1	**363**
Through-Right		0							0				0				0	
Right	41	1	26	0	41	26	39	84	1	32	0	84	1	32	0	84	1	32
Left-Through-Right		0							0				0				0	
Left-Right																		
EASTBOUND																		
Left	30	1	**30**	0	30	**30**	71	104	1	**104**	0	104	1	**104**	0	104	1	**104**
Left-Through		0							0				0				0	
Through	433	2	217	11	444	222	213	687	2	344	11	698	2	349	-2	696	2	348
Through-Right		0							0				0				0	
Right	44	1	34	0	44	33	55	103	1	83	0	103	1	82	0	103	1	82
Left-Through-Right		0							0				0				0	
Left-Right																		
WESTBOUND																		
Left	131	1	131	0	131	131	35	178	1	178	0	178	1	178	0	178	1	178
Left-Through		0							0				0				0	
Through	995	1	**516**	17	1012	**528**	239	1327	1	**727**	17	1344	1	**739**	-3	1341	1	**737**
Through-Right		1							1				1				1	
Right	36	0	36	7	43	43	87	126	0	126	7	133	0	133	-1	132	0	132
Left-Through-Right		0							0				0				0	
Left-Right																		
CRITICAL VOLUMES	*North-South:*		271	*North-South:*		281	*North-South:*			397	*North-South:*			407	*North-South:*			406
	East-West:		546	*East-West:*		558	*East-West:*			831	*East-West:*			843	*East-West:*			841
	SUM:		817	*SUM:*		839	*SUM:*			1228	*SUM:*			1250	*SUM:*			1247
VOLUME/CAPACITY *(V/C)* RATIO:			0.545			0.559				0.819				0.833				0.831
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.445			0.459				0.719				0.733	*With Imp.+TDM*			0.731
LEVEL OF SERVICE (LOS):			A			A				C				C				C

REMARKS:

With Imp.+TDM+Signal Imp. 0.721 C

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.014 — Δ*v/c* after mitigation: 0.002

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					2
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- 0 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	67	1	67	0	67	67	56	129	1	129	0	129	1	129	0	129	1	129
	Left-Through		0							0				0				0	
	Through	440	1	**440**	7	447	**447**	198	679	1	**679**	7	686	1	**686**	-1	685	1	**685**
	Through-Right		0							0				0				0	
	Right	41	1	4	0	41	4	38	83	1	33	0	83	1	33	0	83	1	33
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	45	1	**45**	7	52	**52**	46	95	1	**95**	7	102	1	**102**	-1	101	1	**101**
	Left-Through		0							0				0				0	
	Through	144	1	144	6	150	150	85	242	1	242	6	248	1	248	-1	247	1	247
	Through-Right		0							0				0				0	
	Right	37	1	0	0	37	0	50	90	1	0	0	90	1	0	0	90	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	83	1	83	0	83	83	92	183	1	**183**	0	183	1	**183**	0	183	1	**183**
	Left-Through		0							0				0				0	
	Through	1031	2	**516**	19	1050	**525**	268	1396	2	698	19	1415	2	708	-3	1412	2	706
	Through-Right		0							0				0				0	
	Right	89	1	56	1	90	57	39	136	1	72	1	137	1	73	0	137	1	73
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	74	1	**74**	0	74	**74**	19	100	1	100	0	100	1	100	0	100	1	100
	Left-Through		0							0				0				0	
	Through	753	1	418	24	777	435	298	1122	1	**646**	24	1146	1	**662**	-4	1142	1	**660**
	Through-Right		1							1				1				1	
	Right	83	0	83	9	92	92	78	169	0	169	9	178	0	178	-1	177	0	177
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		485	North-South:		499	North-South:			774	North-South:			788	North-South:			786
		East-West:		590	East-West:		599	East-West:			829	East-West:			845	East-West:			843
		SUM:		1075	SUM:		1098	SUM:			1603	SUM:			1633	SUM:			1629
	VOLUME/CAPACITY (V/C) RATIO:			0.717			0.732				1.069				1.089				1.086
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.617			0.632				0.969				0.989	With Imp.+TDM			0.986
	LEVEL OF SERVICE (LOS):			B			B				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.976 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.020 — Δ*v/c* after mitigation: 0.007

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
20	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	24	1	**24**	2	26	**26**	21	47	1	**47**	2	49	1	**49**	0	49	1	**49**
	Left-Through		0							0				0				0	
	Through	275	1	168	1	276	168	92	393	1	237	1	394	1	238	0	394	1	238
	Through-Right		1							1				1				1	
	Right	60	0	60	0	60	60	15	81	0	81	0	81	0	81	0	81	0	81
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	84	1	84	0	84	84	2	94	1	94	0	94	1	94	0	94	1	94
	Left-Through		0							0				0				0	
	Through	673	1	**673**	0	673	**673**	174	910	1	**910**	0	910	1	**910**	0	910	1	**910**
	Through-Right		0							0				0				0	
	Right	271	1	248	0	271	248	21	317	1	290	0	317	1	290	0	317	1	290
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	46	1	**46**	0	46	**46**	4	54	1	**54**	0	54	1	**54**	0	54	1	**54**
	Left-Through		0							0				0				0	
	Through	444	1	250	19	463	261	253	739	1	405	19	758	1	416	-3	755	1	415
	Through-Right		1							1				1				1	
	Right	55	0	55	3	58	58	11	71	0	71	3	74	0	74	0	74	0	74
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	90	1	90	0	90	90	37	135	1	135	0	135	1	135	0	135	1	135
	Left-Through		0							0				0				0	
	Through	867	1	**446**	21	888	**457**	298	1246	1	**638**	21	1267	1	**649**	-3	1264	1	**648**
	Through-Right		1							1				1				1	
	Right	24	0	24	2	26	26	3	29	0	29	2	31	0	31	0	31	0	31
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	697		*North-South:*	699		*North-South:*	957			*North-South:*	959			*North-South:*	959	
			East-West:	492		*East-West:*	503		*East-West:*	692			*East-West:*	703			*East-West:*	702	
			SUM:	1189		*SUM:*	1202		*SUM:*	1649			*SUM:*	1662			*SUM:*	1661	
	VOLUME/CAPACITY *(V/C)* RATIO:			0.793			0.801			1.099				1.108				1.107	
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.693**			**0.701**			**0.999**				**1.008**			*With Imp.+TDM*	**1.007**	
	LEVEL OF SERVICE (LOS):			**B**			**C**			**E**				**F**				**F**	

REMARKS:

With Imp.+TDM+Signal Imp. **0.997**
F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-0.002
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
20	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	66	1	**66**	3	69	**69**	23	95	1	**95**	3	98	1	**98**	0	98	1	**98**
	Left-Through		0							0				0				0	
	Through	695	1	395	0	695	395	182	942	1	540	0	942	1	540	0	942	1	540
	Through-Right		1							1				1				1	
	Right	94	0	94	0	94	94	34	137	0	137	0	137	0	137	0	137	0	137
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	71	1	71	1	72	72	3	81	1	81	1	82	1	82	0	82	1	82
	Left-Through		0							0				0				0	
	Through	443	1	**443**	1	444	**444**	102	587	1	**587**	1	588	1	**588**	0	588	1	**588**
	Through-Right		0							0				0				0	
	Right	101	1	51	0	101	51	19	129	1	69	0	129	1	69	0	129	1	69
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	101	1	101	0	101	101	10	120	1	120	0	120	1	120	0	120	1	120
	Left-Through		0							0				0				0	
	Through	1004	1	**534**	24	1028	**548**	317	1415	1	**750**	24	1439	1	**764**	-4	1435	1	**761**
	Through-Right		1							1				1				1	
	Right	63	0	63	4	67	67	15	84	0	84	4	88	0	88	-1	87	0	87
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	62	1	**62**	0	62	**62**	20	88	1	**88**	0	88	1	**88**	0	88	1	**88**
	Left-Through		0							0				0				0	
	Through	789	1	422	29	818	436	369	1232	1	647	29	1261	1	662	-4	1257	1	660
	Through-Right		1							1				1				1	
	Right	54	0	54	0	54	54	3	62	0	62	0	62	0	62	0	62	0	62
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	509		*North-South:*	513		*North-South:*	682			*North-South:*	686			*North-South:*	686	
			East-West:	596		*East-West:*	610		*East-West:*	838			*East-West:*	852			*East-West:*	849	
			SUM:	1105		*SUM:*	1123		*SUM:*	1520			*SUM:*	1538			*SUM:*	1535	
	VOLUME/CAPACITY *(V/C)* RATIO:			0.737			0.749			1.013				1.025				1.023	
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.637**			**0.649**			**0.913**				**0.925**			*With Imp.+TDM*	**0.923**	
	LEVEL OF SERVICE (LOS):			**B**			**B**			**E**				**E**				**E**	

REMARKS:

With Imp.+TDM+Signal Imp. **0.913** **E**

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: **0.012** Δ*v/c* after mitigation: **0.000**

Significant impacted? **YES** Fully mitigated? **YES**

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	BRONSON AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
21	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		**0**
	Left-Through		0							0				0					
	Through	125	0	212	0	125	212	5	142	0	238	0	142	0	238		142		0
	Through-Right		1							1				1					
	Right	87	0	0	0	87	0	1	96	0	0	0	96	0	0		96		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	81	0	81	0	81	81	0	89	0	89	0	89	0	89		89		0
	Left-Through		0							0				0					
	Through	252	0	**380**	0	252	**380**	36	312	0	**452**	0	312	0	**452**		312		**0**
	Through-Right		0							0				0					
	Right	47	0	0	0	47	0	0	51	0	0	0	51	0	0		51		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		0
	Left-Through		0							0				0					
	Through	486	1	262	20	506	272	339	871	1	460	20	891	1	470		891		**0**
	Through-Right		1							1				1					
	Right	38	0	38	0	38	38	7	49	0	49	0	49	0	49		49		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	84	1	84	0	84	84	14	106	1	106	0	106	1	106		106		**0**
	Left-Through		0							0				0					
	Through	954	1	**501**	23	977	**513**	336	1379	1	**717**	23	1402	1	**729**		1402		0
	Through-Right		1							1				1					
	Right	48	0	48	0	48	48	3	55	0	55	0	55	0	55		55		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	410		*North-South:*	410		*North-South:*		485		*North-South:*		485		*North-South:*		0
			East-West:	531		*East-West:*	543		*East-West:*		750		*East-West:*		762		*East-West:*		0
			SUM:	941		*SUM:*	953		*SUM:*		1235		*SUM:*		1247		*SUM:*		0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.627			0.635				0.823				0.831				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.527**			**0.535**				**0.723**				**0.731**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.723
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BRONSON AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
21	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	72	1	72	0	72	72	3	82	1	82	0	82	1	82		82		**0**
	Left-Through		0							0				0					
	Through	232	0	**314**	0	232	**314**	31	285	0	**381**	0	285	0	**381**		285		0
	Through-Right		1							1				1					
	Right	82	0	0	0	82	0	6	96	0	0	0	96	0	0		96		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	74	0	**74**	0	74	**74**	0	81	0	**81**	0	81	0	**81**		81		0
	Left-Through		0							0				0					
	Through	150	0	256	0	150	256	6	170	0	286	0	170	0	286		170		**0**
	Through-Right		0							0				0					
	Right	32	0	0	0	32	0	0	35	0	0	0	35	0	0		35		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	76	1	76	0	76	76	0	83	1	83	0	83	1	83		83		0
	Left-Through		0							0				0					
	Through	760	1	**403**	25	785	**415**	366	1197	1	**624**	25	1222	1	**636**		1222		**0**
	Through-Right		1							1				1					
	Right	45	0	45	0	45	45	1	50	0	50	0	50	0	50		50		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	77	1	**77**	0	77	**77**	3	87	1	**87**	0	87	1	**87**		87		**0**
	Left-Through		0							0				0					
	Through	634	1	359	29	663	374	434	1127	1	619	29	1156	1	634		1156		0
	Through-Right		1							1				1					
	Right	84	0	84	0	84	84	19	111	0	111	0	111	0	111		111		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		388	North-South:		388	North-South:			462	North-South:			462	North-South:			0
		East-West:		480	East-West:		492	East-West:			711	East-West:			723	East-West:			0
		SUM:		868	SUM:		880	SUM:			1173	SUM:			1185	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.579			0.587				0.782				0.790				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.479**			**0.487**				**0.682**				**0.690**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.682
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. SB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
22	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	414	1	235	0	414	235	46	499	1	287	0	499	1	287		499		0
Left-Through		0							0				0					
Through	1	0	**235**	0	1	**235**	0	1	0	**287**	0	1	0	**287**		1		**0**
Through-Right		0							0				0					
Right	54	0	0	0	54	0	14	73	0	0	0	73	0	0		73		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
Left-Through		0							0				0					
Through	450	2	225	9	459	230	220	712	2	356	9	721	2	361		721		**0**
Through-Right		0							0				0					
Right	158	1	158	10	168	168	100	273	1	273	10	283	1	283		283		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	47	1	47	0	47	47	27	78	1	78	0	78	1	78		78		**0**
Left-Through		0							0				0					
Through	1158	2	**579**	23	1181	**591**	330	1596	2	**798**	23	1619	2	**810**		1619		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		235	*North-South:*		235	*North-South:*			287	*North-South:*			287	*North-South:*			0
	East-West:		579	*East-West:*		591	*East-West:*			798	*East-West:*			810	*East-West:*			0
	SUM:		814	*SUM:*		826	*SUM:*			1085	*SUM:*			1097	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.571			0.580				0.761				0.770				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.471**			**0.480**				**0.661**				**0.670**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0

No. of Phases	3	3	3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2
Override Capacity	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-0.661
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. SB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
22	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	354	1	197	0	354	197	41	428	1	248	0	428	1	248		428		0
Left-Through		0							0				0					
Through	1	0	**197**	0	1	**197**	0	1	0	**248**	0	1	0	**248**		1		**0**
Through-Right		0							0				0					
Right	38	0	0	0	38	0	24	66	0	0	0	66	0	0		66		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	836	2	**418**	9	845	**423**	280	1194	2	**597**	9	1203	2	**602**		1203		**0**
Through-Right		0							0				0					
Right	203	1	203	16	219	219	112	334	1	334	16	350	1	350		350		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	36	1	**36**	0	36	**36**	16	55	1	**55**	0	55	1	**55**		55		**0**
Left-Through		0							0				0					
Through	803	2	402	29	832	416	394	1272	2	636	29	1301	2	651		1301		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		197	*North-South:*		197	*North-South:*			248	*North-South:*			248	*North-South:*			0
	East-West:		454	*East-West:*		459	*East-West:*			652	*East-West:*			657	*East-West:*			0
	SUM:		651	*SUM:*		656	*SUM:*			900	*SUM:*			905	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.457			0.460				0.632				0.635				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.357**			**0.360**				**0.532**				**0.535**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			3			3			3			3			3			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			
Override Capacity			0			0			0			0			0			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.532
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. NB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
23	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	291	2	**160**	17	308	**169**	105	423	2	**233**	17	440	2	**242**		440		**0**
	Left-Through		0							0				0					
	Through	2	0	0	0	2	0	0	2	0	0	0	2	0	0		2		0
	Through-Right		0							0				0					
	Right	57	1	57	0	57	57	0	62	1	62	0	62	1	62		62		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	68	1	**68**	0	68	**68**	32	106	1	**106**	0	106	1	**106**		106		0
	Left-Through		0							0				0					
	Through	582	2	291	9	591	296	224	861	2	431	9	870	2	435		870		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	16	16	0	0	0	16	0	0		16		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	798	2	**399**	7	805	**403**	203	1076	2	**538**	7	1083	2	**542**		1083		0
	Through-Right		0							0				0					
	Right	336	1	336	0	336	336	59	426	1	426	0	426	1	426		426		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		160	*North-South:*		169	*North-South:*			233	*North-South:*			242	*North-South:*			0
		East-West:		467	*East-West:*		471	*East-West:*			644	*East-West:*			648	*East-West:*			0
		SUM:		627	*SUM:*		640	*SUM:*			877	*SUM:*			890	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.440			0.449				0.615				0.625				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.340**			**0.349**				**0.515**				**0.525**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.010	Δ*v/c* after mitigation:	-0.515
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. NB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
23	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases		3			3			3				3						
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0				0						
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0			NB-- 0 SB--	0			NB-- SB--			
		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0			EB-- 0 WB--	0			EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?		2			2			2				2						
	Override Capacity		0			0			0				0						
NORTHBOUND	Left	209	2	**115**	18	227	**125**	165	394	2	**217**	18	412	2	**227**		412		**0**
	Left-Through		0							0				0					
	Through	3	0	0	0	3	0	0	3	0	0	0	3	0	0		3		0
	Through-Right		0							0				0					
	Right	79	1	79	0	79	79	0	86	1	86	0	86	1	86		86		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	64	1	**64**	0	64	64	39	109	1	109	0	109	1	109		109		0
	Left-Through		0							0				0					
	Through	935	2	468	9	944	**472**	282	1305	2	**653**	9	1314	2	**657**		1314		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Left-Through		0							0				0					
	Through	702	2	351	12	714	357	229	997	2	499	12	1009	2	505		1009		0
	Through-Right		0							0				0					
	Right	407	1	**407**	0	407	407	34	479	1	479	0	479	1	479		479		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		115	North-South:		125	North-South:			217	North-South:			227	North-South:			0
		East-West:		471	East-West:		472	East-West:			653	East-West:			657	East-West:			0
		SUM:		586	SUM:		597	SUM:			870	SUM:			884	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.411			0.419				0.611				0.620				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.311**			**0.319**				**0.511**				**0.520**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-0.511
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
24	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	26	0	**26**	0	26	**26**	36	64	0	**64**	0	64	0	**64**		64		**0**
	Left-Through		1							1				1					
	Through	598	0	388	14	612	398	75	729	0	579	14	743	0	589		743		0
	Through-Right		1							1				1					
	Right	21	0	388	7	28	398	21	44	0	579	7	51	0	589		51		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	24	0	24	0	24	24	15	41	0	41	0	41	0	41		41		0
	Left-Through		1							1				1					
	Through	1160	0	**657**	20	1180	**667**	69	1338	0	**784**	20	1358	0	**794**		1358		**0**
	Through-Right		1							1				1					
	Right	58	0	657	0	58	667	3	66	0	784	0	66	0	794		66		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	12	0	**12**	0	12	**12**	2	15	0	**15**	0	15	0	**15**		15		0
	Left-Through		0							0				0					
	Through	73	0	105	3	76	108	64	144	0	206	3	147	0	209		147		**0**
	Through-Right		0							0				0					
	Right	20	0	0	0	20	0	25	47	0	0	0	47	0	0		47		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	15	0	15	0	15	15	16	32	0	32	0	32	0	32		32		**0**
	Left-Through		0							0				0					
	Through	118	0	**157**	6	124	**163**	71	200	0	**269**	6	206	0	**275**		206		0
	Through-Right		0							0				0					
	Right	24	0	0	0	24	0	11	37	0	0	0	37	0	0		37		0
	Left-Through-Right		1							1				1					
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	683		*North-South:*	693		*North-South:*	848			*North-South:*	858			*North-South:*	0	
			East-West:	169		*East-West:*	175		*East-West:*	284			*East-West:*	290			*East-West:*	0	
			SUM:	852		*SUM:*	868		*SUM:*	1132			*SUM:*	1148			*SUM:*	0	
	VOLUME/CAPACITY *(V/C)* RATIO:			0.568			0.579			0.755				0.765				0.000	
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.468**			**0.479**			**0.655**				**0.665**				0.000	
	LEVEL OF SERVICE (LOS):			**A**			**A**			**B**				**B**				**A**	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.010	Δ*v/c* after mitigation:	-0.655
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
24	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	14	0	14	0	14	14	0	15	0	15	0	15	0	15		15		**0**
	Left-Through		1							1				1					
	Through	1127	0	**615**	26	1153	**628**	45	1278	0	**705**	26	1304	0	**718**		1304		0
	Through-Right		1							1				1					
	Right	46	0	615	0	46	628	22	72	0	705	0	72	0	718		72		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	32	0	**32**	0	32	**32**	0	35	0	**35**	0	35	0	**35**		35		0
	Left-Through		1							1				1					
	Through	664	0	457	19	683	467	70	796	0	539	19	815	0	549		815		**0**
	Through-Right		1							1				1					
	Right	58	0	457	0	58	467	9	72	0	539	0	72	0	549		72		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	49	0	49	0	49	49	5	59	0	59	0	59	0	59		59		0
	Left-Through		0							0				0					
	Through	239	0	**318**	9	248	**327**	88	349	0	**493**	9	358	0	**502**		358		**0**
	Through-Right		0							0				0					
	Right	30	0	0	0	30	0	52	85	0	0	0	85	0	0		85		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	27	0	**27**	0	27	**27**	28	58	0	**58**	0	58	0	**58**		58		**0**
	Left-Through		0							0				0					
	Through	146	0	227	5	151	232	89	249	0	397	5	254	0	402		254		0
	Through-Right		0							0				0					
	Right	54	0	0	0	54	0	31	90	0	0	0	90	0	0		90		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		North-South:		647	North-South:		660	North-South:			740	North-South:			753	North-South:			0
		East-West:		345	East-West:		354	East-West:			551	East-West:			560	East-West:			0
		SUM:		992	SUM:		1014	SUM:			1291	SUM:			1313	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.661			0.676				0.861				0.875				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.561**			**0.576**				**0.761**				**0.775**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.014	Δ*v/c* after mitigation:	-0.761
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
25	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	14	0	**14**	0	14	**14**	0	15	0	**15**	0	15	0	**15**		15		**0**
Left-Through		1							1				1					
Through	59	0	73	12	71	85	13	78	0	93	12	90	0	105		90		0
Through-Right		0							0				0					
Right	11	1	11	0	11	11	8	20	1	20	0	20	1	20		20		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	7	0	7	0	7	7	28	36	0	36	0	36	0	36		36		0
Left-Through		0							0				0					
Through	122	0	**146**	12	134	**161**	13	146	0	**201**	12	158	0	**216**		158		**0**
Through-Right		0							0				0					
Right	17	0	0	3	20	0	0	19	0	0	3	22	0	0		22		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	4	0	**4**	9	13	**13**	0	4	0	**4**	9	13	0	**13**		13		0
Left-Through		0							0				0					
Through	88	0	117	1	89	127	100	196	0	227	1	197	0	237		197		**0**
Through-Right		0							0				0					
Right	25	0	0	0	25	0	0	27	0	0	0	27	0	0		27		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	36	0	36	0	36	36	5	44	0	44	0	44	0	44		44		**0**
Left-Through		0							0				0					
Through	111	0	**168**	3	114	**171**	100	221	0	**292**	3	224	0	**295**		224		0
Through-Right		0							0				0					
Right	21	0	0	0	21	0	4	27	0	0	0	27	0	0		27		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		160	*North-South:*		175	*North-South:*			216	*North-South:*			231	*North-South:*			0
	East-West:		172	*East-West:*		184	*East-West:*			296	*East-West:*			308	*East-West:*			0
	SUM:		332	*SUM:*		359	*SUM:*			512	*SUM:*			539	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.221			0.239				0.341				0.359				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.121**			**0.139**				**0.241**				**0.259**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			2			2				2				2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0				0				0				
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				
Override Capacity			0			0				0				0				

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.018	Δ*v/c* after mitigation:	-0.241
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
25	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	33	0	33	0	33	33	0	36	0	36	0	36	0	36		36		**0**
Left-Through		0							0				0					
Through	175	0	**236**	33	208	**269**	16	207	0	**279**	33	240	0	**312**		240		0
Through-Right		0							0				0					
Right	28	0	0	0	28	0	5	36	0	0	0	36	0	0		36		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	9	0	**9**	0	9	**9**	7	17	0	**17**	0	17	0	**17**		17		0
Left-Through		0							0				0					
Through	44	0	90	24	68	118	10	58	0	115	24	82	0	143		82		**0**
Through-Right		0							0				0					
Right	37	0	0	4	41	0	0	40	0	0	4	44	0	0		44		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	12	0	12	6	18	18	0	13	0	13	6	19	0	19		19		0
Left-Through		0							0				0					
Through	209	0	**292**	3	212	**301**	110	339	0	**430**	3	342	0	**439**		342		**0**
Through-Right		0							0				0					
Right	71	0	0	0	71	0	0	78	0	0	0	78	0	0		78		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	54	0	**54**	0	54	**54**	12	71	0	**71**	0	71	0	**71**		71		**0**
Left-Through		0							0				0					
Through	149	0	234	2	151	236	148	311	0	436	2	313	0	438		313		0
Through-Right		0							0				0					
Right	31	0	0	0	31	0	20	54	0	0	0	54	0	0		54		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		245	*North-South:*		278	*North-South:*			296	*North-South:*			329	*North-South:*			0
	East-West:		346	*East-West:*		355	*East-West:*			501	*East-West:*			510	*East-West:*			0
	SUM:		591	*SUM:*		633	*SUM:*			797	*SUM:*			839	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.394			0.422				0.531				0.559				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.294**			**0.322**				**0.431**				**0.459**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--
No. of Phases																				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?																				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
ATSAC-1 or ATSAC+ATCS-2?																				
Override Capacity																				

	No. of Phases	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	Right Turns: FREE-1, NRTOR-2 or OLA-3?	ATSAC-1 or ATSAC+ATCS-2?	Override Capacity
EXISTING CONDITION	2	0	0	2	0
EXISTING PLUS PROJECT	2	0	0	2	0
FUTURE CONDITION W/O PROJECT	2	0	0	2	0
FUTURE CONDITION W/ PROJECT	2	0	0	2	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.028	Δ*v/c* after mitigation:	-0.431
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--				
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--				
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	39	1	**39**	0	39	**39**	49	92	1	**92**	0	92	1	**92**		92		**0**
	Left-Through		0							0				0					
	Through	589	2	295	45	634	317	63	707	2	354	45	752	2	376		752		0
	Through-Right		0							0				0					
	Right	82	1	50	0	82	50	86	176	1	124	0	176	1	124		176		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	45	1	45	1	46	46	3	52	1	52	1	53	1	53		53		0
	Left-Through		0							0				0					
	Through	1258	1	**643**	49	1307	**669**	108	1484	1	**791**	49	1533	1	**817**		1533		**0**
	Through-Right		1							1				1					
	Right	28	0	28	3	31	31	67	98	0	98	3	101	0	101		101		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	21	1	21	1	22	22	8	31	1	31	1	32	1	32		32		0
	Left-Through		0							0				0					
	Through	58	0	**105**	0	58	**105**	71	134	0	**208**	0	134	0	**208**		134		**0**
	Through-Right		1							1				1					
	Right	47	0	0	0	47	0	23	74	0	0	0	74	0	0		74		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	64	1	**64**	0	64	**64**	34	104	1	**104**	0	104	1	**104**		104		**0**
	Left-Through		0							0				0					
	Through	52	0	89	0	52	91	88	145	0	185	0	145	0	187		145		0
	Through-Right		1							1				1					
	Right	37	0	0	2	39	0	0	40	0	0	2	42	0	0		42		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		682	North-South:		708	North-South:			883	North-South:			909	North-South:			0
		East-West:		169	East-West:		169	East-West:			312	East-West:			312	East-West:			0
		SUM:		851	SUM:		877	SUM:			1195	SUM:			1221	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.567			0.585				0.797				0.814				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.467**			**0.485**				**0.697**				**0.714**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.017	Δ*v/c* after mitigation:	-0.697
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	80	1	80	0	80	80	43	130	1	130	0	130	1	130		130		**0**
	Left-Through		0							0				0					
	Through	1082	2	**541**	75	1157	**579**	113	1296	2	**648**	75	1371	2	**686**		1371		0
	Through-Right		0							0				0					
	Right	152	1	109	0	152	109	111	277	1	201	0	277	1	201		277		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	3	67	**67**	9	79	1	**79**	3	82	1	**82**		82		0
	Left-Through		0							0				0					
	Through	833	1	432	56	889	461	183	1094	1	573	56	1150	1	602		1150		**0**
	Through-Right		1							1				1					
	Right	31	0	31	2	33	33	17	51	0	51	2	53	0	53		53		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	73	1	73	3	76	76	41	121	1	121	3	124	1	124		124		0
	Left-Through		0							0				0					
	Through	126	0	**226**	0	126	**226**	107	245	0	**406**	0	245	0	**406**		245		**0**
	Through-Right		1							1				1					
	Right	100	0	0	0	100	0	52	161	0	0	0	161	0	0		161		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	87	1	**87**	0	87	**87**	58	153	1	**153**	0	153	1	**153**		153		**0**
	Left-Through		0							0				0					
	Through	87	0	181	0	87	186	95	190	0	293	0	190	0	298		190		0
	Through-Right		1							1				1					
	Right	94	0	0	5	99	0	0	103	0	0	5	108	0	0		108		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		605	North-South:		646	North-South:			727	North-South:			768	North-South:			0
		East-West:		313	East-West:		313	East-West:			559	East-West:			559	East-West:			0
		SUM:		918	SUM:		959	SUM:			1286	SUM:			1327	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.612			0.639				0.857				0.885				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.512**			**0.539**				**0.757**				**0.785**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.028	Δ*v/c* after mitigation:	-0.757
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	20	1	**20**	0	20	**20**	11	33	1	**33**	0	33	1	**33**		33		**0**
Left-Through		0							0				0					
Through	81	0	91	4	85	95	60	149	0	197	4	153	0	201		153		0
Through-Right		1							1				1					
Right	10	0	0	0	10	0	37	48	0	0	0	48	0	0		48		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	23	1	23	3	26	26	46	71	1	71	3	74	1	74		74		0
Left-Through		0							0				0					
Through	303	0	**362**	5	308	**367**	41	372	0	**458**	5	377	0	**463**		377		**0**
Through-Right		1							1				1					
Right	59	0	0	0	59	0	21	86	0	0	0	86	0	0		86		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	58	1	**58**	0	58	**58**	70	133	1	**133**	0	133	1	**133**		133		0
Left-Through		0							0				0					
Through	50	0	108	1	51	109	89	144	0	209	1	145	0	210		145		**0**
Through-Right		1							1				1					
Right	58	0	0	0	58	0	2	65	0	0	0	65	0	0		65		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	28	1	28	0	28	28	18	49	1	49	0	49	1	49		49		**0**
Left-Through		0							0				0					
Through	42	0	**94**	2	44	**99**	90	136	0	**227**	2	138	0	**232**		138		0
Through-Right		1							1				1					
Right	52	0	0	3	55	0	34	91	0	0	3	94	0	0		94		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	North-South:		382	North-South:		387	North-South:			491	North-South:			496	North-South:			0
	East-West:		152	East-West:		157	East-West:			360	East-West:			365	East-West:			0
	SUM:		534	SUM:		544	SUM:			851	SUM:			861	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:			0.356			0.363				0.567				0.574				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.256			0.263				0.467				0.474				0.000
LEVEL OF SERVICE (LOS):			A			A				A				A				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.007	Δ*v/c* after mitigation:	-0.467
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	43	1	**43**	0	43	**43**	3	50	1	**50**	0	50	1	**50**		50		**0**
	Left-Through		0							0				0					
	Through	262	0	274	4	266	278	64	351	0	387	4	355	0	391		355		0
	Through-Right		1							1				1					
	Right	12	0	0	0	12	0	23	36	0	0	0	36	0	0		36		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	17	1	17	3	20	20	40	59	1	59	3	62	1	62		62		0
	Left-Through		0							0				0					
	Through	165	0	**261**	4	169	**265**	97	277	0	**430**	4	281	0	**434**		281		**0**
	Through-Right		1							1				1					
	Right	96	0	0	0	96	0	48	153	0	0	0	153	0	0		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	150	1	**150**	0	150	**150**	115	279	1	**279**	0	279	1	**279**		279		0
	Left-Through		0							0				0					
	Through	118	0	205	3	121	208	110	239	0	346	3	242	0	349		242		**0**
	Through-Right		1							1				1					
	Right	87	0	0	0	87	0	12	107	0	0	0	107	0	0		107		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	23	1	23	0	23	23	35	60	1	60	0	60	1	60		60		**0**
	Left-Through		0							0				0					
	Through	103	0	**203**	5	108	**211**	102	215	0	**374**	5	220	0	**382**		220		0
	Through-Right		1							1				1					
	Right	100	0	0	3	103	0	50	159	0	0	3	162	0	0		162		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		304	*North-South:*		308	*North-South:*			480	*North-South:*			484	*North-South:*			0
		East-West:		353	*East-West:*		361	*East-West:*			653	*East-West:*			661	*East-West:*			0
		SUM:		657	*SUM:*		669	*SUM:*			1133	*SUM:*			1145	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.438			0.446				0.755				0.763				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.338**			**0.346**				**0.655**				**0.663**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.655
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
28	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			4			4			4				4					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	26	1	**26**	0	26	**26**	1	29	1	**29**	0	29	1	**29**		29		**0**
Left-Through		0							0				0					
Through	1157	2	423	5	1162	424	196	1461	2	530	5	1466	2	532		1466		0
Through-Right		1							1				1					
Right	111	0	111	0	111	111	9	130	0	130	0	130	0	130		130		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	60	1	60	0	60	60	55	121	1	121	0	121	1	121		121		0
Left-Through		0							0				0					
Through	1500	2	**603**	4	1504	**604**	195	1836	2	**745**	4	1840	2	**746**		1840		**0**
Through-Right		1							1				1					
Right	308	0	308	0	308	308	62	399	0	399	0	399	0	399		399		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	268	1	**268**	0	268	**268**	82	375	1	**375**	0	375	1	**375**		375		0
Left-Through		0							0				0					
Through	1115	2	388	12	1127	392	189	1408	2	489	12	1420	2	493		1420		**0**
Through-Right		1							1				1					
Right	48	0	48	0	48	48	6	58	0	58	0	58	0	58		58		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	146	1	146	0	146	146	17	177	1	177	0	177	1	177		177		**0**
Left-Through		0							0				0					
Through	1340	2	**459**	12	1352	**463**	211	1677	2	**597**	12	1689	2	**601**		1689		0
Through-Right		1							1				1					
Right	37	0	37	0	37	37	73	113	0	113	0	113	0	113		113		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		629	*North-South:*		630	*North-South:*			774	*North-South:*			775	*North-South:*			0
	East-West:		727	*East-West:*		731	*East-West:*			972	*East-West:*			976	*East-West:*			0
	SUM:		1356	*SUM:*		1361	*SUM:*			1746	*SUM:*			1751	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.986			0.990				1.270				1.273				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.886**			**0.890**				**1.170**				**1.173**				0.000
LEVEL OF SERVICE (LOS):			**D**			**D**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-1.170
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
28	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	31	1	**31**	0	31	**31**	5	39	1	**39**	0	39	1	**39**		39		**0**
Left-Through		0							0				0					
Through	1123	2	405	3	1126	406	252	1480	2	535	3	1483	2	536		1483		0
Through-Right		1							1				1					
Right	92	0	92	0	92	92	25	126	0	126	0	126	0	126		126		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	108	1	108	0	108	108	81	199	1	199	0	199	1	199		199		0
Left-Through		0							0				0					
Through	1311	2	**553**	3	1314	**554**	229	1663	2	**712**	3	1666	2	**713**		1666		**0**
Through-Right		1							1				1					
Right	347	0	347	0	347	347	93	473	0	473	0	473	0	473		473		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	172	1	172	0	172	172	91	279	1	279	0	279	1	279		279		0
Left-Through		0							0				0					
Through	1619	2	**556**	7	1626	**559**	203	1974	2	**677**	7	1981	2	**679**		1981		**0**
Through-Right		1							1				1					
Right	50	0	50	0	50	50	1	56	0	56	0	56	0	56		56		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	140	1	**140**	0	140	**140**	21	174	1	**174**	0	174	1	**174**		174		**0**
Left-Through		0							0				0					
Through	1206	2	427	7	1213	430	244	1563	2	570	7	1570	2	573		1570		0
Through-Right		1							1				1					
Right	76	0	76	0	76	76	65	148	0	148	0	148	0	148		148		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		584	*North-South:*		585	*North-South:*			751	*North-South:*			752	*North-South:*			0
	East-West:		696	*East-West:*		699	*East-West:*			851	*East-West:*			853	*East-West:*			0
	SUM:		1280	*SUM:*		1284	*SUM:*			1602	*SUM:*			1605	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.931			0.934				1.165				1.167				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.831**			**0.834**				**1.065**				**1.067**				0.000
LEVEL OF SERVICE (LOS):			**D**			**D**				**F**				**F**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			4			4			4			4						
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2						
Override Capacity			0			0			0			0						

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-1.065
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
29	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	30	1	**30**	0	30	**30**	3	36	1	**36**	0	36	1	**36**	0	36	1	**36**
	Left-Through		0							0				0				0	
	Through	376	1	200	14	390	207	124	535	1	288	14	549	1	295	-2	547	1	294
	Through-Right		1							1				1				1	
	Right	23	0	23	0	23	23	16	41	0	41	0	41	0	41	0	41	0	41
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	44	1	44	0	44	44	17	65	1	65	0	65	1	65	0	65	1	65
	Left-Through		0							0				0				0	
	Through	876	1	**535**	20	896	**545**	117	1075	1	**647**	20	1095	1	**657**	-3	1092	1	**655**
	Through-Right		1							1				1				1	
	Right	193	0	193	0	193	193	7	218	0	218	0	218	0	218	0	218	0	218
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	100	1	**100**	7	107	**107**	20	129	1	**129**	7	136	1	**136**	-1	135	1	**135**
	Left-Through		0							0				0				0	
	Through	1051	2	368	5	1056	369	244	1393	2	485	5	1398	2	487	-1	1397	2	487
	Through-Right		1							1				1				1	
	Right	52	0	52	0	52	52	6	63	0	63	0	63	0	63	0	63	0	63
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	67	1	67	0	67	67	24	97	1	97	0	97	1	97	0	97	1	97
	Left-Through		0							0				0				0	
	Through	1269	2	**436**	12	1281	**440**	242	1630	2	**565**	12	1642	2	**569**	-2	1640	2	**569**
	Through-Right		1							1				1				1	
	Right	39	0	39	0	39	39	23	66	0	66	0	66	0	66	0	66	0	66
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		565	North-South:		575	North-South:			683	North-South:			693	North-South:			691
		East-West:		536	East-West:		547	East-West:			694	East-West:			705	East-West:			704
		SUM:		1101	SUM:		1122	SUM:			1377	SUM:			1398	SUM:			1395
	VOLUME/CAPACITY (V/C) RATIO:			0.773			0.787				0.966				0.981				0.979
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.673			0.687				0.866				0.881	With Imp.+TDM			0.879
	LEVEL OF SERVICE (LOS):			B			B				D				D				D

REMARKS:

With Imp.+TDM+Signal Imp. 0.869
D

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.015 — Δ*v/c* after mitigation: 0.003
Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
29	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	45	1	45	0	45	45	87	136	1	136	0	136	1	136	0	136	1	136
	Left-Through		0							0				0				0	
	Through	779	1	**423**	26	805	**436**	92	944	1	**523**	26	970	1	**536**	-4	966	1	**534**
	Through-Right		1							1				1				1	
	Right	67	0	67	0	67	67	28	101	0	101	0	101	0	101	0	101	0	101
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	66	1	**66**	0	66	**66**	24	96	1	**96**	0	96	1	**96**	0	96	1	**96**
	Left-Through		0							0				0				0	
	Through	458	1	273	19	477	282	149	650	1	377	19	669	1	386	-3	666	1	385
	Through-Right		1							1				1				1	
	Right	87	0	87	0	87	87	8	103	0	103	0	103	0	103	0	103	0	103
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	230	1	**230**	0	230	**230**	8	260	1	**260**	0	260	1	**260**	0	260	1	**260**
	Left-Through		0							0				0				0	
	Through	1362	2	467	19	1381	473	314	1804	2	617	19	1823	2	623	-3	1820	2	622
	Through-Right		1							1				1				1	
	Right	39	0	39	0	39	39	4	47	0	47	0	47	0	47	0	47	0	47
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	41	1	41	0	41	41	26	71	1	71	0	71	1	71	0	71	1	71
	Left-Through		0							0				0				0	
	Through	1209	2	**425**	15	1224	**430**	375	1697	2	**590**	15	1712	2	**595**	-2	1710	2	**594**
	Through-Right		1							1				1				1	
	Right	66	0	66	0	66	66	0	72	0	72	0	72	0	72	0	72	0	72
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		489	North-South:		502	North-South:			619	North-South:			632	North-South:			630
		East-West:		655	East-West:		660	East-West:			850	East-West:			855	East-West:			854
		SUM:		1144	SUM:		1162	SUM:			1469	SUM:			1487	SUM:			1484
	VOLUME/CAPACITY (V/C) RATIO:			0.803			0.815				1.031				1.044				1.041
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.703			0.715				0.931				0.944	With Imp.+TDM			0.941
	LEVEL OF SERVICE (LOS):			C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.931 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.013 | Δ*v/c* after mitigation: 0.000

Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
30	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	10	1	10	0	10	10	0	11	1	11	0	11	1	11		11		**0**
Left-Through		0							0				0					
Through	51	0	**99**	12	63	**111**	15	71	0	**123**	12	83	0	**135**		83		0
Through-Right		1							1				1					
Right	48	0	0	0	48	0	0	52	0	0	0	52	0	0		52		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	12	1	**12**	0	12	**12**	5	18	1	**18**	0	18	1	**18**		18		0
Left-Through		0							0				0					
Through	41	0	62	5	46	73	8	53	0	78	5	58	0	89		58		**0**
Through-Right		1							1				1					
Right	21	0	0	6	27	0	2	25	0	0	6	31	0	0		31		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	22	1	**22**	0	22	**22**	0	24	1	**24**	0	24	1	**24**		24		0
Left-Through		0							0				0					
Through	933	2	318	5	938	320	278	1298	2	441	5	1303	2	442		1303		**0**
Through-Right		1							1				1					
Right	22	0	22	0	22	22	0	24	0	24	0	24	0	24		24		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	44	1	44	6	50	50	0	48	1	48	6	54	1	54		54		**0**
Left-Through		0							0				0					
Through	1619	2	**550**	5	1624	**552**	287	2058	2	**697**	5	2063	2	**699**		2063		0
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		111	*North-South:*		123	*North-South:*			141	*North-South:*			153	*North-South:*			0
	East-West:		572	*East-West:*		574	*East-West:*			721	*East-West:*			723	*East-West:*			0
	SUM:		683	*SUM:*		697	*SUM:*			862	*SUM:*			876	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.455			0.465				0.575				0.584				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.355**			**0.365**				**0.475**				**0.484**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			2			2			2			2			2			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			
Override Capacity			0			0			0			0			0			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-0.475
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet

(Circular 212 Method)

I/S #:	**North-South Street:**	**IVAR AVENUE**	**Year of Count:**	**2011**	**Ambient Growth: (%):**	**1**	**Conducted by:**		**Date:**	**12/28/2012**
30	**East-West Street:**	**SUNSET BOULEVARD**	**Projection Year:**	**2020**	**Peak Hour:**	**PM**	**Reviewed by:**	**HS**	**Project:**	

No. of Phases	2	2	2	2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	*NB--* 0 *SB--* 0 *EB--* 0 *WB--* 0	*NB--* 0 *SB--* 0 *EB--* 0 *WB--* 0	*NB--* 0 *SB--* 0 *EB--* 0 *WB--* 0	*NB--* 0 *SB--* 0 *EB--* 0 *WB--* 0	*NB--* *SB--* *EB--* *WB--*
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

	MOVEMENT	**EXISTING CONDITION**			**EXISTING PLUS PROJECT**			**FUTURE CONDITION W/O PROJECT**				**FUTURE CONDITION W/ PROJECT**				**FUTURE W/ PROJECT W/ MITIGATION**			
		Volume	**No. of Lanes**	**Lane Volume**	**Project Traffic**	**Total Volume**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**
NORTHBOUND	**Left**	46	1	46	0	46	46	0	50	1	50	0	50	1	50		50		**0**
	Left-Through		0							0				0					
	Through	166	0	**297**	19	185	**316**	11	193	0	**336**	19	212	0	**355**		212		0
	Through-Right		1							1				1					
	Right	131	0	0	0	131	0	0	143	0	0	0	143	0	0		143		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	**Left**	59	1	**59**	0	59	**59**	5	70	1	**70**	0	70	1	**70**		70		0
	Left-Through		0							0				0					
	Through	66	0	127	15	81	153	8	80	0	157	15	95	0	183		95		**0**
	Through-Right		1							1				1					
	Right	61	0	0	11	72	0	10	77	0	0	11	88	0	0		88		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	**Left**	35	1	35	15	50	50	3	41	1	41	15	56	1	56		56		0
	Left-Through		0							0				0					
	Through	1390	2	**487**	4	1394	**488**	362	1882	2	**653**	4	1886	2	**655**		1886		**0**
	Through-Right		1							1				1					
	Right	71	0	71	0	71	71	0	78	0	78	0	78	0	78		78		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	**Left**	76	1	**76**	0	76	**76**	0	83	1	**83**	0	83	1	**83**		83		**0**
	Left-Through		0							0				0					
	Through	1209	2	418	4	1213	419	382	1704	2	586	4	1708	2	587		1708		0
	Through-Right		1							1				1					
	Right	44	0	44	0	44	44	6	54	0	54	0	54	0	54		54		0
	Left-Through-Right		0							0				0					
	Left-Right																		

		Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
CRITICAL VOLUMES	***North-South:***	356	375	406	425	0
	East-West:	563	564	736	738	0
	SUM:	919	939	1142	1163	0
VOLUME/CAPACITY *(V/C)* RATIO:		0.613	0.626	0.761	0.775	0.000
***V/C* LESS ATSAC/ATCS ADJUSTMENT:**		**0.513**	**0.526**	**0.661**	**0.675**	0.000
LEVEL OF SERVICE (LOS):		**A**	**A**	**B**	**B**	**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	**0.014**	**Δ*v/c* after mitigation:**	**-0.661**
Significant impacted?	**NO**	**Fully mitigated?**	**N/A**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
31	East-West Street:	VINE STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3			3	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	64	1	**64**	0	64	**64**	2	72	1	**72**	0	72	1	**72**	0	72	1	**72**
	Left-Through		0							0				0				0	
	Through	625	2	313	34	659	330	141	825	2	413	34	859	2	430	-5	854	2	427
	Through-Right		0							0				0				0	
	Right	155	1	29	0	155	29	33	203	1	23	0	203	1	23	0	203	1	23
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	52	1	52	5	57	57	58	115	1	115	5	120	1	120	-1	119	1	119
	Left-Through		0							0				0				0	
	Through	1338	2	**669**	34	1372	**686**	156	1619	2	**810**	34	1653	2	**827**	-5	1648	2	**824**
	Through-Right		0							0				0				0	
	Right	95	1	36	11	106	42	27	131	1	50	11	142	1	56	-2	140	1	55
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	59	1	**59**	5	64	**64**	16	81	1	**81**	5	86	1	**86**	-1	85	1	**85**
	Left-Through		0							0				0				0	
	Through	949	2	340	0	949	340	265	1303	2	461	0	1303	2	461	0	1303	2	461
	Through-Right		1							1				1				1	
	Right	70	0	70	0	70	70	2	79	0	79	0	79	0	79	0	79	0	79
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	126	1	126	0	126	126	42	180	1	180	0	180	1	180	0	180	1	180
	Left-Through		0							0				0				0	
	Through	1397	2	**499**	0	1397	**501**	258	1786	2	**648**	0	1786	2	**650**	0	1786	2	**649**
	Through-Right		1							1				1				1	
	Right	100	0	100	5	105	105	49	158	0	158	5	163	0	163	-1	162	0	162
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		North-South:		733	North-South:		750	North-South:			882	North-South:			899	North-South:			896
		East-West:		558	East-West:		565	East-West:			729	East-West:			736	East-West:			734
		SUM:		1291	SUM:		1315	SUM:			1611	SUM:			1635	SUM:			1630
VOLUME/CAPACITY (V/C) RATIO:				0.906			0.923				1.131				1.147				1.144
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.806			0.823				1.031				1.047	With Imp.+TDM			1.044
LEVEL OF SERVICE (LOS):				D			D				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.034 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.016 — Δ*v/c* after mitigation: 0.003

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
31	East-West Street:	VINE STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3			3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2
Override Capacity			0			0			0			0			0			0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	84	1	84	0	84	84	3	95	1	95	0	95	1	95	0	95	1	95
	Left-Through		0							0				0				0	
	Through	1065	2	**533**	56	1121	**561**	218	1383	2	**692**	56	1439	2	**720**	-8	1431	2	**716**
	Through-Right		0							0				0				0	
	Right	160	1	11	0	160	11	43	218	1	9	0	218	1	9	0	218	1	9
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	61	1	**61**	9	70	**70**	113	180	1	**180**	9	189	1	**189**	-1	188	1	**188**
	Left-Through		0							0				0				0	
	Through	823	2	412	43	866	433	209	1109	2	555	43	1152	2	576	-6	1146	2	573
	Through-Right		0							0				0				0	
	Right	80	1	0	4	84	0	47	134	1	0	4	138	1	0	-1	137	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	95	1	95	4	99	99	56	160	1	160	4	164	1	164	-1	163	1	163
	Left-Through		0							0				0				0	
	Through	1264	2	**450**	0	1264	**450**	307	1689	2	**595**	0	1689	2	**595**	0	1689	2	**595**
	Through-Right		1							1				1				1	
	Right	86	0	86	0	86	86	3	97	0	97	0	97	0	97	0	97	0	97
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	149	1	**149**	0	149	**149**	46	209	1	**209**	0	209	1	**209**	0	209	1	**209**
	Left-Through		0							0				0				0	
	Through	1174	2	423	0	1174	427	338	1622	2	615	0	1622	2	619	0	1622	2	619
	Through-Right		1							1				1				1	
	Right	95	0	95	13	108	108	119	223	0	223	13	236	0	236	-2	234	0	234
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		594	North-South:		631	North-South:			872	North-South:			909	North-South:			904
		East-West:		599	East-West:		599	East-West:			804	East-West:			804	East-West:			804
		SUM:		1193	SUM:		1230	SUM:			1676	SUM:			1713	SUM:			1708
	VOLUME/CAPACITY (V/C) RATIO:			0.837			0.863				1.176				1.202				1.199
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.737			0.763				1.076				1.102	With Imp.+TDM			1.099
	LEVEL OF SERVICE (LOS):			C			C				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.089 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.026 | Δ*v/c* after mitigation: 0.013

Significant impacted? YES | Fully mitigated? NO

Level of Service Worksheet
(Circular 212 Method)

31

PROJECT TITLE:
North-South Street: SUNSET BOULEVARD **East-West Street:** VINE STREET
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 12/28/2012

			AM PEAK HOUR			PM PEAK HOUR		
	No. of Phases				3			3
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0			0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB -- 3	SB --	3	NB -- 3	SB --	3
			EB -- 0	WB --	0	EB -- 0	WB --	0
	ATSAC-1 or ATSAC+ATCS-2?				2			2
	Override Capacity				0			0
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left		64	1	**64**	84	1	84
	Left-Through			0			0	
	Through		654	2	327	1113	2	**557**
	Through-Right			0			0	
	Right		155	1	29	160	1	11
	Left-Through-Right			0			0	
	Left-Right							
SOUTHBOUND	Left		56	1	56	69	1	**69**
	Left-Through			0			0	
	Through		1367	2	**684**	860	2	430
	Through-Right			0			0	
	Right		104	1	41	83	1	0
	Left-Through-Right			0			0	
	Left-Right							
EASTBOUND	Left		63	1	**63**	98	1	98
	Left-Through			0			0	
	Through		949	2	340	1264	2	**450**
	Through-Right			1			1	
	Right		70	0	70	86	0	86
	Left-Through-Right			0			0	
	Left-Right							
WESTBOUND	Left		126	1	126	149	1	**149**
	Left-Through			0			0	
	Through		1397	2	**500**	1174	2	427
	Through-Right			1			1	
	Right		104	0	104	106	0	106
	Left-Through-Right			0			0	
	Left-Right							
	CRITICAL VOLUMES			*North-South:*	748		*North-South:*	626
				East-West:	563		*East-West:*	599
				SUM:	1311		*SUM:*	1225
	VOLUME/CAPACITY *(V/C)* RATIO:				0.920			0.860
	V/C LESS ATSAC/ATCS ADJUSTMENT:			*With TDM*	**0.820**		*With TDM*	**0.760**
	LEVEL OF SERVICE (LOS):				**D**			**C**
				With TDM+Signal Imp.	**0.810**		*With TDM+Signal Imp.*	**0.750**
					D			**C**

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
32	East-West Street:	ARGYLE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--				
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--				
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	**0**	0	0	**0**	23	23	0	**23**	0	23	0	**23**		23		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	10	10	0	56	0	10	0	56		10		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	23	23	0	0	0	23	0	0		23		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	74	0	74	5	79	79	11	92	0	92	5	97	0	97		97		0
Left-Through		0							0				0					
Through	0	0	**171**	0	0	**176**	2	2	0	**246**	0	2	0	**251**		2		**0**
Through-Right		0							0				0					
Right	97	0	0	0	97	0	46	152	0	0	0	152	0	0		152		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	95	1	**95**	0	95	**95**	73	177	1	**177**	0	177	1	**177**		177		0
Left-Through		0							0				0					
Through	1103	2	368	5	1108	369	279	1485	2	497	5	1490	2	498		1490		**0**
Through-Right		1							1				1					
Right	0	0	0	0	0	0	5	5	0	5	0	5	0	5		5		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	0	0	0	0	5	5	0	5	0	5	0	5		5		**0**
Left-Through		1							1				1					
Through	1563	1	**543**	5	1568	**546**	282	1991	1	**707**	5	1996	1	**710**		1996		0
Through-Right		1							1				1					
Right	67	0	543	4	71	546	26	99	0	707	4	103	0	710		103		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		171	*North-South:*		176	*North-South:*			269	*North-South:*			274	*North-South:*			0
	East-West:		638	*East-West:*		641	*East-West:*			884	*East-West:*			887	*East-West:*			0
	SUM:		809	*SUM:*		817	*SUM:*			1153	*SUM:*			1161	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.539			0.545				0.769				0.774				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.439**			**0.445**				**0.669**				**0.674**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.669
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
32	East-West Street:	ARGYLE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases		2	2		2	2		2	2	2		2	2	2				
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0	0		0	0		0	0	0		0	0	0				
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0	0	NB-- 0 SB--	0	0	NB-- 0 SB--	0	0	0	NB-- 0 SB--	0	0	0	NB-- SB--			
		EB-- 0 WB--	0	0	EB-- 0 WB--	0	0	EB-- 0 WB--	0	0	0	EB-- 0 WB--	0	0	0	EB--		WB--	
	ATSAC-1 or ATSAC+ATCS-2?		2	2		2	2		2	2	2		2	2	2				
	Override Capacity		0	0		0	0		0	0	0		0	0	0				
NORTHBOUND	Left	0	0	**0**	0	0	**0**	18	18	0	**18**	0	18	0	**18**		18		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	8	8	0	44	0	8	0	44		8		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	18	18	0	0	0	18	0	0		18		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	91	0	91	4	95	95	35	135	0	135	4	139	0	139		139		0
	Left-Through		0							0				0					
	Through	0	0	**200**	0	0	**204**	13	13	0	**356**	0	13	0	**360**		13		**0**
	Through-Right		0							0				0					
	Right	109	0	0	0	109	0	89	208	0	0	0	208	0	0		208		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	143	1	**143**	0	143	**143**	63	219	1	**219**	0	219	1	**219**		219		0
	Left-Through		0							0				0					
	Through	1381	2	460	9	1390	463	367	1877	2	635	9	1886	2	638		1886		**0**
	Through-Right		1							1				1					
	Right	0	0	0	0	0	0	29	29	0	29	0	29	0	29		29		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	29	29	0	29	0	29	0	29		29		**0**
	Left-Through		1							1				1					
	Through	1316	1	**472**	13	1329	**478**	401	1840	1	**716**	13	1853	1	**722**		1853		0
	Through-Right		1							1				1					
	Right	101	0	472	4	105	478	24	134	0	716	4	138	0	722		138		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		200	*North-South:*		204	*North-South:*			374	*North-South:*			378	*North-South:*			0
		East-West:		615	*East-West:*		621	*East-West:*			935	*East-West:*			941	*East-West:*			0
		SUM:		815	*SUM:*		825	*SUM:*			1309	*SUM:*			1319	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.543			0.550				0.873				0.879				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.443**			**0.450**				**0.773**				**0.779**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.773
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
33	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	8	1	**8**	0	8	**8**	0	9	1	**9**	0	9	1	**9**		9		**0**
	Left-Through		0							0				0					
	Through	539	1	272	14	553	279	135	724	1	365	14	738	1	372		738		0
	Through-Right		1							1				1					
	Right	5	0	5	0	5	5	0	5	0	5	0	5	0	5		5		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	13	0	13	0	13	13	0	14	0	14	0	14	0	14		14		0
	Left-Through		1							1				1					
	Through	972	0	**521**	20	992	**531**	121	1184	0	**644**	20	1204	0	**654**		1204		**0**
	Through-Right		1							1				1					
	Right	44	0	521	0	44	531	0	48	0	644	0	48	0	654		48		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	12	0	**12**	0	12	**12**	0	13	0	**13**	0	13	0	**13**		13		0
	Left-Through		0							0				0					
	Through	43	0	69	2	45	71	5	52	0	80	2	54	0	82		54		**0**
	Through-Right		0							0				0					
	Right	14	0	0	0	14	0	0	15	0	0	0	15	0	0		15		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	16	0	16	0	16	16	0	17	0	17	0	17	0	17		17		**0**
	Left-Through		0							0				0					
	Through	76	0	**120**	3	79	**123**	5	88	0	**136**	3	91	0	**139**		91		0
	Through-Right		0							0				0					
	Right	28	0	0	0	28	0	0	31	0	0	0	31	0	0		31		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		529	*North-South:*		539	*North-South:*			653	*North-South:*			663	*North-South:*			0
		East-West:		132	*East-West:*		135	*East-West:*			149	*East-West:*			152	*East-West:*			0
		SUM:		661	*SUM:*		674	*SUM:*			802	*SUM:*			815	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.441			0.449				0.535				0.543				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.341**			**0.349**				**0.435**				**0.443**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.435
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
33	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	10	1	10	0	10	10	0	11	1	11	0	11	1	11		11		**0**
Left-Through		0							0				0					
Through	795	1	**406**	26	821	**419**	185	1054	1	**537**	26	1080	1	**550**		1080		0
Through-Right		1							1				1					
Right	17	0	17	0	17	17	0	19	0	19	0	19	0	19		19		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	31	0	**31**	0	31	**31**	0	34	0	**34**	0	34	0	**34**		34		0
Left-Through		1							1				1					
Through	555	0	358	19	574	368	172	779	0	512	19	798	0	521		798		**0**
Through-Right		1							1				1					
Right	37	0	358	0	37	368	0	40	0	512	0	40	0	521		40		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	60	0	60	0	60	60	0	66	0	66	0	66	0	66		66		0
Left-Through		0							0				0					
Through	173	0	**272**	3	176	**275**	7	196	0	**305**	3	199	0	**308**		199		**0**
Through-Right		0							0				0					
Right	39	0	0	0	39	0	0	43	0	0	0	43	0	0		43		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	25	0	**25**	0	25	**25**	0	27	0	**27**	0	27	0	**27**		27		**0**
Left-Through		0							0				0					
Through	92	0	185	4	96	189	9	110	0	211	4	114	0	215		114		0
Through-Right		0							0				0					
Right	68	0	0	0	68	0	0	74	0	0	0	74	0	0		74		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	North-South:		437	North-South:		450	North-South:			571	North-South:			584	North-South:			0
	East-West:		297	East-West:		300	East-West:			332	East-West:			335	East-West:			0
	SUM:		734	SUM:		750	SUM:			903	SUM:			919	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:			0.489			0.500				0.602				0.613				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.389**			**0.400**				**0.502**				**0.513**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.011	Δ*v/c* after mitigation:	-0.502
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
34	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	59	1	**59**	0	59	**59**	0	65	1	**65**	0	65	1	**65**		65		**0**
	Left-Through		0							0				0					
	Through	718	1	368	32	750	384	183	968	1	494	32	1000	1	510		1000		0
	Through-Right		1							1				1					
	Right	18	0	18	0	18	18	0	20	0	20	0	20	0	20		20		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	23	1	23	0	23	23	3	28	1	28	0	28	1	28		28		0
	Left-Through		0							0				0					
	Through	1182	1	**621**	33	1215	**641**	194	1487	1	**779**	33	1520	1	**799**		1520		**0**
	Through-Right		1							1				1					
	Right	60	0	60	6	66	66	5	71	0	71	6	77	0	77		77		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	45	1	**45**	2	47	**47**	5	54	1	**54**	2	56	1	**56**		56		0
	Left-Through		0							0				0					
	Through	33	0	94	0	33	94	0	36	0	103	0	36	0	103		36		**0**
	Through-Right		1							1				1					
	Right	61	0	0	0	61	0	0	67	0	0	0	67	0	0		67		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	26	0	26	0	26	26	0	28	0	28	0	28	0	28		28		**0**
	Left-Through		0							0				0					
	Through	74	0	**127**	0	74	**127**	0	81	0	**141**	0	81	0	**141**		81		0
	Through-Right		0							0				0					
	Right	27	0	0	0	27	0	2	32	0	0	0	32	0	0		32		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		680	*North-South:*		700	*North-South:*			844	*North-South:*			864	*North-South:*			0
		East-West:		172	*East-West:*		174	*East-West:*			195	*East-West:*			197	*East-West:*			0
		SUM:		852	*SUM:*		874	*SUM:*			1039	*SUM:*			1061	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.568			0.583				0.693				0.707				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.468**			**0.483**				**0.593**				**0.607**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.014	Δ*v/c* after mitigation:	-0.593
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
34	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	101	1	**101**	0	101	**101**	0	110	1	**110**	0	110	1	**110**		110		**0**
Left-Through		0							0				0					
Through	1265	1	648	53	1318	675	242	1626	1	830	53	1679	1	857		1679		0
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	37	1	37	0	37	37	6	46	1	46	0	46	1	46		46		0
Left-Through		0							0				0					
Through	1112	1	**641**	40	1152	**664**	253	1469	1	**832**	40	1509	1	**855**		1509		**0**
Through-Right		1							1				1					
Right	170	0	170	5	175	175	9	195	0	195	5	200	0	200		200		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	121	1	121	3	124	124	7	139	1	139	3	142	1	142		142		0
Left-Through		0							0				0					
Through	121	0	**261**	0	121	**261**	0	132	0	**285**	0	132	0	**285**		132		**0**
Through-Right		1							1				1					
Right	140	0	0	0	140	0	0	153	0	0	0	153	0	0		153		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	25	0	**25**	0	25	**25**	0	27	0	**27**	0	27	0	**27**		27		**0**
Left-Through		0							0				0					
Through	61	0	106	0	61	106	0	67	0	123	0	67	0	123		67		0
Through-Right		0							0				0					
Right	20	0	0	0	20	0	7	29	0	0	0	29	0	0		29		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		742	*North-South:*		765	*North-South:*			942	*North-South:*			965	*North-South:*			0
	East-West:		286	*East-West:*		286	*East-West:*			312	*East-West:*			312	*East-West:*			0
	SUM:		1028	*SUM:*		1051	*SUM:*			1254	*SUM:*			1277	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.685			0.701				0.836				0.851				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.585**			**0.601**				**0.736**				**0.751**				0.000
LEVEL OF SERVICE (LOS):			**A**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.015	Δ*v/c* after mitigation:	-0.736
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
35	East-West Street:	FOUNTAIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	39	1	**39**	0	39	**39**	1	44	1	**44**	0	44	1	**44**	0	44	1	**44**
	Left-Through		0							0				0				0	
	Through	917	2	459	27	944	472	175	1178	2	589	27	1205	2	603	-4	1201	2	601
	Through-Right		0							0				0				0	
	Right	79	1	26	0	79	26	0	86	1	28	0	86	1	28	0	86	1	28
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	15	1	15	3	18	18	4	20	1	20	3	23	1	23	0	23	1	23
	Left-Through		0							0				0				0	
	Through	1281	2	**641**	27	1308	**654**	183	1584	2	**792**	27	1611	2	**806**	-4	1607	2	**804**
	Through-Right		0							0				0				0	
	Right	56	1	34	3	59	36	6	67	1	40	3	70	1	42	0	70	1	42
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	44	1	**44**	2	46	**46**	6	54	1	**54**	2	56	1	**56**	0	56	1	**56**
	Left-Through		0							0				0				0	
	Through	308	0	352	0	308	352	113	450	0	500	0	450	0	500	0	450	0	500
	Through-Right		1							1				1				1	
	Right	44	0	0	0	44	0	2	50	0	0	0	50	0	0	0	50	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	106	1	106	0	106	106	0	116	1	116	0	116	1	116	0	116	1	116
	Left-Through		0							0				0				0	
	Through	416	0	**452**	0	416	**454**	125	580	0	**621**	0	580	0	**623**	0	580	0	**623**
	Through-Right		1							1				1				1	
	Right	36	0	0	2	38	0	2	41	0	0	2	43	0	0	0	43	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	680		*North-South:*	693		*North-South:*		836		*North-South:*		850		*North-South:*		848
			East-West:	496		*East-West:*	500		*East-West:*		675		*East-West:*		679		*East-West:*		679
			SUM:	1176		*SUM:*	1193		*SUM:*		1511		*SUM:*		1529		*SUM:*		1527
VOLUME/CAPACITY *(V/C)* RATIO:				0.784			0.795				1.007				1.019				1.018
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.684**			**0.695**				**0.907**				**0.919**		*With Imp.+TDM*		**0.918**
LEVEL OF SERVICE (LOS):				**B**			**B**				**E**				**E**				**E**

REMARKS:

With Imp.+TDM+Signal Imp. **0.908** **E**

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.012	Δ*v/c* after mitigation:	0.001
Significant impacted?	YES	Fully mitigated?	YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
35	East-West Street:	FOUNTAIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2				2				2				2
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0				0				0				0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- EB-- 0 WB--		0	NB-- 0 SB-- EB-- 0 WB--		0	NB-- SB-- EB-- WB--	0		0	NB-- SB-- EB-- WB--	0		0	NB-- SB-- EB-- WB--	0		0
	ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				2
	Override Capacity			0			0				0				0				0
NORTHBOUND	Left	74	1	74	0	74	74	2	83	1	83	0	83	1	83	0	83	1	83
	Left-Through		0							0				0				0	
	Through	1249	2	**625**	45	1294	**647**	226	1592	2	**796**	45	1637	2	**819**	-7	1630	2	**815**
	Through-Right		0							0				0				0	
	Right	54	1	15	0	54	15	0	59	1	17	0	59	1	17	0	59	1	17
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	73	1	**73**	4	77	**77**	7	87	1	**87**	4	91	1	**91**	-1	90	1	**90**
	Left-Through		0							0				0				0	
	Through	1137	2	569	34	1171	586	236	1480	2	740	34	1514	2	757	-5	1509	2	755
	Through-Right		0							0				0				0	
	Right	48	1	7	4	52	9	9	61	1	11	4	65	1	14	-1	64	1	13
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	83	1	83	3	86	86	9	100	1	100	3	103	1	103	0	103	1	103
	Left-Through		0							0				0				0	
	Through	477	0	**521**	0	477	**521**	144	666	0	**715**	0	666	0	**715**	0	666	0	**715**
	Through-Right		1							1				1				1	
	Right	44	0	0	0	44	0	1	49	0	0	0	49	0	0	0	49	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	78	1	**78**	0	78	**78**	0	85	1	**85**	0	85	1	**85**	0	85	1	**85**
	Left-Through		0							0				0				0	
	Through	308	0	363	0	308	366	144	481	0	549	0	481	0	552	0	481	0	552
	Through-Right		1							1				1				1	
	Right	55	0	0	3	58	0	8	68	0	0	3	71	0	0	0	71	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		698	North-South:		724	North-South:			883	North-South:			910	North-South:			905
		East-West:		599	East-West:		599	East-West:			800	East-West:			800	East-West:			800
		SUM:		1297	SUM:		1323	SUM:			1683	SUM:			1710	SUM:			1705
	VOLUME/CAPACITY (V/C) RATIO:			0.865			0.882				1.122				1.140				1.137
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.765			0.782				1.022				1.040	With Imp.+TDM			1.037
	LEVEL OF SERVICE (LOS):			C			C				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.027 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.018 — Δ*v/c* after mitigation: 0.005

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
36	East-West Street:	SANTA MONICA BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	64	1	**64**	0	64	**64**	25	95	1	**95**	0	95	1	**95**	0	95	1	**95**
	Left-Through		0							0				0				0	
	Through	906	2	453	10	916	458	155	1146	2	573	10	1156	2	578	-1	1155	2	578
	Through-Right		0							0				0				0	
	Right	71	1	4	0	71	4	2	80	1	3	0	80	1	3	0	80	1	3
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	68	1	68	8	76	76	24	98	1	98	8	106	1	106	-1	105	1	105
	Left-Through		0							0				0				0	
	Through	1116	2	**558**	8	1124	**562**	149	1370	2	**685**	8	1378	2	**689**	-1	1377	2	**689**
	Through-Right		0							0				0				0	
	Right	97	1	76	8	105	79	13	119	1	91	8	127	1	94	-1	126	1	93
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	42	1	**42**	10	52	**52**	11	57	1	**57**	10	67	1	**67**	-1	66	1	**66**
	Left-Through		0							0				0				0	
	Through	780	1	417	0	780	417	203	1056	1	566	0	1056	1	566	0	1056	1	566
	Through-Right		1							1				1				1	
	Right	53	0	53	0	53	53	18	76	0	76	0	76	0	76	0	76	0	76
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	135	1	135	0	135	135	7	155	1	155	0	155	1	155	0	155	1	155
	Left-Through		0							0				0				0	
	Through	1195	1	**617**	0	1195	**622**	235	1542	1	**797**	0	1542	1	**802**	0	1542	1	**802**
	Through-Right		1							1				1				1	
	Right	39	0	39	10	49	49	9	52	0	52	10	62	0	62	-1	61	0	61
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	622		*North-South:*	626		*North-South:*	780			*North-South:*	784			*North-South:*	784	
			East-West:	659		*East-West:*	674		*East-West:*	854			*East-West:*	869			*East-West:*	868	
			SUM:	1281		*SUM:*	1300		*SUM:*	1634			*SUM:*	1653			*SUM:*	1652	
	VOLUME/CAPACITY *(V/C)* RATIO:			0.854			0.867			1.089				1.102				1.101	
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.754			0.767			0.989				1.002			*With Imp.+TDM*	1.001	
	LEVEL OF SERVICE (LOS):			C			C			E				F				F	

REMARKS:

With Imp.+TDM+Signal Imp. 0.991 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.013 | *Δv/c* after mitigation: 0.002

Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
36	East-West Street:	SANTA MONICA BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	83	1	83	0	83	83	27	118	1	118	0	118	1	118	0	118	1	118
	Left-Through		0							0				0				0	
	Through	1122	2	**561**	14	1136	**568**	179	1406	2	**703**	14	1420	2	**710**	-2	1418	2	**709**
	Through-Right		0							0				0				0	
	Right	94	1	38	0	94	38	8	111	1	47	0	111	1	47	0	111	1	47
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	73	1	**73**	11	84	**84**	20	100	1	**100**	11	111	1	**111**	-2	109	1	**109**
	Left-Through		0							0				0				0	
	Through	993	2	497	11	1004	502	199	1285	2	643	11	1296	2	648	-2	1294	2	647
	Through-Right		0							0				0				0	
	Right	57	1	9	11	68	13	20	82	1	20	11	93	1	24	-2	91	1	23
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	96	1	96	14	110	110	19	124	1	124	14	138	1	138	-2	136	1	136
	Left-Through		0							0				0				0	
	Through	1139	1	**600**	0	1139	**600**	302	1548	1	**824**	0	1548	1	**824**	0	1548	1	**824**
	Through-Right		1							1				1				1	
	Right	61	0	61	0	61	61	32	99	0	99	0	99	0	99	0	99	0	99
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	112	1	**112**	0	112	**112**	6	128	1	**128**	0	128	1	**128**	0	128	1	**128**
	Left-Through		0							0				0				0	
	Through	989	1	523	0	989	530	279	1361	1	728	0	1361	1	735	0	1361	1	734
	Through-Right		1							1				1				1	
	Right	57	0	57	14	71	71	33	95	0	95	14	109	0	109	-2	107	0	107
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	634		*North-South:*	652		*North-South:*	803			*North-South:*	821			*North-South:*	818
			East-West:	712		*East-West:*	712		*East-West:*	952			*East-West:*	952			*East-West:*	952
			SUM:	1346		*SUM:*	1364		*SUM:*	1755			*SUM:*	1773			*SUM:*	1770
	VOLUME/CAPACITY *(V/C)* RATIO:			0.897			0.909			1.170				1.182				1.180
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.797			0.809			1.070				1.082			*With Imp.+TDM*	1.080
	LEVEL OF SERVICE (LOS):			C			D			F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.070 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.012 | *Δv/c* after mitigation: 0.000

Significant impacted? YES | Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
37	East-West Street:	MELROSE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	103	1	103	0	103	103	8	121	1	121	0	121	1	121		121		**0**
	Left-Through		0							0				0					
	Through	984	1	**519**	5	989	**521**	185	1261	1	**661**	5	1266	1	**663**		1266		0
	Through-Right		1							1				1					
	Right	53	0	53	0	53	53	2	60	0	60	0	60	0	60		60		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	96	1	**96**	3	99	**99**	20	125	1	**125**	3	128	1	**128**		128		0
	Left-Through		0							0				0					
	Through	998	2	499	4	1002	501	145	1236	2	618	4	1240	2	620		1240		**0**
	Through-Right		0							0				0					
	Right	123	1	90	3	126	92	8	143	1	104	3	146	1	106		146		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	67	1	**67**	2	69	**69**	6	79	1	**79**	2	81	1	**81**		81		0
	Left-Through		0							0				0					
	Through	993	1	530	0	993	530	79	1165	1	619	0	1165	1	619		1165		**0**
	Through-Right		1							1				1					
	Right	66	0	66	0	66	66	1	73	0	73	0	73	0	73		73		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	80	1	80	0	80	80	1	88	1	88	0	88	1	88		88		**0**
	Left-Through		0							0				0					
	Through	1085	1	**589**	0	1085	**590**	149	1336	1	**727**	0	1336	1	**728**		1336		0
	Through-Right		1							1				1					
	Right	92	0	92	2	94	94	16	117	0	117	2	119	0	119		119		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		615	*North-South:*		620	*North-South:*			786	*North-South:*			791	*North-South:*			0
		East-West:		656	*East-West:*		659	*East-West:*			806	*East-West:*			809	*East-West:*			0
		SUM:		1271	*SUM:*		1279	*SUM:*			1592	*SUM:*			1600	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.847			0.853				1.061				1.067				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.747**			**0.753**				**0.961**				**0.967**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.961
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
37	East-West Street:	MELROSE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	112	1	112	0	112	112	1	123	1	123	0	123	1	123		123		**0**
	Left-Through		0							0				0					
	Through	1131	1	**590**	8	1139	**594**	193	1430	1	**743**	8	1438	1	**747**		1438		0
	Through-Right		1							1				1					
	Right	49	0	49	0	49	49	1	55	0	55	0	55	0	55		55		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	102	1	**102**	4	106	**106**	22	134	1	**134**	4	138	1	**138**		138		0
	Left-Through		0							0				0					
	Through	861	2	431	6	867	434	222	1164	2	582	6	1170	2	585		1170		**0**
	Through-Right		0							0				0					
	Right	103	1	51	4	107	53	9	122	1	60	4	126	1	62		126		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	105	1	105	3	108	108	10	125	1	125	3	128	1	128		128		0
	Left-Through		0							0				0					
	Through	1159	1	**619**	0	1159	**619**	145	1413	1	**752**	0	1413	1	**752**		1413		**0**
	Through-Right		1							1				1					
	Right	78	0	78	0	78	78	6	91	0	91	0	91	0	91		91		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	71	1	**71**	0	71	**71**	2	80	1	**80**	0	80	1	**80**		80		**0**
	Left-Through		0							0				0					
	Through	897	1	524	0	897	525	120	1101	1	638	0	1101	1	639		1101		0
	Through-Right		1							1				1					
	Right	150	0	150	3	153	153	10	174	0	174	3	177	0	177		177		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		692	North-South:		700	North-South:			877	North-South:			885	North-South:			0
		East-West:		690	East-West:		690	East-West:			832	East-West:			832	East-West:			0
		SUM:		1382	SUM:		1390	SUM:			1709	SUM:			1717	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.921			0.927				1.139				1.145				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.821**			**0.827**				**1.039**				**1.045**				0.000
LEVEL OF SERVICE (LOS):				**D**			**D**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-1.039
Significant impacted?	NO	Fully mitigated?	N/A

EIR Residential Scenario

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
1	East-West Street:	US-101 FWY. NB OFF-RAMP	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--				
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--				
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	1035	2	**518**	10	1045	**523**	38	1170	2	**585**	10	1180	2	**590**		1180		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
Left-Through		0							0				0					
Through	845	2	423	2	847	424	0	924	2	462	2	926	2	463		926		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	277	1	**162**	0	277	**162**	4	307	1	**179**	0	307	1	**179**		307		**0**
Left-Through		0							0				0					
Through	0	0	162	0	0	162	0	0	0	179	0	0	0	179		0		0
Through-Right		0							0				0					
Right	46	0	0	0	46	0	0	50	0	0	0	50	0	0		50		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		518	*North-South:*		523	*North-South:*			585	*North-South:*			590	*North-South:*			0
	East-West:		162	*East-West:*		162	*East-West:*			179	*East-West:*			179	*East-West:*			0
	SUM:		680	*SUM:*		685	*SUM:*			764	*SUM:*			769	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.453			0.457				0.509				0.513				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.353**			**0.357**				**0.409**				**0.413**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.409
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
1	East-West Street:	US-101 FWY. NB OFF-RAMP	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	2068	2	**1034**	11	2079	**1040**	86	2348	2	**1174**	11	2359	2	**1180**		2359		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
	Left-Through		0							0				0					
	Through	326	2	163	4	330	165	0	357	2	179	4	361	2	181		361		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	117	1	**88**	0	117	**88**	6	134	1	**99**	0	134	1	**99**		134		**0**
	Left-Through		0							0				0					
	Through	0	0	88	0	0	88	0	0	0	99	0	0	0	99		0		0
	Through-Right		0							0				0					
	Right	58	0	0	0	58	0	0	63	0	0	0	63	0	0		63		0
	Left-Through-Right		1							1				1					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		1034	*North-South:*		1040	*North-South:*			1174	*North-South:*			1180	*North-South:*			0
		East-West:		88	*East-West:*		88	*East-West:*			99	*East-West:*			99	*East-West:*			0
		SUM:		1122	*SUM:*		1128	*SUM:*			1273	*SUM:*			1279	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.748			0.752				0.849				0.853				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.648**			**0.652**				**0.749**				**0.753**				0.000
	LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.749
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (NORTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
2	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0
	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	2316	3	**772**	3	2319	**773**	111	2644	3	**881**	3	2647	3	**882**	0	2647	3	**882**
	Through-Right		0							0				0				0	
	Right	148	1	0	0	148	0	14	176	1	0	0	176	1	0	0	176	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	68	1	**68**	4	72	**72**	0	74	1	**74**	4	78	1	**78**	-1	77	1	**77**
	Left-Through		0							0				0				0	
	Through	2390	3	797	1	2391	797	150	2764	3	921	1	2765	3	922	0	2765	3	922
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	634	2	**349**	0	634	**349**	46	739	2	**406**	0	739	2	**406**	0	739	2	**406**
	Left-Through		0							0				0				0	
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through-Right		0							0				0				0	
	Right	58	1	0	15	73	1	1	64	1	0	15	79	1	1	-2	77	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	840		*North-South:*	845		*North-South:*		955		*North-South:*		960		*North-South:*		959
			East-West:	349		*East-West:*	349		*East-West:*		406		*East-West:*		406		*East-West:*		406
			SUM:	1189		*SUM:*	1194		*SUM:*		1361		*SUM:*		1366		*SUM:*		1365
	VOLUME/CAPACITY *(V/C)* RATIO:			0.834			0.838				0.955				0.959				0.958
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.734			0.738				0.855				0.859		*With Imp.+TDM*		0.858
	LEVEL OF SERVICE (LOS):			C			C				D				D				D

REMARKS:

With Imp.+TDM+Signal Imp. 0.848 D

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.004 — Δ*v/c* after mitigation: -0.007

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (NORTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
2	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB-- 0	NB--	3	SB--	0
	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB-- 3	EB--	0	WB--	3
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	2847	3	**949**	2	2849	**950**	166	3280	3	**1093**	2	3282	3	**1094**	0	3282	3	**1094**
	Through-Right		0							0				0				0	
	Right	333	1	104	0	333	104	30	394	1	117	0	394	1	117	0	394	1	117
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	152	1	**152**	16	168	**168**	0	166	1	**166**	16	182	1	**182**	-2	180	1	**180**
	Left-Through		0							0				0				0	
	Through	2243	3	748	3	2246	749	162	2615	3	872	3	2618	3	873	0	2618	3	873
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	417	2	**229**	0	417	**229**	47	503	2	**277**	0	503	2	**277**	0	503	2	**277**
	Left-Through		0							0				0				0	
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through-Right		0							0				0				0	
	Right	219	1	67	9	228	60	1	241	1	75	9	250	1	68	-1	249	1	69
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		1101	*North-South:*		1118	*North-South:*			1259	*North-South:*			1276	*North-South:*			1274
		East-West:		229	*East-West:*		229	*East-West:*			277	*East-West:*			277	*East-West:*			277
		SUM:		1330	*SUM:*		1347	*SUM:*			1536	*SUM:*			1553	*SUM:*			1551
VOLUME/CAPACITY *(V/C)* RATIO:				0.933			0.945				1.078				1.090				1.088
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.833			0.845				0.978				0.990	*With Imp.+TDM*			0.988
LEVEL OF SERVICE (LOS):				D			D				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.978 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.012 — Δ*v/c* after mitigation: 0.000

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (SOUTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
3	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2				2				2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0				0				0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	3	NB-- 0	SB--	3	NB-- 0	SB--		3	NB-- 0	SB--		3	NB--	SB--		
	EB-- 0	WB--	1	EB-- 0	WB--	1	EB-- 0	WB--		1	EB-- 0	WB--		1	EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				
Override Capacity			0			0				0				0				

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	7	7	**0**	30	30	0	**0**	7	37	0	**0**		37		**0**
	Left-Through		0							0				0					
	Through	1489	2	502	3	1492	503	120	1748	2	589	3	1751	2	590		1751		0
	Through-Right		1							1				1					
	Right	16	0	16	0	16	16	2	19	0	19	0	19	0	19		19		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	2087	3	696	1	2088	696	176	2459	3	**820**	1	2460	3	**820**		2460		**0**
	Through-Right		0							0				0					
	Right	1286	1	**712**	0	1286	**712**	13	1419	1	788	0	1419	1	788		1419		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	1136	1	**574**	0	1136	**574**	5	1247	1	**631**	0	1247	1	**631**		1247		0
	Left-Through		1							1				1					
	Through	12	0	574	0	12	574	1	14	0	631	0	14	0	631		14		**0**
	Through-Right		0							0				0					
	Right	49	1	49	2	51	51	32	86	1	86	2	88	1	88		88		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	8	1	**8**	0	8	**8**	0	9	1	**9**	0	9	1	**9**		9		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		712	*North-South:*		712	*North-South:*			820	*North-South:*			820	*North-South:*			0
		East-West:		582	*East-West:*		582	*East-West:*			640	*East-West:*			640	*East-West:*			0
		SUM:		1294	*SUM:*		1294	*SUM:*			1460	*SUM:*			1460	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.863			0.863				0.973				0.973				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.763**			**0.763**				**0.873**				**0.873**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**D**				**D**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.000	Δ*v/c* after mitigation:	-0.873
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE (SOUTH)	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
3	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2			2			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0			0			
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	3	NB-- 0	SB--	3	NB-- 0	SB--	3		NB-- 0	SB--	3		NB--	SB--		
	EB-- 0	WB--	1	EB-- 0	WB--	1	EB-- 0	WB--	1		EB-- 0	WB--	1		EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	6	6	0	42	42	0	0	6	48	0	0		48		**0**
	Left-Through		0							0				0					
	Through	1690	2	**567**	2	1692	**568**	180	2028	2	**681**	2	2030	2	**681**		2030		0
	Through-Right		1							1				1					
	Right	11	0	11	0	11	11	2	14	0	14	0	14	0	14		14		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
	Left-Through		0							0				0					
	Through	1678	3	559	3	1681	560	186	2021	3	674	3	2024	3	675		2024		**0**
	Through-Right		0							0				0					
	Right	1206	1	544	0	1206	544	15	1334	1	602	0	1334	1	602		1334		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	1306	1	**662**	0	1306	**662**	15	1443	1	**732**	0	1443	1	**732**		1443		0
	Left-Through		1							1				1					
	Through	18	0	662	0	18	662	1	21	0	732	0	21	0	732		21		**0**
	Through-Right		0							0				0					
	Right	81	1	81	8	89	89	45	134	1	134	8	142	1	142		142		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	37	1	**37**	0	37	**37**	0	40	1	**40**	0	40	1	**40**		40		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		567	*North-South:*		568	*North-South:*			681	*North-South:*			681	*North-South:*			0
		East-West:		699	*East-West:*		699	*East-West:*			772	*East-West:*			772	*East-West:*			0
		SUM:		1266	*SUM:*		1267	*SUM:*			1453	*SUM:*			1453	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.844			0.845				0.969				0.969				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.744**			**0.745**				**0.869**				**0.869**				0.000
LEVEL OF SERVICE (LOS):				C			C				D				D				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.000 — Δ*v/c* after mitigation: -0.869

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
4	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	19	1	**19**	0	19	**19**	10	31	1	**31**	0	31	1	**31**	0	31	1	**31**
	Left-Through		0							0				0				0	
	Through	663	2	332	10	673	337	32	757	2	379	10	767	2	384	-1	766	2	383
	Through-Right		0							0				0				0	
	Right	39	1	0	0	39	0	14	57	1	0	0	57	1	0	0	57	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	110	1	110	-1	109	109	3	123	1	123	-1	122	1	122	0	122	1	122
	Left-Through		0							0				0				0	
	Through	1194	1	**637**	5	1199	**639**	54	1360	1	**724**	5	1365	1	**726**	-1	1364	1	**726**
	Through-Right		1							1				1				1	
	Right	79	0	79	0	79	79	1	87	0	87	0	87	0	87	0	87	0	87
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	177	1	**177**	0	177	**177**	0	194	1	**194**	0	194	1	**194**	0	194	1	**194**
	Left-Through		0							0				0				0	
	Through	245	0	307	4	249	311	18	286	0	357	4	290	0	361	-1	289	0	360
	Through-Right		1							1				1				1	
	Right	62	0	0	0	62	0	3	71	0	0	0	71	0	0	0	71	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	156	1	156	0	156	156	10	181	1	181	0	181	1	181	0	181	1	181
	Left-Through		0							0				0				0	
	Through	567	1	**567**	15	582	**582**	31	651	1	**651**	15	666	1	**666**	-2	664	1	**664**
	Through-Right		0							0				0				0	
	Right	166	1	111	0	166	112	7	189	1	128	0	189	1	128	0	189	1	128
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		656	*North-South:*		658	*North-South:*			755	*North-South:*			757	*North-South:*			757
		East-West:		744	*East-West:*		759	*East-West:*			845	*East-West:*			860	*East-West:*			858
		SUM:		1400	*SUM:*		1417	*SUM:*			1600	*SUM:*			1617	*SUM:*			1615
	VOLUME/CAPACITY *(V/C)* RATIO:			0.933			0.945				1.067				1.078				1.077
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.833			0.845				0.967				0.978	*With Imp.+TDM*			0.977
	LEVEL OF SERVICE (LOS):			D			D				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.967 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.011 — Δ*v/c* after mitigation: 0.000

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
4	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	2	EB--	0	WB--	2	EB--	0	WB--	2	EB--	0	WB--	2	EB--	0	WB--	2
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	67	1	67	0	67	67	12	85	1	85	0	85	1	85	0	85	1	85
	Left-Through		0							0				0				0	
	Through	1433	2	**717**	11	1444	**722**	70	1637	2	**819**	11	1648	2	**824**	-2	1646	2	**823**
	Through-Right		0							0				0				0	
	Right	89	1	36	0	89	36	15	112	1	43	0	112	1	43	0	112	1	43
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	112	1	**112**	0	112	**112**	9	131	1	**131**	0	131	1	**131**	0	131	1	**131**
	Left-Through		0							0				0				0	
	Through	560	1	295	18	578	304	54	666	1	350	18	684	1	359	-3	681	1	358
	Through-Right		1							1				1				1	
	Right	30	0	30	0	30	30	1	34	0	34	0	34	0	34	0	34	0	34
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	196	1	**196**	0	196	**196**	0	214	1	**214**	0	214	1	**214**	0	214	1	**214**
	Left-Through		0							0				0				0	
	Through	495	1	279	17	512	287	26	567	1	322	17	584	1	331	-3	581	1	329
	Through-Right		1							1				1				1	
	Right	62	0	62	0	62	62	9	77	0	77	0	77	0	77	0	77	0	77
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	106	1	106	0	106	106	22	138	1	138	0	138	1	138	0	138	1	138
	Left-Through		0							0				0				0	
	Through	557	1	**557**	9	566	**566**	33	642	1	**642**	9	651	1	**651**	-1	650	1	**650**
	Through-Right		0							0				0				0	
	Right	474	1	474	-1	473	473	7	525	1	525	-1	524	1	524	0	524	1	524
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		829	*North-South:*		834	*North-South:*			950	*North-South:*			955	*North-South:*			954
		East-West:		753	*East-West:*		762	*East-West:*			856	*East-West:*			865	*East-West:*			864
		SUM:		1582	*SUM:*		1596	*SUM:*			1806	*SUM:*			1820	*SUM:*			1818
	VOLUME/CAPACITY *(V/C)* RATIO:			1.055			1.064				1.204				1.213				1.212
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.955			0.964				1.104				1.113	*With Imp.+TDM*			1.112
	LEVEL OF SERVICE (LOS):			E			E				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.102 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — Δ*v/c* after mitigation: -0.002

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE ST.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
5	East-West Street:	FRANKLIN AVE./US-101 FWY. SB OFF	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3							
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0							
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	1	WB-- 3	EB--	1	WB-- 3	EB--	1	WB-- 3	EB--	1	WB-- 3	EB--	1	WB-- 3	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	133	1	133	15	148	148	9	154	1	154	15	169	1	169		169		0
	Through-Right		1							1				1					
	Right	266	0	**266**	3	269	**269**	1	292	0	**292**	3	295	0	**295**		295		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	340	2	**187**	0	340	**187**	31	403	2	**222**	0	403	2	**222**		403		0
	Left-Through		0							0				0					
	Through	58	1	58	4	62	62	2	65	1	65	4	69	1	69		69		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	227	1	**227**	0	227	**227**	0	248	1	**248**	0	248	1	**248**		248		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	736	2	218	0	736	218	40	845	2	243	0	845	2	243		845		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		453	North-South:		456	North-South:			514	North-South:			517	North-South:			0
		East-West:		227	East-West:		227	East-West:			248	East-West:			248	East-West:			0
		SUM:		680	SUM:		683	SUM:			762	SUM:			765	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.477			0.479				0.535				0.537				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.377**			**0.379**				**0.435**				**0.437**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.435
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE ST.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
5	East-West Street:	FRANKLIN AVE./US-101 FWY. SB OFF	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0		NB-- 0	SB-- 0	0		NB--	SB--		
	EB-- 1	WB-- 3	3	EB-- 1	WB-- 3	3	EB-- 1	WB-- 3	3		EB-- 1	WB-- 3	3		EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
	Left-Through		0							0				0					
	Through	383	1	383	8	391	391	7	426	1	426	8	434	1	434		434		0
	Through-Right		1							1				1					
	Right	394	0	**394**	2	396	**396**	3	434	0	**434**	2	436	0	**436**		436		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	600	2	**330**	0	600	**330**	46	702	2	**386**	0	702	2	**386**		702		0
	Left-Through		0							0				0					
	Through	64	1	64	16	80	80	5	75	1	75	16	91	1	91		91		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	314	1	**314**	0	314	**314**	0	343	1	**343**	0	343	1	**343**		343		**0**
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	712	2	62	0	712	62	54	833	2	72	0	833	2	72		833		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		724	North-South:		726	North-South:			820	North-South:			822	North-South:			0
		East-West:		314	East-West:		314	East-West:			343	East-West:			343	East-West:			0
		SUM:		1038	SUM:		1040	SUM:			1163	SUM:			1165	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.728			0.730				0.816				0.818				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.628**			**0.630**				**0.716**				**0.718**				0.000
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.716
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVE.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
6	East-West Street:	FRANKLIN AVE./US-101 FWY. NB ON-	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	165	1	**97**	19	184	**108**	179	359	1	**199**	19	378	1	**211**		378		**0**
Left-Through		1							1				1					
Through	28	0	97	4	32	108	8	39	0	199	4	43	0	211		43		0
Through-Right		0							0				0					
Right	36	1	0	9	45	0	14	53	1	0	9	62	1	0		62		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	76	1	76	0	76	76	0	83	1	83	0	83	1	83		83		0
Left-Through		0							0				0					
Through	128	1	**111**	0	128	**111**	15	155	1	**129**	0	155	1	**129**		155		**0**
Through-Right		1							1				1					
Right	94	0	94	0	94	94	0	103	0	103	0	103	0	103		103		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	188	1	**188**	0	188	**188**	0	206	1	**206**	0	206	1	**206**		206		0
Left-Through		0							0				0					
Through	525	2	263	3	528	264	24	598	2	299	3	601	2	301		601		**0**
Through-Right		0							0				0					
Right	120	1	72	0	120	66	8	139	1	40	0	139	1	34		139		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	171	1	171	7	178	178	20	207	1	207	7	214	1	214		214		**0**
Left-Through		0							0				0					
Through	731	1	**662**	0	731	**662**	31	830	1	**778**	0	830	1	**778**		830		0
Through-Right		1							1				1					
Right	593	0	593	0	593	593	76	725	0	725	0	725	0	725		725		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		208	*North-South:*		219	*North-South:*			328	*North-South:*			340	*North-South:*			0
	East-West:		850	*East-West:*		850	*East-West:*			984	*East-West:*			984	*East-West:*			0
	SUM:		1058	*SUM:*		1069	*SUM:*			1312	*SUM:*			1324	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.769			0.777				0.954				0.963				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.669**			**0.677**				**0.854**				**0.863**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**D**				**D**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	3	0	0	0
Existing Condition				
Existing Plus Project	3	0	0	0
Future Condition W/O Project	3	0	0	0
Future Condition W/ Project	3	0	0	0
Future W/ Project W/ Mitigation				

	Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
No. of Phases	4	4	4	4	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	1	1	1	1	
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — Δ*v/c* after mitigation: -0.854

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVE.	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
6	East-West Street:	FRANKLIN AVE./US-101 FWY. NB ON-	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			4			4				4				4				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1				1				1				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 3 SB-- 0 EB-- 0 WB-- 0			NB-- 3 SB-- 0 EB-- 0 WB-- 0			NB-- 3 SB-- 0 EB-- 0 WB-- 0				NB-- 3 SB-- 0 EB-- 0 WB-- 0				NB-- SB-- EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				
Override Capacity			0			0				0				0				
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	522	1	**289**	13	535	**297**	276	847	1	**463**	13	860	1	**471**		860		**0**
Left-Through		1							1				1					
Through	56	0	289	3	59	297	18	79	0	463	3	82	0	471		82		0
Through-Right		0							0				0					
Right	182	1	65	6	188	43	16	215	1	68	6	221	1	46		221		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	55	1	55	0	55	55	0	60	1	60	0	60	1	60		60		0
Left-Through		0							0				0					
Through	77	1	**61**	6	83	**64**	14	98	1	**74**	6	104	1	**77**		104		**0**
Through-Right		1							1				1					
Right	45	0	45	0	45	45	0	49	0	49	0	49	0	49		49		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	209	1	**209**	0	209	**209**	0	229	1	**229**	0	229	1	**229**		229		0
Left-Through		0							0				0					
Through	1005	2	503	2	1007	504	35	1134	2	567	2	1136	2	568		1136		**0**
Through-Right		0							0				0					
Right	58	1	0	0	58	0	14	77	1	0	0	77	1	0		77		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	117	1	117	28	145	145	19	147	1	147	28	175	1	175		175		**0**
Left-Through		0							0				0					
Through	678	1	**664**	0	678	**664**	41	783	1	783	0	783	1	783		783		0
Through-Right		1							1				1					
Right	649	0	649	0	649	649	158	868	0	**838**	0	868	0	**838**		868		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		350	*North-South:*		361	*North-South:*			537	*North-South:*			548	*North-South:*			0
	East-West:		873	*East-West:*		873	*East-West:*			1067	*East-West:*			1067	*East-West:*			0
	SUM:		1223	*SUM:*		1234	*SUM:*			1604	*SUM:*			1615	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.889			0.897				1.167				1.175				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.789**			**0.797**				**1.067**				**1.075**				0.000
LEVEL OF SERVICE (LOS):			**C**			**C**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-1.067
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
7	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1			1			1			1				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	177	1	106	0	177	106	19	213	1	**126**	0	213	1	**126**		213		**0**
	Left-Through		1							1				1					
	Through	34	0	106	0	34	106	2	39	0	126	0	39	0	126		39		0
	Through-Right		0							0				0					
	Right	244	1	**113**	0	244	**113**	1	268	1	124	0	268	1	124		268		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	39	0	39	0	39	39	0	43	0	43	0	43	0	43		43		0
	Left-Through		0							0				0					
	Through	114	0	**187**	0	114	**187**	0	125	0	**205**	0	125	0	**205**		125		**0**
	Through-Right		0							0				0					
	Right	34	0	0	0	34	0	0	37	0	0	0	37	0	0		37		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	13	1	**13**	0	13	**13**	2	16	1	**16**	0	16	1	**16**		16		0
	Left-Through		0							0				0					
	Through	671	1	371	12	683	377	41	775	1	427	12	787	1	433		787		**0**
	Through-Right		1							1				1					
	Right	71	0	71	0	71	71	0	78	0	78	0	78	0	78		78		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	263	1	263	0	263	263	0	288	1	288	0	288	1	288		288		**0**
	Left-Through		0							0				0					
	Through	1337	1	**671**	7	1344	**674**	53	1515	1	**760**	7	1522	1	**763**		1522		0
	Through-Right		1							1				1					
	Right	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		300	*North-South:*		300	*North-South:*			331	*North-South:*			331	*North-South:*			0
		East-West:		684	*East-West:*		687	*East-West:*			776	*East-West:*			779	*East-West:*			0
		SUM:		984	*SUM:*		987	*SUM:*			1107	*SUM:*			1110	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.691			0.693				0.777				0.779				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.591**			**0.593**				**0.677**				**0.679**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.677
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
7	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			1			1			1			1			1				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	371	1	**259**	0	371	**259**	42	448	1	**305**	0	448	1	**305**		448		**0**
	Left-Through		1							1				1					
	Through	147	0	259	0	147	259	1	162	0	305	0	162	0	305		162		0
	Through-Right		0							0				0					
	Right	354	1	247	0	354	247	2	389	1	272	0	389	1	272		389		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	18	0	18	0	18	18	0	20	0	20	0	20	0	20		20		0
	Left-Through		0							0				0					
	Through	104	0	**152**	0	104	**152**	1	115	0	**168**	0	115	0	**168**		115		**0**
	Through-Right		0							0				0					
	Right	30	0	0	0	30	0	0	33	0	0	0	33	0	0		33		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	12	1	12	0	12	12	1	14	1	14	0	14	1	14		14		0
	Left-Through		0							0				0					
	Through	1108	1	**588**	8	1116	**592**	54	1266	1	**670**	8	1274	1	**674**		1274		**0**
	Through-Right		1							1				1					
	Right	68	0	68	0	68	68	0	74	0	74	0	74	0	74		74		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	215	1	**215**	0	215	**215**	0	235	1	**235**	0	235	1	**235**		235		**0**
	Left-Through		0							0				0					
	Through	984	1	503	28	1012	517	64	1140	1	582	28	1168	1	596		1168		0
	Through-Right		1							1				1					
	Right	21	0	21	0	21	21	0	23	0	23	0	23	0	23		23		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		411	*North-South:*		411	*North-South:*			473	*North-South:*			473	*North-South:*			0
		East-West:		803	*East-West:*		807	*East-West:*			905	*East-West:*			909	*East-West:*			0
		SUM:		1214	*SUM:*		1218	*SUM:*			1378	*SUM:*			1382	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.852			0.855				0.967				0.970				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.752**			**0.755**				**0.867**				**0.870**				0.000
	LEVEL OF SERVICE (LOS):			**C**			**C**				**D**				**D**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.867
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BEACHWOOD DRIVE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
8	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3							
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0							
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	8	0	8	4	12	12	4	13	0	13	4	17	0	17		17		**0**
	Left-Through		0							0				0					
	Through	32	0	**58**	0	32	**62**	0	35	0	**69**	0	35	0	**73**		35		0
	Through-Right		0							0				0					
	Right	18	0	0	0	18	0	1	21	0	0	0	21	0	0		21		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	204	1	**204**	0	204	**204**	0	223	1	**223**	0	223	1	**223**		223		0
	Left-Through		0							0				0					
	Through	0	0	240	0	0	240	0	0	0	262	0	0	0	262		0		**0**
	Through-Right		1							1				1					
	Right	240	0	0	0	240	0	0	262	0	0	0	262	0	0		262		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	110	1	**110**	0	110	**110**	0	120	1	**120**	0	120	1	**120**		120		0
	Left-Through		0							0				0					
	Through	665	1	335	12	677	341	43	770	1	387	12	782	1	393		782		**0**
	Through-Right		1							1				1					
	Right	4	0	4	0	4	4	0	4	0	4	0	4	0	4		4		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	4	1	4	0	4	4	5	9	1	9	0	9	1	9		9		**0**
	Left-Through		0							0				0					
	Through	1321	1	**715**	4	1325	**717**	48	1493	1	**806**	4	1497	1	**808**		1497		0
	Through-Right		1							1				1					
	Right	109	0	109	0	109	109	0	119	0	119	0	119	0	119		119		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		262	North-South:		266	North-South:			292	North-South:			296	North-South:			0
		East-West:		825	East-West:		827	East-West:			926	East-West:			928	East-West:			0
		SUM:		1087	SUM:		1093	SUM:			1218	SUM:			1224	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.763			0.767				0.855				0.859				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.663**			**0.667**				**0.755**				**0.759**				0.000
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.755
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BEACHWOOD DRIVE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
8	East-West Street:	FRANKLIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--	0	SB-- 3	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	22	0	22	14	36	36	5	29	0	29	14	43	0	43		43		**0**
	Left-Through		0							0				0					
	Through	51	0	**111**	0	51	**125**	0	56	0	**131**	0	56	0	**145**		56		0
	Through-Right		0							0				0					
	Right	38	0	0	0	38	0	4	46	0	0	0	46	0	0		46		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	162	1	**162**	0	162	**162**	0	177	1	**177**	0	177	1	**177**		177		0
	Left-Through		0							0				0					
	Through	0	0	182	0	0	182	0	0	0	199	0	0	0	199		0		**0**
	Through-Right		1							1				1					
	Right	182	0	0	0	182	0	0	199	0	0	0	199	0	0		199		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	259	1	**259**	-1	258	**258**	0	283	1	**283**	-1	282	1	**282**		282		0
	Left-Through		0							0				0					
	Through	1254	1	631	8	1262	635	53	1424	1	716	8	1432	1	720		1432		**0**
	Through-Right		1							1				1					
	Right	7	0	7	0	7	7	0	8	0	8	0	8	0	8		8		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	6	1	6	0	6	6	1	8	1	8	0	8	1	8		8		**0**
	Left-Through		0							0				0					
	Through	936	1	**557**	15	951	**565**	60	1084	1	**640**	15	1099	1	**647**		1099		0
	Through-Right		1							1				1					
	Right	178	0	178	0	178	178	0	195	0	195	0	195	0	195		195		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		273	*North-South:*		287	*North-South:*			308	*North-South:*			322	*North-South:*			0
		East-West:		816	*East-West:*		823	*East-West:*			923	*East-West:*			929	*East-West:*			0
		SUM:		1089	*SUM:*		1110	*SUM:*			1231	*SUM:*			1251	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.764			0.779				0.864				0.878				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.664**			**0.679**				**0.764**				**0.778**				0.000
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.014	Δ*v/c* after mitigation:	-0.764
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
9	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	9	1	**9**	0	9	**9**	1	11	1	**11**	0	11	1	**11**		11		**0**
	Left-Through		0							0				0					
	Through	589	1	304	0	589	308	39	683	1	354	0	683	1	358		683		0
	Through-Right		1							1				1					
	Right	18	0	18	8	26	26	4	24	0	24	8	32	0	32		32		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	64	1	64	4	68	68	19	89	1	89	4	93	1	93		93		0
	Left-Through		0							0				0					
	Through	1350	1	**690**	0	1350	**690**	44	1520	1	**777**	0	1520	1	**777**		1520		**0**
	Through-Right		1							1				1					
	Right	29	0	29	0	29	29	1	33	0	33	0	33	0	33		33		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	49	0	49	0	49	49	5	59	0	59	0	59	0	59		59		0
	Left-Through		0							0				0					
	Through	31	0	**93**	2	33	**95**	23	57	0	**133**	2	59	0	**135**		59		**0**
	Through-Right		0							0				0					
	Right	13	0	0	0	13	0	3	17	0	0	0	17	0	0		17		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	29	1	**29**	0	29	**29**	4	36	1	**36**	0	36	1	**36**		36		**0**
	Left-Through		0							0				0					
	Through	35	1	35	7	42	42	11	49	1	49	7	56	1	56		56		0
	Through-Right		0							0				0					
	Right	69	1	37	10	79	45	2	77	1	33	10	87	1	41		87		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		699	*North-South:*		699	*North-South:*			788	*North-South:*			788	*North-South:*			0
		East-West:		122	*East-West:*		124	*East-West:*			169	*East-West:*			171	*East-West:*			0
		SUM:		821	*SUM:*		823	*SUM:*			957	*SUM:*			959	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.547			0.549				0.638				0.639				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.447**			**0.449**				**0.538**				**0.539**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.001	Δ*v/c* after mitigation:	-0.538
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
9	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	46	1	46	0	46	46	4	54	1	54	0	54	1	54		54		**0**
Left-Through		0							0				0					
Through	1236	1	**637**	0	1236	**637**	72	1424	1	**735**	0	1424	1	**735**		1424		0
Through-Right		1							1				1					
Right	37	0	37	0	37	37	6	46	0	46	0	46	0	46		46		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	80	1	**80**	18	98	**98**	28	115	1	**115**	18	133	1	**133**		133		0
Left-Through		0							0				0					
Through	656	1	344	0	656	344	35	752	1	396	0	752	1	396		752		**0**
Through-Right		1							1				1					
Right	31	0	31	0	31	31	5	39	0	39	0	39	0	39		39		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	152	0	**152**	0	152	**152**	3	169	0	**169**	0	169	0	**169**		169		0
Left-Through		0							0				0					
Through	53	0	223	8	61	231	26	84	0	273	8	92	0	281		92		**0**
Through-Right		0							0				0					
Right	18	0	0	0	18	0	0	20	0	0	0	20	0	0		20		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	22	1	22	-1	21	21	4	28	1	28	-1	27	1	27		27		**0**
Left-Through		0							0				0					
Through	58	1	58	6	64	64	23	86	1	86	6	92	1	92		92		0
Through-Right		0							0				0					
Right	246	1	**206**	11	257	**208**	3	272	1	**215**	11	283	1	**217**		283		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		717	*North-South:*		735	*North-South:*			850	*North-South:*			868	*North-South:*			0
	East-West:		358	*East-West:*		360	*East-West:*			384	*East-West:*			386	*East-West:*			0
	SUM:		1075	*SUM:*		1095	*SUM:*			1234	*SUM:*			1254	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.717			0.730				0.823				0.836				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.617**			**0.630**				**0.723**				**0.736**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**C**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			2			2			2			2			2			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			
Override Capacity			0			0			0			0			0			

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.013	Δ*v/c* after mitigation:	-0.723
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
10	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	24	0	24	10	34	34	1	27	0	27	10	37	0	37		37		**0**
Left-Through		0							0				0					
Through	3	0	**75**	0	3	**85**	0	3	0	**82**	0	3	0	**92**		3		0
Through-Right		0							0				0					
Right	48	0	0	0	48	0	0	52	0	0	0	52	0	0		52		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	7	0	**7**	0	7	**7**	0	8	0	**8**	0	8	0	**8**		8		0
Left-Through		0							0				0					
Through	2	0	12	0	2	12	0	2	0	13	0	2	0	13		2		**0**
Through-Right		0							0				0					
Right	3	0	0	0	3	0	0	3	0	0	0	3	0	0		3		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	3	1	3	0	3	3	0	3	1	3	0	3	1	3		3		0
Left-Through		0							0				0					
Through	66	1	**66**	1	67	**67**	27	99	1	**99**	1	100	1	**100**		100		**0**
Through-Right		0							0				0					
Right	34	1	34	18	52	52	18	55	1	55	18	73	1	73		73		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	136	1	**136**	1	137	**137**	0	149	1	**149**	1	150	1	**150**		150		**0**
Left-Through		0							0				0					
Through	112	1	112	8	120	120	16	138	1	138	8	146	1	146		146		0
Through-Right		0							0				0					
Right	16	1	16	0	16	16	0	17	1	17	0	17	1	17		17		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		82	*North-South:*		92	*North-South:*			90	*North-South:*			100	*North-South:*			0
	East-West:		202	*East-West:*		204	*East-West:*			248	*East-West:*			250	*East-West:*			0
	SUM:		284	*SUM:*		296	*SUM:*			338	*SUM:*			350	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.189			0.197				0.225				0.233				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.095**			**0.099**				**0.125**				**0.133**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?				
Override Capacity				

No. of Phases	Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
	2	2	2	2	

	Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.125
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
10	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	82	0	82	20	102	102	0	90	0	90	20	110	0	110		110		**0**
Left-Through		0							0				0					
Through	6	0	**165**	0	6	**187**	0	7	0	**181**	0	7	0	**203**		7		0
Through-Right		0							0				0					
Right	77	0	0	2	79	0	0	84	0	0	2	86	0	0		86		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	4	0	**4**	0	4	**4**	0	4	0	**4**	0	4	0	**4**		4		0
Left-Through		0							0				0					
Through	4	0	19	0	4	19	0	4	0	20	0	4	0	20		4		**0**
Through-Right		0							0				0					
Right	11	0	0	0	11	0	0	12	0	0	0	12	0	0		12		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	12	1	**12**	0	12	**12**	0	13	1	**13**	0	13	1	**13**		13		0
Left-Through		0							0				0					
Through	107	1	107	9	116	116	48	165	1	165	9	174	1	174		174		**0**
Through-Right		0							0				0					
Right	35	1	35	25	60	60	10	48	1	48	25	73	1	73		73		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	30	1	30	2	32	32	0	33	1	33	2	35	1	35		35		**0**
Left-Through		0							0				0					
Through	222	1	**222**	4	226	**226**	35	278	1	**278**	4	282	1	**282**		282		0
Through-Right		0							0				0					
Right	23	1	23	0	23	23	0	25	1	25	0	25	1	25		25		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		169	*North-South:*		191	*North-South:*			185	*North-South:*			207	*North-South:*			0
	East-West:		234	*East-West:*		238	*East-West:*			291	*East-West:*			295	*East-West:*			0
	SUM:		403	*SUM:*		429	*SUM:*			476	*SUM:*			502	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.269			0.286				0.317				0.335				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.169**			**0.186**				**0.217**				**0.235**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--		SB--	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--		WB--	

No. of Phases			2			2				2				2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0				0				0				
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				
Override Capacity			0			0				0				0				

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.018	Δ*v/c* after mitigation:	-0.217
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	43	1	**43**	8	51	**51**	1	48	1	**48**	8	56	1	**56**		56		**0**
	Left-Through		0							0				0					
	Through	354	1	210	20	374	238	7	394	1	239	20	414	1	267		414		0
	Through-Right		1							1				1					
	Right	66	0	66	35	101	101	12	84	0	84	35	119	0	119		119		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	96	1	96	-2	94	94	84	189	1	189	-2	187	1	187		187		0
	Left-Through		0							0				0					
	Through	1148	2	**574**	13	1161	**581**	120	1376	2	**688**	13	1389	2	**695**		1389		**0**
	Through-Right		0							0				0					
	Right	140	1	135	0	140	135	0	153	1	147	0	153	1	147		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	11	1	11	0	11	11	0	12	1	12	0	12	1	12		12		0
	Left-Through		0							0				0					
	Through	58	1	**58**	-1	57	**57**	24	87	1	**87**	-1	86	1	**86**		86		**0**
	Through-Right		0							0				0					
	Right	32	1	11	2	34	9	2	37	1	13	2	39	1	11		39		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	118	1	**118**	10	128	**128**	16	145	1	**145**	10	155	1	**155**		155		**0**
	Left-Through		0							0				0					
	Through	95	2	48	1	96	48	15	119	2	60	1	120	2	60		120		0
	Through-Right		0							0				0					
	Right	6	1	0	0	6	0	3	10	1	0	0	10	1	0		10		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		617	*North-South:*		632	*North-South:*			736	*North-South:*			751	*North-South:*			0
		East-West:		176	*East-West:*		185	*East-West:*			232	*East-West:*			241	*East-West:*			0
		SUM:		793	*SUM:*		817	*SUM:*			968	*SUM:*			992	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.529			0.545				0.645				0.661				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.429**			**0.445**				**0.545**				**0.561**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.016	Δ*v/c* after mitigation:	-0.545
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	165	1	**165**	5	170	**170**	6	186	1	**186**	5	191	1	**191**		191		**0**
Left-Through		0							0				0					
Through	690	1	451	16	706	478	8	763	1	513	16	779	1	540		779		0
Through-Right		1							1				1					
Right	212	0	212	38	250	250	30	262	0	262	38	300	0	300		300		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	38	1	38	-1	37	37	84	126	1	126	-1	125	1	125		125		0
Left-Through		0							0				0					
Through	700	2	**350**	51	751	**376**	163	929	2	**465**	51	980	2	**490**		980		**0**
Through-Right		0							0				0					
Right	36	1	19	0	36	19	0	39	1	21	0	39	1	21		39		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	34	1	34	0	34	34	0	37	1	37	0	37	1	37		37		0
Left-Through		0							0				0					
Through	124	1	**124**	2	126	**126**	39	175	1	**175**	2	177	1	**177**		177		**0**
Through-Right		0							0				0					
Right	51	1	0	9	60	0	8	64	1	0	9	73	1	0		73		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	78	1	**78**	36	114	**114**	10	95	1	**95**	36	131	1	**131**		131		**0**
Left-Through		0							0				0					
Through	87	2	44	0	87	44	29	124	2	62	0	124	2	62		124		0
Through-Right		0							0				0					
Right	11	1	0	-1	10	0	2	14	1	0	-1	13	1	0		13		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		515	*North-South:*		546	*North-South:*			651	*North-South:*			681	*North-South:*			0
	East-West:		202	*East-West:*		240	*East-West:*			270	*East-West:*			308	*East-West:*			0
	SUM:		717	*SUM:*		786	*SUM:*			921	*SUM:*			989	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.478			0.524				0.614				0.659				0.000
***V/C* LESS ATSAC/ATCS ADJUSTMENT:**			**0.378**			**0.424**				**0.514**				**0.559**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

No. of Phases	2	2	2	2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- SB-- EB-- WB--
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.045	Δ*v/c* after mitigation:	-0.514
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
12	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	16	0	**16**	-1	15	**15**	8	25	0	25	-1	24	0	24		24		**0**
Left-Through		1							1				1					
Through	170	0	103	39	209	121	256	442	0	**248**	39	481	0	**266**		481		0
Through-Right		1							1				1					
Right	3	0	103	0	3	121	0	3	0	248	0	3	0	266		3		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	1	0	1	0	1	1	2	3	0	**3**	0	3	0	**3**		3		0
Left-Through		1							1				1					
Through	236	1	**119**	3	239	**120**	52	310	1	158	3	313	1	160		313		**0**
Through-Right		0							0				0					
Right	126	1	0	7	133	0	12	150	1	0	7	157	1	0		157		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	96	1	**96**	37	133	**133**	61	166	1	**166**	37	203	1	**203**		203		0
Left-Through		0							0				0					
Through	40	1	40	0	40	40	9	53	1	53	0	53	1	53		53		**0**
Through-Right		0							0				0					
Right	73	1	73	0	73	73	81	161	1	161	0	161	1	161		161		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	15	1	15	6	21	21	26	42	1	42	6	48	1	48		48		**0**
Left-Through		0							0				0					
Through	59	0	**86**	0	59	**86**	3	68	0	**117**	0	68	0	**117**		68		0
Through-Right		1							1				1					
Right	27	0	0	0	27	0	19	49	0	0	0	49	0	0		49		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		135	*North-South:*		135	*North-South:*			251	*North-South:*			269	*North-South:*			0
	East-West:		182	*East-West:*		219	*East-West:*			283	*East-West:*			320	*East-West:*			0
	SUM:		317	*SUM:*		354	*SUM:*			534	*SUM:*			589	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.211			0.236				0.356				0.393				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.111**			**0.136**				**0.256**				**0.293**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--	NB--	SB--	EB--	WB--
No. of Phases			2				2				2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0				0				0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	0				
ATSAC-1 or ATSAC+ATCS-2?			2				2				2				2					
Override Capacity			0				0				0				0					

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.037 — Δ*v/c* after mitigation: -0.256

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
12	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	44	0	44	-1	43	43	17	65	0	65	-1	64	0	64		64		**0**
Left-Through		1							1				1					
Through	536	0	**294**	18	554	**303**	375	961	0	**520**	18	979	0	**560**		979		0
Through-Right		1							1				1					
Right	8	0	294	0	8	303	4	13	0	520	0	13	0	560		13		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	12	0	**12**	0	12	**12**	3	16	0	**16**	0	16	0	**16**		16		0
Left-Through		1							1				1					
Through	100	1	62	10	110	67	57	166	1	115	10	176	1	120		176		**0**
Through-Right		0							0				0					
Right	80	1	0	33	113	0	15	102	1	0	33	135	1	0		135		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	216	1	**216**	38	254	**254**	54	290	1	**290**	38	328	1	**328**		328		0
Left-Through		0							0				0					
Through	73	1	73	-1	72	72	3	83	1	83	-1	82	1	82		82		**0**
Through-Right		0							0				0					
Right	78	1	78	-2	76	76	89	174	1	174	-2	172	1	172		172		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	4	1	4	20	24	24	35	39	1	39	20	59	1	59		59		**0**
Left-Through		0							0				0					
Through	36	0	**78**	9	45	**87**	20	59	0	**123**	9	68	0	**132**		68		0
Through-Right		1							1				1					
Right	42	0	0	0	42	0	18	64	0	0	0	64	0	0		64		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		306	*North-South:*		315	*North-South:*			536	*North-South:*			576	*North-South:*			0
	East-West:		294	*East-West:*		341	*East-West:*			413	*East-West:*			460	*East-West:*			0
	SUM:		600	*SUM:*		656	*SUM:*			949	*SUM:*			1036	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.400			0.437				0.633				0.691				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.300**			**0.337**				**0.533**				**0.591**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 1 EB-- 0 WB-- 0	NB-- 0 SB-- 1 EB-- 0 WB-- 0	NB-- 0 SB-- 1 EB-- 0 WB-- 0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2
Override Capacity	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.058	Δ*v/c* after mitigation:	-0.533
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	FULLER AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
13	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	29	0	**29**	0	29	**29**	0	32	0	**32**	0	32	0	**32**		32		**0**
	Left-Through		0							0				0					
	Through	49	0	123	0	49	123	0	54	0	135	0	54	0	135		54		0
	Through-Right		0							0				0					
	Right	45	0	0	0	45	0	0	49	0	0	0	49	0	0		49		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
	Left-Through		0							0				0					
	Through	54	0	**172**	0	54	**172**	0	59	0	**188**	0	59	0	**188**		59		**0**
	Through-Right		0							0				0					
	Right	87	0	0	0	87	0	0	95	0	0	0	95	0	0		95		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	43	1	**43**	0	43	**43**	0	47	1	**47**	0	47	1	**47**		47		0
	Left-Through		0							0				0					
	Through	788	1	423	3	791	424	279	1141	1	602	3	1144	1	603		1144		**0**
	Through-Right		1							1				1					
	Right	57	0	57	0	57	57	0	62	0	62	0	62	0	62		62		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	55	1	55	0	55	55	0	60	1	60	0	60	1	60		60		**0**
	Left-Through		0							0				0					
	Through	1332	2	**666**	12	1344	**672**	234	1691	2	**846**	12	1703	2	**852**		1703		0
	Through-Right		0							0				0					
	Right	30	1	30	0	30	30	0	33	1	33	0	33	1	33		33		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		201	*North-South:*		201	*North-South:*			220	*North-South:*			220	*North-South:*			0
		East-West:		709	*East-West:*		715	*East-West:*			893	*East-West:*			899	*East-West:*			0
		SUM:		910	*SUM:*		916	*SUM:*			1113	*SUM:*			1119	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.607			0.611				0.742				0.746				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.507**			**0.511**				**0.642**				**0.646**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.642
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	FULLER AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
13	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	42	0	42	0	42	42	0	46	0	46	0	46	0	46		46		**0**
Left-Through		0							0				0					
Through	141	0	**222**	0	141	**222**	0	154	0	**243**	0	154	0	**243**		154		0
Through-Right		0							0				0					
Right	39	0	0	0	39	0	0	43	0	0	0	43	0	0		43		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	42	0	**42**	0	42	**42**	0	46	0	**46**	0	46	0	**46**		46		0
Left-Through		0							0				0					
Through	64	0	146	0	64	146	0	70	0	160	0	70	0	160		70		**0**
Through-Right		0							0				0					
Right	40	0	0	0	40	0	0	44	0	0	0	44	0	0		44		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	82	1	**82**	0	82	**82**	0	90	1	**90**	0	90	1	**90**		90		0
Left-Through		0							0				0					
Through	924	1	478	14	938	485	321	1332	1	683	14	1346	1	690		1346		**0**
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	40	1	40	0	40	40	0	44	1	44	0	44	1	44		44		**0**
Left-Through		0							0				0					
Through	882	2	**441**	7	889	**445**	332	1297	2	**649**	7	1304	2	**652**		1304		0
Through-Right		0							0				0					
Right	45	1	45	0	45	45	0	49	1	49	0	49	1	49		49		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		264	*North-South:*		264	*North-South:*			289	*North-South:*			289	*North-South:*			0
	East-West:		523	*East-West:*		527	*East-West:*			739	*East-West:*			742	*East-West:*			0
	SUM:		787	*SUM:*		791	*SUM:*			1028	*SUM:*			1031	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.525			0.527				0.685				0.687				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.425**			**0.427**				**0.585**				**0.587**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2
Override Capacity	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.585
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	LA BREA AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
14	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	76	1	**76**	0	76	**76**	0	83	1	**83**	0	83	1	**83**		83		**0**
	Left-Through		0							0				0					
	Through	750	1	382	0	750	383	48	868	1	460	0	868	1	461		868		0
	Through-Right		1							1				1					
	Right	13	0	13	2	15	15	38	52	0	52	2	54	0	54		54		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	33	1	33	1	34	34	5	41	1	41	1	42	1	42		42		0
	Left-Through		0							0				0					
	Through	798	1	**669**	0	798	**669**	67	940	1	**765**	0	940	1	**765**		940		**0**
	Through-Right		1							1				1					
	Right	539	0	539	0	539	539	0	589	0	589	0	589	0	589		589		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	284	1	**284**	0	284	**284**	0	311	1	311	0	311	1	**311**		311		0
	Left-Through		0							0				0					
	Through	570	1	335	3	573	337	279	902	1	**506**	3	905	1	507		905		**0**
	Through-Right		1							1				1					
	Right	100	0	100	0	100	100	0	109	0	109	0	109	0	109		109		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	290	1	290	6	296	296	37	354	1	**354**	6	360	1	360		360		**0**
	Left-Through		0							0				0					
	Through	766	1	**393**	12	778	**401**	234	1072	1	549	12	1084	1	**557**		1084		0
	Through-Right		1							1				1					
	Right	20	0	20	3	23	23	4	26	0	26	3	29	0	29		29		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		745	*North-South:*		745	*North-South:*			848	*North-South:*			848		*North-South:*		0
		East-West:		677	*East-West:*		685	*East-West:*			860	*East-West:*			868		*East-West:*		0
		SUM:		1422	*SUM:*		1430	*SUM:*			1708	*SUM:*			1716		*SUM:*		0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.998			1.004				1.199				1.204				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.898**			**0.904**				**1.099**				**1.104**				0.000
	LEVEL OF SERVICE (LOS):			**D**			**E**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-1.099
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	LA BREA AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
14	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3				3				3				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0				0				0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--		0	NB-- 0	SB--		0	NB--	SB--		
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--		0	EB-- 0	WB--		0	EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2				2				2				
Override Capacity			0			0				0				0				

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	114	1	**114**	0	114	**114**	0	125	1	**125**	0	125	1	**125**		125		**0**
	Left-Through		0							0				0					
	Through	906	1	468	0	906	471	82	1073	1	582	0	1073	1	586		1073		0
	Through-Right		1							1				1					
	Right	29	0	29	7	36	36	59	91	0	91	7	98	0	98		98		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	37	1	37	3	40	40	6	46	1	46	3	49	1	49		49		0
	Left-Through		0							0				0					
	Through	740	1	**602**	0	740	**602**	67	876	1	**692**	0	876	1	**692**		876		**0**
	Through-Right		1							1				1					
	Right	464	0	464	0	464	464	0	507	0	507	0	507	0	507		507		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	336	1	336	0	336	336	0	367	1	367	0	367	1	367		367		0
	Left-Through		0							0				0					
	Through	628	1	**364**	14	642	**371**	321	1008	1	**559**	14	1022	1	**566**		1022		**0**
	Through-Right		1							1				1					
	Right	100	0	100	0	100	100	0	109	0	109	0	109	0	109		109		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	113	1	**113**	4	117	**117**	44	168	1	**168**	4	172	1	**172**		172		**0**
	Left-Through		0							0				0					
	Through	120	1	70	7	127	75	332	463	1	246	7	470	1	250		470		0
	Through-Right		1							1				1					
	Right	20	0	20	2	22	22	6	28	0	28	2	30	0	30		30		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		716	*North-South:*		716	*North-South:*			817	*North-South:*			817	*North-South:*			0
		East-West:		477	*East-West:*		488	*East-West:*			727	*East-West:*			738	*East-West:*			0
		SUM:		1193	*SUM:*		1204	*SUM:*			1544	*SUM:*			1555	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.837			0.845				1.084				1.091				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.737**			**0.745**				**0.984**				**0.991**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.007	Δ*v/c* after mitigation:	-0.984
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
15	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	21	1	**21**	0	21	**21**	11	34	1	**34**	0	34	1	**34**	0	34	1	**34**
	Left-Through		0							0				0				0	
	Through	1459	2	504	0	1459	504	126	1722	2	611	0	1722	2	611	0	1722	2	611
	Through-Right		1							1				1				1	
	Right	52	0	52	2	54	54	53	110	0	110	2	112	0	112	0	112	0	112
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	53	1	53	1	54	54	63	121	1	121	1	122	1	122	0	122	1	122
	Left-Through		0							0				0				0	
	Through	1617	2	**604**	0	1617	**604**	212	1980	2	**743**	0	1980	2	**743**	0	1980	2	**743**
	Through-Right		1							1				1				1	
	Right	196	0	196	0	196	196	35	249	0	249	0	249	0	249	0	249	0	249
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	155	1	**155**	0	155	**155**	12	182	1	**182**	0	182	1	**182**	0	182	1	**182**
	Left-Through		0							0				0				0	
	Through	434	2	217	6	440	220	236	711	2	356	6	717	2	359	-1	716	2	358
	Through-Right		0							0				0				0	
	Right	59	1	49	0	59	49	24	89	1	72	0	89	1	72	0	89	1	72
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	179	1	179	6	185	185	57	253	1	253	6	259	1	259	-1	258	1	258
	Left-Through		0							0				0				0	
	Through	743	2	**372**	21	764	**382**	206	1019	2	**510**	21	1040	2	**520**	-3	1037	2	**519**
	Through-Right		0							0				0				0	
	Right	132	1	106	3	135	108	42	186	1	126	3	189	1	128	0	189	1	128
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		625	*North-South:*		625	*North-South:*			777	*North-South:*			777	*North-South:*			777
		East-West:		527	*East-West:*		537	*East-West:*			692	*East-West:*			702	*East-West:*			701
		SUM:		1152	*SUM:*		1162	*SUM:*			1469	*SUM:*			1479	*SUM:*			1478
VOLUME/CAPACITY *(V/C)* RATIO:				0.808			0.815				1.031				1.038				1.037
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.708			0.715				0.931				0.938				0.937
LEVEL OF SERVICE (LOS):				C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.927 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.007 — Δ*v/c* after mitigation: -0.004

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
15	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	88	1	88	0	88	88	28	124	1	124	0	124	1	124	0	124	1	124
	Left-Through		0							0				0				0	
	Through	1738	2	**614**	0	1738	**616**	240	2141	2	**801**	0	2141	2	**803**	0	2141	2	**803**
	Through-Right		1							1				1				1	
	Right	104	0	104	7	111	111	148	262	0	262	7	269	0	269	-1	268	0	268
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	72	1	**72**	3	75	**75**	76	155	1	**155**	3	158	1	**158**	0	158	1	**158**
	Left-Through		0							0				0				0	
	Through	1293	2	500	0	1293	500	198	1612	2	621	0	1612	2	621	0	1612	2	621
	Through-Right		1							1				1				1	
	Right	207	0	207	0	207	207	24	250	0	250	0	250	0	250	0	250	0	250
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	240	1	240	0	240	240	35	297	1	297	0	297	1	297	0	297	1	297
	Left-Through		0							0				0				0	
	Through	840	2	**420**	23	863	**432**	290	1209	2	**605**	23	1232	2	**616**	-3	1229	2	**615**
	Through-Right		0							0				0				0	
	Right	103	1	59	0	103	59	24	137	1	75	0	137	1	75	0	137	1	75
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	92	1	**92**	4	96	**96**	57	158	1	**158**	4	162	1	**162**	-1	161	1	**161**
	Left-Through		0							0				0				0	
	Through	502	2	251	13	515	258	277	826	2	413	13	839	2	420	-2	837	2	419
	Through-Right		0							0				0				0	
	Right	97	1	61	2	99	62	53	159	1	82	2	161	1	82	0	161	1	82
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		686	North-South:		691	North-South:			956	North-South:			961	North-South:			961
		East-West:		512	East-West:		528	East-West:			763	East-West:			778	East-West:			776
		SUM:		1198	SUM:		1219	SUM:			1719	SUM:			1739	SUM:			1737
	VOLUME/CAPACITY (V/C) RATIO:			0.841			0.855				1.206				1.220				1.219
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.741			0.755				1.106				1.120	With Imp.+TDM			1.119
	LEVEL OF SERVICE (LOS):			C			C				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.109 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.014 — Δ*v/c* after mitigation: 0.003

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
16	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	18	0	**18**	0	18	**18**	34	54	0	**54**	0	54	0	**54**	0	54	0	**54**
	Left-Through		1							1				1				1	
	Through	569	0	350	4	573	354	15	637	0	512	4	641	0	516	-1	640	0	515
	Through-Right		1							1				1				1	
	Right	23	0	350	3	26	354	38	63	0	512	3	66	0	516	0	66	0	515
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	25	0	25	0	25	25	12	39	0	39	0	39	0	39	0	39	0	39
	Left-Through		1							1				1				1	
	Through	1146	0	**689**	0	1146	**689**	25	1278	0	**825**	0	1278	0	**825**	0	1278	0	**825**
	Through-Right		1							1				1				1	
	Right	182	0	689	0	182	689	17	216	0	825	0	216	0	825	0	216	0	825
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	48	1	**48**	4	52	**52**	17	69	1	**69**	4	73	1	**73**	-1	72	1	**72**
	Left-Through		0							0				0				0	
	Through	473	2	237	3	476	238	292	809	2	405	3	812	2	406	0	812	2	406
	Through-Right		0							0				0				0	
	Right	28	1	28	0	28	28	26	57	1	57	0	57	1	57	0	57	1	57
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	50	1	50	29	79	79	35	90	1	90	29	119	1	119	-4	115	1	115
	Left-Through		0							0				0				0	
	Through	888	2	**444**	30	918	**459**	274	1245	2	**623**	30	1275	2	**638**	-4	1271	2	**636**
	Through-Right		0							0				0				0	
	Right	33	1	33	0	33	33	17	53	1	53	0	53	1	53	0	53	1	53
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		707	*North-South:*		707	*North-South:*			879	*North-South:*			879	*North-South:*			879
		East-West:		492	*East-West:*		511	*East-West:*			692	*East-West:*			711	*East-West:*			708
		SUM:		1199	*SUM:*		1218	*SUM:*			1571	*SUM:*			1590	*SUM:*			1587
VOLUME/CAPACITY *(V/C)* RATIO:				0.841			0.855				1.102				1.116				1.114
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.741			0.755				1.002				1.016				1.014
LEVEL OF SERVICE (LOS):				C			C				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.004 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.014 — Δ*v/c* after mitigation: 0.002

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
16	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	3	0	3	0	3	3	0	3	0	3	0	3	0	3	0	3	0	3
	Left-Through		1							1				1				1	
	Through	1133	0	**611**	0	1133	**626**	41	1280	0	**709**	0	1280	0	**724**	0	1280	0	**722**
	Through-Right		1							1				1				1	
	Right	77	0	611	30	107	626	41	125	0	709	30	155	0	724	-4	151	0	722
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	3	0	**3**	0	3	**3**	0	3	0	**3**	0	3	0	**3**	0	3	0	**3**
	Left-Through		1							1				1				1	
	Through	637	0	374	-1	636	374	10	707	0	428	-1	706	0	428	0	706	0	428
	Through-Right		1							1				1				1	
	Right	93	0	374	0	93	374	29	131	0	428	0	131	0	428	0	131	0	428
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	125	1	125	0	125	125	21	158	1	158	0	158	1	158	0	158	1	158
	Left-Through		0							0				0				0	
	Through	955	2	**478**	35	990	**495**	333	1377	2	**689**	35	1412	2	**706**	-5	1407	2	**704**
	Through-Right		0							0				0				0	
	Right	52	1	52	0	52	52	33	90	1	90	0	90	1	90	0	90	1	90
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	49	1	**49**	16	65	**65**	37	91	1	**91**	16	107	1	**107**	-2	105	1	**105**
	Left-Through		0							0				0				0	
	Through	747	2	374	18	765	383	369	1186	2	593	18	1204	2	602	-3	1201	2	601
	Through-Right		0							0				0				0	
	Right	101	1	101	0	101	101	29	139	1	139	0	139	1	139	0	139	1	139
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		614	North-South:		629	North-South:			712	North-South:			727	North-South:			725
		East-West:		527	East-West:		560	East-West:			780	East-West:			813	East-West:			809
		SUM:		1141	SUM:		1189	SUM:			1492	SUM:			1540	SUM:			1534
	VOLUME/CAPACITY (V/C) RATIO:			0.801			0.834				1.047				1.081				1.076
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.701			0.734				0.947				0.981	With Imp.+TDM			0.976
	LEVEL OF SERVICE (LOS):			C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.966 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.034 — Δ*v/c* after mitigation: 0.019

Significant impacted? YES — Fully mitigated? NO

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
17	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			2			2			2				2			
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0			
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0			NB-- 0 SB-- 0 EB-- 0 WB-- 0				NB-- 0 SB-- 0 EB-- 0 WB-- 0				NB-- SB-- EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2			
Override Capacity			0			0			0				0			
MOVEMENT	**Volume**	**No. of Lanes**	**Lane Volume**	**Project Traffic**	**Total Volume**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**	**Added Volume**	**Total Volume**	**No. of Lanes**	**Lane Volume**
NORTHBOUND																		
Left	14	0	**14**	0	14	**14**	15	30	0	**30**	0	30	0	**30**		30		**0**
Left-Through		1							1				1					
Through	37	0	51	6	43	57	1	41	0	71	6	47	0	77		47		0
Through-Right		0							0				0					
Right	23	1	0	3	26	2	1	26	1	0	3	29	1	3		29		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	9	0	9	0	9	9	5	15	0	15	0	15	0	15		15		0
Left-Through		0							0				0					
Through	89	0	**141**	16	105	**182**	13	110	0	**172**	16	126	0	**213**		126		**0**
Through-Right		0							0				0					
Right	43	0	0	25	68	0	0	47	0	0	25	72	0	0		72		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		0
Left-Through		0							0				0					
Through	487	2	244	9	496	248	298	831	2	416	9	840	2	420		840		**0**
Through-Right		0							0				0					
Right	24	1	24	0	24	24	26	52	1	52	0	52	1	52		52		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	48	1	48	0	48	48	0	52	1	52	0	52	1	52		52		**0**
Left-Through		0							0				0					
Through	977	1	**514**	33	1010	**530**	312	1381	1	**718**	33	1414	1	**735**		1414		0
Through-Right		1							1				1					
Right	50	0	50	0	50	50	0	55	0	55	0	55	0	55		55		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		155	*North-South:*		196	*North-South:*			202	*North-South:*			243	*North-South:*			0
	East-West:		544	*East-West:*		560	*East-West:*			751	*East-West:*			768	*East-West:*			0
	SUM:		699	*SUM:*		756	*SUM:*			953	*SUM:*			1011	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.466			0.504				0.635				0.674				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.366**			**0.404**				**0.535**				**0.574**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.039	Δ*v/c* after mitigation:	-0.535
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
17	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	31	0	31	0	31	31	28	62	0	62	0	62	0	62		62		**0**
Left-Through		0							0				0					
Through	104	0	**239**	22	126	**270**	6	120	0	**299**	22	142	0	**330**		142		0
Through-Right		0							0				0					
Right	104	0	0	9	113	0	3	117	0	0	9	126	0	0		126		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	12	0	**12**	1	13	**13**	2	15	0	**15**	1	16	0	**16**		16		0
Left-Through		0							0				0					
Through	39	0	73	13	52	106	3	46	0	90	13	59	0	123		59		**0**
Through-Right		0							0				0					
Right	22	0	0	19	41	0	5	29	0	0	19	48	0	0		48		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	32	1	32	33	65	65	0	35	1	35	33	68	1	68		68		0
Left-Through		0							0				0					
Through	1000	2	**500**	30	1030	**515**	348	1442	2	**721**	30	1472	2	**736**		1472		**0**
Through-Right		0							0				0					
Right	42	1	42	0	42	42	13	59	1	59	0	59	1	59		59		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	23	1	**23**	6	29	**29**	1	26	1	**26**	6	32	1	**32**		32		**0**
Left-Through		0							0				0					
Through	808	1	419	15	823	427	420	1304	1	669	15	1319	1	677		1319		0
Through-Right		1							1				1					
Right	30	0	30	1	31	31	0	33	0	33	1	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		251	*North-South:*		283	*North-South:*			314	*North-South:*			346	*North-South:*			0
	East-West:		523	*East-West:*		544	*East-West:*			747	*East-West:*			768	*East-West:*			0
	SUM:		774	*SUM:*		827	*SUM:*			1061	*SUM:*			1114	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.516			0.551				0.707				0.743				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.416**			**0.451**				**0.607**				**0.643**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

	NB--	SB--	EB--	WB--
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?				
Override Capacity				

No. of Phases	Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
	2	2	2	2	

	Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0	
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.036	Δ*v/c* after mitigation:	-0.607
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	79	1	**79**	0	79	**79**	32	118	1	**118**	0	118	1	**118**	0	118	1	**118**
	Left-Through		0							0				0				0	
	Through	468	2	234	17	485	243	17	529	2	265	17	546	2	273	-3	543	2	272
	Through-Right		0							0				0				0	
	Right	127	1	71	0	127	71	23	162	1	82	0	162	1	82	0	162	1	82
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	26	1	26	10	36	36	19	47	1	47	10	57	1	57	-1	56	1	56
	Left-Through		0							0				0				0	
	Through	1165	1	**634**	71	1236	**686**	104	1378	1	**757**	71	1449	1	**809**	-11	1438	1	**801**
	Through-Right		1							1				1				1	
	Right	103	0	103	33	136	136	22	135	0	135	33	168	0	168	-5	163	0	163
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	11	1	**11**	10	21	**21**	8	20	1	**20**	10	30	1	**30**	-1	29	1	**29**
	Left-Through		0							0				0				0	
	Through	454	2	227	0	454	227	289	786	2	393	0	786	2	393	0	786	2	393
	Through-Right		0							0				0				0	
	Right	102	1	23	0	102	23	36	148	1	30	0	148	1	30	0	148	1	30
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	112	1	112	0	112	112	39	161	1	161	0	161	1	161	0	161	1	161
	Left-Through		0							0				0				0	
	Through	909	1	**464**	0	909	**465**	248	1242	1	**633**	0	1242	1	**634**	0	1242	1	**634**
	Through-Right		1							1				1				1	
	Right	18	0	18	2	20	20	3	23	0	23	2	25	0	25	0	25	0	25
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		713	*North-South:*		765	*North-South:*			875	*North-South:*			927	*North-South:*			919
		East-West:		475	*East-West:*		486	*East-West:*			653	*East-West:*			664	*East-West:*			663
		SUM:		1188	*SUM:*		1251	*SUM:*			1528	*SUM:*			1591	*SUM:*			1582
VOLUME/CAPACITY *(V/C)* RATIO:				0.834			0.878				1.072				1.116				1.110
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.734			0.778				0.972				1.016	*With Imp.+TDM*			1.010
LEVEL OF SERVICE (LOS):				C			C				E				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.000 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.044 — Δ*v/c* after mitigation: 0.028

Significant impacted? YES — Fully mitigated? NO

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					3
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 3 WB--		0	EB-- 3 WB--		0	EB-- 3 WB--		0		EB-- 3 WB--		0		EB-- 3 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	121	1	121	0	121	121	54	186	1	**186**	0	186	1	**186**	0	186	1	**186**
	Left-Through		0							0				0				0	
	Through	973	2	**487**	73	1046	**523**	37	1101	2	551	73	1174	2	587	-11	1163	2	582
	Through-Right		0							0				0				0	
	Right	187	1	136	0	187	136	63	268	1	193	0	268	1	193	0	268	1	193
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	7	71	**71**	34	104	1	104	7	111	1	111	-1	110	1	110
	Left-Through		0							0				0				0	
	Through	728	1	399	40	768	429	119	915	1	**509**	40	955	1	**539**	-6	949	1	**535**
	Through-Right		1							1				1				1	
	Right	70	0	70	20	90	90	26	103	0	103	20	123	0	123	-3	120	0	120
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	51	1	51	40	91	91	10	66	1	66	40	106	1	106	-6	100	1	100
	Left-Through		0							0				0				0	
	Through	980	2	**490**	1	981	**491**	291	1363	2	**682**	1	1364	2	**682**	0	1364	2	**682**
	Through-Right		0							0				0				0	
	Right	119	1	0	0	119	0	43	173	1	0	0	173	1	0	0	173	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	103	1	**103**	0	103	**103**	37	150	1	**150**	0	150	1	**150**	0	150	1	**150**
	Left-Through		0							0				0				0	
	Through	705	1	390	1	706	397	362	1133	1	609	1	1134	1	616	0	1134	1	615
	Through-Right		1							1				1				1	
	Right	75	0	75	13	88	88	3	85	0	85	13	98	0	98	-2	96	0	96
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		551	North-South:		594	North-South:			695	North-South:			725	North-South:			721
		East-West:		593	East-West:		594	East-West:			832	East-West:			832	East-West:			832
		SUM:		1144	SUM:		1188	SUM:			1527	SUM:			1557	SUM:			1553
	VOLUME/CAPACITY (V/C) RATIO:			0.803			0.834				1.072				1.093				1.090
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.703			0.734				0.972				0.993	With Imp.+TDM			0.990
	LEVEL OF SERVICE (LOS):			C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.980 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.021 — Δ*v/c* after mitigation: 0.008

Significant impacted? YES — Fully mitigated? YES

Level of Service Worksheet
(Circular 212 Method)

18

PROJECT TITLE:
North-South Street: VINE STREET **East-West Street:** HOLLYWOOD BOULEVARD
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 12/28/2012

			AM PEAK HOUR			PM PEAK HOUR		
		No. of Phases			3			3
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0
		Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB -- 0	SB --	0	NB -- 0	SB --	0
			EB -- 3	WB --	0	EB -- 3	WB --	0
		ATSAC-1 or ATSAC+ATCS-2?			2			2
		Override Capacity			0			0
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND		Left	79	1	**79**	121	1	121
		Left-Through		0			0	
		Through	482	2	241	1035	2	**518**
		Through-Right		0			0	
		Right	127	1	71	187	1	136
		Left-Through-Right		0			0	
		Left-Right						
SOUTHBOUND		Left	35	1	35	70	1	**70**
		Left-Through		0			0	
		Through	1225	1	**678**	762	1	425
		Through-Right		1			1	
		Right	131	0	131	87	0	87
		Left-Through-Right		0			0	
		Left-Right						
EASTBOUND		Left	20	1	**20**	85	1	85
		Left-Through		0			0	
		Through	454	2	227	981	2	**491**
		Through-Right		0			0	
		Right	102	1	23	119	1	0
		Left-Through-Right		0			0	
		Left-Right						
WESTBOUND		Left	112	1	112	103	1	**103**
		Left-Through		0			0	
		Through	909	1	**465**	706	1	396
		Through-Right		1			1	
		Right	20	0	20	86	0	86
		Left-Through-Right		0			0	
		Left-Right						
	CRITICAL VOLUMES			*North-South:*	757		*North-South:*	588
				East-West:	485		*East-West:*	594
				SUM:	1242		*SUM:*	1182
	VOLUME/CAPACITY *(V/C)* RATIO:				0.872			0.829
	V/C LESS ATSAC/ATCS ADJUSTMENT:			*With TDM*	**0.772**		*With TDM*	**0.729**
	LEVEL OF SERVICE (LOS):				**C**			**C**
				With TDM+Signal Imp.	**0.762**		*With TDM+Signal Imp.*	**0.719**
					C			**C**

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				2
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	20	1	**20**	0	20	**20**	19	41	1	**41**	0	41	1	**41**	0	41	1	**41**
	Left-Through		0							0				0				0	
	Through	142	1	142	3	145	145	94	249	1	249	3	252	1	252	0	252	1	252
	Through-Right		0							0				0				0	
	Right	23	1	0	0	23	0	11	36	1	0	0	36	1	0	0	36	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	27	1	27	19	46	46	24	54	1	54	19	73	1	73	-3	70	1	70
	Left-Through		0							0				0				0	
	Through	251	1	**251**	14	265	**265**	81	356	1	**356**	14	370	1	**370**	-2	368	1	**368**
	Through-Right		0							0				0				0	
	Right	41	1	26	0	41	26	39	84	1	32	0	84	1	32	0	84	1	32
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	30	1	**30**	0	30	**30**	71	104	1	**104**	0	104	1	**104**	0	104	1	**104**
	Left-Through		0							0				0				0	
	Through	433	2	217	10	443	222	213	687	2	344	10	697	2	349	-1	696	2	348
	Through-Right		0							0				0				0	
	Right	44	1	34	0	44	34	55	103	1	83	0	103	1	83	0	103	1	83
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	131	1	131	0	131	131	35	178	1	178	0	178	1	178	0	178	1	178
	Left-Through		0							0				0				0	
	Through	995	1	**516**	2	997	**519**	239	1327	1	**727**	2	1329	1	**730**	0	1329	1	**729**
	Through-Right		1							1				1				1	
	Right	36	0	36	4	40	40	87	126	0	126	4	130	0	130	-1	129	0	129
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	271		*North-South:*	285		*North-South:*	397			*North-South:*	411			*North-South:*		409
			East-West:	546		*East-West:*	549		*East-West:*	831			*East-West:*	834			*East-West:*		833
			SUM:	817		*SUM:*	834		*SUM:*	1228			*SUM:*	1245			*SUM:*		1242
	VOLUME/CAPACITY *(V/C)* RATIO:			0.545			0.556			0.819				0.830					0.828
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.445			0.456			0.719				0.730			*With Imp.+TDM*		0.728
	LEVEL OF SERVICE (LOS):			A			A			C				C					C

REMARKS:

With Imp.+TDM+Signal Imp. 0.718 C

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.011 — Δ*v/c* after mitigation: -0.001

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					2
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- 0 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	67	1	67	0	67	67	56	129	1	129	0	129	1	129	0	129	1	129
	Left-Through		0							0				0				0	
	Through	440	1	**440**	12	452	**452**	198	679	1	**679**	12	691	1	**691**	-2	689	1	**689**
	Through-Right		0							0				0				0	
	Right	41	1	4	0	41	4	38	83	1	33	0	83	1	33	0	83	1	33
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	45	1	**45**	8	53	**53**	46	95	1	**95**	8	103	1	**103**	-1	102	1	**102**
	Left-Through		0							0				0				0	
	Through	144	1	144	5	149	149	85	242	1	242	5	247	1	247	-1	246	1	246
	Through-Right		0							0				0				0	
	Right	37	1	0	0	37	0	50	90	1	0	0	90	1	0	0	90	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	83	1	83	0	83	83	92	183	1	**183**	0	183	1	**183**	0	183	1	**183**
	Left-Through		0							0				0				0	
	Through	1031	2	**516**	9	1040	**520**	268	1396	2	698	9	1405	2	703	-1	1404	2	702
	Through-Right		0							0				0				0	
	Right	89	1	56	-1	88	55	39	136	1	72	-1	135	1	71	0	135	1	71
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	74	1	**74**	0	74	**74**	19	100	1	100	0	100	1	100	0	100	1	100
	Left-Through		0							0				0				0	
	Through	753	1	418	15	768	434	298	1122	1	**646**	15	1137	1	**662**	-2	1135	1	**659**
	Through-Right		1							1				1				1	
	Right	83	0	83	17	100	100	78	169	0	169	17	186	0	186	-3	183	0	183
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		485	North-South:		505	North-South:			774	North-South:			794	North-South:			791
		East-West:		590	East-West:		594	East-West:			829	East-West:			845	East-West:			842
		SUM:		1075	SUM:		1099	SUM:			1603	SUM:			1639	SUM:			1633
	VOLUME/CAPACITY (V/C) RATIO:			0.717			0.733				1.069				1.093				1.089
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.617			0.633				0.969				0.993	With Imp.+TDM			0.989
	LEVEL OF SERVICE (LOS):			B			B				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.979 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.024 — Δ*v/c* after mitigation: 0.010

Significant impacted? YES — Fully mitigated? NO

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
20	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	24	1	**24**	1	25	**25**	21	47	1	**47**	1	48	1	**48**		48		**0**
	Left-Through		0							0				0					
	Through	275	1	168	0	275	168	92	393	1	237	0	393	1	237		393		0
	Through-Right		1							1				1					
	Right	60	0	60	0	60	60	15	81	0	81	0	81	0	81		81		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	84	1	84	0	84	84	2	94	1	94	0	94	1	94		94		0
	Left-Through		0							0				0					
	Through	673	1	**673**	0	673	**673**	174	910	1	**910**	0	910	1	**910**		910		**0**
	Through-Right		0							0				0					
	Right	271	1	248	0	271	248	21	317	1	290	0	317	1	290		317		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	46	1	**46**	0	46	**46**	4	54	1	**54**	0	54	1	**54**		54		0
	Left-Through		0							0				0					
	Through	444	1	250	27	471	265	253	739	1	405	27	766	1	420		766		**0**
	Through-Right		1							1				1					
	Right	55	0	55	3	58	58	11	71	0	71	3	74	0	74		74		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	90	1	90	0	90	90	37	135	1	135	0	135	1	135		135		**0**
	Left-Through		0							0				0					
	Through	867	1	**446**	6	873	**449**	298	1246	1	**638**	6	1252	1	**641**		1252		0
	Through-Right		1							1				1					
	Right	24	0	24	0	24	24	3	29	0	29	0	29	0	29		29		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		697	*North-South:*		698	*North-South:*			957	*North-South:*			958	*North-South:*			0
		East-West:		492	*East-West:*		495	*East-West:*			692	*East-West:*			695	*East-West:*			0
		SUM:		1189	*SUM:*		1193	*SUM:*			1649	*SUM:*			1653	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.793			0.795				1.099				1.102				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.693**			**0.695**				**0.999**				**1.002**				0.000
	LEVEL OF SERVICE (LOS):			**B**			**B**				**E**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.999
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	GOWER STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
20	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	66	1	**66**	3	69	**69**	23	95	1	**95**	3	98	1	**98**		98		**0**
Left-Through		0							0				0					
Through	695	1	395	0	695	395	182	942	1	540	0	942	1	540		942		0
Through-Right		1							1				1					
Right	94	0	94	0	94	94	34	137	0	137	0	137	0	137		137		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	71	1	71	-1	70	70	3	81	1	81	-1	80	1	80		80		0
Left-Through		0							0				0					
Through	443	1	**443**	0	443	**443**	102	587	1	**587**	0	587	1	**587**		587		**0**
Through-Right		0							0				0					
Right	101	1	51	0	101	51	19	129	1	69	0	129	1	69		129		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	101	1	101	0	101	101	10	120	1	120	0	120	1	120		120		0
Left-Through		0							0				0					
Through	1004	1	**534**	15	1019	**542**	317	1415	1	**750**	15	1430	1	**758**		1430		**0**
Through-Right		1							1				1					
Right	63	0	63	2	65	65	15	84	0	84	2	86	0	86		86		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	62	1	**62**	0	62	**62**	20	88	1	**88**	0	88	1	**88**		88		**0**
Left-Through		0							0				0					
Through	789	1	422	28	817	436	369	1232	1	647	28	1260	1	661		1260		0
Through-Right		1							1				1					
Right	54	0	54	0	54	54	3	62	0	62	0	62	0	62		62		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	North-South:		509	North-South:		512	North-South:			682	North-South:			685	North-South:			0
	East-West:		596	East-West:		604	East-West:			838	East-West:			846	East-West:			0
	SUM:		1105	SUM:		1116	SUM:			1520	SUM:			1531	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:			0.737			0.744				1.013				1.021				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.637**			**0.644**				**0.913**				**0.921**				0.000
LEVEL OF SERVICE (LOS):			**B**			**B**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.913
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	BRONSON AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
21	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		**0**
Left-Through		0							0				0					
Through	125	0	212	0	125	212	5	142	0	238	0	142	0	238		142		0
Through-Right		1							1				1					
Right	87	0	0	0	87	0	1	96	0	0	0	96	0	0		96		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	81	0	81	0	81	81	0	89	0	89	0	89	0	89		89		0
Left-Through		0							0				0					
Through	252	0	**380**	0	252	**380**	36	312	0	**452**	0	312	0	**452**		312		**0**
Through-Right		0							0				0					
Right	47	0	0	0	47	0	0	51	0	0	0	51	0	0		51		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	30	1	**30**	0	30	**30**	0	33	1	**33**	0	33	1	**33**		33		0
Left-Through		0							0				0					
Through	486	1	262	26	512	275	339	871	1	460	26	897	1	473		897		**0**
Through-Right		1							1				1					
Right	38	0	38	0	38	38	7	49	0	49	0	49	0	49		49		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	84	1	84	0	84	84	14	106	1	106	0	106	1	106		106		**0**
Left-Through		0							0				0					
Through	954	1	**501**	6	960	**504**	336	1379	1	**717**	6	1385	1	**720**		1385		0
Through-Right		1							1				1					
Right	48	0	48	0	48	48	3	55	0	55	0	55	0	55		55		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		410	*North-South:*		410	*North-South:*			485	*North-South:*			485	*North-South:*			0
	East-West:		531	*East-West:*		534	*East-West:*			750	*East-West:*			753	*East-West:*			0
	SUM:		941	*SUM:*		944	*SUM:*			1235	*SUM:*			1238	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.627			0.629				0.823				0.825				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.527**			**0.529**				**0.723**				**0.725**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.723
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	BRONSON AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
21	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	No. of Phases		2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0	NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- 0 SB--	0		NB-- SB--		
		EB-- 0 WB--	0	EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- 0 WB--	0		EB-- WB--		
	ATSAC-1 or ATSAC+ATCS-2?		2			2			2				2					
	Override Capacity		0			0			0				0					

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	72	1	72	0	72	72	3	82	1	82	0	82	1	82		82		**0**
	Left-Through		0							0				0					
	Through	232	0	**314**	0	232	**314**	31	285	0	**381**	0	285	0	**381**		285		0
	Through-Right		1							1				1					
	Right	82	0	0	0	82	0	6	96	0	0	0	96	0	0		96		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	74	0	**74**	0	74	**74**	0	81	0	**81**	0	81	0	**81**		81		0
	Left-Through		0							0				0					
	Through	150	0	256	0	150	256	6	170	0	286	0	170	0	286		170		**0**
	Through-Right		0							0				0					
	Right	32	0	0	0	32	0	0	35	0	0	0	35	0	0		35		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	76	1	76	0	76	76	0	83	1	83	0	83	1	83		83		0
	Left-Through		0							0				0					
	Through	760	1	**403**	14	774	**410**	366	1197	1	**624**	14	1211	1	**631**		1211		**0**
	Through-Right		1							1				1					
	Right	45	0	45	0	45	45	1	50	0	50	0	50	0	50		50		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	77	1	**77**	0	77	**77**	3	87	1	**87**	0	87	1	**87**		87		**0**
	Left-Through		0							0				0					
	Through	634	1	359	28	662	373	434	1127	1	619	28	1155	1	633		1155		0
	Through-Right		1							1				1					
	Right	84	0	84	0	84	84	19	111	0	111	0	111	0	111		111		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		388	North-South:		388	North-South:			462	North-South:			462	North-South:			0
		East-West:		480	East-West:		487	East-West:			711	East-West:			718	East-West:			0
		SUM:		868	SUM:		875	SUM:			1173	SUM:			1180	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.579			0.583				0.782				0.787				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.479			0.483				0.682				0.687				0.000
	LEVEL OF SERVICE (LOS):			A			A				B				B				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.005 — Δ*v/c* after mitigation: -0.682

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. SB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
22	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	414	1	235	0	414	235	46	499	1	287	0	499	1	287		499		0
Left-Through		0							0				0					
Through	1	0	**235**	0	1	**235**	0	1	0	**287**	0	1	0	**287**		1		**0**
Through-Right		0							0				0					
Right	54	0	0	0	54	0	14	73	0	0	0	73	0	0		73		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		0
Left-Through		0							0				0					
Through	450	2	225	14	464	232	220	712	2	356	14	726	2	363		726		**0**
Through-Right		0							0				0					
Right	158	1	158	12	170	170	100	273	1	273	12	285	1	285		285		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	47	1	47	0	47	47	27	78	1	78	0	78	1	78		78		**0**
Left-Through		0							0				0					
Through	1158	2	**579**	6	1164	**582**	330	1596	2	**798**	6	1602	2	**801**		1602		0
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		235	*North-South:*		235	*North-South:*			287	*North-South:*			287	*North-South:*			0
	East-West:		579	*East-West:*		582	*East-West:*			798	*East-West:*			801	*East-West:*			0
	SUM:		814	*SUM:*		817	*SUM:*			1085	*SUM:*			1088	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.571			0.573				0.761				0.764				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.471**			**0.473**				**0.661**				**0.664**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0

No. of Phases	3	3	3	3	3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	2
Override Capacity	0	0	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.003 — Δ*v/c* after mitigation: -0.661

Significant impacted? NO — Fully mitigated? N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. SB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
22	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0	NB-- 0	SB-- 0	0		NB-- 0	SB-- 0	0		NB--	SB--		
	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0	EB-- 0	WB-- 0	0		EB-- 0	WB-- 0	0		EB--	WB--		
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					

MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	354	1	197	0	354	197	41	428	1	248	0	428	1	248		428		0
	Left-Through		0							0				0					
	Through	1	0	**197**	0	1	**197**	0	1	0	**248**	0	1	0	**248**		1		**0**
	Through-Right		0							0				0					
	Right	38	0	0	0	38	0	24	66	0	0	0	66	0	0		66		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through		0							0				0					
	Through	836	2	**418**	7	843	**422**	280	1194	2	**597**	7	1201	2	**601**		1201		**0**
	Through-Right		0							0				0					
	Right	203	1	203	6	209	209	112	334	1	334	6	340	1	340		340		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	36	1	**36**	0	36	**36**	16	55	1	**55**	0	55	1	**55**		55		**0**
	Left-Through		0							0				0					
	Through	803	2	402	28	831	416	394	1272	2	636	28	1300	2	650		1300		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		197	North-South:		197	North-South:			248	North-South:			248		North-South:		0
		East-West:		454	East-West:		458	East-West:			652	East-West:			656		East-West:		0
		SUM:		651	SUM:		655	SUM:			900	SUM:			904		SUM:		0
VOLUME/CAPACITY (V/C) RATIO:				0.457			0.460				0.632				0.634				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.357**			**0.360**				**0.532**				**0.534**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.002	Δ*v/c* after mitigation:	-0.532
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. NB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
23	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	291	2	**160**	2	293	**161**	105	423	2	**233**	2	425	2	**234**		425		**0**
Left-Through		0							0				0					
Through	2	0	0	0	2	0	0	2	0	0	0	2	0	0		2		0
Through-Right		0							0				0					
Right	57	1	57	0	57	57	0	62	1	62	0	62	1	62		62		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	68	1	**68**	0	68	**68**	32	106	1	**106**	0	106	1	**106**		106		0
Left-Through		0							0				0					
Through	582	2	291	14	596	298	224	861	2	431	14	875	2	438		875		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	16	16	0	0	0	16	0	0		16		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		**0**
Left-Through		0							0				0					
Through	798	2	**399**	4	802	**401**	203	1076	2	**538**	4	1080	2	**540**		1080		0
Through-Right		0							0				0					
Right	336	1	336	0	336	336	59	426	1	426	0	426	1	426		426		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		160	*North-South:*		161	*North-South:*			233	*North-South:*			234	*North-South:*			0
	East-West:		467	*East-West:*		469	*East-West:*			644	*East-West:*			646	*East-West:*			0
	SUM:		627	*SUM:*		630	*SUM:*			877	*SUM:*			880	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.440			0.442				0.615				0.618				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.340**			**0.342**				**0.515**				**0.518**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-0.515
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	US-101 FWY. NB RAMPS	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
23	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			3			3			3				3					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	209	2	**115**	14	223	**123**	165	394	2	**217**	14	408	2	**224**		408		**0**
Left-Through		0							0				0					
Through	3	0	0	0	3	0	0	3	0	0	0	3	0	0		3		0
Through-Right		0							0				0					
Right	79	1	79	0	79	79	0	86	1	86	0	86	1	86		86		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through		0							0				0					
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	64	1	**64**	0	64	64	39	109	1	109	0	109	1	109		109		0
Left-Through		0							0				0					
Through	935	2	468	7	942	**471**	282	1305	2	**653**	7	1312	2	**656**		1312		**0**
Through-Right		0							0				0					
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	0	0	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**		0		**0**
Left-Through		0							0				0					
Through	702	2	351	14	716	358	229	997	2	499	14	1011	2	506		1011		0
Through-Right		0							0				0					
Right	407	1	**407**	0	407	407	34	479	1	479	0	479	1	479		479		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		115	*North-South:*		123	*North-South:*			217	*North-South:*			224	*North-South:*			0
	East-West:		471	*East-West:*		471	*East-West:*			653	*East-West:*			656	*East-West:*			0
	SUM:		586	*SUM:*		594	*SUM:*			870	*SUM:*			880	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.411			0.417				0.611				0.618				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.311**			**0.317**				**0.511**				**0.518**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.007	Δ*v/c* after mitigation:	-0.511
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
24	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	26	0	**26**	0	26	**26**	36	64	0	**64**	0	64	0	**64**		64		**0**
	Left-Through		1							1				1					
	Through	598	0	388	7	605	392	75	729	0	579	7	736	0	583		736		0
	Through-Right		1							1				1					
	Right	21	0	388	2	23	392	21	44	0	579	2	46	0	583		46		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	24	0	24	0	24	24	15	41	0	41	0	41	0	41		41		0
	Left-Through		1							1				1					
	Through	1160	0	**657**	29	1189	**672**	69	1338	0	**784**	29	1367	0	**799**		1367		**0**
	Through-Right		1							1				1					
	Right	58	0	657	0	58	672	3	66	0	784	0	66	0	799		66		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	12	0	**12**	0	12	**12**	2	15	0	**15**	0	15	0	**15**		15		0
	Left-Through		0							0				0					
	Through	73	0	105	3	76	108	64	144	0	206	3	147	0	209		147		**0**
	Through-Right		0							0				0					
	Right	20	0	0	0	20	0	25	47	0	0	0	47	0	0		47		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	15	0	15	0	15	15	16	32	0	32	0	32	0	32		32		**0**
	Left-Through		0							0				0					
	Through	118	0	**157**	8	126	**165**	71	200	0	**269**	8	208	0	**277**		208		0
	Through-Right		0							0				0					
	Right	24	0	0	0	24	0	11	37	0	0	0	37	0	0		37		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		683	*North-South:*		698	*North-South:*			848	*North-South:*			863	*North-South:*			0
		East-West:		169	*East-West:*		177	*East-West:*			284	*East-West:*			292	*East-West:*			0
		SUM:		852	*SUM:*		875	*SUM:*			1132	*SUM:*			1155	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.568			0.583				0.755				0.770				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.468**			**0.483**				**0.655**				**0.670**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.015	Δ*v/c* after mitigation:	-0.655
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
24	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	14	0	14	0	14	14	0	15	0	15	0	15	0	15		15		**0**
	Left-Through		1							1				1					
	Through	1127	0	**615**	29	1156	**629**	45	1278	0	**705**	29	1307	0	**720**		1307		0
	Through-Right		1							1				1					
	Right	46	0	615	0	46	629	22	72	0	705	0	72	0	720		72		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	32	0	**32**	0	32	**32**	0	35	0	**35**	0	35	0	**35**		35		0
	Left-Through		1							1				1					
	Through	664	0	457	16	680	465	70	796	0	539	16	812	0	547		812		**0**
	Through-Right		1							1				1					
	Right	58	0	457	0	58	465	9	72	0	539	0	72	0	547		72		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	49	0	49	0	49	49	5	59	0	59	0	59	0	59		59		0
	Left-Through		0							0				0					
	Through	239	0	**318**	9	248	**327**	88	349	0	**493**	9	358	0	**502**		358		**0**
	Through-Right		0							0				0					
	Right	30	0	0	0	30	0	52	85	0	0	0	85	0	0		85		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	27	0	**27**	0	27	**27**	28	58	0	**58**	0	58	0	**58**		58		**0**
	Left-Through		0							0				0					
	Through	146	0	227	6	152	233	89	249	0	397	6	255	0	403		255		0
	Through-Right		0							0				0					
	Right	54	0	0	0	54	0	31	90	0	0	0	90	0	0		90		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		North-South:		647	North-South:		661	North-South:			740	North-South:			755	North-South:			0
		East-West:		345	East-West:		354	East-West:			551	East-West:			560	East-West:			0
		SUM:		992	SUM:		1015	SUM:			1291	SUM:			1315	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.661			0.677				0.861				0.877				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.561**			**0.577**				**0.761**				**0.777**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.016	Δ*v/c* after mitigation:	-0.761
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
25	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	14	0	**14**	0	14	**14**	0	15	0	**15**	0	15	0	**15**		15		**0**
Left-Through		1							1				1					
Through	59	0	73	4	63	77	13	78	0	93	4	82	0	97		82		0
Through-Right		0							0				0					
Right	11	1	11	0	11	11	8	20	1	20	0	20	1	20		20		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	7	0	7	0	7	7	28	36	0	36	0	36	0	36		36		0
Left-Through		0							0				0					
Through	122	0	**146**	13	135	**162**	13	146	0	**201**	13	159	0	**217**		159		**0**
Through-Right		0							0				0					
Right	17	0	0	3	20	0	0	19	0	0	3	22	0	0		22		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	4	0	**4**	4	8	**8**	0	4	0	**4**	4	8	0	**8**		8		0
Left-Through		0							0				0					
Through	88	0	117	1	89	122	100	196	0	227	1	197	0	232		197		**0**
Through-Right		0							0				0					
Right	25	0	0	0	25	0	0	27	0	0	0	27	0	0		27		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	36	0	36	0	36	36	5	44	0	44	0	44	0	44		44		**0**
Left-Through		0							0				0					
Through	111	0	**168**	6	117	**174**	100	221	0	**292**	6	227	0	**298**		227		0
Through-Right		0							0				0					
Right	21	0	0	0	21	0	4	27	0	0	0	27	0	0		27		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		160	*North-South:*		176	*North-South:*			216	*North-South:*			232	*North-South:*			0
	East-West:		172	*East-West:*		182	*East-West:*			296	*East-West:*			306	*East-West:*			0
	SUM:		332	*SUM:*		358	*SUM:*			512	*SUM:*			538	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.221			0.239				0.341				0.359				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.121**			**0.139**				**0.241**				**0.259**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0	NB-- 0 SB-- 0 EB-- 0 WB-- 0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2
Override Capacity	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.018	Δ*v/c* after mitigation:	-0.241
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
25	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	33	0	33	0	33	33	0	36	0	36	0	36	0	36		36		**0**
Left-Through		0							0				0					
Through	175	0	**236**	27	202	**263**	16	207	0	**279**	27	234	0	**306**		234		0
Through-Right		0							0				0					
Right	28	0	0	0	28	0	5	36	0	0	0	36	0	0		36		0
Left-Through-Right		1							1				1					
Left-Right																		
SOUTHBOUND																		
Left	9	0	**9**	0	9	**9**	7	17	0	**17**	0	17	0	**17**		17		0
Left-Through		0							0				0					
Through	44	0	90	15	59	108	10	58	0	115	15	73	0	133		73		**0**
Through-Right		0							0				0					
Right	37	0	0	3	40	0	0	40	0	0	3	43	0	0		43		0
Left-Through-Right		1							1				1					
Left-Right																		
EASTBOUND																		
Left	12	0	12	4	16	16	0	13	0	13	4	17	0	17		17		0
Left-Through		0							0				0					
Through	209	0	**292**	5	214	**301**	110	339	0	**430**	5	344	0	**439**		344		**0**
Through-Right		0							0				0					
Right	71	0	0	0	71	0	0	78	0	0	0	78	0	0		78		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	54	0	**54**	0	54	**54**	12	71	0	**71**	0	71	0	**71**		71		**0**
Left-Through		0							0				0					
Through	149	0	234	3	152	237	148	311	0	436	3	314	0	439		314		0
Through-Right		0							0				0					
Right	31	0	0	0	31	0	20	54	0	0	0	54	0	0		54		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		245	*North-South:*		272	*North-South:*			296	*North-South:*			323	*North-South:*			0
	East-West:		346	*East-West:*		355	*East-West:*			501	*East-West:*			510	*East-West:*			0
	SUM:		591	*SUM:*		627	*SUM:*			797	*SUM:*			833	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.394			0.418				0.531				0.555				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.294**			**0.318**				**0.431**				**0.455**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.024	Δ*v/c* after mitigation:	-0.431
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	39	1	**39**	0	39	**39**	49	92	1	**92**	0	92	1	**92**		92		**0**
	Left-Through		0							0				0					
	Through	589	2	295	14	603	302	63	707	2	354	14	721	2	361		721		0
	Through-Right		0							0				0					
	Right	82	1	50	0	82	50	86	176	1	124	0	176	1	124		176		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	45	1	45	0	45	45	3	52	1	52	0	52	1	52		52		0
	Left-Through		0							0				0					
	Through	1258	1	**643**	65	1323	**679**	108	1484	1	**791**	65	1549	1	**827**		1549		**0**
	Through-Right		1							1				1					
	Right	28	0	28	6	34	34	67	98	0	98	6	104	0	104		104		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	21	1	21	1	22	22	8	31	1	31	1	32	1	32		32		0
	Left-Through		0							0				0					
	Through	58	0	**105**	0	58	**105**	71	134	0	**208**	0	134	0	**208**		134		**0**
	Through-Right		1							1				1					
	Right	47	0	0	0	47	0	23	74	0	0	0	74	0	0		74		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	64	1	**64**	0	64	**64**	34	104	1	**104**	0	104	1	**104**		104		**0**
	Left-Through		0							0				0					
	Through	52	0	89	0	52	90	88	145	0	185	0	145	0	186		145		0
	Through-Right		1							1				1					
	Right	37	0	0	1	38	0	0	40	0	0	1	41	0	0		41		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		682	North-South:		718	North-South:			883	North-South:			919	North-South:			0
		East-West:		169	East-West:		169	East-West:			312	East-West:			312	East-West:			0
		SUM:		851	SUM:		887	SUM:			1195	SUM:			1231	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.567			0.591				0.797				0.821				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.467			0.491				0.697				0.721				0.000
LEVEL OF SERVICE (LOS):				A			A				B				C				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.024	Δ*v/c* after mitigation:	-0.697
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	80	1	80	0	80	80	43	130	1	130	0	130	1	130		130		**0**
	Left-Through		0							0				0					
	Through	1082	2	**541**	66	1148	**574**	113	1296	2	**648**	66	1362	2	**681**		1362		0
	Through-Right		0							0				0					
	Right	152	1	109	0	152	109	111	277	1	201	0	277	1	201		277		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	2	66	**66**	9	79	1	**79**	2	81	1	**81**		81		0
	Left-Through		0							0				0					
	Through	833	1	432	37	870	452	183	1094	1	573	37	1131	1	593		1131		**0**
	Through-Right		1							1				1					
	Right	31	0	31	3	34	34	17	51	0	51	3	54	0	54		54		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	73	1	73	5	78	78	41	121	1	121	5	126	1	126		126		0
	Left-Through		0							0				0					
	Through	126	0	**226**	0	126	**226**	107	245	0	**406**	0	245	0	**406**		245		**0**
	Through-Right		1							1				1					
	Right	100	0	0	0	100	0	52	161	0	0	0	161	0	0		161		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	87	1	**87**	0	87	**87**	58	153	1	**153**	0	153	1	**153**		153		**0**
	Left-Through		0							0				0					
	Through	87	0	181	0	87	183	95	190	0	293	0	190	0	295		190		0
	Through-Right		1							1				1					
	Right	94	0	0	2	96	0	0	103	0	0	2	105	0	0		105		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		605	*North-South:*		640	*North-South:*			727	*North-South:*			762	*North-South:*			0
		East-West:		313	*East-West:*		313	*East-West:*			559	*East-West:*			559	*East-West:*			0
		SUM:		918	*SUM:*		953	*SUM:*			1286	*SUM:*			1321	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.612			0.635				0.857				0.881				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.512**			**0.535**				**0.757**				**0.781**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.024	Δ*v/c* after mitigation:	-0.757
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	20	1	**20**	0	20	**20**	11	33	1	**33**	0	33	1	**33**		33		**0**
	Left-Through		0							0				0					
	Through	81	0	91	1	82	92	60	149	0	197	1	150	0	198		150		0
	Through-Right		1							1				1					
	Right	10	0	0	0	10	0	37	48	0	0	0	48	0	0		48		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	23	1	23	6	29	29	46	71	1	71	6	77	1	77		77		0
	Left-Through		0							0				0					
	Through	303	0	**362**	8	311	**370**	41	372	0	**458**	8	380	0	**466**		380		**0**
	Through-Right		1							1				1					
	Right	59	0	0	0	59	0	21	86	0	0	0	86	0	0		86		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	58	1	**58**	0	58	**58**	70	133	1	**133**	0	133	1	**133**		133		0
	Left-Through		0							0				0					
	Through	50	0	108	0	50	108	89	144	0	209	0	144	0	209		144		**0**
	Through-Right		1							1				1					
	Right	58	0	0	0	58	0	2	65	0	0	0	65	0	0		65		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	28	1	28	0	28	28	18	49	1	49	0	49	1	49		49		**0**
	Left-Through		0							0				0					
	Through	42	0	**94**	1	43	**96**	90	136	0	**227**	1	137	0	**229**		137		0
	Through-Right		1							1				1					
	Right	52	0	0	1	53	0	34	91	0	0	1	92	0	0		92		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		382	*North-South:*		390	*North-South:*			491	*North-South:*			499	*North-South:*			0
		East-West:		152	*East-West:*		154	*East-West:*			360	*East-West:*			362	*East-West:*			0
		SUM:		534	*SUM:*		544	*SUM:*			851	*SUM:*			861	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.356			0.363				0.567				0.574				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.256**			**0.263**				**0.467**				**0.474**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.007	Δ*v/c* after mitigation:	-0.467
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	43	1	**43**	0	43	**43**	3	50	1	**50**	0	50	1	**50**		50		**0**
	Left-Through		0							0				0					
	Through	262	0	274	7	269	281	64	351	0	387	7	358	0	394		358		0
	Through-Right		1							1				1					
	Right	12	0	0	0	12	0	23	36	0	0	0	36	0	0		36		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	17	1	17	2	19	19	40	59	1	59	2	61	1	61		61		0
	Left-Through		0							0				0					
	Through	165	0	**261**	3	168	**264**	97	277	0	**430**	3	280	0	**433**		280		**0**
	Through-Right		1							1				1					
	Right	96	0	0	0	96	0	48	153	0	0	0	153	0	0		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	150	1	**150**	0	150	**150**	115	279	1	**279**	0	279	1	**279**		279		0
	Left-Through		0							0				0					
	Through	118	0	205	2	120	207	110	239	0	346	2	241	0	348		241		**0**
	Through-Right		1							1				1					
	Right	87	0	0	0	87	0	12	107	0	0	0	107	0	0		107		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	23	1	23	0	23	23	35	60	1	60	0	60	1	60		60		**0**
	Left-Through		0							0				0					
	Through	103	0	**203**	2	105	**210**	102	215	0	**374**	2	217	0	**381**		217		0
	Through-Right		1							1				1					
	Right	100	0	0	5	105	0	50	159	0	0	5	164	0	0		164		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		304	*North-South:*		307	*North-South:*			480	*North-South:*			483	*North-South:*			0
		East-West:		353	*East-West:*		360	*East-West:*			653	*East-West:*			660	*East-West:*			0
		SUM:		657	*SUM:*		667	*SUM:*			1133	*SUM:*			1143	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.438			0.445				0.755				0.762				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.338**			**0.345**				**0.655**				**0.662**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.007	Δ*v/c* after mitigation:	-0.655
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
28	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			4			4			4				4					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	26	1	**26**	0	26	**26**	1	29	1	**29**	0	29	1	**29**		29		**0**
	Left-Through		0							0				0					
	Through	1157	2	423	2	1159	423	196	1461	2	530	2	1463	2	531		1463		0
	Through-Right		1							1				1					
	Right	111	0	111	0	111	111	9	130	0	130	0	130	0	130		130		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	60	1	60	0	60	60	55	121	1	121	0	121	1	121		121		0
	Left-Through		0							0				0					
	Through	1500	2	**603**	6	1506	**605**	195	1836	2	**745**	6	1842	2	**747**		1842		**0**
	Through-Right		1							1				1					
	Right	308	0	308	0	308	308	62	399	0	399	0	399	0	399		399		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	268	1	**268**	0	268	**268**	82	375	1	**375**	0	375	1	**375**		375		0
	Left-Through		0							0				0					
	Through	1115	2	388	4	1119	389	189	1408	2	489	4	1412	2	490		1412		**0**
	Through-Right		1							1				1					
	Right	48	0	48	0	48	48	6	58	0	58	0	58	0	58		58		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	146	1	146	0	146	146	17	177	1	177	0	177	1	177		177		**0**
	Left-Through		0							0				0					
	Through	1340	2	**459**	15	1355	**464**	211	1677	2	**597**	15	1692	2	**602**		1692		0
	Through-Right		1							1				1					
	Right	37	0	37	0	37	37	73	113	0	113	0	113	0	113		113		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		629	*North-South:*		631	*North-South:*			774	*North-South:*			776		*North-South:*		0
		East-West:		727	*East-West:*		732	*East-West:*			972	*East-West:*			977		*East-West:*		0
		SUM:		1356	*SUM:*		1363	*SUM:*			1746	*SUM:*			1753		*SUM:*		0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.986			0.991				1.270				1.275				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.886**			**0.891**				**1.170**				**1.175**				0.000
	LEVEL OF SERVICE (LOS):			**D**			**D**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-1.170
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	HIGHLAND AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
28	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	31	1	**31**	0	31	**31**	5	39	1	**39**	0	39	1	**39**		39		**0**
Left-Through		0							0				0					
Through	1123	2	405	5	1128	407	252	1480	2	535	5	1485	2	537		1485		0
Through-Right		1							1				1					
Right	92	0	92	0	92	92	25	126	0	126	0	126	0	126		126		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	108	1	108	0	108	108	81	199	1	199	0	199	1	199		199		0
Left-Through		0							0				0					
Through	1311	2	**553**	2	1313	**553**	229	1663	2	**712**	2	1665	2	**713**		1665		**0**
Through-Right		1							1				1					
Right	347	0	347	0	347	347	93	473	0	473	0	473	0	473		473		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	172	1	172	0	172	172	91	279	1	279	0	279	1	279		279		0
Left-Through		0							0				0					
Through	1619	2	**556**	11	1630	**560**	203	1974	2	**677**	11	1985	2	**680**		1985		**0**
Through-Right		1							1				1					
Right	50	0	50	0	50	50	1	56	0	56	0	56	0	56		56		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	140	1	**140**	0	140	**140**	21	174	1	**174**	0	174	1	**174**		174		**0**
Left-Through		0							0				0					
Through	1206	2	427	5	1211	429	244	1563	2	570	5	1568	2	572		1568		0
Through-Right		1							1				1					
Right	76	0	76	0	76	76	65	148	0	148	0	148	0	148		148		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		584	*North-South:*		584	*North-South:*			751	*North-South:*			752	*North-South:*			0
	East-West:		696	*East-West:*		700	*East-West:*			851	*East-West:*			854	*East-West:*			0
	SUM:		1280	*SUM:*		1284	*SUM:*			1602	*SUM:*			1606	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.931			0.934				1.165				1.168				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.831**			**0.834**				**1.065**				**1.068**				0.000
LEVEL OF SERVICE (LOS):			**D**			**D**				**F**				**F**				**A**

	NB--	SB--	EB--	WB--
Right Turns: FREE-1, NRTOR-2 or OLA-3?	0	0	0	0

No. of Phases	4	4	4	4
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2
Override Capacity	0	0	0	0

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.003	Δ*v/c* after mitigation:	-1.065
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
29	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	30	1	**30**	0	30	**30**	3	36	1	**36**	0	36	1	**36**	0	36	1	**36**
	Left-Through		0							0				0				0	
	Through	376	1	200	7	383	203	124	535	1	288	7	542	1	292	-1	541	1	291
	Through-Right		1							1				1				1	
	Right	23	0	23	0	23	23	16	41	0	41	0	41	0	41	0	41	0	41
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	44	1	44	0	44	44	17	65	1	65	0	65	1	65	0	65	1	65
	Left-Through		0							0				0				0	
	Through	876	1	**535**	29	905	**549**	117	1075	1	**647**	29	1104	1	**661**	-4	1100	1	**659**
	Through-Right		1							1				1				1	
	Right	193	0	193	0	193	193	7	218	0	218	0	218	0	218	0	218	0	218
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	100	1	**100**	2	102	**102**	20	129	1	**129**	2	131	1	**131**	0	131	1	**131**
	Left-Through		0							0				0				0	
	Through	1051	2	368	1	1052	368	244	1393	2	485	1	1394	2	486	0	1394	2	486
	Through-Right		1							1				1				1	
	Right	52	0	52	0	52	52	6	63	0	63	0	63	0	63	0	63	0	63
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	67	1	67	0	67	67	24	97	1	97	0	97	1	97	0	97	1	97
	Left-Through		0							0				0				0	
	Through	1269	2	**436**	15	1284	**441**	242	1630	2	**565**	15	1645	2	**570**	-2	1643	2	**570**
	Through-Right		1							1				1				1	
	Right	39	0	39	0	39	39	23	66	0	66	0	66	0	66	0	66	0	66
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		565	North-South:		579	North-South:			683	North-South:			697	North-South:			695
		East-West:		536	East-West:		543	East-West:			694	East-West:			701	East-West:			701
		SUM:		1101	SUM:		1122	SUM:			1377	SUM:			1398	SUM:			1396
	VOLUME/CAPACITY (V/C) RATIO:			0.773			0.787				0.966				0.981				0.980
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.673			0.687				0.866				0.881	With Imp.+TDM			0.880
	LEVEL OF SERVICE (LOS):			B			B				D				D				D

REMARKS:

With Imp.+TDM+Signal Imp. 0.870 D

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.015 — Δ*v/c* after mitigation: 0.004

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
29	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB--	0
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				2
Override Capacity			0			0			0			0			0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	45	1	45	0	45	45	87	136	1	136	0	136	1	136	0	136	1	136
	Left-Through		0							0				0				0	
	Through	779	1	**423**	29	808	**438**	92	944	1	**523**	29	973	1	**537**	-4	969	1	**535**
	Through-Right		1							1				1				1	
	Right	67	0	67	0	67	67	28	101	0	101	0	101	0	101	0	101	0	101
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	66	1	**66**	0	66	**66**	24	96	1	**96**	0	96	1	**96**	0	96	1	**96**
	Left-Through		0							0				0				0	
	Through	458	1	273	16	474	281	149	650	1	377	16	666	1	385	-2	664	1	384
	Through-Right		1							1				1				1	
	Right	87	0	87	0	87	87	8	103	0	103	0	103	0	103	0	103	0	103
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	230	1	**230**	0	230	**230**	8	260	1	**260**	0	260	1	**260**	0	260	1	**260**
	Left-Through		0							0				0				0	
	Through	1362	2	467	16	1378	472	314	1804	2	617	16	1820	2	622	-2	1818	2	622
	Through-Right		1							1				1				1	
	Right	39	0	39	0	39	39	4	47	0	47	0	47	0	47	0	47	0	47
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	41	1	41	0	41	41	26	71	1	71	0	71	1	71	0	71	1	71
	Left-Through		0							0				0				0	
	Through	1209	2	**425**	9	1218	**428**	375	1697	2	**590**	9	1706	2	**593**	-1	1705	2	**592**
	Through-Right		1							1				1				1	
	Right	66	0	66	0	66	66	0	72	0	72	0	72	0	72	0	72	0	72
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		North-South:		489	North-South:		504	North-South:			619	North-South:			633	North-South:			631
		East-West:		655	East-West:		658	East-West:			850	East-West:			853	East-West:			852
		SUM:		1144	SUM:		1162	SUM:			1469	SUM:			1486	SUM:			1483
VOLUME/CAPACITY (V/C) RATIO:				0.803			0.815				1.031				1.043				1.041
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.703			0.715				0.931				0.943	With Imp.+TDM			0.941
LEVEL OF SERVICE (LOS):				C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.931 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.012 — Δ*v/c* after mitigation: 0.000

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
30	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	10	1	10	0	10	10	0	11	1	11	0	11	1	11		11		**0**
Left-Through		0							0				0					
Through	51	0	**99**	4	55	**103**	15	71	0	**123**	4	75	0	**127**		75		0
Through-Right		1							1				1					
Right	48	0	0	0	48	0	0	52	0	0	0	52	0	0		52		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	12	1	**12**	0	12	**12**	5	18	1	**18**	0	18	1	**18**		18		0
Left-Through		0							0				0					
Through	41	0	62	7	48	76	8	53	0	78	7	60	0	92		60		**0**
Through-Right		1							1				1					
Right	21	0	0	7	28	0	2	25	0	0	7	32	0	0		32		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	22	1	**22**	0	22	**22**	0	24	1	**24**	0	24	1	**24**		24		0
Left-Through		0							0				0					
Through	933	2	318	1	934	319	278	1298	2	441	1	1299	2	441		1299		**0**
Through-Right		1							1				1					
Right	22	0	22	0	22	22	0	24	0	24	0	24	0	24		24		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	44	1	44	8	52	52	0	48	1	48	8	56	1	56		56		**0**
Left-Through		0							0				0					
Through	1619	2	**550**	8	1627	**553**	287	2058	2	**697**	8	2066	2	**700**		2066		0
Through-Right		1							1				1					
Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		111	*North-South:*		115	*North-South:*			141	*North-South:*			145	*North-South:*			0
	East-West:		572	*East-West:*		575	*East-West:*			721	*East-West:*			724	*East-West:*			0
	SUM:		683	*SUM:*		690	*SUM:*			862	*SUM:*			869	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.455			0.460				0.575				0.579				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.355**			**0.360**				**0.475**				**0.479**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.475
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	IVAR AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
30	East-West Street:	SUNSET BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases		2	2		2	2		2	2	2		2	2	2				
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0	0		0	0		0	0	0		0	0	0				
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB-- EB-- 0 WB--	0	0	NB-- 0 SB-- EB-- 0 WB--	0	0	NB-- 0 SB-- EB-- 0 WB--	0	0	0	NB-- 0 SB-- EB-- 0 WB--	0	0	0	NB-- SB-- EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?		2	2		2	2		2	2	2		2	2	2				
	Override Capacity		0	0		0	0		0	0	0		0	0	0				
NORTHBOUND	Left	46	1	46	0	46	46	0	50	1	50	0	50	1	50		50		**0**
	Left-Through		0							0				0					
	Through	166	0	**297**	16	182	**313**	11	193	0	**336**	16	209	0	**352**		209		0
	Through-Right		1							1				1					
	Right	131	0	0	0	131	0	0	143	0	0	0	143	0	0		143		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	59	1	**59**	0	59	**59**	5	70	1	**70**	0	70	1	**70**		70		0
	Left-Through		0							0				0					
	Through	66	0	127	9	75	143	8	80	0	157	9	89	0	173		89		**0**
	Through-Right		1							1				1					
	Right	61	0	0	7	68	0	10	77	0	0	7	84	0	0		84		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	35	1	35	10	45	45	3	41	1	41	10	51	1	51		51		0
	Left-Through		0							0				0					
	Through	1390	2	**487**	7	1397	**489**	362	1882	2	**653**	7	1889	2	**656**		1889		**0**
	Through-Right		1							1				1					
	Right	71	0	71	0	71	71	0	78	0	78	0	78	0	78		78		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	76	1	**76**	0	76	**76**	0	83	1	**83**	0	83	1	**83**		83		**0**
	Left-Through		0							0				0					
	Through	1209	2	418	3	1212	419	382	1704	2	586	3	1707	2	587		1707		0
	Through-Right		1							1				1					
	Right	44	0	44	0	44	44	6	54	0	54	0	54	0	54		54		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		356	North-South:		372	North-South:			406	North-South:			422	North-South:			0
		East-West:		563	East-West:		565	East-West:			736	East-West:			739	East-West:			0
		SUM:		919	SUM:		937	SUM:			1142	SUM:			1161	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.613			0.625				0.761				0.774				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.513**			**0.525**				**0.661**				**0.674**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.013	Δ*v/c* after mitigation:	-0.661
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
31	East-West Street:	VINE STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3			3	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	64	1	**64**	0	64	**64**	2	72	1	**72**	0	72	1	**72**	0	72	1	**72**
	Left-Through		0							0				0				0	
	Through	625	2	313	12	637	319	141	825	2	413	12	837	2	419	-2	835	2	418
	Through-Right		0							0				0				0	
	Right	155	1	29	0	155	29	33	203	1	23	0	203	1	23	0	203	1	23
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	52	1	52	4	56	56	58	115	1	115	4	119	1	119	-1	118	1	118
	Left-Through		0							0				0				0	
	Through	1338	2	**669**	44	1382	**691**	156	1619	2	**810**	44	1663	2	**832**	-7	1656	2	**828**
	Through-Right		0							0				0				0	
	Right	95	1	36	17	112	52	27	131	1	50	17	148	1	66	-3	145	1	63
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	59	1	**59**	1	60	**60**	16	81	1	**81**	1	82	1	**82**	0	82	1	**82**
	Left-Through		0							0				0				0	
	Through	949	2	340	0	949	340	265	1303	2	461	0	1303	2	461	0	1303	2	461
	Through-Right		1							1				1				1	
	Right	70	0	70	0	70	70	2	79	0	79	0	79	0	79	0	79	0	79
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	126	1	126	0	126	126	42	180	1	180	0	180	1	180	0	180	1	180
	Left-Through		0							0				0				0	
	Through	1397	2	**499**	0	1397	**500**	258	1786	2	**648**	0	1786	2	**649**	0	1786	2	**649**
	Through-Right		1							1				1				1	
	Right	100	0	100	2	102	102	49	158	0	158	2	160	0	160	0	160	0	160
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	733		*North-South:*	755		*North-South:*		882		*North-South:*		904		*North-South:*		900
			East-West:	558		*East-West:*	560		*East-West:*		729		*East-West:*		731		*East-West:*		731
			SUM:	1291		*SUM:*	1315		*SUM:*		1611		*SUM:*		1635		*SUM:*		1631
VOLUME/CAPACITY *(V/C)* RATIO:				0.906			0.923				1.131				1.147				1.145
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.806			0.823				1.031				1.047		*With Imp.+TDM*		1.045
LEVEL OF SERVICE (LOS):				D			D				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.035 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.016 — Δ*v/c* after mitigation: 0.004

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
31	East-West Street:	VINE STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3			3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3	NB--	3	SB-- 3
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2
Override Capacity			0			0			0			0			0			0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	84	1	84	0	84	84	3	95	1	95	0	95	1	95	0	95	1	95
	Left-Through		0							0				0				0	
	Through	1065	2	**533**	51	1116	**558**	218	1383	2	**692**	51	1434	2	**717**	-8	1426	2	**713**
	Through-Right		0							0				0				0	
	Right	160	1	11	0	160	11	43	218	1	9	0	218	1	9	0	218	1	9
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	61	1	**61**	5	66	**66**	113	180	1	**180**	5	185	1	**185**	-1	184	1	**184**
	Left-Through		0							0				0				0	
	Through	823	2	412	28	851	426	209	1109	2	555	28	1137	2	569	-4	1133	2	567
	Through-Right		0							0				0				0	
	Right	80	1	0	3	83	0	47	134	1	0	3	137	1	0	0	137	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	95	1	95	7	102	102	56	160	1	160	7	167	1	167	-1	166	1	166
	Left-Through		0							0				0				0	
	Through	1264	2	**450**	0	1264	**450**	307	1689	2	**595**	0	1689	2	**595**	0	1689	2	**595**
	Through-Right		1							1				1				1	
	Right	86	0	86	0	86	86	3	97	0	97	0	97	0	97	0	97	0	97
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	149	1	**149**	0	149	**149**	46	209	1	**209**	0	209	1	**209**	0	209	1	**209**
	Left-Through		0							0				0				0	
	Through	1174	2	423	0	1174	425	338	1622	2	615	0	1622	2	617	0	1622	2	617
	Through-Right		1							1				1				1	
	Right	95	0	95	7	102	102	119	223	0	223	7	230	0	230	-1	229	0	229
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	594		*North-South:*	624		*North-South:*		872		*North-South:*		902		*North-South:*		897
			East-West:	599		*East-West:*	599		*East-West:*		804		*East-West:*		804		*East-West:*		804
			SUM:	1193		*SUM:*	1223		*SUM:*		1676		*SUM:*		1706		*SUM:*		1701
	VOLUME/CAPACITY *(V/C)* RATIO:			0.837			0.858				1.176				1.197				1.194
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.737			0.758				1.076				1.097		*With Imp.+TDM*		1.094
	LEVEL OF SERVICE (LOS):			C			C				F				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.084 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.021 | Δ*v/c* after mitigation: 0.008

Significant impacted? YES | Fully mitigated? YES

Level of Service Worksheet
(Circular 212 Method)

31

PROJECT TITLE:
North-South Street: SUNSET BOULEVARD **East-West Street:** VINE STREET
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 12/28/2012

			AM PEAK HOUR			PM PEAK HOUR		
	No. of Phases				3			3
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0			0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB -- 3	SB --	3	NB -- 3	SB --	3
			EB -- 0	WB --	0	EB -- 0	WB --	0
	ATSAC-1 or ATSAC+ATCS-2?				2			2
	Override Capacity				0			0
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left		64	1	**64**	84	1	84
	Left-Through			0			0	
	Through		635	2	318	1108	2	**554**
	Through-Right			0			0	
	Right		155	1	29	160	1	11
	Left-Through-Right			0			0	
	Left-Right							
SOUTHBOUND	Left		55	1	55	65	1	**65**
	Left-Through			0			0	
	Through		1375	2	**688**	847	2	424
	Through-Right			0			0	
	Right		109	1	49	83	1	0
	Left-Through-Right			0			0	
	Left-Right							
EASTBOUND	Left		60	1	**60**	101	1	101
	Left-Through			0			0	
	Through		949	2	340	1264	2	**450**
	Through-Right			1			1	
	Right		70	0	70	86	0	86
	Left-Through-Right			0			0	
	Left-Right							
WESTBOUND	Left		126	1	126	149	1	**149**
	Left-Through			0			0	
	Through		1397	2	**500**	1174	2	425
	Through-Right			1			1	
	Right		102	0	102	101	0	101
	Left-Through-Right			0			0	
	Left-Right							
	CRITICAL VOLUMES			*North-South:*	752		*North-South:*	619
				East-West:	560		*East-West:*	599
				SUM:	1312		*SUM:*	1218
	VOLUME/CAPACITY *(V/C)* RATIO:				0.921			0.855
	V/C LESS ATSAC/ATCS ADJUSTMENT:			*With TDM*	**0.821**		*With TDM*	**0.755**
	LEVEL OF SERVICE (LOS):				**D**			**C**
				With TDM+Signal Imp.	**0.811**		*With TDM+Signal Imp.*	**0.745**
					D			**C**

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
32	East-West Street:	ARGYLE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2							
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0							
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	0	0	**0**	23	23	0	**23**	0	23	0	**23**		23		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	10	10	0	56	0	10	0	56		10		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	23	23	0	0	0	23	0	0		23		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	74	0	74	8	82	82	11	92	0	92	8	100	0	100		100		0
	Left-Through		0							0				0					
	Through	0	0	**171**	0	0	**179**	2	2	0	**246**	0	2	0	**254**		2		**0**
	Through-Right		0							0				0					
	Right	97	0	0	0	97	0	46	152	0	0	0	152	0	0		152		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	95	1	**95**	0	95	**95**	73	177	1	**177**	0	177	1	**177**		177		0
	Left-Through		0							0				0					
	Through	1103	2	368	4	1107	369	279	1485	2	497	4	1489	2	498		1489		**0**
	Through-Right		1							1				1					
	Right	0	0	0	0	0	0	5	5	0	5	0	5	0	5		5		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	5	5	0	5	0	5	0	5		5		**0**
	Left-Through		1							1				1					
	Through	1563	1	**543**	2	1565	**544**	282	1991	1	**707**	2	1993	1	**708**		1993		0
	Through-Right		1							1				1					
	Right	67	0	543	1	68	544	26	99	0	707	1	100	0	708		100		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		171	North-South:		179	North-South:			269	North-South:			277	North-South:			0
		East-West:		638	East-West:		639	East-West:			884	East-West:			885	East-West:			0
		SUM:		809	SUM:		818	SUM:			1153	SUM:			1162	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.539			0.545				0.769				0.775				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.439**			**0.445**				**0.669**				**0.675**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.669
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	SUNSET BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
32	East-West Street:	ARGYLE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	**0**	0	0	**0**	18	18	0	**18**	0	18	0	**18**		18		**0**
	Left-Through		0							0				0					
	Through	0	0	0	0	0	0	8	8	0	44	0	8	0	44		8		0
	Through-Right		0							0				0					
	Right	0	0	0	0	0	0	18	18	0	0	0	18	0	0		18		0
	Left-Through-Right		1							1				1					
	Left-Right																		
SOUTHBOUND	Left	91	0	91	3	94	94	35	135	0	135	3	138	0	138		138		0
	Left-Through		0							0				0					
	Through	0	0	**200**	0	0	**203**	13	13	0	**356**	0	13	0	**359**		13		**0**
	Through-Right		0							0				0					
	Right	109	0	0	0	109	0	89	208	0	0	0	208	0	0		208		0
	Left-Through-Right		1							1				1					
	Left-Right																		
EASTBOUND	Left	143	1	**143**	0	143	**143**	63	219	1	**219**	0	219	1	**219**		219		0
	Left-Through		0							0				0					
	Through	1381	2	460	5	1386	462	367	1877	2	635	5	1882	2	637		1882		**0**
	Through-Right		1							1				1					
	Right	0	0	0	0	0	0	29	29	0	29	0	29	0	29		29		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	0	0	0	0	0	0	29	29	0	29	0	29	0	29		29		**0**
	Left-Through		1							1				1					
	Through	1316	1	**472**	7	1323	**477**	401	1840	1	**716**	7	1847	1	**721**		1847		0
	Through-Right		1							1				1					
	Right	101	0	472	7	108	477	24	134	0	716	7	141	0	721		141		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		200	*North-South:*		203	*North-South:*			374	*North-South:*			377	*North-South:*			0
		East-West:		615	*East-West:*		620	*East-West:*			935	*East-West:*			940	*East-West:*			0
		SUM:		815	*SUM:*		823	*SUM:*			1309	*SUM:*			1317	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.543			0.549				0.873				0.878				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.443**			**0.449**				**0.773**				**0.778**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.773
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
33	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	8	1	**8**	0	8	**8**	0	9	1	**9**	0	9	1	**9**		9		**0**
	Left-Through		0							0				0					
	Through	539	1	272	7	546	276	135	724	1	365	7	731	1	368		731		0
	Through-Right		1							1				1					
	Right	5	0	5	0	5	5	0	5	0	5	0	5	0	5		5		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	13	0	13	0	13	13	0	14	0	14	0	14	0	14		14		0
	Left-Through		1							1				1					
	Through	972	0	**521**	29	1001	**536**	121	1184	0	**644**	29	1213	0	**659**		1213		**0**
	Through-Right		1							1				1					
	Right	44	0	521	0	44	536	0	48	0	644	0	48	0	659		48		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	12	0	**12**	0	12	**12**	0	13	0	**13**	0	13	0	**13**		13		0
	Left-Through		0							0				0					
	Through	43	0	69	1	44	70	5	52	0	80	1	53	0	81		53		**0**
	Through-Right		0							0				0					
	Right	14	0	0	0	14	0	0	15	0	0	0	15	0	0		15		0
	Left-Through-Right		1							1				1					
	Left-Right																		
WESTBOUND	Left	16	0	16	0	16	16	0	17	0	17	0	17	0	17		17		**0**
	Left-Through		0							0				0					
	Through	76	0	**120**	3	79	**123**	5	88	0	**136**	3	91	0	**139**		91		0
	Through-Right		0							0				0					
	Right	28	0	0	0	28	0	0	31	0	0	0	31	0	0		31		0
	Left-Through-Right		1							1				1					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		529	*North-South:*		544	*North-South:*			653	*North-South:*			668	*North-South:*			0
		East-West:		132	*East-West:*		135	*East-West:*			149	*East-West:*			152	*East-West:*			0
		SUM:		661	*SUM:*		679	*SUM:*			802	*SUM:*			820	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.441			0.453				0.535				0.547				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.341**			**0.353**				**0.435**				**0.447**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.012	Δ*v/c* after mitigation:	-0.435
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	CAHUENGA BOULEVARD	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
33	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	10	1	10	0	10	10	0	11	1	11	0	11	1	11		11		**0**
Left-Through		0							0				0					
Through	795	1	**406**	29	824	**421**	185	1054	1	**537**	29	1083	1	**551**		1083		0
Through-Right		1							1				1					
Right	17	0	17	0	17	17	0	19	0	19	0	19	0	19		19		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	31	0	**31**	0	31	**31**	0	34	0	**34**	0	34	0	**34**		34		0
Left-Through		1							1				1					
Through	555	0	358	16	571	366	172	779	0	512	16	795	0	520		795		**0**
Through-Right		1							1				1					
Right	37	0	358	0	37	366	0	40	0	512	0	40	0	520		40		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	60	0	60	0	60	60	0	66	0	66	0	66	0	66		66		0
Left-Through		0							0				0					
Through	173	0	**272**	3	176	**275**	7	196	0	**305**	3	199	0	**308**		199		**0**
Through-Right		0							0				0					
Right	39	0	0	0	39	0	0	43	0	0	0	43	0	0		43		0
Left-Through-Right		1							1				1					
Left-Right																		
WESTBOUND																		
Left	25	0	**25**	0	25	**25**	0	27	0	**27**	0	27	0	**27**		27		**0**
Left-Through		0							0				0					
Through	92	0	185	2	94	187	9	110	0	211	2	112	0	213		112		0
Through-Right		0							0				0					
Right	68	0	0	0	68	0	0	74	0	0	0	74	0	0		74		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	North-South:		437	North-South:		452	North-South:			571	North-South:			585	North-South:			0
	East-West:		297	East-West:		300	East-West:			332	East-West:			335	East-West:			0
	SUM:		734	SUM:		752	SUM:			903	SUM:			920	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:			0.489			0.501				0.602				0.613				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.389**			**0.401**				**0.502**				**0.513**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.011	Δ*v/c* after mitigation:	-0.502
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
34	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--		SB--	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2				
Override Capacity			0			0			0			0			0				

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	59	1	**59**	0	59	**59**	0	65	1	**65**	0	65	1	**65**		65		**0**
Left-Through		0							0				0					
Through	718	1	368	11	729	374	183	968	1	494	11	979	1	500		979		0
Through-Right		1							1				1					
Right	18	0	18	0	18	18	0	20	0	20	0	20	0	20		20		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	23	1	23	0	23	23	3	28	1	28	0	28	1	28		28		0
Left-Through		0							0				0					
Through	1182	1	**621**	41	1223	**646**	194	1487	1	**779**	41	1528	1	**804**		1528		**0**
Through-Right		1							1				1					
Right	60	0	60	8	68	68	5	71	0	71	8	79	0	79		79		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	45	1	**45**	1	46	**46**	5	54	1	**54**	1	55	1	**55**		55		0
Left-Through		0							0				0					
Through	33	0	94	0	33	94	0	36	0	103	0	36	0	103		36		**0**
Through-Right		1							1				1					
Right	61	0	0	0	61	0	0	67	0	0	0	67	0	0		67		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	26	0	26	0	26	26	0	28	0	28	0	28	0	28		28		**0**
Left-Through		0							0				0					
Through	74	0	**127**	0	74	**127**	0	81	0	**141**	0	81	0	**141**		81		0
Through-Right		0							0				0					
Right	27	0	0	0	27	0	2	32	0	0	0	32	0	0		32		0
Left-Through-Right		1							1				1					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		680	*North-South:*		705	*North-South:*			844	*North-South:*			869	*North-South:*			0
	East-West:		172	*East-West:*		173	*East-West:*			195	*East-West:*			196	*East-West:*			0
	SUM:		852	*SUM:*		878	*SUM:*			1039	*SUM:*			1065	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.568			0.585				0.693				0.710				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.468**			**0.485**				**0.593**				**0.610**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.017	Δ*v/c* after mitigation:	-0.593
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
34	East-West Street:	DE LONGPRE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--		WB--	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	101	1	**101**	0	101	**101**	0	110	1	**110**	0	110	1	**110**		110		**0**
	Left-Through		0							0				0					
	Through	1265	1	648	48	1313	672	242	1626	1	830	48	1674	1	854		1674		0
	Through-Right		1							1				1					
	Right	31	0	31	0	31	31	0	34	0	34	0	34	0	34		34		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	37	1	37	0	37	37	6	46	1	46	0	46	1	46		46		0
	Left-Through		0							0				0					
	Through	1112	1	**641**	26	1138	**657**	253	1469	1	**832**	26	1495	1	**848**		1495		**0**
	Through-Right		1							1				1					
	Right	170	0	170	5	175	175	9	195	0	195	5	200	0	200		200		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	121	1	121	3	124	124	7	139	1	139	3	142	1	142		142		0
	Left-Through		0							0				0					
	Through	121	0	**261**	0	121	**261**	0	132	0	**285**	0	132	0	**285**		132		**0**
	Through-Right		1							1				1					
	Right	140	0	0	0	140	0	0	153	0	0	0	153	0	0		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	25	0	**25**	0	25	**25**	0	27	0	**27**	0	27	0	**27**		27		**0**
	Left-Through		0							0				0					
	Through	61	0	106	0	61	106	0	67	0	123	0	67	0	123		67		0
	Through-Right		0							0				0					
	Right	20	0	0	0	20	0	7	29	0	0	0	29	0	0		29		0
	Left-Through-Right		1							1				1					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		742	*North-South:*		758	*North-South:*			942	*North-South:*			958	*North-South:*			0
		East-West:		286	*East-West:*		286	*East-West:*			312	*East-West:*			312	*East-West:*			0
		SUM:		1028	*SUM:*		1044	*SUM:*			1254	*SUM:*			1270	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.685			0.696				0.836				0.847				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.585**			**0.596**				**0.736**				**0.747**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.011	Δ*v/c* after mitigation:	-0.736
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
35	East-West Street:	FOUNTAIN AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	39	1	**39**	0	39	**39**	1	44	1	**44**	0	44	1	**44**	0	44	1	**44**
	Left-Through		0							0				0				0	
	Through	917	2	459	10	927	464	175	1178	2	589	10	1188	2	594	-1	1187	2	594
	Through-Right		0							0				0				0	
	Right	79	1	26	0	79	26	0	86	1	28	0	86	1	28	0	86	1	28
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	15	1	15	3	18	18	4	20	1	20	3	23	1	23	0	23	1	23
	Left-Through		0							0				0				0	
	Through	1281	2	**641**	36	1317	**659**	183	1584	2	**792**	36	1620	2	**810**	-5	1615	2	**808**
	Through-Right		0							0				0				0	
	Right	56	1	34	3	59	37	6	67	1	40	3	70	1	43	0	70	1	43
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	44	1	**44**	1	45	**45**	6	54	1	**54**	1	55	1	**55**	0	55	1	**55**
	Left-Through		0							0				0				0	
	Through	308	0	352	0	308	352	113	450	0	500	0	450	0	500	0	450	0	500
	Through-Right		1							1				1				1	
	Right	44	0	0	0	44	0	2	50	0	0	0	50	0	0	0	50	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	106	1	106	0	106	106	0	116	1	116	0	116	1	116	0	116	1	116
	Left-Through		0							0				0				0	
	Through	416	0	**452**	0	416	**453**	125	580	0	**621**	0	580	0	**622**	0	580	0	**622**
	Through-Right		1							1				1				1	
	Right	36	0	0	1	37	0	2	41	0	0	1	42	0	0	0	42	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES			*North-South:*	680		*North-South:*	698		*North-South:*		836		*North-South:*		854		*North-South:*		852
			East-West:	496		*East-West:*	498		*East-West:*		675		*East-West:*		677		*East-West:*		677
			SUM:	1176		*SUM:*	1196		*SUM:*		1511		*SUM:*		1531		*SUM:*		1529
VOLUME/CAPACITY *(V/C)* RATIO:				0.784			0.797				1.007				1.021				1.019
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.684**			**0.697**				**0.907**				**0.921**		*With Imp.+TDM*		**0.919**
LEVEL OF SERVICE (LOS):				**B**			**B**				**E**				**E**				**E**

REMARKS:

With Imp.+TDM+Signal Imp. **0.909** **E**

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: **0.014** Δ*v/c* after mitigation: **0.002**

Significant impacted? **YES** Fully mitigated? **YES**

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
35	East-West Street:	FOUNTAIN AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0	EB--	0	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	74	1	74	0	74	74	2	83	1	83	0	83	1	83	0	83	1	83
	Left-Through		0							0				0				0	
	Through	1249	2	**625**	41	1290	**645**	226	1592	2	**796**	41	1633	2	**817**	-6	1627	2	**814**
	Through-Right		0							0				0				0	
	Right	54	1	15	0	54	15	0	59	1	17	0	59	1	17	0	59	1	17
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	73	1	**73**	2	75	**75**	7	87	1	**87**	2	89	1	**89**	0	89	1	**89**
	Left-Through		0							0				0				0	
	Through	1137	2	569	22	1159	580	236	1480	2	740	22	1502	2	751	-3	1499	2	750
	Through-Right		0							0				0				0	
	Right	48	1	7	2	50	7	9	61	1	11	2	63	1	12	0	63	1	12
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	83	1	83	3	86	86	9	100	1	100	3	103	1	103	0	103	1	103
	Left-Through		0							0				0				0	
	Through	477	0	**521**	0	477	**521**	144	666	0	**715**	0	666	0	**715**	0	666	0	**715**
	Through-Right		1							1				1				1	
	Right	44	0	0	0	44	0	1	49	0	0	0	49	0	0	0	49	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	78	1	**78**	0	78	**78**	0	85	1	**85**	0	85	1	**85**	0	85	1	**85**
	Left-Through		0							0				0				0	
	Through	308	0	363	0	308	366	144	481	0	549	0	481	0	552	0	481	0	552
	Through-Right		1							1				1				1	
	Right	55	0	0	3	58	0	8	68	0	0	3	71	0	0	0	71	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	698		*North-South:*	720		*North-South:*	883			*North-South:*	906				*North-South:*	903
			East-West:	599		*East-West:*	599		*East-West:*	800			*East-West:*	800				*East-West:*	800
			SUM:	1297		*SUM:*	1319		*SUM:*	1683			*SUM:*	1706				*SUM:*	1703
	VOLUME/CAPACITY *(V/C)* RATIO:			0.865			0.879			1.122				1.137					1.135
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.765			0.779			1.022				1.037			*With Imp.+TDM*		1.035
	LEVEL OF SERVICE (LOS):			C			C			F				F					F

REMARKS:

With Imp.+TDM+Signal Imp. 1.025 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.015 — Δ*v/c* after mitigation: 0.003

Significant impacted? YES — Fully mitigated? YES

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
36	East-West Street:	SANTA MONICA BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	64	1	**64**	0	64	**64**	25	95	1	**95**	0	95	1	**95**		95		**0**
	Left-Through		0							0				0					
	Through	906	2	453	3	909	455	155	1146	2	573	3	1149	2	575		1149		0
	Through-Right		0							0				0					
	Right	71	1	4	0	71	4	2	80	1	3	0	80	1	3		80		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	68	1	68	12	80	80	24	98	1	98	12	110	1	110		110		0
	Left-Through		0							0				0					
	Through	1116	2	**558**	12	1128	**564**	149	1370	2	**685**	12	1382	2	**691**		1382		**0**
	Through-Right		0							0				0					
	Right	97	1	76	12	109	87	13	119	1	91	12	131	1	101		131		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	42	1	**42**	3	45	**45**	11	57	1	**57**	3	60	1	**60**		60		0
	Left-Through		0							0				0					
	Through	780	1	417	0	780	417	203	1056	1	566	0	1056	1	566		1056		**0**
	Through-Right		1							1				1					
	Right	53	0	53	0	53	53	18	76	0	76	0	76	0	76		76		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	135	1	135	0	135	135	7	155	1	155	0	155	1	155		155		**0**
	Left-Through		0							0				0					
	Through	1195	1	**617**	0	1195	**619**	235	1542	1	**797**	0	1542	1	**799**		1542		0
	Through-Right		1							1				1					
	Right	39	0	39	3	42	42	9	52	0	52	3	55	0	55		55		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		622	*North-South:*		628	*North-South:*			780	*North-South:*			786	*North-South:*			0
		East-West:		659	*East-West:*		664	*East-West:*			854	*East-West:*			859	*East-West:*			0
		SUM:		1281	*SUM:*		1292	*SUM:*			1634	*SUM:*			1645	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.854			0.861				1.089				1.097				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.754**			**0.761**				**0.989**				**0.997**				0.000
LEVEL OF SERVICE (LOS):				**C**			**C**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.989
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
36	East-West Street:	SANTA MONICA BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- SB--			
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
	Override Capacity			0			0			0				0					
NORTHBOUND	Left	83	1	83	0	83	83	27	118	1	118	0	118	1	118		118		**0**
	Left-Through		0							0				0					
	Through	1122	2	**561**	14	1136	**568**	179	1406	2	**703**	14	1420	2	**710**		1420		0
	Through-Right		0							0				0					
	Right	94	1	38	0	94	38	8	111	1	47	0	111	1	47		111		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	73	1	**73**	7	80	**80**	20	100	1	**100**	7	107	1	**107**		107		0
	Left-Through		0							0				0					
	Through	993	2	497	7	1000	500	199	1285	2	643	7	1292	2	646		1292		**0**
	Through-Right		0							0				0					
	Right	57	1	9	7	64	9	20	82	1	20	7	89	1	20		89		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	96	1	96	14	110	110	19	124	1	124	14	138	1	138		138		0
	Left-Through		0							0				0					
	Through	1139	1	**600**	0	1139	**600**	302	1548	1	**824**	0	1548	1	**824**		1548		**0**
	Through-Right		1							1				1					
	Right	61	0	61	0	61	61	32	99	0	99	0	99	0	99		99		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	112	1	**112**	0	112	**112**	6	128	1	**128**	0	128	1	**128**		128		**0**
	Left-Through		0							0				0					
	Through	989	1	523	0	989	530	279	1361	1	728	0	1361	1	735		1361		0
	Through-Right		1							1				1					
	Right	57	0	57	14	71	71	33	95	0	95	14	109	0	109		109		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	North-South:		634	North-South:		648	North-South:			803	North-South:			817	North-South:			0
		East-West:		712	East-West:		712	East-West:			952	East-West:			952	East-West:			0
		SUM:		1346	SUM:		1360	SUM:			1755	SUM:			1769	SUM:			0
	VOLUME/CAPACITY (V/C) RATIO:			0.897			0.907				1.170				1.179				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.797**			**0.807**				**1.070**				**1.079**				0.000
	LEVEL OF SERVICE (LOS):			**C**			**D**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.009	Δ*v/c* after mitigation:	-1.070
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
37	East-West Street:	MELROSE AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	103	1	103	0	103	103	8	121	1	121	0	121	1	121		121		**0**
Left-Through		0							0				0					
Through	984	1	**519**	2	986	**520**	185	1261	1	**661**	2	1263	1	**662**		1263		0
Through-Right		1							1				1					
Right	53	0	53	0	53	53	2	60	0	60	0	60	0	60		60		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	96	1	**96**	3	99	**99**	20	125	1	**125**	3	128	1	**128**		128		0
Left-Through		0							0				0					
Through	998	2	499	6	1004	502	145	1236	2	618	6	1242	2	621		1242		**0**
Through-Right		0							0				0					
Right	123	1	90	3	126	92	8	143	1	104	3	146	1	106		146		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	67	1	**67**	1	68	**68**	6	79	1	**79**	1	80	1	**80**		80		0
Left-Through		0							0				0					
Through	993	1	530	0	993	530	79	1165	1	619	0	1165	1	619		1165		**0**
Through-Right		1							1				1					
Right	66	0	66	0	66	66	1	73	0	73	0	73	0	73		73		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	80	1	80	0	80	80	1	88	1	88	0	88	1	88		88		**0**
Left-Through		0							0				0					
Through	1085	1	**589**	0	1085	**589**	149	1336	1	**727**	0	1336	1	**727**		1336		0
Through-Right		1							1				1					
Right	92	0	92	1	93	93	16	117	0	117	1	118	0	118		118		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	North-South:		615	North-South:		619	North-South:			786	North-South:			790	North-South:			0
	East-West:		656	East-West:		657	East-West:			806	East-West:			807	East-West:			0
	SUM:		1271	SUM:		1276	SUM:			1592	SUM:			1597	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:			0.847			0.851				1.061				1.065				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.747**			**0.751**				**0.961**				**0.965**				0.000
LEVEL OF SERVICE (LOS):			**C**			**C**				**E**				**E**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-0.961
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	12/28/2012
37	East-West Street:	MELROSE AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	112	1	112	0	112	112	1	123	1	123	0	123	1	123		123		**0**
	Left-Through		0							0				0					
	Through	1131	1	**590**	7	1138	**594**	193	1430	1	**743**	7	1437	1	**746**		1437		0
	Through-Right		1							1				1					
	Right	49	0	49	0	49	49	1	55	0	55	0	55	0	55		55		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	102	1	**102**	2	104	**104**	22	134	1	**134**	2	136	1	**136**		136		0
	Left-Through		0							0				0					
	Through	861	2	431	4	865	433	222	1164	2	582	4	1168	2	584		1168		**0**
	Through-Right		0							0				0					
	Right	103	1	51	2	105	51	9	122	1	60	2	124	1	60		124		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	105	1	105	3	108	108	10	125	1	125	3	128	1	128		128		0
	Left-Through		0							0				0					
	Through	1159	1	**619**	0	1159	**619**	145	1413	1	**752**	0	1413	1	**752**		1413		**0**
	Through-Right		1							1				1					
	Right	78	0	78	0	78	78	6	91	0	91	0	91	0	91		91		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	71	1	**71**	0	71	**71**	2	80	1	**80**	0	80	1	**80**		80		**0**
	Left-Through		0							0				0					
	Through	897	1	524	0	897	525	120	1101	1	638	0	1101	1	639		1101		0
	Through-Right		1							1				1					
	Right	150	0	150	3	153	153	10	174	0	174	3	177	0	177		177		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		692	North-South:		698	North-South:			877	North-South:			882	North-South:			0
		East-West:		690	East-West:		690	East-West:			832	East-West:			832	East-West:			0
		SUM:		1382	SUM:		1388	SUM:			1709	SUM:			1714	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.921			0.925				1.139				1.143				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.821**			**0.825**				**1.039**				**1.043**				0.000
LEVEL OF SERVICE (LOS):				**D**			**D**				**F**				**F**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	Δ*v/c* after mitigation:	-1.039
Significant impacted?	NO	Fully mitigated?	N/A

ATTACHMENT E
CMA Calculation Worksheets
Project EIR Residential Scenario
With Added Mitigation

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	43	1	**43**	8	51	**51**	1	48	1	**48**	8	56	1	**56**		56		**0**
	Left-Through		0							0				0					
	Through	354	1	210	20	374	241	7	394	1	239	20	414	1	270		414		0
	Through-Right		1							1				1					
	Right	66	0	66	41	107	107	12	84	0	84	41	125	0	125		125		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	96	1	96	-2	94	94	84	189	1	189	-2	187	1	187		187		0
	Left-Through		0							0				0					
	Through	1148	2	**574**	13	1161	**581**	120	1376	2	**688**	13	1389	2	**695**		1389		**0**
	Through-Right		0							0				0					
	Right	140	1	135	0	140	135	0	153	1	147	0	153	1	147		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	11	1	11	0	11	11	0	12	1	12	0	12	1	12		12		0
	Left-Through		0							0				0					
	Through	58	1	**58**	-1	57	**57**	24	87	1	**87**	-1	86	1	**86**		86		**0**
	Through-Right		0							0				0					
	Right	32	1	11	2	34	9	2	37	1	13	2	39	1	11		39		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	118	1	**118**	11	129	**129**	16	145	1	**145**	11	156	1	**156**		156		**0**
	Left-Through		0							0				0					
	Through	95	2	48	1	96	48	15	119	2	60	1	120	2	60		120		0
	Through-Right		0							0				0					
	Right	6	1	0	0	6	0	3	10	1	0	0	10	1	0		10		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		617	*North-South:*		632	*North-South:*			736	*North-South:*			751	*North-South:*			0
		East-West:		176	*East-West:*		186	*East-West:*			232	*East-West:*			242	*East-West:*			0
		SUM:		793	*SUM:*		818	*SUM:*			968	*SUM:*			993	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:				0.529			0.545				0.645				0.662				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.429**			**0.445**				**0.545**				**0.562**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.017	Δ*v/c* after mitigation:	-0.545
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
11	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases		2	2		2	2		2	2	2		2	2	2				
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?		0	0		0	0		0	0	0		0	0	0				
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--	0	0	NB-- 0 SB--	0	0	NB-- 0 SB--	0	0	0	NB-- 0 SB--	0	0	0	NB-- SB--			
		EB-- 0 WB--	0	0	EB-- 0 WB--	0	0	EB-- 0 WB--	0	0	0	EB-- 0 WB--	0	0	0	EB--		WB--	
	ATSAC-1 or ATSAC+ATCS-2?		2	2		2	2		2	2	2		2	2	2				
	Override Capacity		0	0		0	0		0	0	0		0	0	0				
NORTHBOUND	Left	165	1	**165**	5	170	**170**	6	186	1	**186**	5	191	1	**191**		191		**0**
	Left-Through		0							0				0					
	Through	690	1	451	16	706	480	8	763	1	513	16	779	1	541		779		0
	Through-Right		1							1				1					
	Right	212	0	212	41	253	253	30	262	0	262	41	303	0	303		303		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	38	1	38	-1	37	37	84	126	1	126	-1	125	1	125		125		0
	Left-Through		0							0				0					
	Through	700	2	**350**	51	751	**376**	163	929	2	**465**	51	980	2	**490**		980		**0**
	Through-Right		0							0				0					
	Right	36	1	19	0	36	19	0	39	1	21	0	39	1	21		39		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	34	1	34	0	34	34	0	37	1	37	0	37	1	37		37		0
	Left-Through		0							0				0					
	Through	124	1	**124**	2	126	**126**	39	175	1	**175**	2	177	1	**177**		177		**0**
	Through-Right		0							0				0					
	Right	51	1	0	9	60	0	8	64	1	0	9	73	1	0		73		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	78	1	**78**	41	119	**119**	10	95	1	**95**	41	136	1	**136**		136		**0**
	Left-Through		0							0				0					
	Through	87	2	44	0	87	44	29	124	2	62	0	124	2	62		124		0
	Through-Right		0							0				0					
	Right	11	1	0	-1	10	0	2	14	1	0	-1	13	1	0		13		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		515	*North-South:*		546	*North-South:*			651	*North-South:*			681	*North-South:*			0
		East-West:		202	*East-West:*		245	*East-West:*			270	*East-West:*			313	*East-West:*			0
		SUM:		717	*SUM:*		791	*SUM:*			921	*SUM:*			994	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.478			0.527				0.614				0.663				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.378**			**0.427**				**0.514**				**0.563**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.049	Δ*v/c* after mitigation:	-0.514
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet

(Circular 212 Method)

I/S #:	**North-South Street:**	ARGYLE AVENUE	**Year of Count:**	2011	**Ambient Growth: (%):**	1	**Conducted by:**		**Date:** 1/3/2013
12	**East-West Street:**	YUCCA STREET	**Projection Year:**	2020	**Peak Hour:**	AM	**Reviewed by:**	HS	**Project:**

	Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
No. of Phases	2	2	2	2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?	0	0	0	0	
Right Turns: FREE-1, NRTOR-2 or OLA-3? NB--	0	0	0	0	
SB--	1	1	1	1	
EB--	0	0	0	0	
WB--	0	0	0	0	
ATSAC-1 or ATSAC+ATCS-2?	2	2	2	2	
Override Capacity	0	0	0	0	

	MOVEMENT	EXISTING CONDITION Volume	No. of Lanes	Lane Volume	EXISTING PLUS PROJECT Project Traffic	Total Volume	Lane Volume	FUTURE CONDITION W/O PROJECT Added Volume	Total Volume	No. of Lanes	Lane Volume	FUTURE CONDITION W/ PROJECT Added Volume	Total Volume	No. of Lanes	Lane Volume	FUTURE W/ PROJECT W/ MITIGATION Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	16	0	**16**	-1	15	**15**	8	25	0	25	-1	24	0	24		24		**0**
	Left-Through		1							1				1					
	Through	170	0	103	33	203	118	256	442	0	**248**	33	475	0	**263**		475		0
	Through-Right		1							1				1					
	Right	3	0	103	0	3	118	0	3	0	248	0	3	0	263		3		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	1	0	1	0	1	1	2	3	0	**3**	0	3	0	**3**		3		0
	Left-Through		1							1				1					
	Through	236	1	**119**	3	239	**120**	52	310	1	158	3	313	1	160		313		**0**
	Through-Right		0							0				0					
	Right	126	1	0	7	133	0	12	150	1	0	7	157	1	0		157		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	96	1	**96**	43	139	**139**	61	166	1	**166**	43	209	1	**209**		209		0
	Left-Through		0							0				0					
	Through	40	1	40	0	40	40	9	53	1	53	0	53	1	53		53		**0**
	Through-Right		0							0				0					
	Right	73	1	73	0	73	73	81	161	1	161	0	161	1	161		161		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	15	1	15	4	19	19	26	42	1	42	4	46	1	46		46		**0**
	Left-Through		0							0				0					
	Through	59	0	**86**	2	61	**88**	3	68	0	**117**	2	70	0	**119**		70		0
	Through-Right		1							1				1					
	Right	27	0	0	0	27	0	19	49	0	0	0	49	0	0		49		0
	Left-Through-Right		0							0				0					
	Left-Right																		

		Existing Condition	Existing Plus Project	Future Condition W/O Project	Future Condition W/ Project	Future W/ Project W/ Mitigation
CRITICAL VOLUMES	*North-South:*	135	135	251	266	0
	East-West:	182	227	283	328	0
	SUM:	317	362	534	594	0
VOLUME/CAPACITY (*V/C*) RATIO:		0.211	0.241	0.356	0.396	0.000
***V/C* LESS ATSAC/ATCS ADJUSTMENT:**		0.111	0.141	0.256	0.296	0.000
LEVEL OF SERVICE (LOS):		A	A	A	A	A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.040	**Δ*v/c* after mitigation:**	-0.256
Significant impacted?	NO	**Fully mitigated?**	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
12	East-West Street:	YUCCA STREET	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
No. of Phases			2			2			2				2					
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		1	NB-- 0 SB--		1	NB-- 0 SB--		1		NB-- 0 SB--		1		NB-- SB--			
	EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- WB--			
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					
Override Capacity			0			0			0				0					
NORTHBOUND																		
Left	44	0	44	-1	43	43	17	65	0	65	-1	64	0	64		64		**0**
Left-Through		1							1				1					
Through	536	0	**294**	15	551	**301**	375	961	0	**520**	15	976	0	**559**		976		0
Through-Right		1							1				1					
Right	8	0	294	0	8	301	4	13	0	520	0	13	0	559		13		0
Left-Through-Right		0							0				0					
Left-Right																		
SOUTHBOUND																		
Left	12	0	**12**	0	12	**12**	3	16	0	**16**	0	16	0	**16**		16		0
Left-Through		1							1				1					
Through	100	1	62	10	110	67	57	166	1	115	10	176	1	120		176		**0**
Through-Right		0							0				0					
Right	80	1	0	33	113	0	15	102	1	0	33	135	1	0		135		0
Left-Through-Right		0							0				0					
Left-Right																		
EASTBOUND																		
Left	216	1	**216**	41	257	**257**	54	290	1	**290**	41	331	1	**331**		331		0
Left-Through		0							0				0					
Through	73	1	73	-1	72	72	3	83	1	83	-1	82	1	82		82		**0**
Through-Right		0							0				0					
Right	78	1	78	-2	76	76	89	174	1	174	-2	172	1	172		172		0
Left-Through-Right		0							0				0					
Left-Right																		
WESTBOUND																		
Left	4	1	4	15	19	19	35	39	1	39	15	54	1	54		54		**0**
Left-Through		0							0				0					
Through	36	0	**78**	14	50	**92**	20	59	0	**123**	14	73	0	**137**		73		0
Through-Right		1							1				1					
Right	42	0	0	0	42	0	18	64	0	0	0	64	0	0		64		0
Left-Through-Right		0							0				0					
Left-Right																		
CRITICAL VOLUMES	*North-South:*		306	*North-South:*		313	*North-South:*			536	*North-South:*			575	*North-South:*			0
	East-West:		294	*East-West:*		349	*East-West:*			413	*East-West:*			468	*East-West:*			0
	SUM:		600	*SUM:*		662	*SUM:*			949	*SUM:*			1043	*SUM:*			0
VOLUME/CAPACITY *(V/C)* RATIO:			0.400			0.441				0.633				0.695				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.300**			**0.341**				**0.533**				**0.595**				0.000
LEVEL OF SERVICE (LOS):			**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.062	Δ*v/c* after mitigation:	-0.533
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			3			3			3			3			3				3
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				0
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0	NB--	0	SB--	0
	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0	EB--	3	WB--	0
ATSAC-1 or ATSAC+ATCS-2?				2				2				2				2				2
Override Capacity				0				0				0				0				0

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	79	1	**79**	0	79	**79**	32	118	1	**118**	0	118	1	**118**	0	118	1	**118**
	Left-Through		0							0				0				0	
	Through	468	2	234	18	486	243	17	529	2	265	18	547	2	274	-3	544	2	272
	Through-Right		0							0				0				0	
	Right	127	1	71	0	127	71	23	162	1	82	0	162	1	82	0	162	1	82
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	26	1	26	16	42	42	19	47	1	47	16	63	1	63	-2	61	1	61
	Left-Through		0							0				0				0	
	Through	1165	1	**634**	74	1239	**688**	104	1378	1	**757**	74	1452	1	**810**	-11	1441	1	**802**
	Through-Right		1							1				1				1	
	Right	103	0	103	33	136	136	22	135	0	135	33	168	0	168	-5	163	0	163
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	11	1	**11**	10	21	**21**	8	20	1	**20**	10	30	1	**30**	-1	29	1	**29**
	Left-Through		0							0				0				0	
	Through	454	2	227	0	454	227	289	786	2	393	0	786	2	393	0	786	2	393
	Through-Right		0							0				0				0	
	Right	102	1	23	0	102	23	36	148	1	30	0	148	1	30	0	148	1	30
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	112	1	112	0	112	112	39	161	1	161	0	161	1	161	0	161	1	161
	Left-Through		0							0				0				0	
	Through	909	1	**464**	0	909	**466**	248	1242	1	**633**	0	1242	1	**635**	0	1242	1	**634**
	Through-Right		1							1				1				1	
	Right	18	0	18	4	22	22	3	23	0	23	4	27	0	27	-1	26	0	26
	Left-Through-Right		0							0				0				0	
	Left-Right																		
CRITICAL VOLUMES		*North-South:*		713	*North-South:*		767	*North-South:*			875	*North-South:*			928	*North-South:*			920
		East-West:		475	*East-West:*		487	*East-West:*			653	*East-West:*			665	*East-West:*			663
		SUM:		1188	*SUM:*		1254	*SUM:*			1528	*SUM:*			1593	*SUM:*			1583
VOLUME/CAPACITY *(V/C)* RATIO:				0.834			0.880				1.072				1.118				1.111
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.734			0.780				0.972				1.018	*With Imp.+TDM*			1.011
LEVEL OF SERVICE (LOS):				C			C				E				F				F

REMARKS:

With Imp.+TDM+Signal Imp. 1.001 F

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.046 — Δ*v/c* after mitigation: 0.029

Significant impacted? YES — Fully mitigated? NO

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
18	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			3			3			3				3					3
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 3 WB--		0	EB-- 3 WB--		0	EB-- 3 WB--		0		EB-- 3 WB--		0		EB-- 3 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	121	1	121	0	121	121	54	186	1	**186**	0	186	1	**186**	0	186	1	**186**
	Left-Through		0							0				0				0	
	Through	973	2	**487**	76	1049	**525**	37	1101	2	551	76	1177	2	589	-11	1166	2	583
	Through-Right		0							0				0				0	
	Right	187	1	136	0	187	136	63	268	1	193	0	268	1	193	0	268	1	193
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	9	73	**73**	34	104	1	104	9	113	1	113	-1	112	1	112
	Left-Through		0							0				0				0	
	Through	728	1	399	41	769	430	119	915	1	**509**	41	956	1	**540**	-6	950	1	**535**
	Through-Right		1							1				1				1	
	Right	70	0	70	20	90	90	26	103	0	103	20	123	0	123	-3	120	0	120
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	51	1	51	40	91	91	10	66	1	66	40	106	1	106	-6	100	1	100
	Left-Through		0							0				0				0	
	Through	980	2	**490**	1	981	**491**	291	1363	2	**682**	1	1364	2	**682**	0	1364	2	**682**
	Through-Right		0							0				0				0	
	Right	119	1	0	0	119	0	43	173	1	0	0	173	1	0	0	173	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	103	1	**103**	0	103	**103**	37	150	1	**150**	0	150	1	**150**	0	150	1	**150**
	Left-Through		0							0				0				0	
	Through	705	1	390	1	706	400	362	1133	1	609	1	1134	1	619	0	1134	1	617
	Through-Right		1							1				1				1	
	Right	75	0	75	18	93	93	3	85	0	85	18	103	0	103	-3	100	0	100
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		551	North-South:		598	North-South:			695	North-South:			726	North-South:			721
		East-West:		593	East-West:		594	East-West:			832	East-West:			832	East-West:			832
		SUM:		1144	SUM:		1192	SUM:			1527	SUM:			1558	SUM:			1553
	VOLUME/CAPACITY (V/C) RATIO:			0.803			0.836				1.072				1.093				1.090
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.703			0.736				0.972				0.993	With Imp.+TDM			0.990
	LEVEL OF SERVICE (LOS):			C			C				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.980 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.021 — Δ*v/c* after mitigation: 0.008

Significant impacted? YES — Fully mitigated? YES

Level of Service Worksheet
(Circular 212 Method)

18

PROJECT TITLE:
North-South Street: VINE STREET **East-West Street:** HOLLYWOOD BOULEVARD
Scenario: Existing with Project with Mitigation
Count Date: 2011 **Analyst:** **Date:** 1/4/2013

			AM PEAK HOUR			PM PEAK HOUR		
		No. of Phases			3			3
		Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0
		Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB -- 0	SB --	0	NB -- 0	SB --	0
			EB -- 3	WB --	0	EB -- 3	WB --	0
		ATSAC-1 or ATSAC+ATCS-2?			2			2
		Override Capacity			0			0
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Volume	No. of Lanes	Lane Volume
NORTHBOUND		Left	79	1	**79**	121	1	121
		Left-Through		0			0	
		Through	483	2	242	1038	2	**519**
		Through-Right		0			0	
		Right	127	1	71	187	1	136
		Left-Through-Right		0			0	
		Left-Right						
SOUTHBOUND		Left	40	1	40	72	1	**72**
		Left-Through		0			0	
		Through	1228	1	**680**	763	1	425
		Through-Right		1			1	
		Right	131	0	131	87	0	87
		Left-Through-Right		0			0	
		Left-Right						
EASTBOUND		Left	20	1	**20**	85	1	85
		Left-Through		0			0	
		Through	454	2	227	981	2	**491**
		Through-Right		0			0	
		Right	102	1	23	119	1	0
		Left-Through-Right		0			0	
		Left-Right						
WESTBOUND		Left	112	1	112	103	1	**103**
		Left-Through		0			0	
		Through	909	1	**465**	706	1	398
		Through-Right		1			1	
		Right	21	0	21	90	0	90
		Left-Through-Right		0			0	
		Left-Right						
	CRITICAL VOLUMES			*North-South:*	759		*North-South:*	591
				East-West:	485		*East-West:*	594
				SUM:	1244		*SUM:*	1185
	VOLUME/CAPACITY *(V/C)* RATIO:				0.873			0.832
	V/C LESS ATSAC/ATCS ADJUSTMENT:			*With Imp.+TDM*	0.773		*With Imp.+TDM*	0.732
	LEVEL OF SERVICE (LOS):				C			C
				With Imp.+TDM+Signal Imp.	0.763		*With Imp.+TDM+Signal Imp.*	0.722
					C			C

Version: 1i Beta; 8/4/2011

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	
	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	20	1	**20**	0	20	**20**	19	41	1	**41**	0	41	1	**41**	0	41	1	**41**
	Left-Through		0							0				0				0	
	Through	142	1	142	2	144	144	94	249	1	249	2	251	1	251	0	251	1	251
	Through-Right		0							0				0				0	
	Right	23	1	0	0	23	0	11	36	1	0	0	36	1	0	0	36	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	27	1	27	14	41	41	24	54	1	54	14	68	1	68	-2	66	1	66
	Left-Through		0							0				0				0	
	Through	251	1	**251**	11	262	**262**	81	356	1	**356**	11	367	1	**367**	-2	365	1	**365**
	Through-Right		0							0				0				0	
	Right	41	1	26	0	41	26	39	84	1	32	0	84	1	32	0	84	1	32
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	30	1	**30**	0	30	**30**	71	104	1	**104**	0	104	1	**104**	0	104	1	**104**
	Left-Through		0							0				0				0	
	Through	433	2	217	16	449	225	213	687	2	344	16	703	2	352	-2	701	2	351
	Through-Right		0							0				0				0	
	Right	44	1	34	0	44	34	55	103	1	83	0	103	1	83	0	103	1	83
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	131	1	131	0	131	131	35	178	1	178	0	178	1	178	0	178	1	178
	Left-Through		0							0				0				0	
	Through	995	1	**516**	4	999	**519**	239	1327	1	**727**	4	1331	1	**730**	-1	1330	1	**730**
	Through-Right		1							1				1				1	
	Right	36	0	36	3	39	39	87	126	0	126	3	129	0	129	0	129	0	129
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES		*North-South:*	271		*North-South:*	282		*North-South:*		397		*North-South:*		408		*North-South:*		406
			East-West:	546		*East-West:*	549		*East-West:*		831		*East-West:*		834		*East-West:*		834
			SUM:	817		*SUM:*	831		*SUM:*		1228		*SUM:*		1242		*SUM:*		1240
	VOLUME/CAPACITY *(V/C)* RATIO:			0.545			0.554				0.819				0.828				0.827
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.445			0.454				0.719				0.728		*With Imp.+TDM*		0.727
	LEVEL OF SERVICE (LOS):			A			A				C				C				C

REMARKS:

With Imp.+TDM+Signal Imp. 0.717 C

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — Δ*v/c* after mitigation: -0.002

Significant impacted? NO — Fully mitigated? N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
19	East-West Street:	HOLLYWOOD BOULEVARD	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
	No. of Phases			2			2			2				2					2
	Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0					0
	Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 0 SB--		0	NB-- 0 SB--		0	NB-- 0 SB--		0		NB-- 0 SB--		0		NB-- 0 SB--		0	
		EB-- 0 WB--		0	EB-- 0 WB--		0	EB-- 0 WB--		0		EB-- 0 WB--		0		EB-- 0 WB--		0	
	ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2					2
	Override Capacity			0			0			0				0					0
NORTHBOUND	Left	67	1	67	0	67	67	56	129	1	129	0	129	1	129	0	129	1	129
	Left-Through		0							0				0				0	
	Through	440	1	**440**	10	450	**450**	198	679	1	**679**	10	689	1	**689**	-1	688	1	**688**
	Through-Right		0							0				0				0	
	Right	41	1	4	0	41	4	38	83	1	33	0	83	1	33	0	83	1	33
	Left-Through-Right		0							0				0				0	
	Left-Right																		
SOUTHBOUND	Left	45	1	**45**	5	50	**50**	46	95	1	**95**	5	100	1	**100**	-1	99	1	**99**
	Left-Through		0							0				0				0	
	Through	144	1	144	4	148	148	85	242	1	242	4	246	1	246	-1	245	1	245
	Through-Right		0							0				0				0	
	Right	37	1	0	0	37	0	50	90	1	0	0	90	1	0	0	90	1	0
	Left-Through-Right		0							0				0				0	
	Left-Right																		
EASTBOUND	Left	83	1	83	0	83	83	92	183	1	**183**	0	183	1	**183**	0	183	1	**183**
	Left-Through		0							0				0				0	
	Through	1031	2	**516**	9	1040	**520**	268	1396	2	698	9	1405	2	703	-1	1404	2	702
	Through-Right		0							0				0				0	
	Right	89	1	56	-1	88	55	39	136	1	72	-1	135	1	71	0	135	1	71
	Left-Through-Right		0							0				0				0	
	Left-Right																		
WESTBOUND	Left	74	1	**74**	0	74	**74**	19	100	1	100	0	100	1	100	0	100	1	100
	Left-Through		0							0				0				0	
	Through	753	1	418	20	773	434	298	1122	1	**646**	20	1142	1	**662**	-3	1139	1	**659**
	Through-Right		1							1				1				1	
	Right	83	0	83	12	95	95	78	169	0	169	12	181	0	181	-2	179	0	179
	Left-Through-Right		0							0				0				0	
	Left-Right																		
	CRITICAL VOLUMES	North-South:		485	North-South:		500	North-South:			774	North-South:			789	North-South:			787
		East-West:		590	East-West:		594	East-West:			829	East-West:			845	East-West:			842
		SUM:		1075	SUM:		1094	SUM:			1603	SUM:			1634	SUM:			1629
	VOLUME/CAPACITY (V/C) RATIO:			0.717			0.729				1.069				1.089				1.086
	V/C LESS ATSAC/ATCS ADJUSTMENT:			0.617			0.629				0.969				0.989	With Imp.+TDM			0.986
	LEVEL OF SERVICE (LOS):			B			B				E				E				E

REMARKS:

With Imp.+TDM+Signal Imp. 0.976 E

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.020 — Δ*v/c* after mitigation: 0.007

Significant impacted? YES — Fully mitigated? YES

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	39	1	**39**	0	39	**39**	49	92	1	**92**	0	92	1	**92**		92		**0**
	Left-Through		0							0				0					
	Through	589	2	295	14	603	302	63	707	2	354	14	721	2	361		721		0
	Through-Right		0							0				0					
	Right	82	1	50	0	82	50	86	176	1	124	0	176	1	124		176		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	45	1	45	3	48	48	3	52	1	52	3	55	1	55		55		0
	Left-Through		0							0				0					
	Through	1258	1	**643**	65	1323	**679**	108	1484	1	**791**	65	1549	1	**827**		1549		**0**
	Through-Right		1							1				1					
	Right	28	0	28	6	34	34	67	98	0	98	6	104	0	104		104		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	21	1	21	1	22	22	8	31	1	31	1	32	1	32		32		0
	Left-Through		0							0				0					
	Through	58	0	**105**	0	58	**105**	71	134	0	**208**	0	134	0	**208**		134		**0**
	Through-Right		1							1				1					
	Right	47	0	0	0	47	0	23	74	0	0	0	74	0	0		74		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	64	1	**64**	0	64	**64**	34	104	1	**104**	0	104	1	**104**		104		**0**
	Left-Through		0							0				0					
	Through	52	0	89	0	52	91	88	145	0	185	0	145	0	187		145		0
	Through-Right		1							1				1					
	Right	37	0	0	2	39	0	0	40	0	0	2	42	0	0		42		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		682	North-South:		718	North-South:			883	North-South:			919	North-South:			0
		East-West:		169	East-West:		169	East-West:			312	East-West:			312	East-West:			0
		SUM:		851	SUM:		887	SUM:			1195	SUM:			1231	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.567			0.591				0.797				0.821				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				0.467			0.491				0.697				0.721				0.000
LEVEL OF SERVICE (LOS):				A			A				B				C				A

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.024	Δ*v/c* after mitigation:	-0.697
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	VINE STREET	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
26	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	80	1	80	0	80	80	43	130	1	130	0	130	1	130		130		**0**
	Left-Through		0							0				0					
	Through	1082	2	**541**	66	1148	**574**	113	1296	2	**648**	66	1362	2	**681**		1362		0
	Through-Right		0							0				0					
	Right	152	1	109	0	152	109	111	277	1	201	0	277	1	201		277		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	64	1	**64**	3	67	**67**	9	79	1	**79**	3	82	1	**82**		82		0
	Left-Through		0							0				0					
	Through	833	1	432	37	870	452	183	1094	1	573	37	1131	1	593		1131		**0**
	Through-Right		1							1				1					
	Right	31	0	31	3	34	34	17	51	0	51	3	54	0	54		54		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	73	1	73	5	78	78	41	121	1	121	5	126	1	126		126		0
	Left-Through		0							0				0					
	Through	126	0	**226**	0	126	**226**	107	245	0	**406**	0	245	0	**406**		245		**0**
	Through-Right		1							1				1					
	Right	100	0	0	0	100	0	52	161	0	0	0	161	0	0		161		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	87	1	**87**	0	87	**87**	58	153	1	**153**	0	153	1	**153**		153		**0**
	Left-Through		0							0				0					
	Through	87	0	181	0	87	185	95	190	0	293	0	190	0	297		190		0
	Through-Right		1							1				1					
	Right	94	0	0	4	98	0	0	103	0	0	4	107	0	0		107		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		605	North-South:		641	North-South:			727	North-South:			763	North-South:			0
		East-West:		313	East-West:		313	East-West:			559	East-West:			559	East-West:			0
		SUM:		918	SUM:		954	SUM:			1286	SUM:			1322	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.612			0.636				0.857				0.881				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.512**			**0.536**				**0.757**				**0.781**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**C**				**C**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.024	Δ*v/c* after mitigation:	-0.757
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	AM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	20	1	**20**	0	20	**20**	11	33	1	**33**	0	33	1	**33**		33		**0**
	Left-Through		0							0				0					
	Through	81	0	91	1	82	92	60	149	0	197	1	150	0	198		150		0
	Through-Right		1							1				1					
	Right	10	0	0	0	10	0	37	48	0	0	0	48	0	0		48		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	23	1	23	3	26	26	46	71	1	71	3	74	1	74		74		0
	Left-Through		0							0				0					
	Through	303	0	**362**	8	311	**370**	41	372	0	**458**	8	380	0	**466**		380		**0**
	Through-Right		1							1				1					
	Right	59	0	0	0	59	0	21	86	0	0	0	86	0	0		86		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	58	1	**58**	0	58	**58**	70	133	1	**133**	0	133	1	**133**		133		0
	Left-Through		0							0				0					
	Through	50	0	108	3	53	111	89	144	0	209	3	147	0	212		147		**0**
	Through-Right		1							1				1					
	Right	58	0	0	0	58	0	2	65	0	0	0	65	0	0		65		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	28	1	28	0	28	28	18	49	1	49	0	49	1	49		49		**0**
	Left-Through		0							0				0					
	Through	42	0	**94**	2	44	**97**	90	136	0	**227**	2	138	0	**230**		138		0
	Through-Right		1							1				1					
	Right	52	0	0	1	53	0	34	91	0	0	1	92	0	0		92		0
	Left-Through-Right		0							0				0					
	Left-Right																		
CRITICAL VOLUMES		North-South:		382	North-South:		390	North-South:			491	North-South:			499	North-South:			0
		East-West:		152	East-West:		155	East-West:			360	East-West:			363	East-West:			0
		SUM:		534	SUM:		545	SUM:			851	SUM:			862	SUM:			0
VOLUME/CAPACITY (V/C) RATIO:				0.356			0.363				0.567				0.575				0.000
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.256**			**0.263**				**0.467**				**0.475**				0.000
LEVEL OF SERVICE (LOS):				**A**			**A**				**A**				**A**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.008	Δ*v/c* after mitigation:	-0.467
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Workheet
(Circular 212 Method)

I/S #:	North-South Street:	ARGYLE AVENUE	Year of Count:	2011	Ambient Growth: (%):	1	Conducted by:		Date:	1/3/2013
27	East-West Street:	SELMA AVENUE	Projection Year:	2020	Peak Hour:	PM	Reviewed by:	HS	Project:	

No. of Phases			2			2			2			2			2				
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0				
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--						
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--						
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2							
Override Capacity			0			0			0			0							

	MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	43	1	**43**	0	43	**43**	3	50	1	**50**	0	50	1	**50**		50		**0**
	Left-Through		0							0				0					
	Through	262	0	274	7	269	281	64	351	0	387	7	358	0	394		358		0
	Through-Right		1							1				1					
	Right	12	0	0	0	12	0	23	36	0	0	0	36	0	0		36		0
	Left-Through-Right		0							0				0					
	Left-Right																		
SOUTHBOUND	Left	17	1	17	0	17	17	40	59	1	59	0	59	1	59		59		0
	Left-Through		0							0				0					
	Through	165	0	**261**	3	168	**264**	97	277	0	**430**	3	280	0	**433**		280		**0**
	Through-Right		1							1				1					
	Right	96	0	0	0	96	0	48	153	0	0	0	153	0	0		153		0
	Left-Through-Right		0							0				0					
	Left-Right																		
EASTBOUND	Left	150	1	**150**	0	150	**150**	115	279	1	**279**	0	279	1	**279**		279		0
	Left-Through		0							0				0					
	Through	118	0	205	3	121	208	110	239	0	346	3	242	0	349		242		**0**
	Through-Right		1							1				1					
	Right	87	0	0	0	87	0	12	107	0	0	0	107	0	0		107		0
	Left-Through-Right		0							0				0					
	Left-Right																		
WESTBOUND	Left	23	1	23	0	23	23	35	60	1	60	0	60	1	60		60		**0**
	Left-Through		0							0				0					
	Through	103	0	**203**	4	107	**209**	102	215	0	**374**	4	219	0	**380**		219		0
	Through-Right		1							1				1					
	Right	100	0	0	2	102	0	50	159	0	0	2	161	0	0		161		0
	Left-Through-Right		0							0				0					
	Left-Right																		
	CRITICAL VOLUMES	*North-South:*		304	*North-South:*		307	*North-South:*			480	*North-South:*			483	*North-South:*			0
		East-West:		353	*East-West:*		359	*East-West:*			653	*East-West:*			659	*East-West:*			0
		SUM:		657	*SUM:*		666	*SUM:*			1133	*SUM:*			1142	*SUM:*			0
	VOLUME/CAPACITY *(V/C)* RATIO:			0.438			0.444				0.755				0.761				0.000
	V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.338**			**0.344**				**0.655**				**0.661**				0.000
	LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**A**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.006	Δ*v/c* after mitigation:	-0.655
Significant impacted?	NO	Fully mitigated?	N/A

Appendix G

Site Access Impact and Pedestrian/Bicycle Safety Analysis, Crain & Associates, January 15, 2013

Millennium Hollywood Project
Site Access Impact and Pedestrian/Bicycle Safety Analyses

Introduction

The detailed Millennium Hollywood project (the Project) operational and construction traffic, parking and transit impacts are addressed in the June 2012 Traffic Impact Report (Traffic Study). However, in comments on the Draft EIR, concerns were raised about the Project impacts upon the streets and sidewalk areas immediately adjacent to the Project Site. This analysis addresses the impact of the Project on the pedestrian safety conditions adjacent to the Project Site.

Site Access Impact

As illustrated in Attachment A, Site Plan, vehicular access to the West Site will be provided via two full-service driveways along Ivar Avenue and Vine Street respectively. The driveway on Ivar Avenue will be located approximately 250 feet south of Yucca Street and the driveway on Vine Street will be located approximately 270 feet south of Yucca Street. Both driveways will serve the parking structure on the West Site and thereby all uses of the Project including the residential, commercial, and non-commercial components situated on the West Site.

To access the East Site, two full-service driveways will be provided on Vine Street and Argyle Avenue, in addition to the existing driveway serving the Capitol Records Building on Yucca Street. The driveway on Vine Street will be located approximately 460 feet south of Yucca Street and will serve the parking for both the residential and the office uses. The second East Site driveway, located on Argyle Avenue approximately 360 feet south of Yucca Street, will exclusively serve the residential use portion of the parking. The existing Capitol Records East Site driveway is approximately 200 feet west of Argyle Avenue on Yucca Street and will serve the office use portion of the parking exclusively.

Ingress/egress driveways to/from the Project Site will be designed and constructed in accordance with the City design standards. This analysis concludes that the driveways as shown on the Site Plan will not introduce any unusual adverse hazards. The City's permit process will ensure that no hazards are introduced into the final design and that the driveways will comply with the City's applicable emergency and other access requirements. The final construction Site Plan will be assessed in detail by the City of Los Angeles Department of Transportation (LADOT) as part of the building permit plan set approval process to ensure that 1) adequate emergency circulation is being provided[1] prior to a building permit being issued, 2) width and gate set back requirements are all met to ensure that queues do not extend into the public rights-of-way, and 3) adequate driveway sight distance continues to be provided for vehicles maneuvering into or out of the Project driveways.

[1] *The final Site Plan/plot plan will also be reviewed by the LAFD and the LAPD to ensure adequate emergency access is provided.*

The City of Los Angeles CEQA Thresholds Guide criteria specifies that if a project generates more than 500 daily trips or 43 a.m. or p.m. peak hour trips, then the following items should be considered:

- Is a Project driveway proposed on a major or secondary highway within 150 feet of an intersection with another major or secondary highway?

- Would a project driveway intersect an on-street bicycle lane or cross a sidewalk in an area of high pedestrian activity?

- Can it be readily perceived that there are access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls or other barriers to adequate lines of sight?

Currently, there are multiple driveways serving the existing facilities on the Project Site. These include:

- Vine Street - A two-way driveway serves the surface parking lot on the East Site. Three one-way driveways serve the surface parking lot and the Capitol Records Building on the West Site.

- Yucca Street – A two-way driveway serves the Capitol Records Building.

- Ivar Avenue – A two-way driveway serves the parking lot on the West Site and another two-way driveway serves the Enterprise Rent-a-Car site.

- Argyle Avenue – A two-way driveway directly on Argyle Avenue and another two-way driveway from the mid-block alley serve the parking lot and the Capitol Records Building on the East Site.

The Project would reduce the number of driveways serving the Project Sites on Vine Street, Ivar Avenue and Argyle Avenue from the existing conditions. Each driveway will be greater than 150 feet from the nearest intersection. No potential sightline conflict with other vehicles, including bicycles, has been identified at these driveways. However, there is a potential for a high level of pedestrian activity near the Project driveways, so further study of the potential for vehicular/pedestrian conflicts was conducted.

Pedestrian Analysis

To further address potential vehicular/pedestrian conflicts, pedestrian/bicycle counts along the Project driveway frontage streets were conducted for twelve consecutive hours (7:00 AM – 7:00 PM on a weekday (December 19, 2012), when majority of schools and other nearby educational institutions were still in session. The counts were conducted in order to determine if the sidewalks that would have a Project driveway are in an area with high pedestrian activity. The count worksheets are included in Attachment B. The counts show that the highest hourly pedestrian/bike volumes occurred on each of the streets to have a driveway added as follows:

- 59 pedestrians/bikes passing through the Ivar Avenue Project driveway frontage sidewalk (east sidewalk) between 4:45 PM - 5:45 PM;
- 428 pedestrians/bikes passing through the Vine Street Project driveway frontage sidewalk (west sidewalk) between 1:00 PM – 2:00 PM;
- 126 pedestrians/bikes passing through the Vine Street Project driveway frontage sidewalk (east sidewalk) between 12:30 PM – 1:30 PM;
- 89 pedestrians/bikes passing through the Argyle Avenue Project driveway frontage sidewalk (west sidewalk) between 4:00 PM – 5:00 PM;
- 37 pedestrians/bikes passing through the Yucca Street Project driveway frontage sidewalk (south sidewalk) between 10:00 AM – 11:00 AM and 11:30 AM – 12:30 PM.

In order to determine if the sidewalk volumes represent an area of high pedestrian activity, the Transportation Research Board, Highway Capacity Manual, 2010 (HCM) methodology was utilized. The pedestrian flow rates are used to determine the pedestrian density, which is in turn used to determine restrictions on the pedestrians' ability to maneuver. The Qualitative Description for Pedestrian Space is shown in Table 1. The first four categories are not considered high pedestrian flow areas.

Table 1
Qualitative Description of Pedestrian Space *

Pedestrian Space (ft^2 / p)		
Random Flow	Platoon Flow	Description
>60	>530	Ability to move in desired path, no need to alter movements
>40-60	>90-530	Occasional need to adjust path to avoid conflicts
>24-40	>40-90	Frequent need to adjust path to avoid conflicts
>15-24	>23-40	Speed and ability to pass slower pedestrians restricteds
>8-15	>11-23	Speed restricted, very limited ability to pass slower pedestrians
≤8	≤11	Speed severily restricted, frequent contact with other users

* Transportation Research Board Highway Capacity Manual, 2010 (HCM) Exhibit 17-16.

Table 2 uses the HCM methodology to estimate the pedestrian densities for the sidewalks at the Project driveways being analyzed. As shown in Table 2, the lowest average space for each pedestrian on the sidewalk is approximately 443.99 ft^2/p at Vine Street (east sidewalk). Other Project driveway frontage sidewalks are all serving at better pedestrian space levels. As shown in Table 1, all of these sidewalks at the Project driveway frontages are in the highest category when considering flows to be random flows. Even if the flows are considered platoon flows for an organized event, the space provided is in the highest two categories. Therefore, the street segment sidewalks that the Project driveways will be located along are considered to be providing good pedestrian space levels, and thus the sidewalks that will have added Project driveways are not considered to be in areas of high pedestrian activity and conflicts with pedestrian activity will be less than significant.

Table 2
Project Site Frontage Sidewalk Pedestrian Space Assumptions

Ivar Avenue (east sidewalk)			
Standard Walking Speed **S**	4.4	ft/s	(HCM recommended for this type of location)
Effective Sidewalk Width **W***	7	ft	(field check shows 10 ft concrete sidewalk width)
Peak Pedestrian Volumes **V**	59	peds/h	(pedestrian/bike peak hour counts 4:45-5:45 PM)
Ped. Flow/unit width of sidewalk **v**	0.14	p/ft/min	(v = V / 60 W -- HCM Equation 17-27)
Average Walking Speed **Sp**	4.40	ft/s	(SP = (1-0.00078 v^2) S -- HCM Equation 17-28)
Average Pedestrian Space **A**	1879.29	ft^2/p	(A = 60 Sp/v -- HCM Equation 17-29)
Vine Street (west sidewalk)			
Standard Walking Speed **S**	4.4	ft/s	(HCM recommended for this type of location)
Effective Sidewalk Width **W***	12	ft	(field check shows 15 ft concrete sidewalk width)
Peak Pedestrian Volumes **V**	428	peds/h	(pedestrian/bike peak hour counts 1:00-2:00 PM)
Ped. Flow/unit width of sidewalk **v**	0.59	p/ft/min	(v = V / 60 W -- HCM Equation 17-27)
Average Walking Speed **Sp**	4.40	ft/s	(SP = (1-0.00078 v^2) S -- HCM Equation 17-28)
Average Pedestrian Space **A**	443.99	ft^2/p	(A = 60 Sp/v -- HCM Equation 17-29)
Vine Street (east sidewalk)			
Standard Walking Speed **S**	4.4	ft/s	(HCM recommended for this type of location)
Effective Sidewalk Width **W***	12	ft	(field check shows 15 ft concrete sidewalk width)
Peak Pedestrian Volumes **V**	126	peds/h	(pedestrian/bike peak hour counts 12:30-1:30 PM)
Ped. Flow/unit width of sidewalk **v**	0.18	p/ft/min	(v = V / 60 W -- HCM Equation 17-27)
Average Walking Speed **Sp**	4.40	ft/s	(SP = (1-0.00078 v^2) S -- HCM Equation 17-28)
Average Pedestrian Space **A**	1508.54	ft^2/p	(A = 60 Sp/v -- HCM Equation 17-29)
Argyle Avenue (west sidewalk)			
Standard Walking Speed **S**	4.4	ft/s	(HCM recommended for this type of location)
Effective Sidewalk Width **W***	7	ft	(field check shows 10 ft concrete sidewalk width)
Peak Pedestrian Volumes **V**	89.00	peds/h	(pedestrian/bike peak hour counts 4:00-5:00 PM)
Ped. Flow/unit width of sidewalk **v**	0.21	p/ft/min	(v = V / 60 W -- HCM Equation 17-27)
Average Walking Speed **Sp**	4.40	ft/s	(SP = (1-0.00078 v^2) S -- HCM Equation 17-28)
Average Pedestrian Space **A**	1245.80	ft^2/p	(A = 60 Sp/v -- HCM Equation 17-29)
Yucca Street (south sidewalk)			
Standard Walking Speed **S**	4.4	ft/s	(HCM recommended for this type of location)
Effective Sidewalk Width **W***	8	ft	(field check shows 12 ft concrete sidewalk width)
Peak Pedestrian Volumes **V**	83	peds/h	(pedestrian/bike peak hour counts 10:00-11:00 AM and 11:30 AM-12:30 PM)
Ped. Flow/unit width of sidewalk **v**	0.17	p/ft/min	(v = V / 60 W -- HCM Equation 17-27)
Average Walking Speed **Sp**	4.40	ft/s	(SP = (1-0.00078 v^2) S -- HCM Equation 17-28)
Average Pedestrian Space **A**	1526.71	ft^2/p	(A = 60 Sp/v -- HCM Equation 17-29)

*A reduction of 3-4 feet taken to account for street furniture blockages.

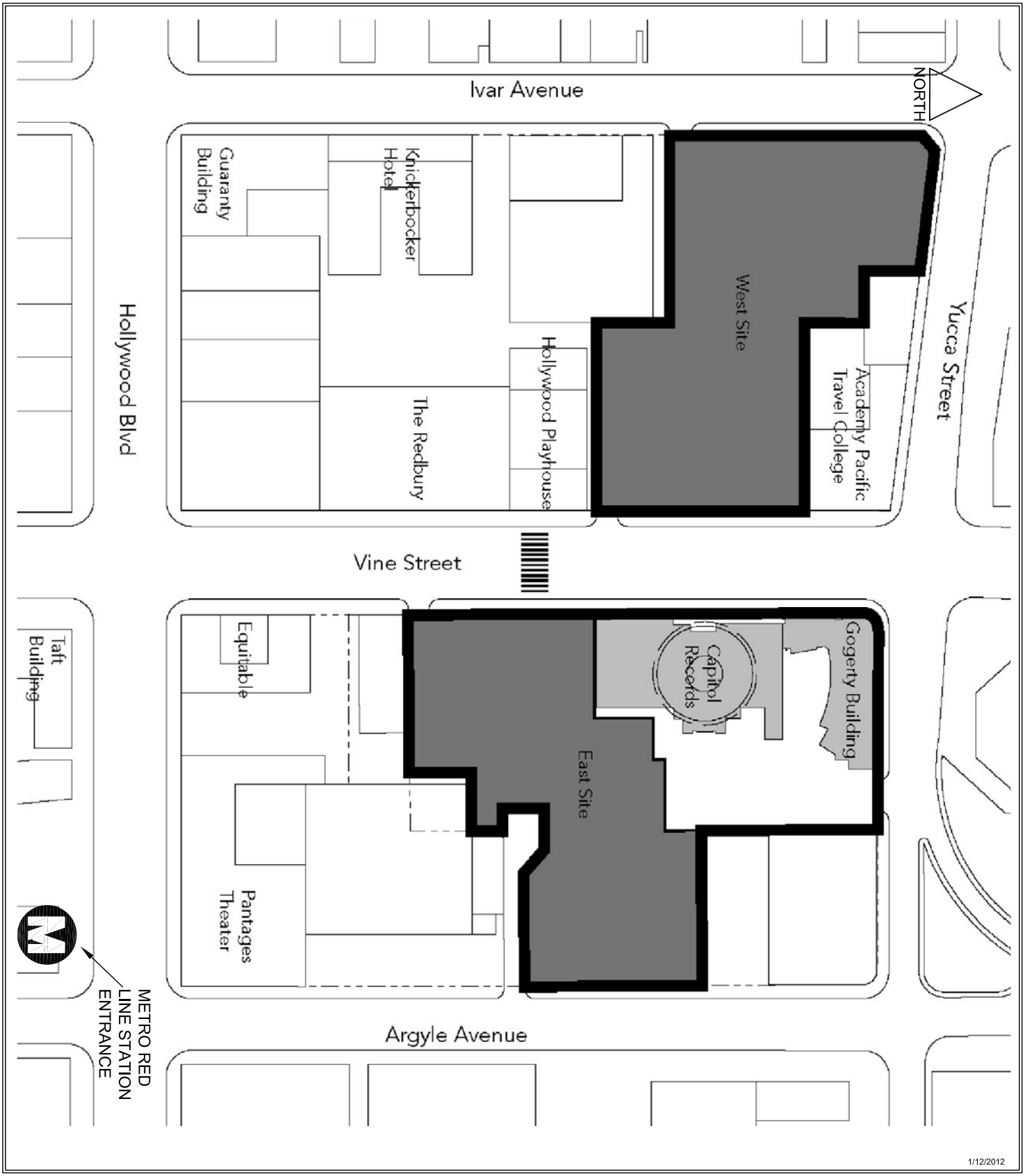
Pedestrian Accident

To be conservative, accident data for the existing driveway locations was obtained and reviewed to determine if a pattern of accidents is present at the existing driveways surrounding the Project Site. LADOT Traffic Collision History Report was requested. The report supplied by LADOT is for the most recent available records of collisions along Yucca Street from west of Ivar Avenue to east of Argyle Avenue, Ivar Avenue, Vine Street and Argyle Avenue from north of Yucca Street to south of Hollywood Boulevard. The listing provided is for a 6 year period (from 2005 to 2010, inclusive) and is included in Attachment C. The data shows that there were no accidents involving motorists making turns to or from the driveways along the Project Site frontages. Only one vehicle-pedestrian accident occurred within the Project Site frontage streets. The cause of the pedestrian injury accident was listed as a pedestrian violation of crossing Ivar Avenue 155 feet south of its intersection with Yucca Street. The pedestrian was injured by a vehicle traveling southbound on Ivar Street. Thus, the existing driveways along the Project Site frontage streets have not presented an operational issue. The proposed driveways will be of a similar design to the existing driveways, although fewer in number. Therefore, the data indicates that the Project driveways will not have a significant pedestrian safety impact.

It should be noted that although the data indicates that the driveways will meet acceptable City standard, the Traffic Study does contain Appendix K, an analysis of the traffic impacts of shifting the site access from Vine Street (the two highest pedestrian/bicycle sidewalk volumes) to Argyle Avenue and Ivar Avenue, which have lower pedestrian/bicycle sidewalk volumes.

ATTACHMENT A

SITE PLAN



FN: CAPITOL RECORDS\2012-06 MAIN REPORT\SITEPLAN

CONCEPTUAL PROJECT SITE PLAN

CRAIN & ASSOCIATES
Transportation Planning
Traffic Engineering
300 Corporate Pointe, Suite 470
Culver City, California 90230
PH (310) 473 6508 F (310) 444 9771
www.crainandassociates.com

ATTACHMENT B

PEDESTRIAN/BICYCLE COUNTS

PREPARED BY NATIONAL DATA & SURVEYING SERVICES

PROJECT#: 12-5517-004
N/S Street: Ivar Ave
E/W Street: between Yucca St and Hollywood Blvd
DATE: 12/19/2012 DAY: Wednesday
CITY: Hollywood

PEDESTRIANS

TIME	EAST SIDEWALK				WEST SIDEWALK		
	NB	SB	TOTAL		NB	SB	TOTAL
7:00 AM-8:00 AM	3	11	14		1	1	2
7:15 AM-8:15 AM	3	15	18		3	0	3
7:30 AM-8:30 AM	5	13	18		3	3	6
7:45 AM-8:45 AM	6	15	21		6	6	12
8:00 AM-9:00 AM	6	14	20		6	6	12
8:15 AM-9:15 AM	7	15	22		4	10	14
8:30 AM-9:30 AM	11	21	32		6	10	16
8:45 AM-9:45 AM	11	27	38		4	10	14
9:00 AM-10:00 AM	10	27	37		5	13	18
9:15 AM-10:15 AM	10	24	34		7	10	17
9:30 AM-10:30 AM	7	21	28		5	11	16
9:45 AM-10:45 AM	7	15	22		7	9	16
10:00 AM-11:00 AM	8	15	23		9	7	16
10:15 AM-11:15 AM	9	19	28		13	7	20
10:30 AM-11:30 AM	8	18	26		15	5	20
10:45 AM-11:45 AM	8	20	28		13	4	17
11:00 AM-12:00 PM	9	21	30		16	6	22
11:15 AM-12:15 PM	14	21	35		11	13	24
11:30 AM-12:30 PM	17	18	35		11	15	26
11:45 AM-12:45 PM	23	17	40		17	18	35
12:00 PM-1:00 PM	24	18	42		11	17	28
12:15 PM-1:15 PM	25	14	39		17	17	34
12:30 PM-1:30 PM	24	16	40		21	25	46
12:45 PM-1:45 PM	18	18	36		18	24	42
1:00 PM-2:00 PM	17	15	32		20	24	44
1:15 PM-2:15 PM	12	16	28		17	20	37
1:30 PM-2:30 PM	12	16	28		17	9	26
1:45 PM-2:45 PM	14	11	25		16	10	26
2:00 PM-3:00 PM	14	8	22		15	15	30
2:15 PM-3:15 PM	17	5	22		16	18	34
2:30 PM-3:30 PM	20	8	28		17	22	39
2:45 PM-3:45 PM	19	10	29		17	23	40
3:00 PM-4:00 PM	20	14	34		17	20	37
3:15 PM-4:15 PM	23	15	38		14	17	31
3:30 PM-4:30 PM	21	17	38		7	19	26
3:45 PM-4:45 PM	19	18	37		6	15	21
4:00 PM-5:00 PM	22	18	40		13	13	26
4:15 PM-5:15 PM	16	32	48		16	12	28
4:30 PM-5:30 PM	16	27	43		20	6	26
4:45 PM-5:45 PM	34	25	59	*	21	11	32
5:00 PM-6:00 PM	34	24	58		17	17	34
5:15 PM-6:15 PM	39	16	55		14	21	35
5:30 PM-6:30 PM	45	19	64		14	24	38
5:45 PM-6:45 PM	36	21	57		13	22	35
6:00 PM-7:00 PM	29	21	50		14	18	32

BIKES

TIME	EAST SIDEWALK				WEST SIDEWALK		
	NB	SB	TOTAL		NB	SB	TOTAL
7:00 AM-8:00 AM	0	0	0		0	0	0
7:15 AM-8:15 AM	0	0	0		0	0	0
7:30 AM-8:30 AM	0	0	0		0	0	0
7:45 AM-8:45 AM	0	0	0		0	0	0
8:00 AM-9:00 AM	0	0	0		0	0	0
8:15 AM-9:15 AM	0	0	0		0	0	0
8:30 AM-9:30 AM	0	0	0		0	0	0
8:45 AM-9:45 AM	0	0	0		0	0	0
9:00 AM-10:00 AM	0	0	0		0	0	0
9:15 AM-10:15 AM	0	0	0		0	0	0
9:30 AM-10:30 AM	0	0	0		0	0	0
9:45 AM-10:45 AM	0	0	0		0	0	0
10:00 AM-11:00 AM	0	0	0		0	0	0
10:15 AM-11:15 AM	0	0	0		0	0	0
10:30 AM-11:30 AM	0	0	0		0	0	0
10:45 AM-11:45 AM	0	0	0		0	0	0
11:00 AM-12:00 PM	0	0	0		0	0	0
11:15 AM-12:15 PM	0	0	0		0	0	0
11:30 AM-12:30 PM	0	0	0		0	0	0
11:45 AM-12:45 PM	0	0	0		0	0	0
12:00 PM-1:00 PM	0	0	0		0	0	0
12:15 PM-1:15 PM	0	0	0		0	0	0
12:30 PM-1:30 PM	0	0	0		0	0	0
12:45 PM-1:45 PM	0	0	0		0	0	0
1:00 PM-2:00 PM	0	0	0		0	0	0
1:15 PM-2:15 PM	0	0	0		0	0	0
1:30 PM-2:30 PM	0	0	0		0	0	0
1:45 PM-2:45 PM	0	0	0		0	0	0
2:00 PM-3:00 PM	1	0	1		0	0	0
2:15 PM-3:15 PM	1	0	1		0	0	0
2:30 PM-3:30 PM	1	0	1		0	0	0
2:45 PM-3:45 PM	1	0	1		0	0	0
3:00 PM-4:00 PM	0	0	0		0	0	0
3:15 PM-4:15 PM	0	0	0		0	0	0
3:30 PM-4:30 PM	0	0	0		0	0	0
3:45 PM-4:45 PM	0	0	0		0	0	0
4:00 PM-5:00 PM	0	0	0		0	0	0
4:15 PM-5:15 PM	0	0	0		0	0	0
4:30 PM-5:30 PM	0	0	0		0	0	0
4:45 PM-5:45 PM	0	0	0	*	0	0	0
5:00 PM-6:00 PM	0	0	0		0	0	0
5:15 PM-6:15 PM	0	0	0		0	0	0
5:30 PM-6:30 PM	0	0	0		0	0	0
5:45 PM-6:45 PM	0	0	0		0	0	0
6:00 PM-7:00 PM	0	0	0		0	0	0

PREPARED BY NATIONAL DATA & SURVEYING SERVICES

PROJECT#: 12-5517-004
N/S Street: Vine St
E/W Street: between Yucca St and Hollywood Blvd
DATE: 12/19/2012 DAY: Wednesday
CITY: Hollywood

PEDESTRIANS

TIME	EAST SIDEWALK				WEST SIDEWALK			
	NB	SB	TOTAL		NB	SB	TOTAL	
7:00 AM-8:00 AM	10	13	23		13	35	48	
7:15 AM-8:15 AM	12	20	32		14	34	48	
7:30 AM-8:30 AM	12	24	36		15	43	58	
7:45 AM-8:45 AM	11	32	43		33	94	127	
8:00 AM-9:00 AM	12	33	45		66	211	277	
8:15 AM-9:15 AM	15	24	39		70	227	297	
8:30 AM-9:30 AM	20	28	48		77	235	312	
8:45 AM-9:45 AM	19	23	42		69	178	247	
9:00 AM-10:00 AM	17	24	41		54	52	106	
9:15 AM-10:15 AM	15	28	43		61	48	109	
9:30 AM-10:30 AM	12	24	36		78	73	151	
9:45 AM-10:45 AM	15	20	35		71	91	162	
10:00 AM-11:00 AM	25	24	49		118	151	269	
10:15 AM-11:15 AM	25	29	54		143	197	340	
10:30 AM-11:30 AM	26	29	55		157	248	405	
10:45 AM-11:45 AM	27	34	61		172	251	423	
11:00 AM-12:00 PM	23	40	63		121	212	333	
11:15 AM-12:15 PM	23	37	60		88	173	261	
11:30 AM-12:30 PM	25	40	65		61	109	170	
11:45 AM-12:45 PM	29	42	71		67	105	172	
12:00 PM-1:00 PM	26	98	124		84	96	180	
12:15 PM-1:15 PM	24	99	123		124	118	242	
12:30 PM-1:30 PM	26	100	126	*	184	172	356	
12:45 PM-1:45 PM	25	100	125		176	212	388	
1:00 PM-2:00 PM	31	36	67		164	262	426	*
1:15 PM-2:15 PM	34	37	71		131	243	374	
1:30 PM-2:30 PM	34	32	66		73	176	249	
1:45 PM-2:45 PM	25	22	47		75	159	234	
2:00 PM-3:00 PM	14	14	28		95	130	225	
2:15 PM-3:15 PM	8	4	12		137	147	284	
2:30 PM-3:30 PM	0	0	0		199	165	364	
2:45 PM-3:45 PM	1	7	8		205	160	365	
3:00 PM-4:00 PM	10	13	23		199	157	356	
3:15 PM-4:15 PM	17	29	46		187	163	350	
3:30 PM-4:30 PM	30	37	67		179	227	406	
3:45 PM-4:45 PM	48	40	88		171	209	380	
4:00 PM-5:00 PM	48	43	91		156	188	344	
4:15 PM-5:15 PM	47	35	82		132	160	292	
4:30 PM-5:30 PM	41	35	76		102	88	190	
4:45 PM-5:45 PM	33	34	67		101	84	185	
5:00 PM-6:00 PM	32	35	67		126	90	216	
5:15 PM-6:15 PM	33	40	73		125	98	223	
5:30 PM-6:30 PM	36	35	71		126	107	233	
5:45 PM-6:45 PM	30	33	63		131	132	263	
6:00 PM-7:00 PM	29	29	58		110	159	269	

BIKES

TIME	EAST SIDEWALK				WEST SIDEWALK			
	NB	SB	TOTAL		NB	SB	TOTAL	
7:00 AM-8:00 AM	2	0	2		0	1	1	
7:15 AM-8:15 AM	2	0	2		0	1	1	
7:30 AM-8:30 AM	2	0	2		0	2	2	
7:45 AM-8:45 AM	1	0	1		0	2	2	
8:00 AM-9:00 AM	0	0	0		0	3	3	
8:15 AM-9:15 AM	0	0	0		0	2	2	
8:30 AM-9:30 AM	0	0	0		0	1	1	
8:45 AM-9:45 AM	0	0	0		0	1	1	
9:00 AM-10:00 AM	0	1	1		0	0	0	
9:15 AM-10:15 AM	0	2	2		0	0	0	
9:30 AM-10:30 AM	0	2	2		0	0	0	
9:45 AM-10:45 AM	0	2	2		0	0	0	
10:00 AM-11:00 AM	0	1	1		0	0	0	
10:15 AM-11:15 AM	1	0	1		0	0	0	
10:30 AM-11:30 AM	1	0	1		0	0	0	
10:45 AM-11:45 AM	1	0	1		0	1	1	
11:00 AM-12:00 PM	1	0	1		0	1	1	
11:15 AM-12:15 PM	2	0	2		0	1	1	
11:30 AM-12:30 PM	2	0	2		0	1	1	
11:45 AM-12:45 PM	2	0	2		0	0	0	
12:00 PM-1:00 PM	2	0	2		0	0	0	
12:15 PM-1:15 PM	0	0	0		1	0	1	
12:30 PM-1:30 PM	0	0	0	*	1	1	2	
12:45 PM-1:45 PM	0	0	0		1	1	2	
1:00 PM-2:00 PM	0	0	0		1	1	2	*
1:15 PM-2:15 PM	0	0	0		0	1	1	
1:30 PM-2:30 PM	0	1	1		0	0	0	
1:45 PM-2:45 PM	0	1	1		0	0	0	
2:00 PM-3:00 PM	0	1	1		0	0	0	
2:15 PM-3:15 PM	0	1	1		0	0	0	
2:30 PM-3:30 PM	0	0	0		0	0	0	
2:45 PM-3:45 PM	0	0	0		0	0	0	
3:00 PM-4:00 PM	0	0	0		0	0	0	
3:15 PM-4:15 PM	0	0	0		0	0	0	
3:30 PM-4:30 PM	0	0	0		0	0	0	
3:45 PM-4:45 PM	0	0	0		0	0	0	
4:00 PM-5:00 PM	0	0	0		0	0	0	
4:15 PM-5:15 PM	0	0	0		0	0	0	
4:30 PM-5:30 PM	0	0	0		0	0	0	
4:45 PM-5:45 PM	0	0	0		0	0	0	
5:00 PM-6:00 PM	0	0	0		0	0	0	
5:15 PM-6:15 PM	1	0	1		0	0	0	
5:30 PM-6:30 PM	1	0	1		0	0	0	
5:45 PM-6:45 PM	1	0	1		1	0	1	
6:00 PM-7:00 PM	1	0	1		1	0	1	

PREPARED BY NATIONAL DATA & SURVEYING SERVICES

PROJECT#: 12-5517-004
N/S Street: Argyle Ave
E/W Street: between Yucca St and Hollywood Blvd
DATE: 12/19/2012 DAY: Wednesday
CITY: Hollywood

PEDESTRIANS

TIME	EAST SIDEWALK			WEST SIDEWALK		
	NB	SB	TOTAL	NB	SB	TOTAL
7:00 AM-8:00 AM	3	2	5	8	30	38
7:15 AM-8:15 AM	3	4	7	13	35	48
7:30 AM-8:30 AM	4	4	8	16	41	57
7:45 AM-8:45 AM	6	5	11	19	33	52
8:00 AM-9:00 AM	5	5	10	20	34	54
8:15 AM-9:15 AM	4	3	7	20	35	55
8:30 AM-9:30 AM	3	4	7	20	31	51
8:45 AM-9:45 AM	1	3	4	22	34	56
9:00 AM-10:00 AM	1	3	4	20	42	62
9:15 AM-10:15 AM	2	5	7	16	35	51
9:30 AM-10:30 AM	1	3	4	15	33	48
9:45 AM-10:45 AM	1	3	4	9	29	38
10:00 AM-11:00 AM	3	2	5	10	28	38
10:15 AM-11:15 AM	2	1	3	13	32	45
10:30 AM-11:30 AM	2	1	3	16	36	52
10:45 AM-11:45 AM	2	3	5	18	33	51
11:00 AM-12:00 PM	0	3	3	18	31	49
11:15 AM-12:15 PM	0	2	2	14	28	42
11:30 AM-12:30 PM	1	3	4	12	28	40
11:45 AM-12:45 PM	1	3	4	16	35	51
12:00 PM-1:00 PM	1	3	4	21	29	50
12:15 PM-1:15 PM	3	7	10	24	28	52
12:30 PM-1:30 PM	2	9	11	21	26	47
12:45 PM-1:45 PM	2	10	12	23	17	40
1:00 PM-2:00 PM	5	14	19	20	22	42
1:15 PM-2:15 PM	4	11	15	19	28	47
1:30 PM-2:30 PM	6	11	17	25	33	58
1:45 PM-2:45 PM	10	9	19	22	41	63
2:00 PM-3:00 PM	7	5	12	20	40	60
2:15 PM-3:15 PM	6	4	10	21	32	53
2:30 PM-3:30 PM	5	6	11	19	28	47
2:45 PM-3:45 PM	1	5	6	21	21	42
3:00 PM-4:00 PM	6	5	11	22	22	44
3:15 PM-4:15 PM	6	5	11	27	33	60
3:30 PM-4:30 PM	5	0	5	29	38	67
3:45 PM-4:45 PM	5	2	7	34	48	82
4:00 PM-5:00 PM	1	4	5	42	47	89 *
4:15 PM-5:15 PM	1	5	6	43	43	86
4:30 PM-5:30 PM	2	8	10	45	38	83
4:45 PM-5:45 PM	2	6	8	43	33	76
5:00 PM-6:00 PM	3	4	7	40	43	83
5:15 PM-6:15 PM	3	5	8	40	45	85
5:30 PM-6:30 PM	2	3	5	39	40	79
5:45 PM-6:45 PM	2	3	5	36	34	70
6:00 PM-7:00 PM	0	5	5	33	23	56

BIKES

TIME	EAST SIDEWALK			WEST SIDEWALK		
	NB	SB	TOTAL	NB	SB	TOTAL
7:00 AM-8:00 AM	0	0	0	0	0	0
7:15 AM-8:15 AM	0	0	0	0	0	0
7:30 AM-8:30 AM	0	0	0	0	0	0
7:45 AM-8:45 AM	0	0	0	0	0	0
8:00 AM-9:00 AM	0	0	0	0	0	0
8:15 AM-9:15 AM	0	0	0	0	0	0
8:30 AM-9:30 AM	0	0	0	0	0	0
8:45 AM-9:45 AM	0	0	0	0	0	0
9:00 AM-10:00 AM	0	0	0	0	0	0
9:15 AM-10:15 AM	0	0	0	0	0	0
9:30 AM-10:30 AM	0	0	0	0	0	0
9:45 AM-10:45 AM	0	0	0	0	0	0
10:00 AM-11:00 AM	0	0	0	0	0	0
10:15 AM-11:15 AM	0	0	0	0	0	0
10:30 AM-11:30 AM	0	0	0	0	0	0
10:45 AM-11:45 AM	0	0	0	0	0	0
11:00 AM-12:00 PM	0	0	0	0	0	0
11:15 AM-12:15 PM	0	0	0	0	0	0
11:30 AM-12:30 PM	0	0	0	0	0	0
11:45 AM-12:45 PM	0	0	0	0	0	0
12:00 PM-1:00 PM	0	0	0	0	0	0
12:15 PM-1:15 PM	0	0	0	1	0	1
12:30 PM-1:30 PM	0	0	0	1	0	1
12:45 PM-1:45 PM	0	0	0	1	0	1
1:00 PM-2:00 PM	0	0	0	1	0	1
1:15 PM-2:15 PM	0	0	0	1	0	1
1:30 PM-2:30 PM	0	0	0	1	0	1
1:45 PM-2:45 PM	0	0	0	1	0	1
2:00 PM-3:00 PM	0	0	0	2	0	2
2:15 PM-3:15 PM	0	0	0	1	0	1
2:30 PM-3:30 PM	0	0	0	1	0	1
2:45 PM-3:45 PM	0	0	0	1	0	1
3:00 PM-4:00 PM	0	0	0	0	0	0
3:15 PM-4:15 PM	0	0	0	0	0	0
3:30 PM-4:30 PM	0	0	0	0	0	0
3:45 PM-4:45 PM	0	0	0	0	0	0
4:00 PM-5:00 PM	0	0	0	0	0	0 *
4:15 PM-5:15 PM	0	0	0	0	0	0
4:30 PM-5:30 PM	0	0	0	0	0	0
4:45 PM-5:45 PM	0	0	0	0	0	0
5:00 PM-6:00 PM	0	0	0	1	0	1
5:15 PM-6:15 PM	0	0	0	1	0	1
5:30 PM-6:30 PM	0	0	0	1	0	1
5:45 PM-6:45 PM	0	0	0	1	0	1
6:00 PM-7:00 PM	0	0	0	0	0	0

PREPARED BY NATIONAL DATA & SURVEYING SERVICES

PROJECT#: 12-5517-004
N/S Street: between Vine St and Argyle Ave
E/W Street: Yucca St
DATE: 12/19/2012 DAY: Wednesday
CITY: Hollywood

PEDESTRIANS

TIME	NORTH SIDEWALK			SOUTH SIDEWALK			
	NB	SB	TOTAL	NB	SB	TOTAL	
7:00 AM-8:00 AM	2	3	5	1	1	2	
7:15 AM-8:15 AM	4	5	9	1	1	2	
7:30 AM-8:30 AM	5	5	10	3	0	3	
7:45 AM-8:45 AM	8	10	18	3	3	6	
8:00 AM-9:00 AM	9	15	24	5	4	9	
8:15 AM-9:15 AM	11	23	34	7	8	15	
8:30 AM-9:30 AM	12	25	37	5	14	19	
8:45 AM-9:45 AM	7	26	33	7	14	21	
9:00 AM-10:00 AM	9	23	32	5	16	21	
9:15 AM-10:15 AM	7	12	19	8	21	29	
9:30 AM-10:30 AM	9	10	19	10	15	25	
9:45 AM-10:45 AM	13	5	18	11	15	26	
10:00 AM-11:00 AM	15	5	20	17	20	37	*
10:15 AM-11:15 AM	13	6	19	16	13	29	
10:30 AM-11:30 AM	9	9	18	16	14	30	
10:45 AM-11:45 AM	6	12	18	18	17	35	
11:00 AM-12:00 PM	5	14	19	15	12	27	
11:15 AM-12:15 PM	5	19	24	15	16	31	
11:30 AM-12:30 PM	8	17	25	16	23	39	
11:45 AM-12:45 PM	11	14	25	15	19	34	
12:00 PM-1:00 PM	9	10	19	11	19	30	
12:15 PM-1:15 PM	10	10	20	11	13	24	
12:30 PM-1:30 PM	9	11	20	13	8	21	
12:45 PM-1:45 PM	8	11	19	15	9	24	
1:00 PM-2:00 PM	8	14	22	19	10	29	
1:15 PM-2:15 PM	14	11	25	20	10	30	
1:30 PM-2:30 PM	14	10	24	20	8	28	
1:45 PM-2:45 PM	13	12	25	15	5	20	
2:00 PM-3:00 PM	25	12	37	11	1	12	
2:15 PM-3:15 PM	20	10	30	6	1	7	
2:30 PM-3:30 PM	19	9	28	4	5	9	
2:45 PM-3:45 PM	19	6	25	6	6	12	
3:00 PM-4:00 PM	10	5	15	10	7	17	
3:15 PM-4:15 PM	15	9	24	13	10	23	
3:30 PM-4:30 PM	19	14	33	12	8	20	
3:45 PM-4:45 PM	19	14	33	13	12	25	
4:00 PM-5:00 PM	14	13	27	15	19	34	
4:15 PM-5:15 PM	7	10	17	14	21	35	
4:30 PM-5:30 PM	4	6	10	16	18	34	
4:45 PM-5:45 PM	5	9	14	16	14	30	
5:00 PM-6:00 PM	7	11	18	10	8	18	
5:15 PM-6:15 PM	10	13	23	8	3	11	
5:30 PM-6:30 PM	8	12	20	5	6	11	
5:45 PM-6:45 PM	9	11	20	1	5	6	
6:00 PM-7:00 PM	7	8	15	1	3	4	

BIKES

TIME	NORTH SIDEWALK			SOUTH SIDEWALK			
	NB	SB	TOTAL	NB	SB	TOTAL	
7:00 AM-8:00 AM	0	0	0	0	0	0	
7:15 AM-8:15 AM	0	0	0	0	0	0	
7:30 AM-8:30 AM	0	0	0	0	0	0	
7:45 AM-8:45 AM	0	0	0	0	0	0	
8:00 AM-9:00 AM	0	0	0	0	0	0	
8:15 AM-9:15 AM	0	0	0	0	0	0	
8:30 AM-9:30 AM	0	0	0	0	0	0	
8:45 AM-9:45 AM	0	0	0	0	0	0	
9:00 AM-10:00 AM	0	0	0	0	0	0	
9:15 AM-10:15 AM	0	0	0	0	0	0	
9:30 AM-10:30 AM	0	0	0	2	0	2	
9:45 AM-10:45 AM	0	2	2	2	0	2	
10:00 AM-11:00 AM	0	2	2	2	0	2	*
10:15 AM-11:15 AM	0	2	2	2	0	2	
10:30 AM-11:30 AM	0	2	2	0	0	0	
10:45 AM-11:45 AM	0	0	0	0	0	0	
11:00 AM-12:00 PM	0	0	0	0	0	0	
11:15 AM-12:15 PM	0	1	1	0	0	0	
11:30 AM-12:30 PM	0	2	2	0	0	0	
11:45 AM-12:45 PM	0	2	2	0	0	0	
12:00 PM-1:00 PM	0	3	3	0	0	0	
12:15 PM-1:15 PM	0	2	2	1	0	1	
12:30 PM-1:30 PM	0	1	1	1	0	1	
12:45 PM-1:45 PM	0	1	1	1	0	1	
1:00 PM-2:00 PM	0	0	0	1	1	2	
1:15 PM-2:15 PM	0	0	0	0	1	1	
1:30 PM-2:30 PM	0	0	0	0	1	1	
1:45 PM-2:45 PM	0	0	0	0	1	1	
2:00 PM-3:00 PM	2	0	2	0	0	0	
2:15 PM-3:15 PM	2	0	2	0	0	0	
2:30 PM-3:30 PM	2	0	2	0	0	0	
2:45 PM-3:45 PM	2	0	2	0	0	0	
3:00 PM-4:00 PM	0	0	0	0	0	0	
3:15 PM-4:15 PM	0	0	0	0	0	0	
3:30 PM-4:30 PM	1	0	1	0	0	0	
3:45 PM-4:45 PM	1	0	1	0	0	0	
4:00 PM-5:00 PM	1	0	1	0	0	0	
4:15 PM-5:15 PM	1	0	1	0	0	0	
4:30 PM-5:30 PM	0	0	0	0	0	0	
4:45 PM-5:45 PM	0	0	0	0	0	0	
5:00 PM-6:00 PM	0	0	0	0	0	0	
5:15 PM-6:15 PM	0	0	0	0	0	0	
5:30 PM-6:30 PM	0	0	0	0	0	0	
5:45 PM-6:45 PM	0	0	0	0	0	0	
6:00 PM-7:00 PM	0	0	0	0	0	0	

ATTACHMENT C

CITY OF LOS ANGELES DEPARTMENT OF TRANSPORTATION TRAFFIC COLLISION HISTORY REPORT

Settings Used For Query

Parameter	Setting
Street Name	IVAR AVENUE
Cross Street	YUCCA STREET
Starting Date	1/1/2005
Ending Date	3/31/2011
Distance from Intersection	>= 0' for non rear-end collisions
	>= 0' for rear-end collisions

DEC 19 2012

CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION
CERTIFIED A TRUE COPY
Barbara Adams
Records Section

City of Los Angeles
Department of Transportation

Collision Report Summary

12/19/2012
Date Range Reported: 1/1/05 - 3/31/11
Total Number of Collisions: 14

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
1913085	2/17/05	17:50	Ivar Avenue & Yucca Street	105'	South	Hit Object	Fixed Object	South	Making Left Turn	North	Backing	Improper Turning	0	0	
2155094	7/30/05	02:10	Ivar Avenue & Yucca Street	200'	South	Rear-End	Other Motor Vehicle	South	Proceeding Straight	South	Stopped in Road	Unsafe Speed	0	0	
3611779	2/1/08	11:10	Yucca Street & Ivar Avenue	168'	East	Sideswipe	Parked Motor Vehicle	South	Backing	South	Parked	Unsafe Starting or Backing	0	0	
3680858	3/29/08	02:35	Ivar Avenue & Yucca Street	30'	South	Sideswipe	Other Motor Vehicle	South	Making Right Turn	North	Stopped in Road	Improper Passing	0	0	
3878156	8/25/08	10:35	Yucca Street & Ivar Avenue	80'	East	Broadside	Other Motor Vehicle	East	Proceeding Straight	East	Making Right Turn	Improper Passing	2	0	
4167472	3/17/09	01:10	Yucca Street & Ivar Avenue	181'	West	Broadside	Parked Motor Vehicle	West	Proceeding Straight	North	Parked	Other Improper Driving	0	0	
4425512	9/18/09	02:20	Yucca Street & Ivar Avenue	100'	East	Broadside	Parked Motor Vehicle	Not State	Making Right Turn	West	Parked	Unsafe Speed	0	0	
4425492	9/20/09	00:40	Ivar Avenue & Yucca Street	120'	North	Sideswipe	Other Motor Vehicle	Not State	Proceeding Straight	North	Proceeding Straight	Unsafe Speed	0	0	
4457924	10/22/09	20:00	Ivar Avenue & Yucca Street	200'	North	Rear-End	Parked Motor Vehicle	North	Parked	North	Parked	Unsafe Starting or Backing	0	0	
4533265	11/25/09	19:05	Ivar Avenue & Yucca Street	29'	North	Hit Object	Fixed Object	South	Proceeding Straight			Driving Under Influence	0	0	
4728965	5/14/10	20:30	Ivar Avenue & Yucca Street	30'	North	Rear-End	Parked Motor Vehicle	South	Backing	North	Parked	Unsafe Starting or Backing	0	0	
4854324	7/11/10	22:00	Ivar Avenue & Yucca Street	50'	North	Broadside	Parked Motor Vehicle	North	Parked	East	Backing	Unsafe Starting or Backing	0	0	
4858545	7/14/10	02:15	Yucca Street & Ivar Avenue	60'	East	Rear-End	Other Motor Vehicle	North	Backing	East	Proceeding Straight	Unsafe Starting or Backing	0	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
5131776	3/6/11	02:15	Ivar Avenue & Yucca Street	155'	South	Vehicle - Pedestrian	Pedestrian	South	Proceeding Straight	East	Other	Pedestrian Violation	1	0	

Settings Used For Query

Parameter	Setting
Street Name	ARGYLE AVENUE
Cross Street	HOLLYWOOD BOULEVARD
Starting Date	1/1/2005
Ending Date	3/31/2011
Distance from Intersection	>= 0' for non rear-end collisions
	>= 0' for rear-end collisions

City of Los Angeles
Department of Transportation

Collision Report Summary

12/19/2012
Date Range Reported: 1/1/05 - 3/31/11
Total Number of Collisions: 35

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
2260825	10/1/05	06:35	Hollywood Boulevard & Argyle Avenue	60'	West	Rear-End	Parked Motor Vehicle	West	Changing Lanes	West	Parked	Unsafe Lane Change	0	0	
2456358	1/29/06	22:05	Hollywood Boulevard & Argyle Avenue	0'	In Int.	Broadside	Other Motor Vehicle	East	Making Left Turn	West	Proceeding Straight	Driving Under Influence	3	0	
2507516	2/26/06	14:30	Hollywood Boulevard & Argyle Avenue	50'	East	Sideswipe	Other Motor Vehicle	West	Changing Lanes	West	Proceeding Straight	Unsafe Lane Change	0	0	
2534860	3/9/06	11:35	Hollywood Boulevard & Argyle Avenue	0'	In Int.	Broadside	Other Motor Vehicle	East	Making Left Turn	West	Proceeding Straight	Auto R/W Violation	2	0	
2665908	6/8/06	21:30	Hollywood Boulevard & Argyle Avenue	5'	East	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Unsafe Speed	1	0	
2700823	6/28/06	14:55	Hollywood Boulevard & Argyle Avenue	30'	West	Sideswipe	Other Motor Vehicle	West	Entering Traffic	West	Proceeding Straight	Unsafe Starting or Backing	2	0	
2787114	8/19/06	16:30	Argyle Avenue & Hollywood Boulevard	0'	In Int.	Broadside	Motor Vehicle on Other	East	Proceeding Straight	South	Proceeding Straight	Traffic Signals and Signs	0	0	
2833388	9/24/06	02:45	Hollywood Boulevard & Argyle Avenue	0'	In Int.	Sideswipe	Other Motor Vehicle	North	Proceeding Straight	South	Stopped in Road	Auto R/W Violation	0	0	
2841968	10/8/06	04:00	Hollywood Boulevard & Argyle Avenue	100'	West	Head-On	Other Motor Vehicle	East	Proceeding Straight	East	Proceeding Straight	Unsafe Speed	0	0	
3000260	12/16/06	02:45	Hollywood Boulevard & Argyle Avenue	35'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Following Too Closely	1	0	
3049873	2/9/07	09:15	Argyle Avenue & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	West	Proceeding Straight	South	Proceeding Straight	Traffic Signals and Signs	1	0	
3086605	3/13/07	09:00	Argyle Avenue & Hollywood Boulevard	33'	South	Sideswipe	Other Motor Vehicle	South	Making Right Turn	South	Parked	Improper Turning	0	0	
3143747	4/21/07	23:10	Argyle Avenue & Hollywood Boulevard	85'	Not Stated	Sideswipe	Other Motor Vehicle	South	Proceeding Straight	South	Proceeding Straight	Unsafe Lane Change	0	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
3277895	7/11/07	15:50	Hollywood Boulevard & Argyle Avenue	165'	West	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Proceeding Straight	Following Too Closely	1	0	
3345647	8/26/07	03:00	Argyle Avenue & Hollywood Boulevard	0'	In Int.	Head-On	Other Motor Vehicle	South	Making Left Turn	North	Proceeding Straight	Auto R/W Violation	0	0	
3392647	8/30/07	16:25	Hollywood Boulevard & Argyle Avenue	65'	East	Sideswipe	Parked Motor Vehicle	East	Parked	East	Proceeding Straight	Unsafe Speed	1	0	
3404885	10/4/07	14:30	Argyle Avenue & Hollywood Boulevard	0'	In Int.	Sideswipe	Bicycle	North	Making Right Turn	West	Traveling Wrong Way	Wrong Side of Road	1	0	
3682663	3/23/08	19:42	Argyle Avenue & Hollywood Boulevard	245'	North	Vehicle - Pedestrian	Pedestrian	North	Backing	South	Not Stated	Unsafe Starting or Backing	1	0	
3970737	11/11/08	22:50	Hollywood Boulevard & Argyle Avenue	25'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Following Too Closely	0	0	
4074973	12/6/08	17:20	Argyle Avenue & Hollywood Boulevard	75'	North	Sideswipe	Other Motor Vehicle	North	Changing Lanes	North	Proceeding Straight	Unsafe Lane Change	1	0	
4010597	12/7/08	23:20	Hollywood Boulevard & Argyle Avenue	30'	East	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Driving Under Influence	2	0	
4022904	12/8/08	01:00	Hollywood Boulevard & Argyle Avenue	45'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Proceeding Straight	Other Improper Driving	3	0	
4022888	12/15/08	23:30	Hollywood Boulevard & Argyle Avenue	42'	East	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Driving Under Influence	0	0	
4078080	1/24/09	16:00	Hollywood Boulevard & Argyle Avenue	20'	West	Sideswipe	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Unsafe Lane Change	0	0	
4300039	5/14/09	16:00	Hollywood Boulevard & Argyle Avenue	0'	In Int.	Sideswipe	Other Motor Vehicle	East	Making Right Turn	East	Making Right Turn	Other Improper Driving	0	0	
4317313	7/8/09	03:25	Argyle Avenue & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	East	Proceeding Straight	North	Proceeding Straight	Driving Under Influence	2	0	
4442766	10/16/09	08:25	Hollywood Boulevard & Argyle Avenue	0'	In Int.	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Following Too Closely	3	0	
4534412	11/28/09	07:40	Argyle Avenue & Hollywood Boulevard	0'	In Int.	Vehicle - Pedestrian	Pedestrian	South	Making Left Turn	North	Not Stated	Ped R/W Violation	1	0	
4837277	8/7/10	01:00	Hollywood Boulevard & Argyle Avenue	20'	East	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Unsafe Speed	0	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
4837245	8/10/10	10:20	Argyle Avenue & Hollywood Boulevard	200'	South	Broadside	Other Motor Vehicle	East	Entering Traffic	South	Proceeding Straight	Not Stated	1	0	
4890646	8/31/10	15:05	Argyle Avenue & Hollywood Boulevard	10'	South	Vehicle - Pedestrian	Pedestrian	West	Making Left Turn	West	Proceeding Straight	Pedestrian Violation	1	0	
4916462	9/15/10	09:55	Hollywood Boulevard & Argyle Avenue	0'	In Int.	Broadside	Other Motor Vehicle	East	Proceeding Straight	West	Making Left Turn	Auto R/W Violation	1	0	
4950127	10/25/10	02:40	Argyle Avenue & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	North	Proceeding Straight	West	Proceeding Straight	Traffic Signals and Signs	0	0	
4974732	11/19/10	09:10	Argyle Avenue & Hollywood Boulevard	30'	South	Broadside	Other Motor Vehicle	South	Entering Traffic	South	Proceeding Straight	Auto R/W Violation	1	0	
5117794	2/17/11	01:00	Hollywood Boulevard & Argyle Avenue	48'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Unsafe Speed	0	0	

Settings Used For Query

Parameter	Setting
Street Name	VINE STREET
Cross Street	HOLLYWOOD BOULEVARD
Starting Date	1/1/2005
Ending Date	3/31/2011
Distance from Intersection	>= 0' for non rear-end collisions
	>= 0' for rear-end collisions

City of Los Angeles
Department of Transportation

Collision Report Summary

12/19/2012
Date Range Reported: 1/1/05 - 3/31/11
Total Number of Collisions: 90

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
1848164	1/29/05		Hollywood Boulevard & Vine Street	60'	East	Sideswipe	Parked Motor Vehicle	East	Parking Maneuver	East	Parked	Unsafe Speed	0	0	
1913061	2/17/05	10:15	Vine Street & Hollywood Boulevard	302'	North	Rear-End	Other Motor Vehicle	South	Proceeding Straight	South	Stopped in Road	Following Too Closely	3	0	
2039773	5/20/05	23:45	Vine Street & Hollywood Boulevard	500'	North	Broadside	Other Motor Vehicle	South	Proceeding Straight	East	Entering Traffic	Auto R/W Violation	0	0	
2183542	8/5/05	23:50	Hollywood Boulevard & Vine Street	75'	West	Sideswipe	Other Motor Vehicle	East	Changing Lanes	East	Proceeding Straight	Unsafe Lane Change	2	0	
2183544	8/7/05	19:10	Hollywood Boulevard & Vine Street	55'	West	Rear-End	Other Motor Vehicle	East	Stopped in Road	East	Proceeding Straight	Unsafe Speed	0	0	
2201133	8/20/05	21:20	Hollywood Boulevard & Vine Street	10'	East	Vehicle - Pedestrian	Pedestrian	South	Making Left Turn	North	Not Stated	Pedestrian Violation	1	0	
2226502	8/20/05	22:15	Vine Street & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	North	Making Left Turn	South	Proceeding Straight	Auto R/W Violation	1	0	
2201049	8/29/05	16:15	Hollywood Boulevard & Vine Street	145'	East	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Unsafe Speed	1	0	
2235185	9/17/05	18:30	Vine Street & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	West	Making Left Turn	East	Proceeding Straight	Auto R/W Violation	3	0	
2277751	10/9/05	02:40	Hollywood Boulevard & Vine Street	0'	In Int.	Rear-End	Other Motor Vehicle	East	Backing	East	Proceeding Straight	Unsafe Starting or Backing	0	0	
2277747	10/9/05	02:45	Vine Street & Hollywood Boulevard	95'	North	Overturned	Parked Motor Vehicle	North	Other Unsafe Turning	North	Parked	Driving Under Influence	1	0	
2341656	11/1/05	12:05	Hollywood Boulevard & Vine Street	0'	In Int.	Vehicle - Pedestrian	Pedestrian	West	Making Right Turn	South	Not Stated	Pedestrian Violation	1	0	
2387062	11/12/05	01:50	Vine Street & Hollywood Boulevard	0'	In Int.	Rear-End	Other Motor Vehicle	North	Proceeding Straight	North	Stopped in Road	Driving Under Influence	0	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
2362636	11/26/05	00:00	Hollywood Boulevard & Vine Street	39'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Proceeding Straight	Unsafe Speed	1	0	
2441220	1/16/06	06:20	Hollywood Boulevard & Vine Street	0'	In Int.	Head-On	Other Motor Vehicle	East	Making Left Turn	West	Proceeding Straight	Auto R/W Violation	2	0	
2534808	2/24/06	17:40	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	West	Making Left Turn	South	Proceeding Straight	Auto R/W Violation	2	0	
2605027	4/16/06	01:30	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	North	Proceeding Straight	West	Proceeding Straight	Traffic Signals and Signs	1	0	
2627143	5/13/06	01:10	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	East	Making Left Turn	West	Proceeding Straight	Auto R/W Violation	2	0	
2810269	6/2/06	22:45	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	West	Proceeding Straight	West	Making Right Turn	Improper Turning	0	0	
2691520	6/21/06	22:15	Vine Street & Hollywood Boulevard	475'	North	Sideswipe	Parked Motor Vehicle	South	Proceeding Straight	South	Parked	Unsafe Speed	0	0	
2738690	7/2/06	11:00	Hollywood Boulevard & Vine Street	0'	In Int.	Hit Object	Fixed Object	South	Proceeding Straight			Other Hazardous Movement	0	0	
2715878	7/3/06	02:15	Vine Street & Hollywood Boulevard	120'	North	Rear-End	Other Motor Vehicle	East	Entering Traffic	South	Proceeding Straight	Auto R/W Violation	2	0	
2724697	7/12/06	17:45	Vine Street & Hollywood Boulevard	42'	North	Sideswipe	Parked Motor Vehicle	South	Proceeding Straight	South	Parked	Unsafe Speed	0	0	
2739546	7/19/06	16:45	Vine Street & Hollywood Boulevard	121'	South	Sideswipe	Other Motor Vehicle	North	Entering Traffic	North	Proceeding Straight	Unsafe Starting or Backing	0	0	
2751663	7/28/06	21:00	Vine Street & Hollywood Boulevard	170'	North	Sideswipe	Other Motor Vehicle	North	Proceeding Straight	North	Parked	Unsafe Speed	0	0	
2757129	7/31/06	00:40	Vine Street & Hollywood Boulevard	150'	North	Rear-End	Other Motor Vehicle	East	Making Left Turn	East	Making Left Turn	Improper Turning	0	0	
9008012	8/28/06	23:00	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	East	Making Left Turn	West	Proceeding Straight	Auto R/W Violation	0	0	
2793493	9/4/06	12:50	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	West	Proceeding Straight	North	Proceeding Straight	Traffic Signals and Signs	1	0	
2831733	10/3/06	12:15	Hollywood Boulevard & Vine Street	50'	East	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Unsafe Speed	0	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
2841447	10/14/06	02:10	Hollywood Boulevard & Vine Street	5'	West	Sideswipe	Other Motor Vehicle	North	Making Left Turn	East	Stopped in Road	Driving Under Influence	0	0	
2898287	11/3/06	16:20	Hollywood Boulevard & Vine Street	3'	East	Vehicle - Pedestrian	Pedestrian	East	Making Right Turn	East	Other	Ped R/W Violation	1	0	
2894106	11/9/06	19:40	Vine Street & Hollywood Boulevard	100'	North	Rear-End	Other Motor Vehicle	North	Proceeding Straight	North	Making Right Turn	Following Too Closely	0	0	
2913354	11/23/06	02:30	Vine Street & Hollywood Boulevard	130'	North	Rear-End	Parked Motor Vehicle	North	Proceeding Straight	North	Parked	Unsafe Speed	0	0	
2934132	12/5/06	19:40	Hollywood Boulevard & Vine Street	0'	In Int.	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Driving Under Influence	0	0	
2930261	12/6/06	02:00	Vine Street & Hollywood Boulevard	113'	South	Broadside	Other Motor Vehicle	West	Proceeding Straight	South	Proceeding Straight	Unknown	0	0	
3049796	2/14/07	19:30	Hollywood Boulevard & Vine Street	208'	East	Hit Object	Fixed Object	West	Proceeding Straight			Other Than Driver or Ped	0	0	
3049788	2/14/07	19:30	Hollywood Boulevard & Vine Street	208'	East	Hit Object	Other Object	West	Proceeding Straight			Other Than Driver or Ped	0	0	
3055388	2/19/07	22:00	Vine Street & Hollywood Boulevard	300'	North	Rear-End	Other Motor Vehicle	North	Proceeding Straight	North	Stopped in Road	Following Too Closely	4	0	
3165706	5/2/07	14:40	Hollywood Boulevard & Vine Street	75'	East	Rear-End	Other Motor Vehicle	West	Backing	West	Stopped in Road	Unsafe Starting or Backing	0	0	
3214167	5/3/07	23:10	Vine Street & Hollywood Boulevard	20'	North	Sideswipe	Other Motor Vehicle	South	Proceeding Straight	South	Proceeding Straight	Unsafe Lane Change	0	0	
3192090	5/13/07	02:05	Vine Street & Hollywood Boulevard	52'	South	Vehicle - Pedestrian	Pedestrian	South	Proceeding Straight	West	Not Stated	Pedestrian Violation	1	0	
3308380	7/28/07	02:20	Vine Street & Hollywood Boulevard	36'	South	Hit Object	Fixed Object	South	Making Right Turn			Driving Under Influence	0	0	
3453594	11/23/07	11:45	Hollywood Boulevard & Vine Street	88'	West	Sideswipe	Fixed Object	West	Parking Maneuver			Other Than Driver or Ped	0	0	
3613666	2/19/08	15:20	Hollywood Boulevard & Vine Street	40'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Unsafe Speed	1	0	
3695325	4/20/08	02:40	Hollywood Boulevard & Vine Street	0'	In Int.	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Making Right Turn	Driving Under Influence	0	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
3853505	7/19/08	20:35	Hollywood Boulevard & Vine Street	18'	East	Rear-End	Other Motor Vehicle	West	Proceeding Straight	West	Stopped in Road	Unknown	0	0	
3858477	7/31/08	19:40	Hollywood Boulevard & Vine Street	15'	East	Sideswipe	Other Motor Vehicle	West	Proceeding Straight	West	Proceeding Straight	Unsafe Lane Change	0	0	
3876209	8/13/08	14:00	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Bicycle	South	Making Right Turn	East	Traveling Wrong Way	Wrong Side of Road	1	0	
3947677	10/11/08	19:00	Hollywood Boulevard & Vine Street	0'	In Int.	Vehicle - Pedestrian	Pedestrian	North	Proceeding Straight	East	Not Stated	Pedestrian Violation	1	0	
3971659	10/19/08	02:40	Vine Street & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	South	Making Left Turn	North	Proceeding Straight	Auto R/W Violation	1	0	
4052760	11/16/08	04:00	Hollywood Boulevard & Vine Street	0'	In Int.	Sideswipe	Other Motor Vehicle	West	Proceeding Straight	West	Proceeding Straight	Driving Under Influence	0	0	
4025937	12/10/08	23:00	Hollywood Boulevard & Vine Street	35'	West	Rear-End	Other Motor Vehicle	East	Backing	East	Stopped in Road	Unsafe Starting or Backing	0	0	
4104115	1/16/09	02:40	Vine Street & Hollywood Boulevard	200'	North	Sideswipe	Other Motor Vehicle	North	Proceeding Straight	North	Proceeding Straight	Driving Under Influence	0	0	
4035242	1/24/09	02:20	Hollywood Boulevard & Vine Street	10'	North	Rear-End	Other Motor Vehicle	East	Slowing/Stopping	East	Stopped in Road	Not Stated	0	0	
4126425	2/4/09	22:50	Hollywood Boulevard & Vine Street	24'	East	Vehicle - Pedestrian	Pedestrian	South	Making Left Turn	East	Not Stated	Ped R/W Violation	1	0	
4126477	2/13/09	17:15	Hollywood Boulevard & Vine Street	150'	East	Broadside	Other Motor Vehicle	South	Entering Traffic	West	Proceeding Straight	Auto R/W Violation	0	0	
4149503	3/2/09	22:50	Hollywood Boulevard & Vine Street	0'	In Int.	Vehicle - Pedestrian	Pedestrian	East	Not Applicable -	East	Making Left Turn	Auto R/W Violation	2	0	
4166522	3/11/09	16:00	Vine Street & Hollywood Boulevard	100'	North	Sideswipe	Other Motor Vehicle	North	Proceeding Straight	North	Proceeding Straight	Improper Passing	1	0	
4167521	3/15/09	17:21	Vine Street & Hollywood Boulevard	0'	In Int.	Vehicle - Pedestrian	Pedestrian	West	Making Right Turn	West	Not Stated	Ped R/W Violation	1	0	
4167468	3/17/09	16:00	Vine Street & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	South	Making Left Turn	North	Proceeding Straight	Auto R/W Violation	1	0	
4293833	6/6/09	07:30	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	West	Proceeding Straight	South	Proceeding Straight	Traffic Signals and Signs	1	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
4354422	6/24/09	22:50	Vine Street & Hollywood Boulevard	80'	South	Rear-End	Parked Motor Vehicle	North	Parked	North	Proceeding Straight	Driving Under Influence	1	0	
4346445	7/26/09	10:15	Vine Street & Hollywood Boulevard	0'	In Int.	Broadside	Other Motor Vehicle	North	Making Left Turn	South	Proceeding Straight	Auto R/W Violation	1	0	
4531183	8/2/09	23:15	Hollywood Boulevard & Vine Street	0'	In Int.	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Driving Under Influence	0	0	
4425449	9/18/09	02:10	Hollywood Boulevard & Vine Street	250'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Proceeding Straight	Unsafe Speed	0	0	
4516072	10/10/09	02:05	Hollywood Boulevard & Vine Street	0'	In Int.	Sideswipe	Other Motor Vehicle	East	Making U Turn	East	Making Left Turn	Driving Under Influence	1	0	
4482090	11/16/09	10:20	Hollywood Boulevard & Vine Street	100'	East	Sideswipe	Other Motor Vehicle	West	Proceeding Straight	North	Changing Lanes	Unsafe Lane Change	0	0	
4521195	12/17/09	12:25	Hollywood Boulevard & Vine Street	266'	West	Sideswipe	Other Motor Vehicle	East	Merging	East	Proceeding Straight	Unsafe Starting or Backing	0	0	
4604935	1/17/10	23:50	Hollywood Boulevard & Vine Street	0'	In Int.	Vehicle - Pedestrian	Pedestrian	North	Making Left Turn	West	Proceeding Straight	Ped R/W Violation	2	0	
4573301	1/20/10	05:05	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	West	Proceeding Straight	North	Proceeding Straight	Traffic Signals and Signs	0	0	
4572651	1/22/10	03:20	Hollywood Boulevard & Vine Street	9'	West	Vehicle - Pedestrian	Pedestrian	East	Proceeding Straight	North	Proceeding Straight	Traffic Signals and Signs	1	0	
4573341	1/25/10	21:10	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	East	Proceeding Straight	South	Proceeding Straight	Traffic Signals and Signs	2	0	
4606927	1/31/10	03:50	Hollywood Boulevard & Vine Street	50'	East	Sideswipe	Other Motor Vehicle	East	Changing Lanes	East	Changing Lanes	Unsafe Starting or Backing	0	0	
4646449	2/13/10	18:20	Vine Street & Hollywood Boulevard	200'	South	Rear-End	Other Motor Vehicle	South	Slowing/Stopping	South	Stopped in Road	Following Too Closely	1	0	
4705355	5/7/10	00:00	Vine Street & Hollywood Boulevard	75'	North	Vehicle - Pedestrian	Pedestrian	North	Parking Maneuver	East	Stopped in Road	Unsafe Starting or Backing	1	0	
4808897	6/22/10	14:10	Hollywood Boulevard & Vine Street	6'	East	Vehicle - Pedestrian	Pedestrian	North	Making Right Turn	North	Proceeding Straight	Ped R/W Violation	1	0	
4767026	7/2/10	10:55	Vine Street & Hollywood Boulevard	1'	South	Hit Object	Fixed Object	North	Ran Off Road			Improper Turning	0	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
4823156	7/13/10	18:00	Hollywood Boulevard & Vine Street	5'	East	Vehicle - Pedestrian	Pedestrian	East	Proceeding Straight	North	Proceeding Straight	Traffic Signals and Signs	1	0	
4854195	8/5/10	02:15	Hollywood Boulevard & Vine Street	2'	East	Hit Object	Fixed Object	East	Ran Off Road			Not Stated	1	0	
4913907	9/9/10	14:50	Vine Street & Hollywood Boulevard	0'	In Int.	Sideswipe	Other Motor Vehicle	North	Making Left Turn	South	Proceeding Straight	Auto R/W Violation	0	0	
4887887	9/18/10	00:01	Hollywood Boulevard & Vine Street	100'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Slowing/Stopping	Unsafe Speed	0	0	
4922497	10/7/10	00:10	Hollywood Boulevard & Vine Street	10'	West	Hit Object	Fixed Object	Not State	Ran Off Road			Unsafe Speed	0	0	
4965625	11/15/10	04:00	Hollywood Boulevard & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	South	Making Left Turn	East	Proceeding Straight	Auto R/W Violation	1	0	
4961721	11/15/10	22:00	Vine Street & Hollywood Boulevard	50'	South	Rear-End	Parked Motor Vehicle	South	Backing	South	Parked	Unsafe Starting or Backing	0	0	
5038253	12/9/10	03:10	Vine Street & Hollywood Boulevard	105'	North	Vehicle - Pedestrian	Pedestrian	South	Proceeding Straight	South	Stopped In Road	Unknown	1	0	
5054353	1/6/11	12:00	Vine Street & Hollywood Boulevard	50'	South	Sideswipe	Other Object	South	Making Right Turn			Other Improper Driving	0	0	
5074530	1/14/11	19:55	Vine Street & Hollywood Boulevard	183'	North	Sideswipe	Other Motor Vehicle	South	Making U Turn	South	Making Left Turn	Improper Turning	1	0	
5100077	2/15/11	17:50	Vine Street & Hollywood Boulevard	10'	South	Rear-End	Other Motor Vehicle	North	Proceeding Straight	North	Stopped in Road	Following Too Closely	1	0	
5167764	3/17/11	19:45	Hollywood Boulevard & Vine Street	5'	West	Vehicle - Pedestrian	Pedestrian	East	Proceeding Straight	North	Proceeding Straight	Pedestrian Violation	1	0	
4755603	3/30/11	21:25	Vine Street & Hollywood Boulevard	50'	South	Sideswipe	Other Motor Vehicle	South	Making U Turn	North	Stopped in Road	Improper Turning	0	0	

Settings Used For Query

Parameter	Setting
Street Name	IVAR AVENUE
Cross Street	HOLLYWOOD BOULEVARD
Starting Date	1/1/2005
Ending Date	3/31/2011
Distance from Intersection	>= 0' for non rear-end collisions
	>= 0' for rear-end collisions

City of Los Angeles
Department of Transportation

Collision Report Summary

12/19/2012
Date Range Reported: 1/1/05 - 3/31/11
Total Number of Collisions: 36

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
1911003	3/5/05	01:45	Hollywood Boulevard & Ivar Avenue	50'	East	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Driving Under Influence	2	0	
1924159	3/5/05	02:40	Hollywood Boulevard & Ivar Avenue	86'	East	Vehicle - Pedestrian	Pedestrian	East	Proceeding Straight	North	Proceeding Straight	Driving Under Influence	0	0	
2333195	11/7/05	10:45	Ivar Avenue & Hollywood Boulevard	300'	North	Sideswipe	Parked Motor Vehicle	North	Parking Maneuver	North	Parked	Driving Under Influence	0	0	
2503293	2/4/06	01:20	Hollywood Boulevard & Ivar Avenue	15'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Driving Under Influence	0	0	
2495079	2/10/06	02:55	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Broadside	Other Motor Vehicle	North	Proceeding Straight	West	Proceeding Straight	Driving Under Influence	3	0	
2583882	4/16/06	02:20	Ivar Avenue & Hollywood Boulevard	0'	In Int.	Vehicle - Pedestrian	Pedestrian	South	Making Right Turn	South	Other	Ped R/W Violation	1	0	
2700778	7/2/06	19:30	Ivar Avenue & Hollywood Boulevard	0'	In Int.	Vehicle - Pedestrian	Pedestrian	South	Making Left Turn	North	Not Stated	Ped R/W Violation	1	0	
3102344	3/20/07	21:50	Ivar Avenue & Hollywood Boulevard	75'	North	Sideswipe	Other Motor Vehicle	North	Entering Traffic	North	Proceeding Straight	Driving Under Influence	0	0	
3143788	4/22/07	21:25	Hollywood Boulevard & Ivar Avenue	10'	East	Sideswipe	Other Motor Vehicle	East	Changing Lanes	East	Proceeding Straight	Unsafe Lane Change	1	0	
3163196	4/29/07	01:00	Ivar Avenue & Hollywood Boulevard	375'	North	Rear-End	Other Motor Vehicle	South	Proceeding Straight	South	Stopped in Road	Driving Under Influence	0	0	
3233381	6/16/07	02:15	Hollywood Boulevard & Ivar Avenue	35'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Following Too Closely	1	0	
3261763	6/28/07	13:15	Ivar Avenue & Hollywood Boulevard	75'	South	Sideswipe	Other Motor Vehicle	North	Proceeding Straight	North	Backing	Unsafe Speed	0	0	
3343167	8/21/07	17:50	Ivar Avenue & Hollywood Boulevard	86'	South	Sideswipe	Parked Motor Vehicle	North	Proceeding Straight	North	Parked	Other Improper Driving	1	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
3364229	9/9/07	02:00	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Vehicle - Pedestrian	Pedestrian	East	Making Right Turn	North	Not Stated	Ped R/W Violation	1	0	
3411180	10/11/07	12:50	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Broadside	Other Motor Vehicle	East	Proceeding Straight	South	Proceeding Straight	Traffic Signals and Signs	1	0	
3469051	11/3/07	23:50	Ivar Avenue & Hollywood Boulevard	90'	South	Rear-End	Other Motor Vehicle	North	Proceeding Straight	South	Backing	Unknown	0	0	
3583639	1/5/08	01:25	Hollywood Boulevard & Ivar Avenue	1320'	West	Broadside	Parked Motor Vehicle	East	Making U Turn	North	Parked	Improper Turning	0	0	
3624906	2/13/08	14:40	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Sideswipe	Other Motor Vehicle	West	Proceeding Straight	West	Proceeding Straight	Unsafe Lane Change	0	0	
3808653	6/9/08	21:45	Hollywood Boulevard & Ivar Avenue	600'	East	Sideswipe	Other Motor Vehicle	West	Backing	West	Stopped in Road	Unknown	0	0	
3788563	6/14/08	20:30	Ivar Avenue & Hollywood Boulevard	0'	In Int.	Vehicle - Pedestrian	Pedestrian	North	Backing	East	Not Stated	Unsafe Starting or Backing	1	0	
3986127	10/5/08	02:40	Hollywood Boulevard & Ivar Avenue	18'	West	Rear-End	Other Motor Vehicle	East	Stopped in Road	East	Changing Lanes	Driving Under Influence	0	0	
3978840	11/18/08	23:30	Ivar Avenue & Hollywood Boulevard	62'	South	Vehicle - Pedestrian	Pedestrian	South	Proceeding Straight	West	Not Stated	Pedestrian Violation	1	0	
3990866	11/25/08	20:30	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Vehicle - Pedestrian	Pedestrian	West	Making Left Turn	East	Not Stated	Ped R/W Violation	1	0	
4022896	12/5/08	11:45	Hollywood Boulevard & Ivar Avenue	60'	West	Sideswipe	Other Motor Vehicle	West	Changing Lanes	West	Proceeding Straight	Unsafe Lane Change	0	0	
4104219	2/1/09	02:35	Hollywood Boulevard & Ivar Avenue	62'	West	Sideswipe	Other Motor Vehicle	West	Traveling Wrong Way	East	Stopped in Road	Improper Turning	0	0	
4172214	3/23/09	13:00	Hollywood Boulevard & Ivar Avenue	30'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Following Too Closely	0	0	
4425471	9/13/09	14:55	Hollywood Boulevard & Ivar Avenue	50'	West	Broadside	Bicycle	Not State	Proceeding Straight	West	Parked	Other Hazardous Movement	1	0	
4425496	9/17/09	01:40	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Broadside	Other Motor Vehicle	Not State	Making Left Turn	West	Proceeding Straight	Auto R/W Violation	1	0	
4550723	12/3/09	18:00	Ivar Avenue & Hollywood Boulevard	0'	In Int.	Vehicle - Pedestrian	Pedestrian	North	Making Left Turn	East	Not Stated	Ped R/W Violation	1	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
4703533	5/4/10	10:00	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Head-On	Other Motor Vehicle	West	Making Left Turn	East	Proceeding Straight	Auto R/W Violation	1	0	
4837251	7/30/10	15:00	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Broadside	Bicycle	West	Proceeding Straight	East	Making Left Turn	Auto R/W Violation	1	0	
4969955	12/1/10	16:15	Hollywood Boulevard & Ivar Avenue	181'	West	Sideswipe	Parked Motor Vehicle	East	Proceeding Straight	East	Parked	Other Hazardous Movement	0	0	
5032108	12/26/10	09:00	Hollywood Boulevard & Ivar Avenue	30'	East	Rear-End	Parked Motor Vehicle	West	Parking Maneuver	East	Parked	Unsafe Starting or Backing	1	0	
5140940	2/16/11	19:35	Hollywood Boulevard & Ivar Avenue	5'	South	Vehicle - Pedestrian	Pedestrian	North	Making Right Turn	West	Proceeding Straight	Ped R/W Violation	1	0	
5112133	3/3/11	14:20	Ivar Avenue & Hollywood Boulevard	0'	In Int.	Vehicle - Pedestrian	Pedestrian	South	Making Right Turn	South	Proceeding Straight	Ped R/W Violation	1	0	
5177605	3/31/11	15:10	Hollywood Boulevard & Ivar Avenue	0'	In Int.	Sideswipe	Bicycle	West	Changing Lanes	West	Proceeding Straight	Unsafe Lane Change	1	0	

Settings Used For Query

Parameter	Setting
Street Name	VINE STREET
Cross Street	YUCCA STREET
Starting Date	1/1/2005
Ending Date	3/31/2011
Distance from Intersection	>= 0' for non rear-end collisions
	>= 0' for rear-end collisions

DEC 19 2012

CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION
CERTIFIED A TRUE COPY
Barbara Adams
Records Section

City of Los Angeles
Department of Transportation

Collision Report Summary

12/19/2012
Date Range Reported: 1/1/05 - 3/31/11
Total Number of Collisions: 24

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
1923836	2/19/05	12:30	Vine Street & Yucca Street	55'	North	Rear-End	Other Motor Vehicle	South	Proceeding Straight	South	Stopped in Road	Unsafe Speed	1	0	
2319241	9/17/05	20:20	Vine Street & Yucca Street	140'	North	Sideswipe	Parked Motor Vehicle	South	Parking Maneuver	South	Parked	Improper Turning	0	0	
2277684	10/12/05	14:15	Vine Street & Yucca Street	0'	In Int.	Broadside	Other Motor Vehicle	North	Proceeding Straight	East	Proceeding Straight	Traffic Signals and Signs	4	0	
2396070	12/15/05	17:30	Vine Street & Yucca Street	155'	North	Vehicle - Pedestrian	Parked Motor Vehicle	South	Backing	North	Stopped In Road	Unsafe Starting or Backing	1	0	
2503440	2/8/06	07:45	Yucca Street & Vine Street	120'	West	Hit Object	Fixed Object	West	Entering Traffic			Unsafe Starting or Backing	0	0	
2503611	2/20/06	02:10	Vine Street & Yucca Street	92'	South	Sideswipe	Parked Motor Vehicle	South	Making U Turn	South	Parked	Improper Turning	0	0	
9007813	8/22/06	18:35	Yucca Street & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	East	Proceeding Straight	South	Proceeding Straight	Traffic Signals and Signs	4	0	
2907096	11/14/06		Yucca Street & Vine Street	200'	West	Sideswipe	Parked Motor Vehicle	South	Proceeding Straight	South	Parked	Other Improper Driving	0	0	
3055502	2/11/07	02:20	Vine Street & Yucca Street	0'	In Int.	Sideswipe	Other Motor Vehicle	North	Stopped in Road	North	Proceeding Straight	Unknown	0	0	
3113369	3/15/07	23:20	Vine Street & Yucca Street	0'	In Int.	Rear-End	Other Motor Vehicle	North	Proceeding Straight	North	Stopped in Road	Driving Under Influence	0	0	
3261810	6/29/07	18:20	Yucca Street & Vine Street	120'	West	Broadside	Other Motor Vehicle	West	Making U Turn	West	Proceeding Straight	Improper Turning	1	0	
3264913	7/5/07	08:10	Vine Street & Yucca Street	0'	In Int.	Sideswipe	Other Motor Vehicle	North	Making Left Turn	North	Proceeding Straight	Improper Turning	1	0	
3376218	9/11/07	18:30	Yucca Street & Vine Street	0'	In Int.	Broadside	Other Motor Vehicle	West	Making Left Turn	East	Proceeding Straight	Auto R/W Violation	1	0	

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.
3364145	9/15/07	00:50	Yucca Street & Vine Street	45'	West	Rear-End	Other Motor Vehicle	East	Proceeding Straight	East	Stopped in Road	Unsafe Speed	0	0	
3802431	6/20/08	21:40	Vine Street & Yucca Street	150'	South	Rear-End	Other Motor Vehicle	South	Proceeding Straight	South	Backing	Unsafe Starting or Backing	1	0	
3876628	8/15/08	23:35	Vine Street & Yucca Street	100'	North	Rear-End	Parked Motor Vehicle	South	Backing	South	Parked	Other Improper Driving	0	0	
3978824	11/14/08	09:20	Yucca Street & Vine Street	0'	In Int.	Vehicle - Pedestrian	Pedestrian	West	Making Right Turn	South	Not Stated	Ped R/W Violation	1	0	
4385581	8/29/09	02:20	Vine Street & Yucca Street	0'	In Int.	Sideswipe	Other Motor Vehicle	North	Proceeding Straight	North	Stopped in Road	Unsafe Lane Change	0	0	
4433937	9/18/09	17:20	Yucca Street & Vine Street	0'	In Int.	Vehicle - Pedestrian	Pedestrian	East	Making Left Turn	West	Proceeding Straight	Ped R/W Violation	1	0	
4550759	12/6/09	14:20	Vine Street & Yucca Street	0'	In Int.	Rear-End	Parked Motor Vehicle	North	Proceeding Straight	North	Parked	Unsafe Speed	0	0	
4807587	6/12/10	02:45	Yucca Street & Vine Street	198'	West	Rear-End	Other Motor Vehicle	West	Backing	West	Stopped in Road	Driving Under Influence	0	0	
4950108	10/13/10	16:30	Yucca Street & Vine Street	3'	West	Vehicle - Pedestrian	Pedestrian	East	Making Right Turn	North	Proceeding Straight	Ped R/W Violation	1	0	
4961702	11/14/10	03:00	Vine Street & Yucca Street	150'	North	Sideswipe	Other Motor Vehicle	North	Changing Lanes	North	Proceeding Straight	Unsafe Lane Change	0	0	
5119869	3/12/11	22:30	Vine Street & Yucca Street	300'	South	Vehicle - Pedestrian	Pedestrian	North	Proceeding Straight	West	Entering Traffic	Ped R/W Violation	1	0	

Settings Used For Query

Parameter	Setting
Street Name	ARGYLE AVENUE
Cross Street	YUCCA STREET (E)
Starting Date	1/1/2005
Ending Date	3/31/2011
Distance from Intersection	>= 0' for non rear-end collisions >= 0' for rear-end collisions

City of Los Angeles
Department of Transportation

Collision Report Summary

12/19/2012
Date Range Reported: 1/1/05 - 3/31/11
Total Number of Collisions: 0

Report#	Date	Time	Location	Dist.	Dir.	Type of Collision	Motor Veh. Involved With	Dir. of Travel 1	Movement Prec. Coll. 1	Dir. of Travel 2	Movement Prec. Coll. 2	PCF	Inj.	Kil.	Ver.

Appendix H

Millennium Hollywood Project Trip Cap and Mitigation Triggers

MILLENNIUM HOLLYWOOD PROJECT
TRIP CAP AND MITIGATION TRIGGERS

Introduction

The Millennium Hollywood Project (the "Project") is proposed for development as a mixed-use project, including residential and commercial uses, on opposite sides of Vine Street between Yucca Street and Hollywood Boulevard, and Ivar Avenue and Argyle Avenue, in the Hollywood Community of Los Angeles. The Project Site consists of two sites bisected by Vine Street, the West Site and East Site, respectively and includes the historic Capitol Records Building and Gogerty Building (the "Capitol Records Complex").

The controlling parameters of the Project will be established by a "Development Agreement" between the City of Los Angeles and the Project Applicant. The Development Agreement and corresponding Development Regulations will include project design features such as the types of uses to be developed, the maximum height of the buildings, the amount of required parking, and the connections of the Project Site to the nearby Metro Red Line station and other area transportation facilities.

For purposes of the impact analysis for the Project, a recommended trip cap limit has been developed to control the extent and intensity of uses developed on the Project Site through implementation of the Development Agreement. Similarly, this document establishes the levels of Project development that would "trigger" the traffic mitigation measures established in the Millennium Hollywood Traffic Impact Study (the "Traffic Study"). In other words, this document demonstrates when the developer would have to implement certain traffic mitigation measures that correspond to the amount of development on the Project Site and the related traffic trips.

The trip generation calculations, development size limit (based on the trip cap), and mitigation measure triggers listed in the final section of this appendix are based on data in the Traffic Study. In order to maintain consistency with the Traffic Study trip generation estimates, the scenario that causes the greatest level of traffic impact (the Commercial Scenario) was also used in this supplemental analysis. This appendix also addresses the construction traffic impacts.

Trip Generation Calculations

Adjustments to ITE Assumptions

The level of potential traffic generated by the mixed-use components of the Project is a fundamental part of the Traffic Study. In it, adjustments to the basic ITE trip generation rates are listed individually by component in the Traffic Study. The adjustments were made because the vehicular travel behavior of a mixed-use project (located in a heavily-

developed urban area near rail and mass transit options) is materially different than vehicular travel behavior of the single-use suburban sites studied for the ITE manual.

In addition, the adjusted trip generation values from the Traffic Study are based on the SCAG model and approved by LADOT. The same adjustments are consistently used in the analysis contained in this supplement. The trip generation values in the Traffic Study generation table are:

Base (ITE) generation; and
Reductions for:
- Internal Commute Trips;
- Internal Support Trips;
- Transit/Walk-in Trips; and
- Pass-by Trips.

Similar adjustments were made to the existing uses trip generation estimates as were made to the trip generation estimates for the proposed uses associated with the Project. The adjustments to the existing uses trip generation were made to properly account for the Project traffic impacts, as the existing uses are also in a location within an urban community, next to a transit railway station. This supplemental analysis utilized the same reductions to the existing and the proposed uses trip generation as those used in the Traffic Study.

Trip Cap Calculation

The trip cap for the Project is recommended to be set based on the level of trip generation analyzed in the Traffic Study. Table 1 summarizes the land-use and trip generation parameters from the Traffic Study.

Table 1
Adjusted Trip Generation Based on Project Uses

Land Use Category	Use Size	AM Peak Hour Trips	PM Peak Hour Trips
220 Residential	461 du	165 trips	151 trips
310 Hotel	254 rm	121 trips	128 trips
492 Health/Fitness Club	80 ksf	63 trips	156 trips
710 General Office	150 ksf	137 trips	54 trips
820 Retail	100 ksf	78 trips	321 trips
931 Quality Restaurant	25 ksf	13 trips	121 trips
N/A Car Rental	-8 ksf	(3) trips	(7) trips
Site Total (Trip Cap)		574 trips	924 trips

As depicted in Table 1, the "Commercial Scenario" of the Project would produce 574 net new AM peak hour trips and 924 new PM peak hour trips. For purposes of environmental impact analysis, this 574 AM/924 PM peak hour "Trip Cap" generation represents the number of AM and PM peak hour trips associated with the most trip-

intensive development scenario of the Project. Thus, the maximum allowable peak hour trips that would be allowed under any development scenario would be limited to Trip Cap of 574 AM peak hour trips and 924 PM peak hour trips. Accordingly, Project trip generation at the Trip Cap level was used in the Traffic Study to analyze the maximum level of potential traffic impacts associated with Project development.

Project Component Trip Generation Calculation Procedures

The Project may be built in several phases, and the aggregate site development for each phase will be evaluated to ensure that the Trip Cap would not be exceeded by the cumulative site development. Further, due to the potential for the Project to be constructed over many years, the implementation of traffic mitigation measures is phased to correspond with the amount of development (and associated trips) on the Project Site. In other words, certain levels of development will "trigger" the requirement to implement traffic mitigation measures before construction.

The mitigation measures triggers based on trip generation would be implemented as follows. First, a trip generation calculation would be required before any building permits are issued for each phase of development. Project trip generation for two periods (i.e., the Construction Period and Operational Period) would be analyzed for each development phase. For the Construction Period, a set of trip generation calculations would consider the maximum level of Construction Period trip generation based on construction trucks and employees. For the build out and occupancy phase (defined herein as the Operational Period), a second set of calculations would be made. The Operational Period calculations typically represents a longer term period with higher trip generation than the Construction Period. The tables and narrative below explain how trip generation would be calculated. Table 2 contains the Project's proposed construction activities and land uses, and a corresponding trip generation multiplying factor which would be used to create trip generation estimates.

The construction activities would first be considered in the trip generation calculations. Construction activity employees were assumed to generate traffic similar to a light industrial use. No credit was taken for transit/walk-in employee trips or other factors. The Passenger Car Equivalent ("PCE") factor for trucks is applied to account for the trucks' larger size and traffic impact. The PCE factor, depending upon truck size, ranges from 1 to 3. A conservative average PCE of 2.5 was assumed and applied to the trucks entering or exiting the Project Site on a daily basis. It was generally assumed that there would be 1 inbound and 1 outbound trip per load and the truck trips would be spread evenly over an 8 hour work day. For soils export, however, the standard City Haul Route conditions do not allow truck trips to be made during peak hours. Therefore, none of the truck trips will be added to the site peak hour trip generation and associated traffic impacts for the Excavation and Shoring phase.

Table 2
Trip Cap Computation Factors
By Construction Activity and Land-Use Type Level

	Land Use/Activity	Peak Hour Trips Factor		
Construction Period		**AM**	**PM**	**Unit**
110	Construction Employee*	0.440	0.420	trips/employee
N/A	Construction Trucks**	0.625	0.625	trips/truck load
Operational Period				
220	Residential	0.358	0.328	trips/du
310	Hotel	0.476	0.504	trips/rm
492	Health/Fitness Club	0.788	1.950	trips/ksf
710	General Office	0.913	0.360	trips/ksf
820	Retail***			
	(1-25,000 sf)	1.444	5.026	trips/ksf
	(25,001+ sf)	0.559	2.604	trips/ksf
931	Restaurant	0.520	4.840	trips/ksf
N/A	Car Rental Facility	0.373	0.871	trips/ksf

* The trip rates per peak construction worker used are the ITE Trip Generation, 8th edition manual rates for a Light Industrial site (LU 110).

** Standard City haul route conditions prohibit such truck activity during the excavation and shoring construction phase and thereby 0 truck trips are to be assumed for that phase. The 0.625 rates apply to the average trucks hauling loads to or from the site on a weekday during each other construction phase.

*** Incrementally applied to the retail building area on the site at the conclusion of a development phase.

Second, the Operational Period trips would be considered. The Operational Period multiplying factors were calculated based on the Traffic Study data summarized in Table 1. The measure of land use intensity for each Project use was also taken from the Traffic Study data summarized in Table 1. The trip generation data and land-use intensity assumptions were then used to establish the rate of trip generation per unit of development for the Project that are included in Table 2.

In the Traffic Study, the trip generation estimates for the Operational Period were all based on procedures in the ITE Trip Generation Manual, except for the rental car facility, which is not an ITE land-use and which will be demolished as part of the Project. For the residential use, the land-use intensity is measured in terms of dwelling units. For the hotel, the measurement is for number of rooms. For all other uses, the square footage of building area is used as the land-use intensity parameter.

The total amount of trips considering the net land-uses included on the Project Site during the development phase would be determined. For analytical purposes, the total net development would be comprised of the following elements:

a) All buildings currently occupying the Project Site which were constructed after the Development Agreement was approved;

b) All buildings removed from the site which were existing before the Development Agreement was approved (as a credit);
c) Any buildings proposed to be constructed on the Project Site for which a previous application was filed and not withdrawn, but the building has not yet been constructed; and
d) The current development phase now being applied for.

The trip generation level for each of the four land-use elements will be determined using the rates in Table 2. The trip generation for land-use items a, b and c will be the same for both the Construction and Operational Periods. The trip generation value for land-use element d can vary between the estimates for the construction and operational. The Project Construction Period and Operational Period Project trip generation would be separately determined from the summation of the trip generation for the four land-use elements discussed above.

Trip Cap Comparisons

Construction Period

In order to evaluate the transportation implications of the construction, and verify that the traffic generation will remain within the Trip Cap, a conservative scenario was evaluated. Under this conservative scenario, it was assumed that the entire Project was constructed as a single phase. The assumed construction activity included the efforts required to simultaneously construct the components on both the East and West Sites. Table 3 shows the resulting level of activity.

Table 4 shows the results of the trip calculations under the conservative scenario whereby all construction occurs at the same time. The analysis applies the rates set in Table 2 to the level of activity shown in Table 3. The greatest generation will occur during Phase 7 - Finishes, due to the large combination of workers and deliveries.

Table 3
Level of Activity During Project Construction
By Construction Phase

		Months (Inclusive)			Construction Daily Amount			
					Truck Loads		Workers	
	Construction Phase	Start	End	Duration	Average	Peak	Average	Peak
1	Demolition	Month 1	Month 1	1 Month	4	6	10	14
2	Excavation & Shoring	Month 2	Month 9	8 Months	95	120	60	75
3	Foundation & Below Grade	Month 9	Month 14	6 Months	30	40	85	100
4	Building Superstructure	Month 13	Month 25	13 Months	50	60	160	175
5	Exterior Finishing	Month 16	Month 28	13 Months	30	40	185	225
6	Framing / Rough In	Month 16	Month 28	13 Months	15	20	300	400
7	Finishes	Month 22	Month 38	17 Months	45	50	625	700

Table 4
Trip Generation During Project Construction
For Each Construction Phase

Construction Phase	AM Peak Hour Construction Period Trips			PM Peak Hour Construction Period Trips		
	Trucks	Workers[1]	Total	Trucks	Workers[1]	Total
Average for Phase						
1 Demolition	3	4	7	3	4	7
2 Excavation & Shoring	0	26	26	0	25	25
3 Foundation & Below Grade	19	37	56	19	36	55
4 Building Superstructure	31	70	101	31	67	98
5 Exterior Finishing	19	81	100	19	78	97
6 Framing / Rough In	9	132	141	9	126	135
7 Finishes	28	275	303	28	263	291
Peak of Phase						
1 Demolition	4	6	10	4	6	10
2 Excavation & Shoring	0	33	33	0	32	32
3 Foundation & Below Grade	26	44	70	26	42	68
4 Building Superstructure	38	77	115	38	74	112
5 Exterior Finishing	26	99	125	26	95	121
6 Framing / Rough In	14	176	190	14	168	182
7 Finishes	32	308	340	32	294	326

Notes:
1 Conservatively assumes that construction worker shifts begin and end as typical industrial shifts.
2 Soils import/export truck trips are not allowed in the peak hours.

Table 5 utilizes the information in Table 4 and calculates the level of Construction Trips during each period of months. It was assumed that each activity would be at its average level over the length of that phase. Each phase will be at its peak for the month(s) when 1) that phase is the only phase operating on the site, or 2) when that phase is starting if it would not occupy the entire site at any time. The level of activity was adjusted for the non-peak months so that the average trip level remained the same as indicated in Table 4. These same assumptions shall be made in subsequent evaluations. As Table 5 shows, the maximum level of trip-making activity from the Project Site during the AM peak hour will be 496 trips, which is nearly 15% lower than the Trip Cap of 574 AM peak hour trips. The highest PM peak hour construction generation is 479 trips, slightly greater than half of the Trip Cap level of 924 PM peak hour trips.

Table 5
Trip Generation During Project Construction
By Month Within the Construction Period

	AM Peak Hour								PM Peak Hour							
Month(s)	Phase1	Phasa2	Phasa3	Phasa4	Phasa5	Phasa6	Phasa7	Total	Phase1	Phasa2	Phasa3	Phasa4	Phasa5	Phasa6	Phasa7	Total
1	10							10	10							10
2 - 8		33						33		32						32
9		19	42					61		18	42					60
10 - 12			70					70			68					68
13 - 14			42	100				142			42	97				139
15				115				115				112				112
16 - 23				100	125	190		415				97	121	182		400
22 - 25				100	71	84	241	496				97	69	80	233	479
26 - 28					71	84	241	396					69	80	233	382
29 - 38							340	340							326	326

* Phases -- 1 = Demolition, 2 = Excavation and Shoring, 3 =Foundation and Below Grade, 4 = Building Superstructure, 5 = Exterior Finishing, 6 = Framing / Rough In, and 7 = Finishes.

Operational Period

To stay within the envelope of environmental impact analysis, the Project trips must remain within the Trip Cap during the Operational Period. Table 6 shows a set of AM and PM trip level computations that compare each development scenario (Concept Plan, Commercial Scenario and Residential Scenario) in the EIR to the Trip Cap. As this table demonstrates, under all three scenarios the Project trip generation would remain at, or below, the Trip Cap values of 574 for the AM peak hour and 924 for the PM peak hour.

Table 6

Sample AM and PM Peak Hours Trip Level Computations For Comparison to the Trip Cap and Mitigation Trigger Values

		Component Size	AM Peak Hour	PM Peak Hour
Concept Plan				
220	Residential	492 du	176 trips	161 trips
310	Hotel	200 rm	95 trips	101 trips
492	Health/Fitness Club	35 ksf	28 trips	68 trips
710	General Office	215 ksf	197 trips	78 trips
820	Retail (1-25,000 sf)	15 ksf	22 trips	75 trips
	(25,001+ sf)	0 ksf	0 trips	0 trips
931	Restaurant	34 ksf	18 trips	165 trips
N/A	Car Rental Facility	-8 ksf	-3 trips	-7 trips
110	Construction Employee	0 emp	0 trips	0 trips
N/A	Construction Truck	0 trucks	0 trips	0 trips
	Total		**533 trips**	**641 trips**
Commercial Scenario (Traffic Study)				
220	Residential	461 du	165 trips	151 trips
310	Hotel	254 rm	121 trips	128 trips
492	Health/Fitness Club	80 ksf	63 trips	156 trips
710	General Office	150 ksf	137 trips	54 trips
820	Retail (1-25,000 sf)	25 ksf	36 trips	126 trips
	(25,001+0 sf)	75 ksf	42 trips	195 trips
931	Restaurant	25 ksf	13 trips	121 trips
N/A	Car Rental Facility	-8 ksf	-3 trips	-7 trips
110	Construction Employee	0 emp	0 trips	0 trips
N/A	Construction Truck	0 trucks	0 trips	0 trips
	Total		**574 trips**	**924 trips**
Residential Scenario				
220	Residential	897 du	321 trips	294 trips
310	Hotel	0 rm	0 trips	0 trips
492	Health/Fitness Club	30 ksf	24 trips	59 trips
710	General Office	114 ksf	104 trips	41 trips
820	Retail (1-25,000 sf)	25 ksf	36 trips	126 trips
	(25,001+ sf)	0 ksf	0 trips	0 trips
931	Restaurant	10 ksf	5 trips	48 trips
N/A	Car Rental Facility	-8 ksf	-3 trips	-7 trips
110	Construction Employee	0 emp	0 trips	0 trips
N/A	Construction Truck	0 trucks	0 trips	0 trips
	Total		**487 trips**	**561 trips**

Off-Site Transportation Mitigation Measure Implementation Schedule

The mitigation triggers and payment schedule are intended to implement traffic mitigations prior to the construction or occupancy levels that would create traffic impacts. Thus, prior to issuance of any building permit or issuance of a permit allowing a change of land-use the number of Operational Period and Construction Period trips to be

generated by the Project would be calculated using the procedures described in this supplemental analysis. The results of the calculations would be compared to the Trip Cap values of 574 AM peak hour trips and 924 PM peak hour trips. No building permits would be issued to allow the Project-related trip generation to exceed the Trip Cap value unless other supplemental analysis is completed. The results would also be compared to the triggers based on the trip generation level.

Trigger mechanisms are to be used for mitigation measures that will be directly implemented by the Project Applicant. However, payments will be made based on the payment schedule set forth below for mitigation measures that will be implemented by the City. Project payments to the trust funds for the Bike Plan Trust Fundand Signal Systems Upgrades shall be made proportional to the trip generation values at the completion of each phase. For the payments, the number of trips at phase completion shall be multiplied by the rates set forth in Table 7, accounting for inflation based on the Marshall Valuation Service Comparative Cost Index (per City standards), and the higher of the amounts based on the AM peak hour or PM peak hour trips shall be due. Credits shall be made for previous Project payments to these funds.

The AM peak hour and PM peak hour trigger values/payment amounts for each off-site mitigation measure is listed in Table 7. The Project Applicant would be responsible for implementing all off-site Transportation Mitigation Measures for which either of the two trigger values (AM peak hour of PM peak hour) would be exceeded by that phase of development and making any required payment corresponding to the higher value for that phase of development. If the trigger for one or more off-site Transportation Mitigation Measures will be exceeded by the Construction Period trips, a B-permit application must be filed with the Bureau of Engineering for that improvement prior to a building permit being issued. The application would include the posting of a bond for implementing the triggered mitigation measure(s). Filing the B-permit with a bond ensures that the triggered mitigation measure would be implemented to address the related traffic impact. If the Operational Period trips exceed a trigger, that corresponding mitigation measure(s) would be implemented prior to a permanent Certificate of Occupancy for that phase being issued by the City. The mitigation trigger applies to any and all buildings proposed to be part of that phase. For any other approval by the City (e.g. a change of use) which is determined to cause the Project trip generation to exceed a trigger for a Transportation Mitigation Measure, a B-permit application must be filed with the Bureau of Engineering.

For those measures requiring a payment to a trust fund administered by the City (the Bike Lane Trust Fundand the Signal SystemUpgrades), the full payment for that phase shall be made to the City prior to any certificate of occupancy (temporary or permanent) being issued for a building in that phase.

There are other Project-related Construction Period transportation impacts and corresponding mitigation measure that are not directly related to the Project's trip generation level. Instead, these impacts are a result of the temporary capacity loss (such as intrusions into the City's right of way) from Construction Period activities. As a result, there would also be a review of any such Project activities during construction for each Project phase and the mitigation measures would be implemented accordingly.

Table 7
"Trigger" Values and Fee Payment Schedule
For Off-Site Transportation Mitigation Measures

Measure	Trip Trigger	Payment Schedule
	AM/PM	AM/PM
Hollywood Community Transportation Management Organization (TMO)	110 AM/ 210 PM	
Bicycle Plan Trust Fund		$436/AM trip; $271/PM trip
Signal System Upgrades*	Completed Prior to any C of O	$1,611/AM trip; $1,001/PM trip*
* The Project Applicant may pay the per trip amount for the Signal System Upgrades, or in the alternative, the City and Project Applicant may instead agree to the Project Applicant installing the Signal System Upgrades under a B-permit, to be completed prior to any C of O.		

The Transit Enhancements must be completed prior to any Certificate of Occupancy and a Caltrans Encroachment Permit must be applied for prior to any Certificate of Occupancy pursuant to the LADOT Correspondence to the Department of City Planning, dated August 16, 2012. See Appendix K.2 of the Draft EIR.

On-Site Transportation Project Features and Mitigation Measure Implementation Schedule

On-site transportation project features from the Project Description and mitigation measures recommended in the EIR include:

- The Project Transportation Demand Management (TDM) Program,
- The Pedestrian, Bicycle, Automobile and Delivery Circulation Systems,
- Widenings or dedications for adjacent public streets,
- Site Loading Facilities, and
- The Parking Provisions.

Standard City of Los Angeles procedures would be followed for the building permits associated with each phase. The requirements would consider the building(s) uses being planned for each phase and the layout of the Project Site at the completion of each development phase. Plans for the physical on-site transportation infrastructure would accompany each building permit application or, if determined to be appropriate by the Director of the Planning Department, with any other application for an approval by the City. The on-site requirements would be phased so as to appropriately serve the specific buildings to be developed on the Project Site within each phase. For example:

- Greater loading dock capacity per square foot of building area shall be required for retail or restaurant uses than for office uses, and

- The parking demand for each phase will be calculated using the shared parking provisions of the Development Agreement as studied in the Shared Parking

Analysis and the EIR, and that amount of parking shall be provided for that phase. If less parking is provided, additional environmental analysis will be required, however, the Project Applicant may provide more parking than required by the shared parking calculations.

Pursuant to the LADOT Correspondence to the Department of City Planning, dated August 16, 2012 (See Appendix K.2 to this Draft EIR*)*, prior to the issuance of the first building permit, the TDM Program shall be prepared and submitted to LADOT for review and a final TDM Program approved by LADOT is required prior to issuance of the first C of O for the Project. The TDM Program shall include measures to serve the occupants of the proposed building(s) (as well as retaining service to any other buildings on the Project Site), a description of how the building(s) shall comply with the City's Municipal Code bicycle requirements, and how the building(s) shall provide access to and/or encourage use of the area transit facilities. The TDM Program shall also address the implementation of other methods to encourage ridesharing and other alternative mode usage, including parking management, car and bike sharing, and on-site transit pass sales.

The TDM Program for all phases of the Project shall contain the measures listed in Table 8.

Table 8
Transportation Demand Management Measures
To Be Included in All TDM Plans

▪ Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator
▪ A bicycle, transit, and pedestrian friendly environment
▪ Administrative support for the formation of carpools/vanpools
▪ Flexible/alternative work schedules and telecommuting programs
▪ Parking provided as an option only for all leases and sales
▪ A provision requiring compliance with the State Parking Cash-out Law in all leases
▪ Distribution of information to all residents and employees of the onsite pedestrian, bicycle and transit rider services, including shared car and shared bicycle services

While the final TDM Program will be approved by LADOT prior to issuance of the first C of O for the Project, the implementation of the additional specific measures below shall be included in the program beginning with the triggers listed in Table 9.

Table 9
"Trigger" Values for Selected On-site
Transportation Demand Management Measures

Measure	Trigger
Inclusion of business services to facilitate work-at-home arrangements for the proposed residential uses, if constructed	50 Residential Units
Provision of a self-service bicycle repair area and shared tools for residents and employees	50 ksf of Net New Office Use or 50 Residential Units
Provide car share amenities (including a minimum five parking spaces for a shared car program)	500 Net New Parking Spaces
Bike Parking Required per the Municipal Code in a Bike Friendly Manner	10 ksf of Net New Non-Residential Uses
Showers, and Lockers Required per the Municipal Code in a Bike Friendly Manner	50 ksf of Net New Office Use

Conclusion

The above procedures are designed to ensure that the Project construction and operation do not exceed the level of traffic impacts analyzed in the Traffic Study and supplemental analyses conducted for the EIR. Calculation of the Project net trip generation would be required for each development phase. The Project trip generation computation for each phase would also take the construction impacts into account. A trip cap of 574 AM/924 PM peak hour net trips is to be included within the Project's Development Agreement. Also established are a payment schedule or trigger levels of net trip generation at which each off-site transportation mitigation measure would be required. It is recommended that these also be included in the Development Agreement. Finally, procedures are recommended for the Development Agreement to ensure that the on-site transportation mitigation measures are also implemented. The Tables above contain the measures to be included with each phase, and the triggers are listed for those measures specific to a minimum development level. The overall recommended Development Agreement program is designed to ensure that the Project transportation impacts do not exceed those analyzed in the Traffic Study and the EIR.

Appendix I

Bureau of Sanitation Inter-Departmental Correspondence to Department of City Planning, January 8, 2013

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: January 8, 2013

TO: Srimal Hewawitharana, Environmental Specialist
Environmental Review Section
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Millennium Hollywood Project – Notice of Completion of Draft EIR**

This is in response to your letter requesting a review of your proposed project to construct a mixed-use development. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

PROPOSED CONCEPT PLAN

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Office	120 GPD/1000 SQ.FT	114,303 SQ.FT	(13,716)
Proposed			
Office	120 GPD/1000 SQ.FT	215,000 SQ.FT	25,800
Retail	25 GPD/1000 SQ.FT	15,000 SQ.FT	375
Food & Beverage	300 GPD/1000 SQ.FT	34,000 SQ.FT	10,200
Gym	200 GPD/1000 SQ.FT	35,100 SQ.FT	7,020
Residential Apt-1BR	110 GPD/DU	166 DU	18,260
Residential Apt-2BR	150 GPD/DU	314 DU	47,100
Residential Apt-3BR	190 GPD/DU	12 DU	2,280
Hotel Guest Room	120 GPD/Room	200 Rooms	24,000
Total			**121,319**

PROPOSED COMMERCIAL SCENERIO

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Office	120 GPD/1000 SQ.FT	114,303 SQ.FT	(13,716)
Proposed			
Office	120 GPD/1000 SQ.FT	264,303 SQ.FT	31,716
Retail	25 GPD/1000 SQ.FT	100,000 SQ.FT	5,000
Food & Beverage	300 GPD/1000 SQ.FT	25,000 SQ.FT	7,500
Gym	200 GPD/1000 SQ.FT	80,000 SQ.FT	16,000
Residential Apt-1BR	110 GPD/DU	156 DU	17,160
Residential Apt-2BR	150 GPD/DU	295 DU	44,250
Residential Apt-3BR	190 GPD/DU	10 DU	1,900
Hotel Guest Room	120 GPD/Room	254 Rooms	30,480
Total			**140,290**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Argyle Ave, 8-inch line on Vine St, and 12-inch on Yucca St. The sewage from the existing 8-inch line on Vine St feeds into a 21-inch line on Vine St before discharging into a 33-inch line on Vine St. The sewage from the existing 8-inch line on Argyle St connects with the existing 21-inch line on Vine St at the intersection of Sunset Blvd and Vine St before discharging to a 27-inch line. The sewage from the existing 12-inch on Yucca St feeds into a 12-inch line on Ivar Ave then continues down Ivar Ave before discharging into a 21-inch line on Cole Ave. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8, 12, 21 and 27-inch lines cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Vine St	*	725,000 GPD
8	Argyle Ave	50	229,000 GPD
12	Yucca St	*	676,000 GPD
12	Ivar Ave	*	1.07 MGD
21	Cole St	10	5.46 MGD
21	Vine St	*	6.59 MGD
27	Vine St	*	12.43 MGD
33	Vine St	24	21.11 MGD

* No gauging available

Based on the estimated flows, it appears the 8-inch line on Argyle Ave will not be able to accommodate your proposed flows. The sewer system might be able to accommodate the total flow for your proposed project based on the following conditions:

- Connection is made either to the 8-inch line on Vine and/or the 12-inch line on Yucca St.

Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled"*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

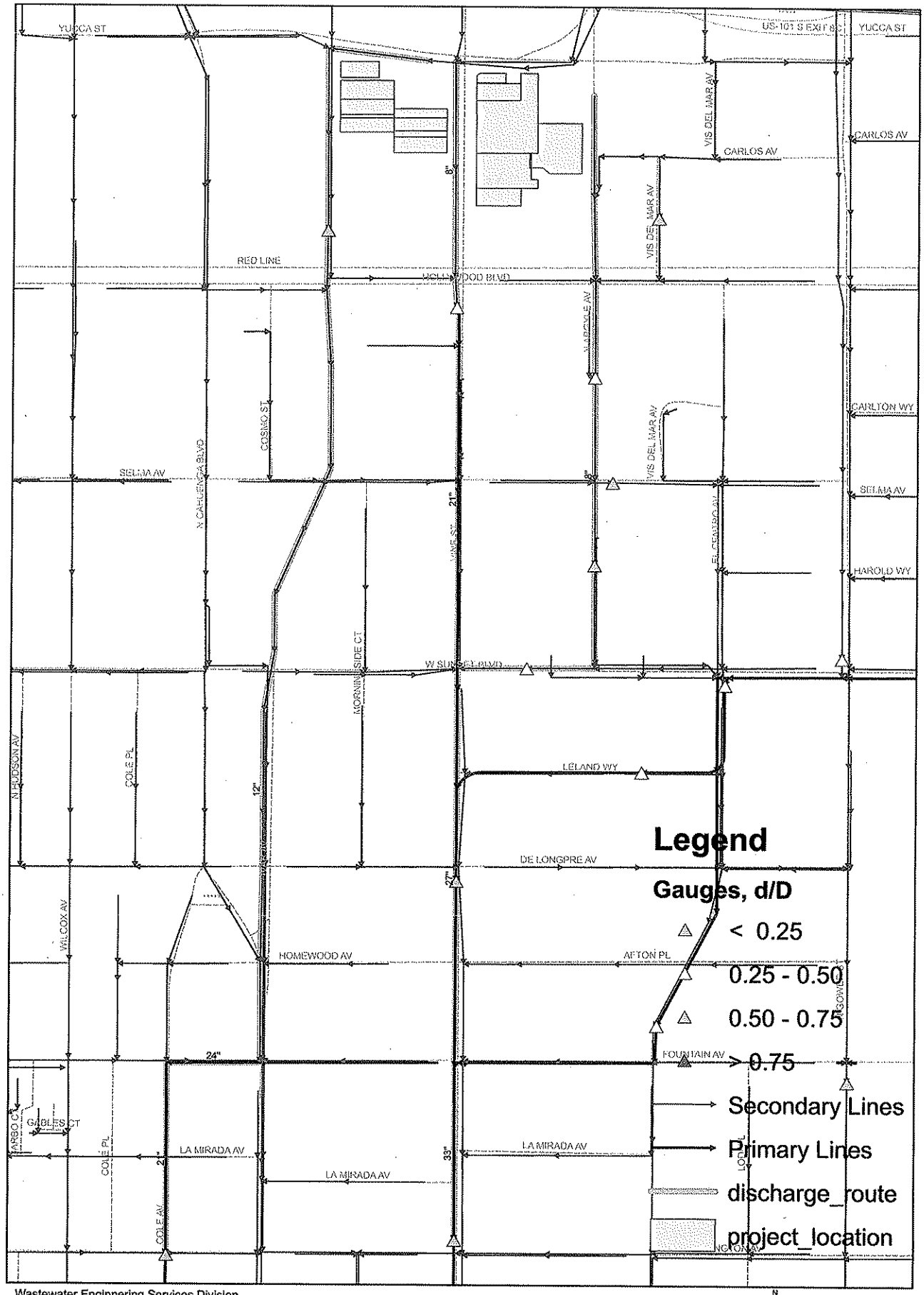
If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

Attachments:
Figure 1 – Sewer Map

cc: Kosta Kaporis, BOS
Daniel Hackney, BOS
Rowena Lau, BOS



Wastewater Enginnering Services Division
Bureau of Sanitation
City of Los Angeles

CITY OF LOS ANGELES
SANITATION
DEPARTMENT OF
PUBLIC WORKS

FIGURE 1
Mellennium Hollywood Project
Sewer

0 115 230 460 690 920 Feet

Appendix J

Feasibility Assessment

FEASIBILITY ASSESSMENT

NOISE AND VIBRATION MITIGATION MEASURES FOR THE MILLENNIUM HOLLYWOOD PROJECT

January 31, 2013

Prepared by:

PARKER
ENVIRONMENTAL CONSULTANTS

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INTRODUCTION

On behalf of the Project Applicant (Millennium Hollywood LLC), **Parker Environmental Consultants** has completed a comprehensive review of the comment letters submitted on the Draft EIR and identified requests for new and/or revised mitigation measures pertaining to the Project's short-term construction-related noise and vibration impacts. We then completed a technical assessment to address the applicability and feasibility of implementing certain mitigation measures proposed in the comment letters submitted during the public review period for the Draft EIR.

The following matrix is organized in two columns: 1) the original Draft EIR comments that request new and/or revised mitigation in column one (notation based on Responses to Comments Chapter of the Final EIR); and, 2) a brief discussion regarding the applicability of the suggested mitigation measures to the Project and/or a determination of whether the suggested mitigation measures are considered feasible in column two. In some cases, column two will note that the suggested mitigation measure (or a substantially similar mitigation measure) was already included in the Draft EIR. In these cases, the mitigation measure from the Draft EIR has been included for reference. In other cases, the Draft EIR comment may have resulted in a new and/or revised mitigation measure to be included in the Final EIR. In these cases, the added or amended mitigation measures are noted in column two strikeout (deleted text) and double underline (added text) for distinction.

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Draft EIR Comments Noise Mitigation Measures	Applicability and Feasibility of Suggested Mitigation Measures
AMDA Letter **Comment 9-18** • *Noise and groundborne vibration construction activities whose specific location on the Project may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as **far as feasibly possible** from the nearest noise- and vibration-sensitive land uses.* (Mitigation Measure H-3) (Emphasis added.) • *Construction activities shall be scheduled so as to avoid **as feasible** operating several pieces of equipment simultaneously, which causes high noise levels.* (Mitigation Measure H-4) (Emphasis added.) • *The Project contractor shall use power construction equipment with state-of- the-art noise shielding and muffling devices **as available**.* (Mitigation Measure H-6) (Emphasis added.) • *Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the surrounding noise-sensitive receptors **to the maximum extent** feasible during construction.* (Mitigation Measure H-7) (Emphasis added.) • *All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors **to the extent feasible**.* (Mitigation Measure H-8) (Emphasis added.) All the bolded language above serves to remove any assurances or standards from the mitigation. For example, relative to Mitigation Measure H-3, there is no reason that the DEIR should not disclose exactly where flexible noise-generating equipment will be located to reduce impacts to AMDA and other sensitive uses (and the resulting post-mitigation noise levels at the property line). A mere representation that the activities will be conducted "as far as feasibly possible" deprives the public of the ability to comment on whether the Applicant	The comment's claim that the Draft EIR noise mitigation measures are illusory is unsupported as applied to this Project for the reasons explained below. Language in the Draft EIR mitigation measures such as "as feasible" and "to the maximum extent feasible" in the context of Mitigation Measures H-3, H-4, and H-6, H-7, and H-8, addresses the realities of the complex nature of the proposed construction plan on an infill lot located adjacent to several sensitive receptors. This type of language actually provides the most conservative mechanism for the reduction of construction noise given the Project Site constraints and anticipated construction activities. In the context of mitigation measure H-3, the Project proposes to excavate and build out the entire Project Site footprint for both the East and West Sites, which will necessitate placing portable/flexible noise-generating equipment in close proximity to the adjacent land uses. In some cases, a zero lot line is proposed to construct the underground parking garages. As such, the term "as far as feasibly possible" is practical and necessary to allow for proper judgment to be made in the field so noise-producing construction activities can be located as far as feasibly possible from sensitive land uses located around the Project Site. Similarly, in the context of mitigation measure H-4, the reality of any construction site mandates that at certain times, it is required to operate several pieces of construction equipment simultaneously. Again, the practicality of this language is necessary to allow the contractors to use good judgment while in the field to perform standard construction practices while also minimizing simultaneous and unnecessary noise-generating activities. As such, the term "as feasible" is necessary and appropriate in this instance. In the context of mitigation measure H-6, the term "as available" reflects the construction industry reality that certain pieces of construction equipment do not have noise shielding or muffling devices. Accordingly, the term "as available" is necessary to allow the use of equipment that does not come equipped with

Draft EIR Comments Noise Mitigation Measures	Applicability and Feasibility of Suggested Mitigation Measures
truly is mitigating "as far as feasibly possible."	manufacturer-recommended noise attenuating devices. As drafted, the mitigation measure requires noise-muffling devices when such devices are available. In the context of mitigation measure H-7, the term "to the maximum extent feasible" reflects the reality that the Project proposes to excavate and construct subterranean garages up to the lot line with minimal setbacks from adjacent land uses. Thus, in some cases, erecting a sound curtain barrier between the construction area and the sensitive receptor would be physically impossible, and therefore is considered infeasible. As such the term "to the maximum extent feasible" is used to ensure that noise barriers are employed when it is physically possible and feasible to implement those measures while considering the Project Site constraints. In the context of mitigation measure H-8, the term "to the extent feasible" reflects the reality that any proposed haul route is likely to impact sensitive land use receptors. The term "to the extent feasible" is necessary to acknowledge that completely avoiding sensitive receptors is infeasible given the infill nature of the Project Site and the extent of development in the project vicinity. For example, the nearest off ramp is the Hollywood 101 Freeway ramp at Franklin. The use of this ramp is very likely for construction equipment and will require trucks traveling on Vine Street and Yucca Street. Based on the existing baseline conditions around the Project Site, complete avoidance of any impacts to all sensitive receptors is infeasible. Accordingly, the Draft EIR disclosed significant construction noise impacts and proposed feasible mitigation to minimize those impacts to the extent possible. Lastly, it should be noted that AMDA recommended using similar language (i.e., "as far as possible" and to the maximum extent feasible") in its comments below, which is contrary to its request to remove such language in this comment.
AMDA Letter - Comment 9-18 In fact, when the Applicant's current tenant, EMI, was previously concerned	To start with, it should be noted that the comment is referencing suggested mitigation measure that are for a different project, located on a different site, with different site constraints, and a different operational relationship with the potential

Draft EIR Comments Noise Mitigation Measures	Applicability and Feasibility of Suggested Mitigation Measures
about impacts to Capitol Records from a nearby construction project at 6941 Yucca (the "Yucca Condominium Project"), it secured mitigation measures such as the following: • No stationary equipment will be operated ***within 40 feet*** of the west project site property line with EMI/Capital [sic] Records. Tower cranes and personnel lifts shall be positioned ***near Argyle on the eastern edge of the project site.*** (Mitigation Measure Supp 18) (Emphasis added.) • Construction materials shall be stock-piled at distant portions of the site, ***at least 40 feet*** from the western project site property line with EMI/Capitol Records. The equipment warm-up areas, water tanks and equipment storage areas described in Mitigation Measure 1-5 above shall also be located ***at least 40 feet*** from the western project site property line with EMI/Capitol Records. (Mitigation Measure Supp 19) (Emphasis added.) • ***Within 40 feet*** of the western project site property line with EMI/Capital [sic] Records, demolition, excavation and construction activities at or below the street level of the project site (including loading of demolition refuse), grading equipment and activities, augured pile driving, vibratory rollers, jumping jack compactors, and other excavation and construction equipment and activities ***shall be prohibited after 10:00 a.m. Mondays through Saturdays,*** unless one of the following exceptions apply ... (Mitigation Measure Supp 12) (Emphasis added.) A complete list of mitigation measures for the Yucca Condominium Project is attached as Exhibit H for reference.	impacted sensitive receptor (Capitol Records Building facilities) noted in the example mitigation measures. Also, it should be noted that while a lead agency is required to respond to comments proposing definitive, facially feasible mitigation measures, it is not required to accept the suggested mitigation measures. *A Local & Reg'l Monitor (ALARM) v City of Los Angeles* (1993) 12 CA4th 1773, 1809, 16 CR2d 358. Accordingly, this feasibility assessment supports the Final EIR responses to comments by providing good-faith reasoned responses and in certain instances modifying the Draft EIR noise mitigation measures. Prior to addressing the technical feasibility of implementing these example mitigation measures, it is important to understand the distinction of the relationships between the Applicant of the Yucca Street Condominium Project and the Capitol Records Complex, and the relationship of the Project Applicant of the Millennium Hollywood Project to the Capitol Records Complex. Under the Yucca Street Condominium Project, the applicant's mitigation was developed to minimize potential business and operational conflicts with the off-site and unaffiliated EMI/Capitol Records Complex. As noted on Page IV.H-30 of the Draft EIR, the Capitol Records Building's underground recording studios are located on the Project Site, which is owned and operated by the Project Applicant. As such, any vibration-related land use operational conflicts would be resolved through tenant-landlord agreements and further coordination between each entity with respect to on-site activities. Through this relationship, the potential for land use operational conflicts to occur between neighboring property owners would be minimized with respect to the Capitol Records Building since it is part of the Project Site. Nonetheless, the feasibility analysis provided herein demonstrates that the example mitigation measures referenced by AMDA are either inapplicable to this Project, are already incorporated in a similar fashion in the Draft EIR, or are otherwise considered infeasible.

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	Within this context, and regarding the "40-foot setback" repeatedly referenced in Comment 09-18, it is important to acknowledge that those 40-foot setbacks are related to a different project site. Accordingly, those setbacks are not directly applicable to the Project Site. In other words, the suggested mitigation measures are only applicable to the Yucca Condominium Project due to the very nature of that site's location in comparison to the Capitol Records Building. In addition, the Draft EIR included a substantially similar measure to provide a setback distance from adjacent sensitive receptors. This measure was amended in the Final EIR to include a setback to the AMDA property at the southwest corner of Vine Street and Yucca Street. The revised mitigation measures H-3 and H-7 are as follows: H-3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from ~~the nearest noise and vibration sensitive~~ all adjacent land uses. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be operated efficiently to minimize noise impacts to the maximum extent feasible. H-7 Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the adjacent land uses and surrounding noise-sensitive receptors to the maximum extent feasible during construction. With respect to the language "to the maximum extent feasible" see response to comment 9-18 above. In some cases, the maximum extent feasible may include a setback of more than 40 feet. As explained above, due to the nature of construction activities required for the underground parking structures, it may be required to operate stationary equipment or stockpile materials within 40 feet of adjacent land

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	uses. Thus removing the term "to the maximum extent feasible" is not otherwise feasible given the Project's building footprint and proximity to adjacent land uses. Accordingly, the Draft EIR disclosed a significant impact related to construction noise. With respect to the prohibition of noise generating construction activities after 10:00 am Mondays through Saturdays, it should be noted that this measure was drafted to accommodate the schedule of the Capitol Records/EMI recording chamber at the time of the Yucca Condominium Project approvals. The comment does not provide any evidence that this same measure is necessary or applicable now. And, importantly, because the Capitol Records/EMI recording chamber is located on the Project Site, the Applicant and the Capitol Records Building tenant have the benefit of operational coordination that alleviates the need for this suggested mitigation measure. It should also be noted that a prohibition upon construction activities after 10:00 a.m. Monday through Saturday is not considered feasible given anticipated construction activities and duration related to the Project. In addition, such construction activity constraints are not required by the Los Angeles Municipal Code (LAMC).
Exhibit H Measures (Attachment to AMDA Letter) **I-1** All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.	This measure is considered feasible and will be added to the MMRP in the Final EIR. **H-13:** All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
Exhibit H Measures (Attachment to AMDA Letter) **I-2** Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards	It should be noted that this mitigation measure suggested by AMDA contains similar language (i.e., "as far as possible" and to the maximum extent feasible") as the mitigation measures AMDA critiqued in its Comment No. 9-18. This demonstrates not only that AMDA has inconsistently suggested mitigation measures, but also that in certain development circumstances using that type of language is adequate mitigation because it provides maximum flexibility to locate the noise generating

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these land uses to the maximum extent possible. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers. (Former Measures 1-2 and 1-3 were combined into one measure in the CPC Decision).	equipment as far as feasibly possible from recognized sensitive land uses. Moreover, this suggested mitigation measure is substantially similar to the Draft EIR's mitigation measure H-3. In good-faith response to this comment, however, mitigation measure H-3 has been amended to incorporate additional language from the commenter's example mitigation measure I-2. Amended Mitigation Measure H-3 now reads as follows: H-3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from ~~the nearest noise- and vibration-sensitive~~ all adjacent land uses. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be operated efficiently to minimize noise impacts to the extent feasible. Further constraining the use of construction equipment is considered infeasible based on standard construction industry standards that require the concurrent use of several pieces of noise-generating construction equipment to development a project site within a reasonable period of time. Please note that the use of pile drivers was also addressed in the responses to comments (See RTC 61-16) and the following additional measure was added to the MMRP for the Final EIR to preclude such use: H-12 Driven soldier piles shall be prohibited during construction. Augered piles are permitted.
Exhibit H Measures (Attachment to AMDA Letter) **I-3** Barriers such as plywood structures or flexible sound control curtains shall be erected along Argyle Avenue between the project site and the multi-family	The Draft EIR already includes a similar measure, which is Mitigation Measure H-7 that states: H-7: Barriers such as plywood structures or flexible sound control curtains

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residential units and along the western project site boundary between the project site and the Capitol Records Tower to minimize the amount of noise the residential units shall be subject to. The barrier or curtain shall be at least 16 feet in height.	extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the surrounding adjacent land uses and noise-sensitive receptors to the maximum extent feasible during construction. It should also be noted that the suggested mitigation measures is not specific to the Project Site and references sound control curtains that could mitigate impacts from the Yucca Condominium Project, but are not necessarily applicable to the Project Site to do its different location and orientation to sensitive receptors. Regarding AMDA specifically, and with respect to the height of the barrier curtain to be 16 feet, it should be noted that the first 16 feet of the AMDA structure's south facing fascade is of concrete construction without any windows. Additionally, the southernmost portion of the AMDA structure is improved and used for surface parking, which is not sensitive to the effects of construction noise. AMDA's concrete fascade will attenuate construction noise. Regardless of the height of the barrier, the impact would conservatively remain significant and unavoidable. In addition, implementing a 16-foot high noise barrier to minimize potential noise impacts to sensitive receptors located around the Project Site is considered otherwise infeasible due to the Project development footprint and anticipated construction activities. Figure IV.H-2 in the Draft EIR identifies surrounding sensitive receptors. The Project anticipates potential excavation and development activities to the zero lot line as shown by this Figure. Implementing a 16-foot-high (versus an 8-foot-high) noise curtain would require additional stabilization (footings) that would need to occur on the Project Site and offsite on land the Applicant does not own. Thus, this suggested measure is considered infeasible based on Project Site constraints.
Exhibit H Measures (Attachment to AMDA Letter) **I-4** Equipment warm-up areas, water tanks, and equipment storage areas shall be	This mitigation measure is not applicable to the Proposed Project's West Site, as the West Site is located more than 150 feet from any multi-family residential land uses. With respect to the East Site, the nearest existing multi-family residential land uses

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located a minimum of 150 feet from the multi-family residential units.	are located at the southeast corner of Yucca Street and Argyle, approximately 120 feet to the northeast of the Project Site. The 6230 Yucca Project (proposed, but not built) is located directly adjacent to the East Site and a 150-foot setback would be technically infeasible as it would conflict with mitigation measures H-3 and H-6 which require the positioning and use of noisy construction equipment as far as technically feasible away from all adjacent land uses. The Boulevard 6200 Project (under construction) is located 80 feet to the east of the East Site across Argyle Avenue. Therefore, based on the different location and constraints associated with the Project Site, this suggested mitigation measure is considered unwarranted and infeasible.
Exhibit H Measures (Attachment to AMDA Letter) **I-5** Flexible sound control curtains shall be placed around and drilling apparatuses and drill rigs, if used.	This measure is substantially similar to the Draft EIR's mitigation measure H-5, which reads as follows: H-5: Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **I-6** Noticing of the scheduling of various phases of construction shall be submitted to the Capitol Records Tower.	This measure is substantially similar to the Draft EIR's mitigation measure H-10, which reads: H-10: Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. Thus, no further mitigation is warranted.

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Exhibit H Measures (Attachment to AMDA Letter) **I-7** Demolition and construction activities that generate noise shall be prohibited between the hours of 4:00 p.m. and 7:00 a.m. Monday through Friday. All such activity at the project site shall cease by 4:00 p.m. Construction related activities which promote excessive noise shall be prohibited on Saturdays. (modified by CPC in response to EMI; Saturday restriction superseded by more specific additional Mitigation Measures volunteered after CPC decision in consultation with EMI/Capitol Records).	Consistent with the provisions of the LAMC, Draft EIR Mitigation Measure H-2 states: Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday or national holidays. No construction activities shall occur on any Sunday. As noted above in Response to Comment No. 09-18, additional restrictions are not applicable or required for the Project because the Capitol Records/EMI recording studio is an on-site use and scheduling conflicts will be addressed with the Project Applicant. Further restrictions would be contrary to the permissible hours of construction permitted on the Project Site pursuant to the LAMC and have not been requested in connection with this Project.
Exhibit H Measures (Attachment to AMDA Letter) **I-8** The project shall comply with the City of Los Angeles Noise Ordinance No. 144, 331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.	This measure is the same as the Draft EIR's mitigation measure H-1, which reads: H-1: The Project shall comply with the City of Los Angeles Noise Ordinance No. 144331 and 161574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **I-9** Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.	This measure is the same as the Draft EIR's mitigation measure H-4, which reads: H-4: Construction activities shall be scheduled so as to avoid as feasible operating several pieces of equipment simultaneously, which causes high noise levels. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **I-10** The project contractor shall use power construction equipment with state-of-the art noise shielding and muffling devices. (added after CPC decision)	This measure is the same as the Draft EIR's mitigation measure H-6, which has been amended as follows: H-6: The Project contractor shall use power construction equipment with ~~state-of-the-art~~ noise shielding and muffling devices in accordance with the manufacturer's recommendations ~~as available~~.

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	Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **I-11** The project shall comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.	The Draft EIR addressed this issue and included Mitigation Measure H-13 accordingly. Draft EIR Mitigation Measure H-13 has been renumbered in the Final EIR as H-19. It should be noted that the Draft EIR Mitigation Measure is more restrictive than the comment's request. It provides the following: ~~H-13~~ H-19: Consistent with Section 99.05.507.4.1 of the LAMC (Green Building Code), Exterior Noise Transmission, the proposed building envelope shall have an STC of at least 50, and exterior windows shall have a minimum STC of 30. Furthermore, the Project shall comply with Title 24 Noise Insulation Standards, which specifies the maximum allowable sound transmission between dwelling units in new multi-family buildings, and limits allowable interior noise levels in new multi-family residential units to 45 dBA CNEL. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **MM-1** The project applicant shall perform pre- and post-construction surveys of the Capitol Records echo chambers and pay for the cost of any repairs proximately caused by the construction.	Draft EIR Mitigation Measure H-11 already reflects the nature of this suggested mitigation measure as it relates to the Capitol Records Building facilities. Also, it should be note that is suggested mitigation measure per se is in applicable to the Project because the Applicant owns the echo chambers. Thus, construction cost and any related repairs to the echo chambers are already attributed to the resource owner, unless caused by no fault of the Applicant. Regarding AMDA, this measure is not applicable to AMDA's main campus structures as they are located across Yucca Street and do not abut the Project Site. Nonetheless, in good-faith reasoned response to this comment, Mitigation Measure H-11 is amended as shown below. H-11 All new construction work shall be performed so as not to adversely impact or cause loss of support to on-site and neighboring/bordering structures. Preconstruction conditions documentation will be performed to document conditions of the on-site and neighboring/bordering buildings, including the

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	Pantages Theater, the Avalon Theater, the Art Deco Storefronts on Yucca Street, the AMDA building at 1777 Vine Street, and the Capitol Records Complex, prior to construction activities. The structure monitoring program will be developed for implementation and monitoring during construction. The performance standards of the adjacent structure monitoring plan will including the following. All new construction work will be performed so as not to adversely impact or cause loss of support to neighboring/bordering structures. Preconstruction conditions documentation will be performed to document conditions of the neighboring/bordering buildings, including the historic structures that are on or adjacent to the Project Site, prior to initiating construction activities. As a minimum, the documentation will consist of video and photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings immediately bordering the Project Site. A registered civil engineer or certified engineering geologist will develop recommendations for the adjacent structure monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program will include vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, work will stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent structures.
Exhibit H Measures (Attachment to AMDA Letter) **MM-2** The project applicant shall meet with representatives of EMI regularly during construction and use reasonable efforts to schedule use of the echo chamber and the most disruptive construction activity at different times.	This measure is accommodated for all adjacent properties as noted in mitigation measures H-9 and H-10, below: H-9: The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's

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	agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety. H-10: Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-12** Within 40 feet of the western project site property line with EMI/Capitol Records, demolition, excavation and construction activities at or below the street level of the project site (including loading of demolition refuse), grading equipment and activities, augured pile driving, vibratory rollers, jumping jack compactors, and other excavation and construction equipment and activities shall be prohibited after 10:00 a.m. Mondays through Saturdays, unless one of the following exceptions apply: a. The EMI/Capitol Records recording studios and echo chambers are not in use; or b. It can be demonstrated (in coordination with EMI/Capitol Records) that any such demolition, grading, excavation, or construction activity or equipment will not result in sound within the echo chambers of more than 20 dBA energy averaged over any 5 minute period and a maximum of 25 dB A slow meter	As discussed above in comment No. 09-18, the 40-foot setbacks referenced apply to a different project site and are therefore not directly applicable to the Project Site based on the language in the suggested mitigation measure. In addition, as mentioned above, certain areas of the Project Site will be excavated to the zero lot line and therefore these types of suggested mitigation measures are considered otherwise infeasible based on Project Site constraints. In addition, this measure would be infeasible to implement if such restrictions were modified to apply to the AMDA site based on it location to the Project Site and anticipated construction activities. It should also be noted that the commenter has not requested this mitigation be applied to AMDA, but instead generally suggested that these mitigation measures – for a different project – could apply to this Project. There is no further evidence provided by the commenter that demonstrates the applicability of these measure to the Project or the likelihood that such measures could reduce the impacts identified in the Draft EIR to less than significant.

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response.	
Exhibit H Measures (Attachment to AMDA Letter) **Supp-13** Within 40 feet of the western project site property line with EMI/Capitol Records, demolition, excavation, and construction activities at or below the street level of the project site (including loading of demolition refuse), grading equipment and activities, augured pile drilling, vibratory rollers, jumping jack compactors, and other excavation and construction equipment and activities shall be prohibited during the one-week period leading up to and including the Grammy, Emmy, and Oscar awards, unless one of the following exceptions apply: a. The EMI/Capitol Records recording studios and echo chambers are not in use; or b. It can be demonstrated (in coordination with EMI) that any such demolition, grading, or excavation activity or equipment will not result in sound within the echo chambers of more than 20 dBA energy averaged over any 5 minute period and a maximum of 25 dBA slow meter response.	Please see the responses above regarding the 40-foot setback issue and the differences between site locations, construction activities, and party relationships. Regarding AMDA, this measure does not correspond to the AMDA's operations or special events. AMDA has not provided a schedule of special events nor requested any restrictions similar to those proposed in this suggest mitigation measure. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-14** Loading of refuse will be accomplished through the use of rubber tired equipment. Every effort will be made during the loading and removal operation to reduce noise from any operated equipment. Trucks will be staged and loaded at the Argyle Street curb and driveway.	Rubber tired loaders and skid steer loaders will be used during construction. Also Draft EIR mitigation measure H-8 requires truck traffic to avoid residential areas and other sensitive receptors to the extent feasible. Mitigation Measure H-8 reads as follows: All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-15** Driven soldier piles are prohibited; augured piles are permitted (subject to the conditions set forth in Supplemental Mitigation Measures 12 and 13	The Project will not include driven soldier piles. The following mitigation measure shall be added to the MMRP and is included within the Final EIR: H-12: Driven soldier piles shall be prohibited during construction. Augered piled

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above).	are permitted. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-16** Tracked loaders and dozers are other similar tracked equipment are prohibited; wheeled loaders and dozers other similar wheeled equipment are permitted (subject to the conditions set forth in Supplemental Mitigation Measures 12 and 13 above).	This measure is considered partially feasible and will be added to the MMRP and Final EIR as follows: H-15: Rubber tired equipment shall be utilized when applicable, such as a combination loader/excavator for light-duty construction operations. Tracked excavator and tracked bulldozers will be utilized during mass excavation as necessary to facilitate timely completion of the excavation phase of development. It should be noted that the proposed excavation and earthwork activities will necessitate the use of tracked excavators and bulldozers. These pieces of equipment are standard equipment in the construction industry and are considered necessary for major construction projects. Therefore, restricting their use is considered to be infeasible as it would preclude the excavation and earthwork activities that are necessary to construct the Project.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-17** Rubber tired equipment will be used during excavation, with the possible exception of a tracked "back-hoe-type" excavator (with rubber track pads and/or sound deadening blankets utilized) which may speed excavation and cause less vibration. Any tracked excavator would be operated at lowest possible gear at lowest possible speed (All equipment is subject to the conditions set forth in Supplemental Mitigation Measures 12 and 13 above).	This measure is also considered partially feasible and will be added to the MMRP and Final EIR. See the response and mitigation language immediately above. The recommendation for any tracked excavator to be operated at lowest possible gear at lowest possible speed would result in a longer construction process increasing the duration of noise and vibration impacts. Therefore, this portion of the mitigation measure is unwarranted because it could increase noise impacts and was thus not incorporated.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-18** No stationary equipment will be operated within 40 feet of the western	Please see the responses above regarding the setback issues and the differences between site locations, construction activities, party relationships, and the resulting applicability of the suggested mitigation measures. Furthermore, this restriction is

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project site property line with EMI/Capitol Records. Tower cranes and personnel lifts shall be positioned near Argyle on the eastern edge of the project site.	not feasible to impose as a mitigation measure on the Project because detailed construction plans are not available at this time. Also, due to certain Project Site constraints, a 40-foot setback from any adjacent land use is not considered feasible because the Project is proposing to excavate up to the property lines. Accordingly, the Draft EIR disclosed significant construction related noise impacts.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-19** Construction materials shall be stock-piled at distant portions of the site, at least 40 feet from the western project site property line with EMI/Capitol Records. The equipment warm-up areas, water tanks and equipment storage areas described in Mitigation Measure I-5 above shall also be located at least 40 feet from the western project site property line with EMI/Capitol Records.	Please see the responses above regarding the setback issues and the differences between site locations, construction activities, party relationships, and the resulting applicability of the suggested mitigation measures. Also, this restriction is considered not feasible to impose as a mitigation measure as a detailed construction plan has not been prepared. Also, it should be noted that the mitigation measures already contained in the Draft EIR (H-3 and H-4) require setbacks that require noise generating equipment and activities to be place as far away as possible from sensitive receptors, which during implementation could be more effective than then example mitigation in reducing noise impacts.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-20** All plans and specifications and construction means and methods (including plans and specifications submitted to the City of Los Angeles Department of Building & Safety regarding the neoprene foam liner and miradrain system referenced in Mitigation Measure Supp 26) shall be provided to EMI/Capitol Records for review concurrently with their submission to the City of Los Angeles Department of Building & Safety.	This restriction is not feasible or appropriate to impose as a mitigation measure upon the AMDA property line as there are no underground uses on that property that would be adversely affected in the same manner as the Capitol Records/EMI underground echo chamber. Regarding, general applicability to the Project Site, this measure will be added to the Final EIR. <u>H-16: All plans and specifications and construction means and methods shall be provided to EMI/Capitol Records for review concurrently with their submission to the City of Los Angeles Department of Building & Safety.</u>
Exhibit H Measures (Attachment to AMDA Letter) **Supp-21** The Applicant shall secure a "Noise/Vibration" expert and notify EMI/Capitol Records of the name and contact information for such expert. The	The Draft EIR addressed this issue and included Mitigation Measure H-11 accordingly. The Draft EIR Mitigation Measure H-11 ensures that Project construction would not damage or result in the loss of any historic structure, including the Capitol Records Complex, its studios, or its underground echo

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"Noise/Vibration" expert shall review the construction plans and specifications and shall prepare a "best practices"' report with regards to demolition and construction activities as they relate to noise and vibration. The expert shall also review the construction schedule and inform the contractor of activities and equipment likely to cause excessive ground borne noise and/or vibration during construction. The "best practices" report shall be provided to the City of Los Angeles Department of Building & Safety, EMI/Capitol Records, and the construction manager prior to initiation of any demolition, excavation or construction of the project, and the recommendations in the report shall be followed. The duties required of the "Noise/Vibration" expert in this measure shall not require the "Noise/Vibration" expert to be present on-site at all times so long as the duties herein required.	chambers. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-22** Prior to initiation of demolition, excavation or construction activities on the project site, the Applicant shall designate in writing to EMI/Capitol Records a contact person with the contractor, including such person's cell phone number, that will be on-site, available and have the authority to control construction activities, and who is the person that EMI/Capitol Records shall contact if there is interference with recording activities at EMI/Capitol Records studios or echo chambers. If at any time during demolition, excavation or construction of the project EMI/Capitol Records notifies such contact person that construction activity is interfering with a recording session, the contractor shall promptly take all necessary measures to identify and modify the activity causing the interference so that the interference ceases and the recording session may continue without further delay and the interference does not recur. If there are two documented incidents of interference that are not satisfactorily resolved with the Applicant's construction contact in such a manner that recording operations at EMI/Capitol Records can continue, and such documentation is provided by EMI/Capitol Records to the Applicant, the City of	The Draft EIR incorporates similar mitigation measures (H-9 and H-10), which require noticing to adjacent property owners, and the provision of a name and number to resolve conflicts. They are restated as follows: H-9: The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety. H-10: Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the

Draft EIR Comments Noise Mitigation Measures	Applicability and Feasibility of Suggested Mitigation Measures
Los Angeles Department of Building & Safety and Council Office for District 13, then the City of Los Angeles Department of Building & Safety shall immediately respond by going to the project site to identify and instruct the contractor to modify the activity causing the interference so that interference ceases and develop an action plan for moving forward with construction in a manner that will not interfere with recording operations at EMI/Capitol Records.	construction period. In addition, it should be noted again that the Applicant owns the Capitol Records Building and coordinated efforts regarding noise issues will occur as a result of the landlord tenant relationship, which did not existing in the situation reference by this suggested mitigation measure. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-23** In addition to the measures provided in Mitigation Measure Supp 22 above, in the event that recording activities at EMI/Capitol Records are interrupted during demolition, excavation or construction and a resolution cannot be reached between the contractor and EMI/Capitol Records, the "Noise/Vibration" expert shall be immediately contacted and shall first verify if the interruption is caused by construction activity and then make additional recommendations regarding how to further reduce or eliminate interruption to EMI/Capitol Records' recording operations. These recommendations shall be provided to and discussed with. The City of Los Angeles Department of Building & Safety and EMI/Capitol Records.	The Draft EIR incorporates similar mitigation measures (H-9 and H-10), which provide for a reasonable way for the property owners to address potential conflicts during the construction process. Furthermore, the Applicant will be required to identify a mitigation monitor to serve as a liaison between the Applicant, the community, and the City Planning Department, and to resolve such conflicts in a timely manner. Measures H-9 and H-10 are restated as follows: H-9: The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety. H-10: Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. Thus, no further mitigation is warranted.

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Exhibit H Measures (Attachment to AMDA Letter) **Supp-24** All mitigation measures restricting construction activity will be posted at the Site and all construction personnel will be instructed as to the nature of the noise and vibration mitigation measures.	This measure is feasible to implement and will be added to the MMRP and identified in the Final EIR: H-14: All mitigation measures restricting construction activity will be posted at the Project Site and all construction personnel will be instructed as to the nature of the noise and vibration mitigation measures.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-25** The Applicant, its contractor and noise/vibration expert shall coordinate with EMI/Capitol Records relative to recording and construction activity schedules. During the construction period, the applicant shall establish a schedule to meet with EMI/Capitol Records at least once per week during construction. The applicant shall provide EMI/Capitol Records a detailed construction schedule, including scheduled construction equipment, and the applicant shall request the recording schedule of EMI/Capitol Records' use of the studios and echo chambers during the same period. Without in any manner limiting the scope of other Supplemental Mitigation Measures, the applicant shall use best efforts to coordinate in good faith with EMI/Capitol Records to avoid use of construction equipment and avoid construction activities that cause significant noise and vibration impacts during hours shown on the schedule provided by EMI/Capitol Records and during EMI/Capitol Records' special events.	Please see the responses related to suggested mitigation measures Supp-22 and Supp 23 above. Thus, no further mitigation is warranted.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-26** A not less than two-inch thick closed cell neoprene foam liner will be applied to exposed excavation or lagging at the west project site property line with EMI/Capitol Records provided that: (1) the liner is approved for this use by the City of Los Angeles Department of Building & Safety (if not so approved, then an equivalent product approved for this use by the City of Los Angeles	This suggested mitigation measure is considered partially feasible as applied to the Capitol Records Building facilities. It should be noted, however, that this suggested measure is for a different project site and thereby is not directly applicable to the Project Site and development design. Nonetheless, in good-faith reasoned response, the following measure will be added to the Final EIR. H-17 In the event that excavation and development design encounters the

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Department of Building and Safety shall be applied) and (2) a Miradrain system (or equivalent product) for drainage and waterproofing will be installed per manufacturer recommendations. A 10 to 12 inch thick shotcrete basement wall will then be built. If operation of the project, including normal traffic in the underground garage exceeds the threshold of l) 20 dBA energy averaged over any 5 minute period and 2) a maximum of 25 dBA slow meter response, then the applicant shall take such measures to reduce the impact below the above thresholds.	foundation or structural walls of the Capitol Records Building echo chamber, a not less than two-inch thick closed cell neoprene foam liner will be applied to exposed excavation at the West Site adjacent to the EMI/Capitol Records echo chamber provided that: (1) the liner is approved for this use by the City of Los Angeles Department of Building & Safety (if not so approved, then an equivalent product approved for this use by the City of Los Angeles Department of Building and Safety shall be applied) and (2) a Miradrain system (or equivalent product) for drainage and waterproofing will be installed per manufacturer recommendations. A 10 to 12 inch thick cast-in-place or shotcrete wall will then be built to attenuate operational noise created by the Project.
Exhibit H Measures (Attachment to AMDA Letter) **Supp-27** Noise and vibration generating equipment such as cooling towers and HVAC systems shall either be located on the roof of the structure or shall be located at a distance of not less than 40 feet from the EMI/Capitol Records property line, unless it can be demonstrated (in coordination with EMI/Capitol Records) that any such equipment will not result in sound within the echo chambers of more than 20 dBA energy averaged over any 5 minute period and a maximum of 25 dBA slow meter response.	This measure is substantially similar and equally effective as mitigation measure H-12 in the Draft EIR (which has been renumbered in the Final EIR as H-18), which states: ~~H-12~~ H-18: All new mechanical equipment associated with the Project shall comply with Section 112.02 of the City of Los Angeles Municipal Code, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. Thus, no further mitigation is warranted.

David Jordan Letter Comment 61-16 <u>Noise</u> • The vibration and noise analyses do not account for pile drivers, yet there is no prohibition against the use of such equipment (see, e.g., Table IV.H-7). Pile driving generates significant groundborne vibration. Impacts to sensitive receptors such as the Capital Records recording studios, therefore, are not adequately analyzed.	As noted in the revisions to the Final EIR, the Project will not use pile drivers during construction. Table IV.H-7 in the Draft EIR does not list the types of equipment or methods of construction proposed to be used for the Project, but provides a range of noise levels for certain types of equipment typically used in construction. To ensure the use of pile drivers is prohibited during construction, the following mitigation measure (H-12, below) be incorporated into the Additions and Correction Section of the Final EIR. This mitigation measure shall also be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) to ensure it is a binding condition of permissible construction activity. <u>H-12: Driven soldier piles shall be prohibited during construction. Augered piles are permitted.</u>
David Jordon Letter **Comment 61-18** The DEIR should require the use of noise curtains and reduced hours (especially in the p.m.) as feasible mitigation to reduce noise impacts on the Pantages and Avalon Theater. Limited hours would also be effective in reducing vibration impacts on these sensitive receptors. Noise curtains are a standard and feasible measure to reduce the severity of construction noise impacts. Thus the DEIR fails to include feasible mitigation to avoid or reduce the severity of impacts.	As noted in the Final EIR responses to comments, the noise reduction actions described in the comment are in fact incorporated into the Project. Mitigation Measures H-1 through H-11 located on pages IV.H-43 through IV.H-45 of the Draft EIR include thorough and feasible mitigation strategies aimed at reducing construction noise and vibration impacts on adjacent land uses. Specifically, Mitigation Measures H-2 and H-10 limit construction hours and require construction schedule notifications, and Mitigation Measures H-5, H-6 and H-7 require the use of sound control curtains, muffling devices, and noise barriers. For example, Draft EIR mitigation measures H-5 and H-3 are substantially similar to this measure and apply to the all adjacent properties: H-5: Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use. Also, Draft EIR mitigation measure H-3 states: H-3 Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from ~~the nearest noise- and vibration-sensitive~~ <u>all</u>

	adjacent land uses. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be operated efficiently to minimize noise impacts to the maximum extent feasible. H-7 Barriers such as plywood structures or flexible sound control curtains extending eight-feet high shall be erected around the Project Site boundary to minimize the amount of noise on the adjacent land uses and surrounding noise-sensitive receptors to the maximum extent feasible during construction. Also, the Project will comply with the LAMC hours of operation regarding construction activity as noted above. Thus, no further mitigation is warranted.
Reznik Letter **Comment No. 84- 27** The DEIR fails to identify the location of these outdoor areas, and fails to provide typical mitigation measures required of other hotel rooftops in the areas, such as (i) time limits for rooftop patio use, (ii) prohibition of live entertainment and limits to background music on rooftops, and (iii) proper design and landscaping to locate noisier areas, such as pools, away from residential uses. A subsequent or supplemental environmental review is necessary prior to approval of specific outdoor areas for residential, hotel and restaurant use.	The Draft EIR determined these impacts to be less than significant without mitigation. Thus, mitigation is not required. Further, the Project would be required to comply with Section 112.01 of the LAMC, which would ensure outdoor eating and gathering areas would not substantially alter the ambient outdoor noise levels at surrounding off site uses.