

# 8850 Sunset Boulevard Project Initial Study

*Prepared by*

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*Prepared with assistance from*

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## SEPTEMBER 2019



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# Acronyms and Abbreviations

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Acronym/Abbreviation	Definition
CAP	Climate Action Plan
CEQA	California Environmental Quality Act
CH <sub>4</sub>	methane
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
DMP	Demolition Permit
DNL	day-night average sound level
DVP	Development Permit
ECP	Erosion Control Plan
EIR	Environmental Impact Report
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
GHG	sources of greenhouse gases
HFC	hydrofluorocarbon
IS	Initial Study
LADPW	Los Angeles County Department of Public Works
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOS	level of service
LSWPPP	Local Storm Water Pollution Prevention Plan
N <sub>2</sub> O	nitrous oxide
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PFC	perfluorocarbons
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter equal to or less than 10 microns
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
PRC	Public Resources Code
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SF <sub>6</sub>	sulfur hexafluoride
SPA	Specific Plan Amendment
SSP	Sunset Specific Plan
USFWS	U.S. Fish and Wildlife Services
VMT	vehicle miles traveled
VOC	volatile organic compounds
WHMC	West Hollywood Municipal Code

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# 1 Introduction

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## 1.1 Project Overview

The 8850 Sunset Boulevard Project (proposed project) consists of the demolition of existing buildings and the construction and operation of a new mixed-use hotel and residential building on a property along the south side of Sunset Boulevard, extending the full city block between Larrabee Street and San Vicente Boulevard, in the City of West Hollywood (project site). The existing buildings on the project site that would be demolished comprise approximately 21,000 square feet. The new mixed-use hotel and residential building would be approximately 369,000 gross square feet in size and 15 stories (approximately 200 feet) in height. The commercial portion of the project would include 115 hotel guestrooms with ancillary uses such as meeting rooms, spa/gym, outdoor pools, restaurants, lounges, and retail, as well as a new nightclub space for the Viper Room. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units with residential amenities including a gym, movie screening room, and an outdoor pool. The proposed project also would include four subterranean levels, three of which would primarily be used as a parking garage, providing 269 spaces.

## 1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, the City of West Hollywood (City) is the lead agency responsible for compliance with CEQA for the proposed project.

The City has prepared an Initial Study (IS) in accordance with the CEQA guidelines to determine if the proposed project could have the potential to cause significant adverse environmental impacts. Based on the conclusions of the Initial Study evaluation (contained in Section 3 of this document), the City has determined that the proposed project may have a significant impact and, therefore, will prepare an Environmental Impact Report (EIR) pursuant to CEQA. Since the analysis in the Initial Study determined that the proposed project would not result in significant impacts for some environmental categories, the City proposes to eliminate the following topics from further evaluation in the EIR: aesthetics, agriculture and forestry resources, biological resources, mineral resources, recreation, and wildfire.

## 1.3 Project Location

The proposed project site is located on the Sunset Strip, in the City of West Hollywood. Below is a description of the regional location and project site, followed by a description of the environment that immediately surrounds the project site.

### **Regional Location**

The project site is located in the City of West Hollywood. The City covers 1.9 square miles in the Los Angeles Metropolitan Area. The City is located within the County of Los Angeles (County), approximately 7.5 miles

northwest of downtown Los Angeles. Regional access to the project site is provided via U.S. Route 101 (US 101, Hollywood Freeway), located approximately 4.4 miles east of the project site. Figure 1 shows the regional location of the project site, as well as the project site within the context of Sunset Boulevard. Local access is provided via major north-south and east-west oriented roads including Sunset Boulevard, which forms the northern boundary of the project site; La Cienega Boulevard, located approximately 0.5 miles east of the project site; Santa Monica Boulevard, located approximately 0.3 miles south of the project site; and San Vicente Boulevard, which forms the western boundary of the project site.

### **Project Site**

The approximately 39,983-square foot project site is bound by Sunset Boulevard to the north, Larrabee Street to the east, the London Hotel to the south, and San Vicente Boulevard to the west. The addresses associated with project site consist of 8850-8878 Sunset Boulevard and 1025-1029 Larrabee Street, West Hollywood. The project site is comprised of eight Assessor Parcel Numbers (APNs): 4339-017-001, 4339-017-002, 4339-017-003, 4339-017-004, 4339-017-005, 4339-017-006, 4339-017-007, and 4339-017-008.

## 1.4 Environmental Setting

### **Existing Land Uses**

The project site is located on the Sunset Strip, which is a highly urbanized area within the City and an internationally known corridor, historically recognized for its entertainment uses, restaurants, and billboards. It contains a mix of low- and high-rise buildings most of which front directly onto the street. A high level of pedestrian activity and “urban village” ambience results from the types of uses, siting of the structures on the sidewalks, and design characteristics on the street level that invite pedestrian observation and use. The Sunset Strip is also known for its wide array of large and colorful billboards and tall wall signs.

As shown on Figure 1, the project site is currently developed with four one- and two-story commercial buildings totaling approximately 21,000 square feet. The existing buildings are currently occupied by the Viper Room nightclub, two liquor stores, two restaurants, a barbershop, a professional office, and two retail stores. The project site also has existing surface parking lots totaling 27,450 square feet and four existing billboards. The existing commercial buildings appear to be one-story along Sunset Boulevard with the second story daylighting in the back (south side) due to the slope of the project site. The surface parking lots are located on the southern portion of the project site. On the east end of the project site, located above the liquor store at 8850 Sunset Boulevard, is a roof-mounted, east-facing 14-foot by 48-foot billboard. The billboard is 54 feet above Sunset Boulevard and is visible to westbound traffic. On the west end of the project site, there are three roof-mounted billboards. One east-facing 18-foot by 48-foot billboard is 54 feet above Sunset Boulevard, visible to westbound traffic on Sunset Boulevard. One west-facing 18-foot by 48-foot billboard is 45 feet above Sunset Boulevard, visible to eastbound traffic on Sunset Boulevard. One south-facing 14-foot by 48-foot billboard is 41 feet above Sunset Boulevard, visible to northbound traffic on San Vicente Boulevard.





FIGURE 1

# Project Location

8850 Sunset Boulevard Project

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## Surrounding Land Uses

Land uses surrounding the project site include commercial and residential uses. To the immediate north of the project site, on the north side of Sunset Boulevard, are commercial uses located in one- and two-story buildings. Multi-family residential buildings are further to the north of Sunset Boulevard, along Larrabee Street and North Clark Street. The multi-family residential buildings range in height from approximately two stories to five stories. However, the project area slopes up towards the north, and multi-family residential uses to the north appear greater in height from the project site level. At the northeast corner of Larrabee Street are a four-story office building, one-story commercial building, and surface parking lot. To the immediate east of the project site, there are several one- to two-story commercial buildings, and a four-story multi-family residential building. Further east, along Nellis Street, are several multi-story residential uses and a seven-story office building. The southern project boundary abuts the London Hotel, which is an 11-story luxury hotel with a rooftop pool. To the west of the project site is a gas station and mini-mart, one- and two-story commercial buildings, and two- and three-story multi-family residential buildings.

## Existing Land Use and Zoning Designations

According to the City's General Plan, the project site is located within the Sunset Boulevard Commercial Subarea and has a zoning and land use designation of Sunset Specific Plan (SSP). The general intent of the SSP designation is to accommodate quality development that meets market demand while preserving the eclectic nature of the Sunset Strip. The SSP distributes the total allowable increase in development among eight specific geographic areas along the Sunset Strip, and each geographic area has been assigned a portion of the allowable development along the Sunset Strip. Density increases for each area are assigned based on the current and anticipated character of development envisioned for the SSP. The project site is located in Geographic Area 6-E (City of West Hollywood 1996, 2011).

## Existing Stormwater Flows

Existing stormwater runoff from the project site is conveyed via sheet flow and curb drains to the adjacent streets. The existing site slopes mostly towards the south with an approximately 11% gradient. Additionally, there is an easterly slope of approximately 2.5% across the existing site. The project site is located within the Federal Emergency Management Agency (FEMA) Flood Zone X, which denotes an area where the potential for flooding is minimal. There are no surface water bodies in the project vicinity.

# 1.5 References

City of West Hollywood. 1996. *Sunset Specific Plan*. Adopted July 1996.

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. <https://www.weho.org/city-government/download-documents/-folder-155>.

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## 2 Project Description

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The proposed project would involve the demolition of the four existing one- and two-story commercial buildings on the project site totaling approximately 21,000 square feet, which are currently occupied by the Viper Room nightclub, two liquor stores, two restaurants, a barbershop, a professional office, and two retail stores. The proposed project would also involve demolition of the existing 27,450 square feet of surface parking and removal of the four existing billboards. Once the existing uses are removed, an approximately 369,000 square-foot mixed-use hotel and residential building would be constructed on the site. The building would have 15 aboveground stories and would be approximately 200 feet in height (including an emergency helipad), as measured from the lowest point of the site (the southwest corner of the site). This height equates to approximately 185 feet above Sunset Boulevard. The building would also have 4 below ground levels, extending 45 feet below grade. The aboveground portion of the building would be 239,868 square feet in size and the belowground portion of the building would be 128,932 square feet in size.

The commercial portion of the project would include 115 hotel guestrooms with ancillary uses such as meeting rooms, spa/gym, outdoor pools, restaurants, lounges, and retail, as well as a new nightclub space for the Viper Room. The residential portion would provide 31 market-rate condominiums and 10 income-restricted units with residential amenities including a gym, movie screening room, and an outdoor pool (Figure 2). The building would have floor area ratio (FAR)<sup>1</sup> of 6:1. The building square footage used for the FAR calculation is 240,000 square feet.

### 2.1 Project Design

The lower portion of the proposed building would consist of an undulating one- to three-story transparent volume along Sunset Boulevard that would wrap around the east and west facades of the structure. This predominantly glass volume would include the hotel lobby, the entry to the Viper Room, and a restaurant/bar and café that would activate the street level during the day and night. Above this lower portion would be two separate rectilinear volumes that would house the residential uses and hotel uses, which would be set apart from each other by an approximately 120-foot opening. By locating these two separate volumes on the east and west sides of the building, the design provides a large view corridor between them in the center of the building (i.e., an open volume of approximately 166,150 square feet in area) allowing for north-south views through the site and providing an architectural element for the project. The focal point of the opening would be a landscaped roof with publicly accessible terraces that would be visible from Sunset Boulevard. The building would be capped with a bridge connecting the residential volume and the hotel volume at the top floor (level 15). The bridge would house a publicly accessible restaurant, bar, and terrace (Figure 2). Two pools for hotel guests also would be located on the roof of the bridge component, while a separate pool for residents and their guests would be located on the roof of the residential volume.

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<sup>1</sup> The City defines floor area ratio (FAR) as the ratio of floor area to total lot area. FAR restrictions are used to limit the maximum gross floor area allowed on a site (including all structures on the site). The maximum gross floor area of all structures permitted on a site is determined by multiplying the FAR by the total area of the site (FAR x Site Area = Maximum Allowable Gross Floor Area). Basement area is not included in calculation of floor area ratio.

The proposed uses within the building are described in more detail below.

### **Subterranean Levels & Street Level**

- **Levels B4, B3, and B2:** These levels would provide subterranean parking for the proposed project, with approximately 189 parking spaces for the hotel and commercial uses and 80 spaces for the residents and their guests. Vehicle ingress for residents who elect to self-park would be provided from Larrabee Street at the B2 Level.
- **Level B1:** This level would be partially below grade on the north side of the project site and partially above grade (daylight) on the south side of the project site. Vehicle ingress to the site for hotel guests, commercial patrons, and residents and their guests who are using valet services would be provided at this level, off San Vicente Boulevard. Egress from the site would be onto Larrabee Street, also from this level. Valet areas, including hotel and residential reception lounges, would also be provided on this level. The reception lounges would be open air but completely covered by Level 1 above, which would create a roof overhang.
- **Level 1 (Sunset Level):** Hotel lobby, a restaurant with outdoor dining, a café with outdoor dining, and the lobby for the Viper Room would all open onto Sunset Boulevard. This level would also include a hotel lounge, kitchens, and hotel back-of-house administration spaces.

Beyond Level 1, the building would divide into the two volumes described above (one with residential uses and the other with hotel uses). These volumes are thus described separately below.

### **Residential Portion (Eastern Volume)**

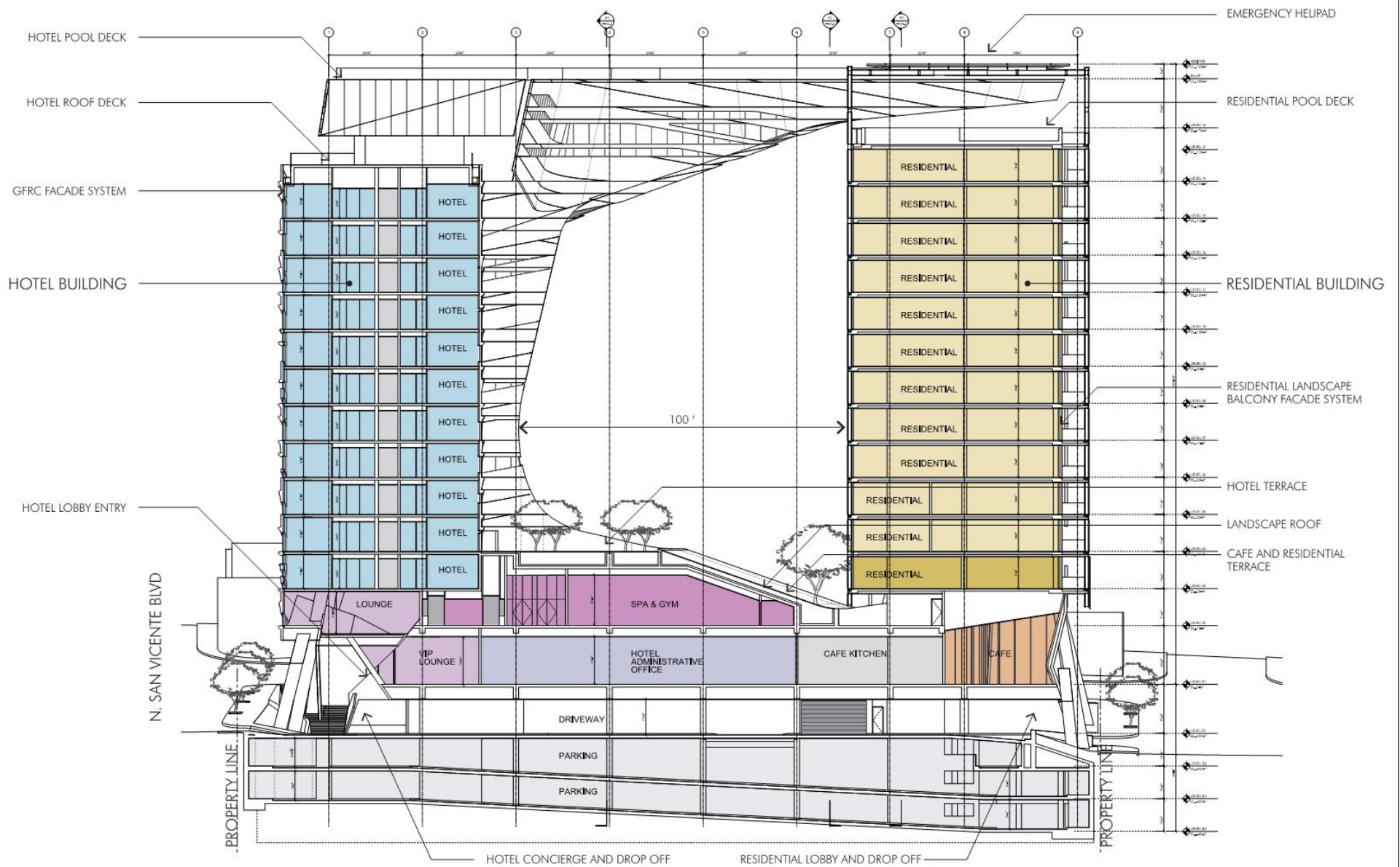
The residential portion of the project would have approximately 15,400 square feet of common open space including 7,500 square feet of landscaping and 6,100 square feet of hardscape. The residential units would range in size from one-bedroom units to four-bedroom units. Each residential unit would have a balcony of at least 120 square feet in size. The levels of the residential portion of the building would include the following:

- **Level 2:** A terrace for the residents would be on this level, on the south side of the building.
- **Levels 3–14:** The residential units would be on these levels with the 10 income-restricted units located on the third level.
- **Level 15 and Roof:** The residential pool and pool terrace would be on the fifteenth level. The emergency helipad for the entire building would be located on the roof of the residential portion of the project.

### **Hotel Portion (Western Volume)**

- **Level 2:** This level would contain a lounge and a pre-function lounge, a banquet hall that could accommodate up to 500 seats, four meeting rooms, the hotel spa and gym, back-of-house spaces, and an outdoor terrace for the ground-floor cafe.
- **Levels 3–13:** Hotel guestrooms would be located on these levels. The fourth level would also have a terrace cafe and an outdoor terrace for hotel guests.
- **Level 14:** The hotel restaurant and outdoor dining terrace would be on this level with an exterior stair continuing up to the rooftop pools and pool deck.
- **Level 15 and Roof:** This level would have the changing rooms for the hotel pools and mechanical space. The hotel pools and pool deck would be on the roof of the bridge component connecting the hotel portion of the project to the residential component.





Proposed project section (looking from the south)

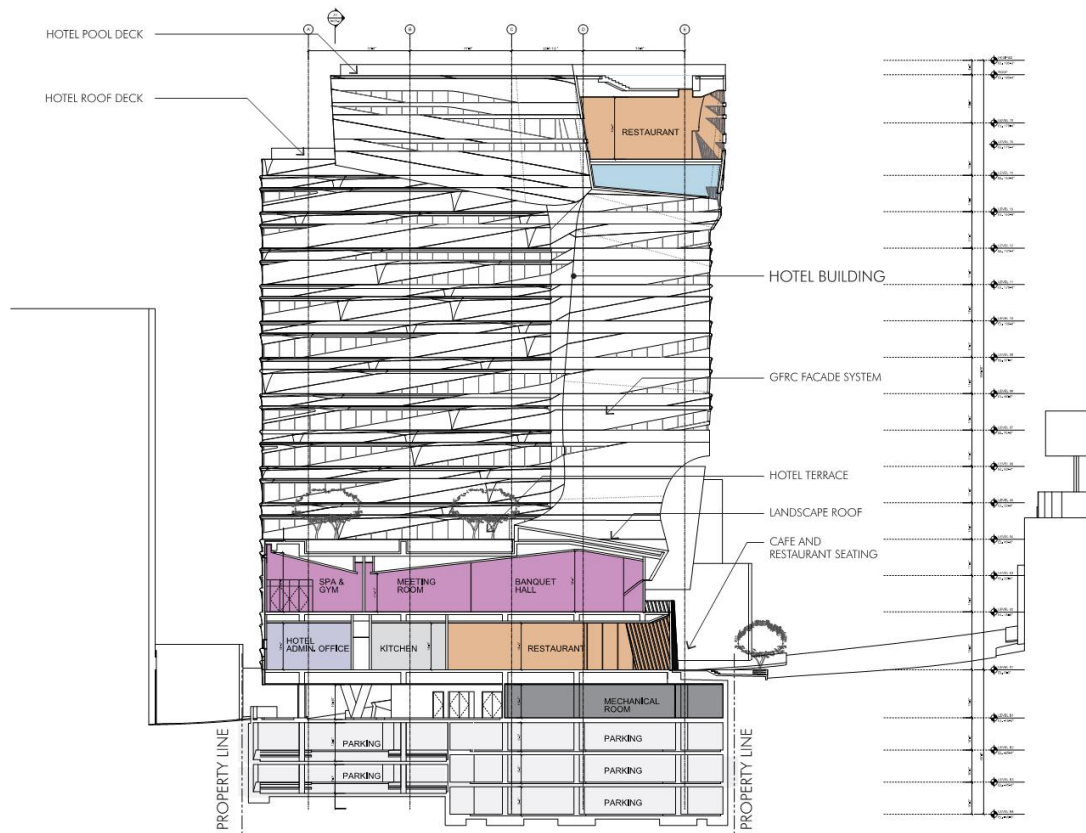
Source: Morphosis Architects

**DUDEK**

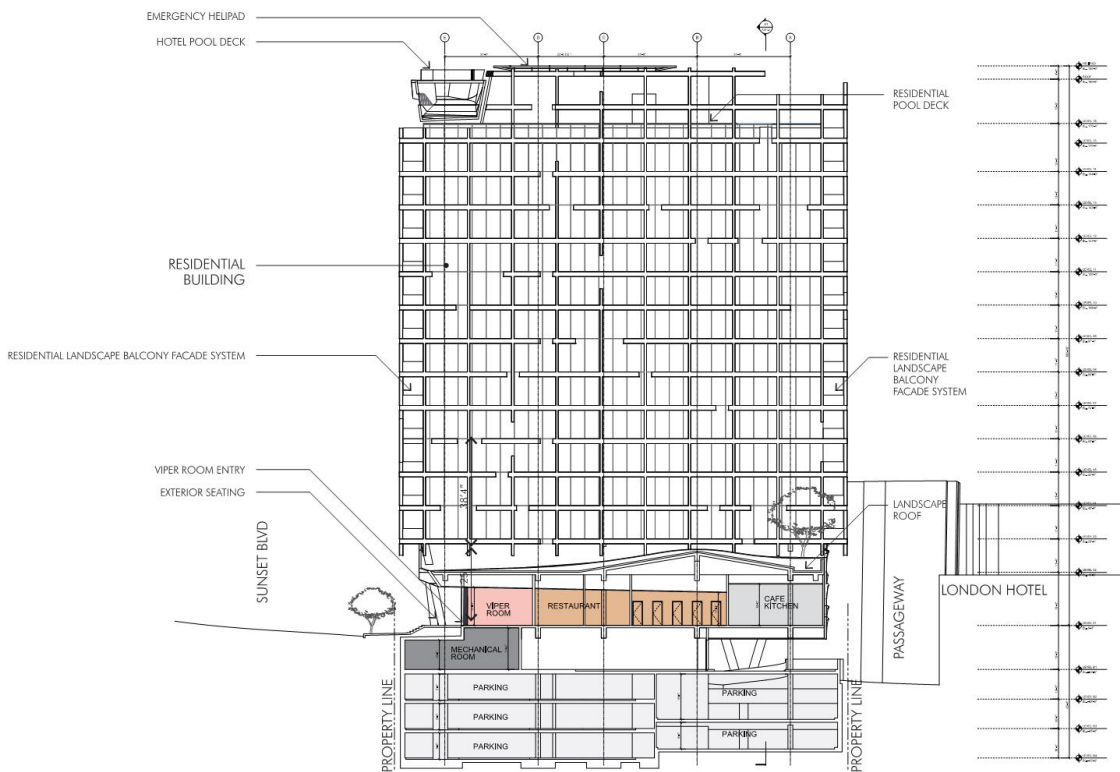
**FIGURE 2a**  
Conceptual Project Design  
8850 Sunset Boulevard Project

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**Proposed project section (looking from the west)**



**Proposed project section (looking from the east)**

Source: Morphosis Architects

**DUDEK**

**FIGURE 2b**

**Project Elevations**

8850 Sunset Boulevard Project

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### **Landscaping**

The plant pallet utilized as part of the proposed project would comply with the West Hollywood Municipal Code (WHMC) Section 19.26.060. The proposed project would provide 12,419 square feet of landscaped area on Levels B1, 1, 3, 4, and the roof. The proposed project would incorporate a privacy wall vine planting at the southern boundary of the project site on Level B1, adjacent to the London Hotel. At Level 1 (Sunset Level), the proposed project would incorporate street trees along the northern, eastern, and western project boundaries. On Levels 3 and 4, the approximately 120-foot opening would contain terraced landscaping with native plantings. The roof landscaping would consist of ground cover native plants and short palm trees near the pools.

### **Access, Circulation, and Parking**

Vehicle ingress into the project site for hotel and commercial patrons and residents and their guests using valet services would be from San Vicente Boulevard at the B1 Level. Vehicle ingress into the project site for residents electing to self-park would be from Larrabee Street at the B2 level. All egress from the project site would be onto Larrabee Street at the B1 Level.

The WHMC requires 240 parking spaces for the proposed project, and the project would provide 267 parking spaces. The subterranean parking levels (Levels B4, B3, and B2) would provide 189 parking spaces for the hotel and commercial uses and 80 spaces for the residents and their guests.

### **Signage**

The proposed project would demolish the four existing billboards on the project site, which may be replaced with digital signage along the proposed building's Sunset Boulevard frontage.

### **Stormwater Flows**

Stormwater runoff from the project site would be conveyed to the public streets via roof downspouts, site area, and podium drains, in a similar manner to the existing conditions. However, the proposed storm drain design would include a capture and reuse system and other approved best management practices (BMPs) in order to treat stormwater runoff as required by the Los Angeles County Department of Public Works (LADPW) and the City.

## **2.2 Construction**

Proposed project construction would entail demolition and grading of the entire project site, followed by construction of the proposed uses. Construction of the proposed project is anticipated to commence in May 2021 and would terminate in February 2024. Construction activities would include demolition, site preparation, grading/earthwork, building construction, paving, and architectural coating. Off-road construction equipment that would be used during construction would include an excavator, a skid steer loader, rollers, air compressors, fork lifts, and a crane.

It is estimated that the project would require excavation to approximately 45 feet below Sunset Boulevard. The total cut for the project would involve approximately 62,320 cubic yards of earthwork materials, which would be exported from the project site. No import of earthwork material is anticipated.

The likely haul route from the project site would be for construction vehicles to travel east on Sunset Boulevard, south on La Cienega Boulevard to I-10, and eastbound on I-10 for depositing soil. Empty trucks returning to the project site after dumping their loads would return from I-10 and travel north on La Cienega Boulevard, then west onto San Vicente Boulevard.

## 2.3 Operation

### Hours of Operation

Table 2-1 presents the hours of operation for food and alcohol sales, services and consumption for each of the following areas of the proposed project.

**Table 2-1  
Hours of Operation**

Location	Hours
<b>Hotel Operations and Guestrooms</b>	
Hotel Operations	24 hours, Daily
Banquet and Meeting Rooms – Operation and Food	24 hours, Daily
Banquet and Meeting Rooms – Alcohol	7:00 am to 2:00 am, Daily
Guestrooms Room Service – Food Service	24 hours, Daily
Guestrooms Room Service – Alcohol Sales & Service	7:00 am to 2:00 am, Daily (Minibars 24 hours, Daily)
Residential Units Service – Food Service	24 hours, Daily
Residential Units Service – Alcohol Sales & Service	7:00 am to 2:00 am, Daily
<b>Level B1</b>	
Viper Room	7:00 am to 2:00 am, Daily
<b>Level L1 (Sunset Level)</b>	
Hotel Lobby Lounge	7:00 am to 2:00 am, Daily
Restaurant – Interior Dining and Alcohol	6:00 am to 2:00 am, Daily
Restaurant – Outdoor Dining and Alcohol	7:00 am to 2:00 am, Daily
Café – Interior Dining and Alcohol	6:00 am to 2:00 am, Daily
Café – Outdoor Dining and Alcohol (L1 & L2)	7:00 am to 2:00 am, Daily
<b>Level L4</b>	
Terrace Café – Indoor Dining and Alcohol	7:00 am to 2:00 am, Daily
Terrace Café – Outdoor Dining and Alcohol	7:00 am to 2:00 am, Daily
<b>Level 14</b>	
Hotel Pools and Pool Deck – Operation, Food and Alcohol	7:00 am to 2:00 am, Daily
<b>Level 15</b>	
Restaurant – Interior Dining and Alcohol	7:00 am to 2:00 am, Daily
Restaurant – Outdoor Dining and Alcohol	7:00 am to 2:00 am, Daily
Residential Pool and Pool Deck - Operation, Food and Alcohol	7:00 am to 2:00 am, Daily

## Population

The proposed project includes 41 residential units. According to the Southern California Association of Government's 2019 Local Profile for the City of West Hollywood, the average household size is 1.6 persons (SCAG 2019). Therefore, the residential portion of the proposed project is expected to have approximately 66 residents.

## 2.4 Sustainability Practices and Features

The proposed project would include energy saving and sustainability goals, aiming to optimize building performance and enhance interior environments to promote health and well-being. Targeted sustainable design strategies, in addition to meeting the requirements of California's Building Energy Efficiency Standards and Green Building Standards Code, would include LEED Gold Certification or equivalent green building standards, and a Green Star rating. Taking advantage of the mild climate of Southern California, natural lighting and airflow would be used whenever practicable to reduce energy use. Landscaping and the green roof would use water-saving native plantings and contribute to passive cooling strategies. Durable, locally sourced materials, such as cast in place concrete and precast concrete would be used to improve building longevity and reduce the energy footprint. Smart building systems would be utilized to monitor building performance to ensure sustainability systems are functioning and to optimize user comfort. The proposed project also would include 28 electric vehicle charging stalls.

## 2.5 Sunset Specific Plan Amendment

The proposed project is requesting an Amendment to the Sunset Specific Plan (SSP), specifically for Geographic Area 6-E. The amendment would establish development standards for the project site and would allow for greater height and density, as well as alternate parking requirements.

## 2.6 Required Permits and Approvals

A list of permits and approvals from the City that are required to complete the proposed project include, but are not necessarily limited to the following:

- **Specific Plan Amendment (SPA)** to establish development standards for Sunset Specific Plan Geographic Site 6-E for the proposed project.
- **Development Permit (DVP)** to allow development of a new mixed-use hotel and residential project of approximately 369,000 gross square feet (240,000 FAR square feet).
- **Demolition Permit (DMP)** to allow demolition of the four existing one- and two-story commercial buildings totaling approximately 21,000 square feet, in conjunction with the requested Development Permit and other entitlements.
- **Conditional Use Permit** for a hotel with ancillary alcohol sales, service, and on-site consumption throughout the hotel including lounges, associated outdoor hotel dining/lounge areas, outdoor pool deck, room service, and in-room mini-bars, and to also allow the sale of alcohol for off-site consumption (California ABC License Type 21) intended for the project's residential uses as an accessory use within the hotel from an approximately 100-square foot space adjacent to the ground floor restaurant.
- **Conditional Use Permit** for a nightclub for the Viper Room.
- **Minor Conditional Use Permit** for a restaurant with ancillary alcohol sales, service, and on-site consumption.

- **Administrative Permit** for outdoor dining, lounge terraces, and the pool deck.
- **Vesting Tentative Tract Map** to merge and re-subdivide the site for residential and commercial condominium purposes.
- **Sign Permit** to allow digital off-site signage on the building's Sunset Boulevard frontage, which may replace the four static billboard faces that currently exist on the property.

Approvals from other agencies may also be required and are listed as follows:

- State Water Resources Control Board – Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit
- Los Angeles Regional Water Quality Control Board – Applicant must submit a Notice of Intent to discharge groundwater during construction and to comply with the General Permit
- Los Angeles County Fire Department – Plan approval
- Los Angeles County Sheriff's Department – Plan approval
- Utility providers – Utility connection permits

## 2.7 References

SCAG (Southern California Association of Governments). 2019. Profile of the City of West Hollywood. May 2019.  
<http://www.scag.ca.gov/Documents/WestHollywood.pdf>.

# 3 Initial Study Checklist

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**1. Project title:**

8850 Sunset Boulevard Project

**2. Lead agency name and address:**

City of West Hollywood  
Community Development Department  
8300 Santa Monica Boulevard  
West Hollywood, California 90069

**3. Contact person and phone number:**

Doug Vu, Senior Planner  
City of West Hollywood  
Community Development Department  
8300 Santa Monica Boulevard  
West Hollywood, California 90069  
323.848.6318  
dvu@weho.org

**4. Project location:**

8850–8878 West Sunset Boulevard and 1025–1029 Larrabee Street  
West Hollywood, California 90046

**5. Project sponsor's name and address:**

Silver Creek Commercial Development, LLC  
8872 Sunset Boulevard  
West Hollywood, California 90069

**6. General plan designation:**

Sunset Specific Plan

**7. Zoning:**

Sunset Specific Plan (SSP)

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

Refer to Chapter 2.0 of this Initial Study.

**9. Surrounding land uses and setting (Briefly describe the project's surroundings):**

Refer to Section 1.4 of this Initial Study.

**10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

Refer to Section 2.6 of this Initial Study.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Refer to Section 3.18 of this Initial Study for details.

*Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.*



**Environmental Factors Potentially Affected**

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

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Aesthetics                               | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources                     | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" type="checkbox"/> Geology and Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input checked="" type="checkbox"/> Hydrology and Water Quality   | <input checked="" type="checkbox"/> Land Use and Planning    | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                         | <input checked="" type="checkbox"/> Population and Housing   | <input checked="" type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                               | <input checked="" type="checkbox"/> Transportation           | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature



Date

9/4/19

## Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance

### 3.1 Aesthetics

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

Pursuant to SB 743 (PRC Section 21099(d)(1)), “[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099(a) defines a “transit priority area” as an area within 0.5 mile of a major transit stop. PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099(a) defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099(a) defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The proposed project would be a mixed-use residential project located on an infill site within a transit priority area that meets the criteria set forth in Section 21099(d)(1). The project is considered to be mixed-use residential because it would include residential and commercial uses. The project is considered to be on an infill site because the project area is highly urbanized and the site has been developed with commercial uses since the 1920s.

The project is within a transit priority area because the nearest “major transit stop” as defined under PRC Section 21064.3 is located within 0.5 miles at the intersection of San Vicente Boulevard and Santa Monica Boulevard. This transit stop is served by four Los Angeles Metropolitan Transportation Authority (Metro) bus routes, including the Metro Local 4 and 30/330, and Metro Rapid 704 and 105/705 lines. Service intervals for each of these four

*Metro routes at this location are between 6 minutes to 20 minutes during morning and afternoon peak commute periods (Metro 2018). This intersection is also served by City of West Hollywood shuttles, including the CityLine Local La Brea (eastbound) and Cedars-Sinai (westbound), and CityLine Commuter Hollywood/Highland (eastbound) and West Hollywood (westbound) shuttles (CityLine 2018). Furthermore, the project is within a transit priority area as mapped by the Southern California Association of Governments (SCAG 2019).*

*Because the proposed project is considered a mixed-use residential project on an infill site within a transit priority area, aesthetic impacts of the project cannot be considered significant, pursuant to PRC Section 21099(d).*

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

**No Impact.** The City's General Plan does not identify any designated scenic vistas. However, the Hollywood Hills lie just to the north of the City and are visible throughout the City. Views of the Los Angeles Basin and buildings in downtown Los Angeles are generally not visible at the street level but are visible from higher vantage points throughout the City (City of West Hollywood 2011). As described in the Sunset Specific Plan, public views of the Hollywood Hills and the Los Angeles Basin are available from the Sunset Strip through open spaces between buildings that provide unobstructed views from the ground to the sky ("view corridors"), from open plazas or patios accessible from the street level that provide expansive views ("view terraces"), and from openings through buildings that provide a clear view from street level ("view portals"). Preservation of public views is encouraged by the Sunset Specific Plan, and enhancement of views through incorporation of view corridors, view terraces, or view portals into the design of new development is required at 13 specified sites along the Sunset Strip, the nearest of which is located at a property approximately 400 feet west of the project site. As such, the project would not interfere with or be subject to the development of required view corridors, view terraces, or view portals. Nevertheless, the Sunset Specific Plan still encourages public view preservation and enhancement along all areas of the Sunset Strip, and the EIR will address the project's consistency with those goals.

The proposed project involves construction of a 15-story mixed-use hotel and residential building. Public views in the project area include views of the Hollywood Hills and the Los Angeles Basin, which are intermittently visible in the project area. However, public views of these resources are obstructed from many vantage points by existing topography, trees, and multi-story buildings. Pursuant to PRC Section 21099, no impact would occur and further analysis is not warranted.

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

**No Impact.** The project site is in a predominately urbanized area that does not contain scenic resources, such as trees and rock outcroppings. The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge (Caltrans 2011). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 13 miles northwest of the proposed project site. Due to this distance, the proposed project site is not within the viewshed of this State Scenic Highway. Therefore, no impact on scenic resources within a state scenic highway would occur as a result of the proposed project, and this topic will not be further discussed in the EIR.

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

**No Impact.** The project site is located on Sunset Boulevard, one of West Hollywood's iconic commercial corridors that runs along the entire northern border of the City. The areas to the north and south of Sunset Boulevard are occupied by commercial, multi-family residential, and single-family residential uses. As such, the project site is located in an urbanized area. The project site has a land use designation and zoning designation of SSP. The SSP designation allows for commercial uses and mixed-use development generally at greater heights and densities than under existing conditions. The proposed project would require an amendment to the SSP, specifically for Geographic Area 6-E, in part to allow for the proposed height and density of the project. The visual character of the project area is diverse; the surrounding buildings have varying architectural styles, massing, and heights. Buildings immediately to the north, east, and west of the project site are generally one to two stories in height. To the south of the project site is the 11-story London Hotel. The Sunset Strip as a whole is interspersed with buildings rising over 100 feet above the street. The 9000 Sunset Boulevard building, located about 700 feet west of the project site, is approximately 14 stories (194 feet) in height. Further to the west, the building at 9229 Sunset Boulevard is 144 feet in height, the building at 9200 Sunset Boulevard is 195 feet in height, and the building at 9201 Sunset Boulevard is 140 feet in height. To the east of the project site, the Mondrian hotel building at 8440 Sunset Boulevard is 147 feet in height, and the Andaz West Hollywood hotel building at 8401 Sunset Boulevard is 150 feet in height. Additionally, several recently approved projects also rise over 100 feet above the Sunset Strip. The Edition Hotel, located on the corner of Sunset Boulevard and Doheny Drive (9040 Sunset Boulevard; about 1,000 feet west of the project site) is 14 stories in height. This project was approved in 2010 and is expected to open in December 2019. The Arts Club Project (8920 Sunset Boulevard) was approved in 2018 and will be 137 feet in height (9 stories). A hotel that would be approximately 248 feet in height (22 stories) is being proposed at 9034 Sunset Boulevard, between the 9000 Sunset Boulevard building and the Edition Hotel. As such, while the proposed project is immediately surrounded by low-rise structures to the north, east, and west, it is located in an area that is characterized by buildings ranging from one story in height to well over 100 feet in height. The proposed project, which would be 15 stories (200 feet) in height, would be generally consistent with the existing variability in building height and massing along the Sunset Strip. Pursuant to PRC Section 21099, no impact would occur and further analysis is not warranted.

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

**No Impact.** The project site is in an urbanized area with high levels of existing lighting. Primary sources of light on the project site include lighting associated with the existing commercial buildings including building mounted lighting and headlights from vehicles in the surface parking lots. The primary source of daytime glare on the project site is the sun's reflection from metallic and glass surfaces on vehicles parked in the surface parking lots. The adjacent commercial, residential, and roadway uses generate light and glare along all sides of the project site.

The windows and building materials proposed for the exterior of the proposed development could increase the reflected sunlight during certain times of the day. Further, the proposed project would incorporate exterior lighting in the form of pedestrian walkway lighting, building mounted lighting, interior

lighting, safety related lighting, and off-site signage lighting. Because of the size of the proposed project and the digital signage that would be incorporated into the design, there would be new levels of lighting on the project site compared to existing site conditions. In addition, glass windows on the exterior facades of these structures could reflect light and add new sources of glare.

Project plans will be reviewed by the City for conformance with all applicable City requirements relating to lighting and glare. For example, to limit excessive light and glare, the WHMC includes development standards and design guidelines. Specifically, Article 19-3 “Site Planning and General Development Standards” provides development standards and design guidelines for outdoor lighting and sign illumination to address light and glare. These development standards and design guidelines provide requirements to limit light and glare to the extent feasible while providing standards to ensure sufficient light for safety and practicality, including maximum heights of lighting fixtures; design, installation, and maintenance of lighting fixtures; standards for new development and remodeling; lighting for parking areas; and sign illumination. Development projects are required to adhere to these requirements and standards. Further, new digital signage proposed as part of the project would be subject to the additional lighting regulations in the Sunset Strip Off-Site Signage policy, which limit light trespass at adjacent residentially zoned properties to 1.4 footcandles.

Pursuant to PRC Section 21099, no impact would occur and further analysis of this issue is not warranted.

## References

- Caltrans (California Department of Transportation). 2011. Caltrans Officially Designated Scenic Highways. Accessed June 10, 2019: [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/laangeles.htm](http://www.dot.ca.gov/hq/LandArch/scenic_highways/laangeles.htm).
- City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. <https://www.weho.org/city-government/download-documents/-folder-155>.
- Metro (Los Angeles Metropolitan Transportation Authority). 2018. Bus and Rail System Map. June 2018. Accessed August 13, 2019. <https://www.metro.net/riding/maps/system-maps/>.
- CityLine (City of West Hollywood). 2018. CityLine Local Route Map. September 2018. Accessed August 22, 2019 <https://www.weho.org/services/public-transportation-transit-options/cityline-shuttle>.
- SCAG (Southern California Association of Governments). 2019. Transit Priority Areas (2016) and Transit Priority Areas (2045) – SCAG Region. Web mapping applications. Last updated June 2019. Accessed August 13, 2019. [http://gisdata-scag.opendata.arcgis.com/datasets/c9249b6bba0f49829b67ce104f81ef20\\_1](http://gisdata-scag.opendata.arcgis.com/datasets/c9249b6bba0f49829b67ce104f81ef20_1).

## 3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** The project site and surrounding areas are characterized by features typical of an urban landscape. As shown on the Los Angeles County Important Farmland map, the project site does not include any sites mapped by the Farmland Mapping and Monitoring Program as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (FMMP 2017). Implementation of the proposed project would not involve changes that could result in conversion of farmland to non-agricultural use, as no agricultural uses or farmland exist on the project site or in proximity to the project site. Furthermore, the project site is already graded and highly disturbed. Therefore, the proposed project would not convert



Farmland to non-agricultural uses, and no impact would occur as a result of the proposed project. This issue will not be further analyzed in the EIR.

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

**No Impact.** The project site is located within the boundaries of the SSP and is zoned and designated as SSP (City of West Hollywood 2011). The SSP zoning district contains commercial and residential uses. As shown on the Los Angeles County Williamson Act Fiscal Year 2015/2016 map, no areas that are under a Williamson Act contract exist on the project site or in the vicinity of the project site (California Department of Conservation 2016). For these reasons, implementation of the proposed project would not conflict with existing zoning for agricultural use, as none exist in the area, nor would it conflict with a Williamson Act contract, as none exist in the area. No impact to Williamson Act contract lands or land zoned for agricultural uses would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

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

**No Impact.** The project site is located within the boundaries of the SSP and is zoned and designated as SSP. The SSP zoning district contains commercial and residential uses (City of West Hollywood 2011). The list of allowable land uses contained in the City's Zoning Ordinance for commercial and residential zones does not include any timberland or forest land uses (City of West Hollywood Zoning Ordinance Section 19.10.030 and 19.06.030). No forest land, timberland, or Timberland Production areas are located within or adjacent to the project site. Therefore, the proposed project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The project would be implemented on an existing developed site that is surrounded by fully developed areas. No impact to forest land or timberland would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

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

**No Impact.** As characterized above, no forest land is located within the project site or in the vicinity of the project site, as the area is urbanized and developed with commercial and residential uses. No forest land would be converted or otherwise affected by the proposed project, and no impact would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

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

**No Impact.** As characterized above, no farmland or forest land is located in the project site or within the vicinity of the project site, as the area is urbanized and developed with commercial and residential uses. No farmland or forest land would be converted or otherwise affected by the proposed project, and no impact would occur as a result of the proposed project. This issue will not be further analyzed in the EIR.

## References

California Department of Conservation. 2016. *Los Angeles County Williamson Act FY 2015/2016*. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2016. Accessed June 20, 2019. [http://www.conservation.ca.gov/dlrp/wa/Pages/stats\\_reports.aspx](http://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx).

City of West Hollywood. 2011. *City of West Hollywood Zoning Districts Map*. November 3, 2011. Accessed June 20, 2019. <http://www.weho.org/home/showdocument?id=5138>.

FMMP (Farmland Mapping and Monitoring Program). 2017. *Los Angeles County Important Farmland 2016*. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program. July 2017. Accessed June 20, 2019. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>.

## 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

**Potentially Significant Impact.** A significant impact may occur if the project is not consistent with the applicable air quality plan or would interfere with implementation of the policies of that plan. The project site is within the South Coast Air Basin, and the applicable plan is the Air Quality Management Plan prepared by the South Coast Air Quality Management District. Construction and operation of the project could result in an increase in emissions by increasing the intensity of development at the project site, which has the potential to conflict with the Air Quality Management Plan. As such, further analysis of this issue will be provided in the EIR.

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

**Potentially Significant Impact.** Construction emissions associated with development of the proposed mixed-use hotel and residential uses would temporarily emit pollutants to the local airshed from dust and on-site equipment, construction worker vehicles, delivery trucks, and off-site haul trucks. Volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM<sub>10</sub>), particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (PM<sub>2.5</sub>), and sulfur oxides (SO<sub>x</sub>) emissions are the main pollutants that would result from construction. Project operation would also emit pollutants associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas, appliances, and space and water heating).

Criteria pollutants under nonattainment in the SCAB are ozone and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) (SCAQMD 2017). The proposed project would generate VOC and NO<sub>x</sub> emissions (which are precursors to ozone) and emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. Further analysis will be required to determine the proposed project's potential to result in a cumulatively considerable net increase of these criteria pollutants. Therefore, this issue will be further analyzed in the EIR.

- c) ***Would the project expose sensitive receptors to substantial pollutant concentrations?***

**Potentially Significant Impact.** There are sensitive receptors (residences) located within 100 feet of the property line of the project site. The proposed project may generate toxic air contaminant emissions during construction of the project from construction equipment and diesel vehicles. Additionally, the operational emissions associated with the project could expose sensitive receptors to pollutant concentrations as well. Further analysis is required regarding the air pollutant emissions that would result from the proposed project, and whether it would be substantial. Therefore, this issue will be further analyzed in the EIR.

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

#### **Odor Emissions**

**Less Than Significant Impact.** The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the project site and would generally occur at magnitudes that would not affect substantial numbers of people.

Land uses and industrial operations associated with operational odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Operation of the proposed project would not entail any of

these potentially odor-causing land uses. Thus, there would be no operational activities associated with the project that would produce substantial odorous emissions. Therefore, the proposed project would not create any new sources of odor during operation, and impacts would be less than significant.

#### Asbestos Emissions

**Less Than Significant Impact.** Demolition activities could result in airborne entrainment of asbestos, particularly where structures built prior to 1980 (such as the existing structures on site) would be demolished. However, these materials would be removed in accordance with regulatory requirements (pursuant to South Coast Air Quality Management District Rule 1403 [Asbestos Emissions]), which establishes survey, notification, and work practice requirements to prevent asbestos emissions during building demolition. Upon compliance with all applicable federal, state, and local regulations, the potential for the proposed project to create a significant impact to the public or environment from emissions of asbestos would be low. Therefore, impacts related to asbestos emissions would be less than significant.

#### References

SCAQMD (South Coast Air Quality Management District). 1993. CEQA Air Quality Handbook.

SCAQMD (South Coast Air Quality Management District). 2017. *Final 2016 Air Quality Management Plan*. March 2017. Accessed June 10, 2019. <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.

### 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Less Than Significant Impact.** The project site is located in a developed part of the City and is surrounded by a predominantly urbanized mix of land uses, including residential and commercial uses. The proposed project involves demolition of existing commercial buildings and surface parking lots and the construction of a new mixed-use hotel and residential building. Under existing conditions, the project site supports limited, ornamental landscaping typical of an urban area. The project site has 10 on-site trees (9 eucalyptus trees and 1 palm tree), and 6 street trees are located along the boundaries of the site (4 magnolia trees, 1 Chinese flame tree, and 1 ficus tree). The site also has several small planters that support limited amounts of ornamental shrubs. The vegetation on site is ornamental in nature and does not include special-status plants. Furthermore, this vegetation would not be expected to serve as suitable habitat for special-status wildlife species. The base of the Hollywood Hills is located north of the project site. This portion of the Hollywood Hills is fully developed with residential uses, and, therefore, would not be expected to serve as suitable habitat for special-status species.

According to the City's General Plan EIR, the majority of West Hollywood has been developed, paved, or landscaped, and either denuded of vegetation or supports primarily ornamental and/or nonnative plant species. In general, suitable habitat for sensitive species in the region does not occur within the City. An electronic database review of the Beverly Hills Quadrangle and surrounding quadrangles in the California Natural Diversity Database (CNDDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants, and the U.S. Fish and Wildlife Services' (USFWS) Information for Planning and Consultation (iPAC) was conducted (CDFW 2019a; CNPS 2019; USFWS 2019a). While sensitive species are known to occur within the general vicinity of the project area, based on the disturbed and developed condition of the project site and the relative lack of suitable habitat, the potential for any known sensitive species to occur on the site is low. Furthermore, according to the database review, no candidate, sensitive, or special-status wildlife or plant species have the potential to occur on the project site.

However, the ornamental vegetation that is within and adjacent to the project site could provide potential nesting sites for birds that are protected under Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and under the Migratory Bird Treaty Act (1918). The proposed project would require removal of several existing street trees that are currently located along the project site. In the event that a bird is nesting in the trees at the time they are being removed, the process of removing the tree could adversely affect the bird(s) by harming, harassing, or killing bird(s) or their eggs, in violation of protections for nesting birds. Construction activities would also elevate noise levels and could cause disturbance to nesting or roosting of protected species on site or adjacent to the site. Construction could occur during the nesting season (i.e., between February 1–August 31). Thus, there is potential for construction activities to negatively affect breeding or reproduction of protected nesting birds on or adjacent to the project site. If active bird nests are present, a protective buffer must be established to ensure that they are not disturbed until fledglings have left the nest. Compliance with the Migratory Bird Treaty Act and the California Fish and Game Code by avoiding disturbance of active bird nests would ensure that protected birds are not adversely affected during construction. No operational impacts to nesting birds are anticipated to occur. Any trees that are removed would be replaced as part of the proposed project's landscaping. As such, any nesting habitat that is temporarily affected during construction would be generally replaced by the proposed landscaping. During operation, the project site and the corridor on which it is located (the Sunset Strip) would remain areas of high pedestrian and vehicular activity, consistent with existing conditions. Due to the highly developed nature of the project area and upon required compliance with the Migratory Bird Treaty Act and the California Fish and Game Code, impacts associated with nesting birds would be less than significant. For these reasons, special-status species are not expected to be adversely affected by the project. This issue will not be further analyzed in the EIR.

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

**No Impact.** The project site is currently developed with commercial uses and is surrounded by commercial and residential uses. The project site supports limited ornamental vegetation consisting of ornamental trees, grasses, and shrubs. Because the vegetation is ornamental in nature and is situated in an urban environment, it does not constitute a sensitive natural community in and of itself. Thus, riparian habitats and sensitive natural communities do not exist within the project area, and the proposed project would result in no impact on riparian habitats and other sensitive natural communities. This issue will not be further analyzed in the EIR.

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

**No Impact.** The project site does not support any wetland areas. Based on a review of the USFWS National Wetlands Inventory, the project site does not contain any blue-line streams or wetland habitats (USFWS 2019b). Due to the urbanized nature of the project area and its surroundings, as well as the absence of any wetlands within the project site, implementation of the proposed project would result in no impact to federally protected wetlands. This issue will not be further analyzed in the EIR.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

**No Impact.** As described under Section 3.4(c), there are no wetlands or running waters within the project site, and therefore, the proposed project would have no potential to affect the movement of migratory fish. The project site is highly urbanized and surrounded by urban uses on all sides; therefore, the project site does not function as a wildlife movement corridor. As stated in the City's General Plan EIR, while some local movement of wildlife can be expected to occur throughout the City, the City is not recognized as an area that links migratory wildlife populations (City of West Hollywood 2010). Furthermore, the City is not recognized as an existing or proposed Significant Ecological Area that links migratory populations, as designated by the County of Los Angeles (Department of Regional Planning 2015). Additionally, as described under Section 3.4(a), the project site does not support native habitat. The project site is mostly paved and is located in a highly urbanized area with frequent disturbances. Vegetation is limited and ornamental in nature. As such, the project site would not serve as a native wildlife nursery site. No impacts would occur, and this issue will not be further analyzed in the EIR.

- e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

**No Impact.** The WHMC provides regulations governing the treatment of street trees and trees on other public lands, as well as requirements under the City of West Hollywood Heritage Tree Program. No trees in the project area have been designated as Heritage Trees by the City (City of West Hollywood 2019). Street trees and trees on public property are protected under Chapter 11.36 of the WHMC. As stated in Section 11.36.010, it is unlawful for any person, firm or corporation (other than the city, or persons acting under the city's authority) to plant, trim, prune, cut, break, deface, destroy, burn or remove any shade or ornamental tree, hedge, plant, shrub or flower growing, or planted to grow upon any public highway, public ground or public property within the City of West Hollywood without a permit issued pursuant to the provisions of Chapter 11.36.". There are four street trees fronting the project site along the Sunset Boulevard sidewalk, and two street trees along Larrabee Street; the proposed project would involve removal of all of these trees. As such, the proposed project would be required to comply with Section 11.36.040 of the WHMC, which states that any tree located on public property that is removed is required to be replaced with another tree, at the discretion and specification of the Director of Public Works. Additionally, a permit would be required from the Director of Public Works prior to removing the street trees. The proposed project would include installation of several replacement street trees along the project site perimeter. The proposed project would comply with all applicable permit requirements prior to the removal of any trees or plantings located on public property. Therefore, implementation of the proposed project would not conflict with local policies or ordinances protecting trees or other biological resources. No impact would occur, and no further evaluation of this issue is required in the EIR.

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

**No Impact.** The City's General Plan EIR does not designate any areas of the City as being within a habitat conservation plan (City of West Hollywood 2010). Furthermore, the City is not within any of the regional conservation plans designated by the state (CDFW 2017b). Therefore, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan; natural community

conservation plan; or other approved local, regional, or state habitat plan, as none apply to the project site. No impact would occur as a result of the proposed project, and this issue will not be further analyzed in the EIR.

## References

- CDFW (California Department of Fish and Wildlife). 2019a. List of California Natural Diversity Database (CNDDB) Species. Accessed June 10, 2019. <https://www.wildlife.ca.gov/Data/CNDDB>.
- CDFW (California Department of Fish and Wildlife). 2019b. California Natural Community Conservation Plans. April 2019. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP>.
- City of West Hollywood. 2010. *Final Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan* (State Clearinghouse No. 2009091124). Adopted October 2010. <https://www.weho.org/city-government/download-documents/-folder-626>.
- City of West Hollywood. 2019. Designated Heritage Trees. Accessed June 7, 2019. <https://www.weho.org/home/showdocument?id=7043>.
- CNPS (California Native Plant Society). 2019. *Inventory of Rare and Endangered Plants* (online edition, v8-03). Sacramento, California: California Native Plant Society. Accessed June 10, 2019. [www.rareplants.cnps.org](http://www.rareplants.cnps.org).
- Department of Regional Planning. 2015. Significant Ecological Area and Coastal Resource Area Policy Map. Accessed June 7, 2019. February 2015. [http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf).
- USFWS (United States Fish and Wildlife Service). 2019a. Environmental Conservation Online System Information, Planning, and Conservation System (IPaC). Accessed June 10, 2019. <https://ecos.fws.gov/ipac/>.
- USFWS. 2019b. National Wetlands Inventory, *Wetlands Mapper*. Accessed June 7, 2019. <http://www.fws.gov/wetlands/Data/Mapper.html>.

## 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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

**Potentially Significant Impact.** The existing structures on the project site are at least 45 years of age, as shown in Table 3.5-1. The proposed project would involve demolition of these structures; as such, the EIR will evaluate potential impacts to historic resources.

**Table 3.5-1  
Historic-Age Buildings on the Project Site**

Street Address	Existing use	Built date	Eligibility Status
8850–8860 Sunset Boulevard	Commercial (Terner’s Liquor; The Viper Room; Sun Bee Liquor Store; Barcode Barbershop)	1921/1930	The City’s 2016 commercial building survey resulted in a status code of 6Z (found ineligible for the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation). The City’s online preservation database lists a status code of 7N (needs to be reevaluated) and notes that the building may warrant consideration in local planning (6L) because it is one of the oldest buildings on the Sunset Strip.
8866–8870 Sunset Boulevard	Commercial (Ta-Ke Sushi restaurant; Amarone Kitchen and Wine; Glen Lerner Injury Attorneys)	1935/1958	The City’s 2016 commercial building survey and the online preservation database list a status code of 6L (determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning).
8872–8878 Sunset Boulevard	Retail (Aahs! Gift store)	1937/1950	The City’s 2016 commercial building survey does not address this building. The online preservation database lists a status code of 6Z (found ineligible for the National Register of Historic Places, California Register of Historical Resources, or local designation through survey evaluation).

Source: City of West Hollywood 2019; GPA Consulting Inc. 2016

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

**Potentially Significant Impact.** The project site is located within an urbanized area and has been subject to disturbance in the past. PRC Section 21083.2(g) generally defines a unique archaeological resource as an artifact, object, or site that meets a number of criteria, including an ability to provide information needed to answer important scientific questions that have public interest; having a special and particular quality, such as being the oldest of its type; or, being directly associated with a scientifically recognized important prehistoric or historic event or person.

Any archaeological resources on the project site have likely been previously disturbed. However, ground-disturbing activities associated with construction of the proposed project, such as excavation of the four-level subterranean parking garage and grading of the site during site preparation, has the potential to

damage or destroy intact subsurface archeological deposits that may be present below the ground surface. The EIR will therefore discuss the potential for such resources to be impacted by the proposed project and will identify mitigation measures to reduce impacts of the proposed project on any archeological resources that may be present. As such, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As previously discussed, the project site is located within an urbanized area and has been subject to disturbance in the past. The project site is not part of a formal cemetery, and therefore, it is unlikely that human remains exist on or in the vicinity of the project site. No known burial sites have been identified within the project site or in the vicinity. Although it is unlikely, previously undiscovered human remains could be located within the project site and could be disturbed by construction activities. Therefore, this issue will be further analyzed in the EIR.

## References

City of West Hollywood. 2019. City of West Hollywood Historic Preservation Database Search. Accessed March 2019. <https://www.wehopreservation.org/database-search/>.

GPA Consulting Inc. 2016. City of West Hollywood Commercial Historic Resources Survey. September 2016. [https://www.wehopreservation.org/wp-content/uploads/2016/10/2015\\_Survey\\_Full\\_-Document.pdf](https://www.wehopreservation.org/wp-content/uploads/2016/10/2015_Survey_Full_-Document.pdf).

## 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Construction of the proposed project would require the use of energy in the form of fossil fuels (for construction equipment, worker vehicles, and truck trips) and electricity (for construction site lighting, computer equipment, and temporary construction trailers, if needed). Operation of the proposed project would require electricity for building operation (appliances, lighting, etc.) and fossil fuels related to vehicular transportation to and from the project site. Project operation would also result in indirect energy consumption related to the supply, distribution, and treatment of water,

wastewater, and solid waste. Further analysis is required to quantify the total anticipated energy use and to determine the potential environmental impacts resulting from the consumption of energy resources. Therefore, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The proposed project is subject to various regional and local plans guiding energy use, including the City's Climate Action Plan. The proposed project is required to be consistent with existing regulations and, therefore, is not anticipated to conflict with renewable energy or energy efficiency plans. However, the EIR will include a more robust discussion of applicable plans and will provide a consistency analysis for the proposed project, to ensure that the project would comply with such plans.

## 3.7 Geology and Soils

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

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

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

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

**Potentially Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act regulates development near active faults to reduce hazards associated with surface fault rupture. The act prohibits the location of most structures for human occupancy across the trace of active faults and establishes special study zones called Alquist-Priolo Zones, which extend 500 feet from the fault. These zones are delineated and defined by the state geologist and identify areas where potential surface rupture along a fault could prove hazardous. The project site is located within an Alquist-Priolo Earthquake Fault Zone associated with the Hollywood Fault (CGS 2018). Project construction and operation would not increase or exacerbate the potential for fault rupture to occur and, therefore, would not directly or indirectly cause potential substantial adverse effects involving surface fault rupture. Nevertheless, because the project site is within a state-designated Alquist-Priolo Earthquake Fault Zone, detailed fault studies and analysis will be presented in the EIR.

ii) ***Strong seismic ground shaking?***

**Potentially Significant Impact.** The project site is within close proximity to the Hollywood Fault and is also located within an area that could be subject to seismic ground shaking from a variety of fault lines throughout the region. A number of faults in the region are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the project site. Although the proposed project could be subject to severe seismic shaking, construction and operation of the project would not increase or exacerbate the potential for earthquakes to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving seismically induced ground shaking. Nevertheless, due to the project's location in proximity to the Hollywood Fault and in a seismically active region, this issue will be further discussed in the EIR.

iii) ***Seismic-related ground failure, including liquefaction?***

**Potentially Significant Impact.** Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. Earthquake waves cause water pressure to increase in the sediment and the sand grains to lose contact with each other, leading the sediment to lose strength and behave like a liquid. A portion of the project site is identified as

having the potential for liquefaction (CGS 2018; City of West Hollywood 2011). In the event of liquefaction at the project site, hazardous geotechnical conditions could result. Although the project site could be subject to liquefaction, project construction and operation is not anticipated to increase or exacerbate the potential for liquefaction to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving seismically related ground failure, including liquefaction. The site's potential susceptibility to seismic-related ground failure is similar to soil conditions that exist throughout the region and can be addressed through the project's foundation design. Nevertheless, because of the site's location within a designated liquefaction hazard zone, this issue will be further discussed in the EIR.

**iv) Landslides?**

**No Impact.** The project site is not located within an area identified as being susceptible to earthquake-induced landslides on maps prepared by the state (CGS 2018). Additionally, the City's General Plan Safety Element does not identify the project site as an area with the potential for slope instability (City of West Hollywood 2011). There are no known landslides near the site, nor is the site in the path of any known or potential landslides. As such, landslides are unlikely to occur on the project site and would not expose people or structures to adverse risks associated with landslides. No impacts would occur, and this issue will not be further analyzed in the EIR.

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

**Potentially Significant Impact.** Temporary erosion could occur during project construction. However, the project applicant or its construction contractor would be required to comply with WHMC Section 15.56.090. This section requires stormwater runoff containing sediment, construction materials, or other pollutants from a construction site to be reduced to the maximum extent practicable. However, in order for the design and construction of the project to account for site-specific erosion potential, analysis of the results of site-specific geologic reports is required. Therefore, this issue will be further discussed in the EIR.

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

**Potentially Significant Impact.** Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas or as a result of decomposition of natural organic materials. Soils that are particularly subject to subsidence include those with high silt or clay content and/or high organic content. The site is located outside the boundary of the area identified in the City's General Plan Safety Element as a former marsh (City of West Hollywood 2011). Therefore, the potential for subsidence at the project site is considered low.

As previously discussed, the project site is not located within an area susceptible to earthquake-induced landslides; however, a portion of the project site is identified as being susceptible to liquefaction (CGS 2018). Additionally, temporary slope instability could occur during construction. As such, this issue will be further discussed in the EIR.

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

**Potentially Significant Impact.** Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. The proposed project would be required to comply with California Building Code requirements related to hazards involving potentially expansive soils. Additionally, project construction and operation would not increase or exacerbate the potential for expansive soils to create substantial direct or indirect risks to life or property. Nevertheless, further analysis of the on-site soils will be presented in the EIR based on site-specific geologic reports. Therefore, this issue will be further analyzed in the EIR.

- e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

**No Impact.** The project site is served by the existing municipal sewer system. The City has established utility services, and no septic systems are either proposed or required to serve the project. Therefore, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

**Potentially Significant Impact.** As previously discussed, the project site is located within an urbanized area and has been subject to disturbance in the past. Any paleontological resources or unique geologic features on the project site have likely been previously disturbed. However, any grading, excavation, or other construction activities resulting from implementation of the proposed project could potentially disturb undiscovered paleontological resources or unique geologic features, in the event that any are present on the project site. The EIR will present the findings of a paleontological resources records search and will identify the potential for the project to adversely affect such resources. Mitigation measures will be presented if necessary. Therefore, this issue will be further analyzed in the EIR.

## References

- City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. <https://www.weho.org/city-government/download-documents/-folder-155>.
- CGS (California Geologic Survey). 2018. *Earthquake Zones of Required Investigation – Beverly Hills Quadrangle*. Earthquake Fault Zones Released March 25, 1999. Revised January 11, 2018. <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>.

### 3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Climate change is the observed increase in the average temperature of the earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of greenhouse gases (GHG), which contribute to the "greenhouse effect," a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions. This process is essential to support life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat and contribute to an average increase in Earth's temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs include fossil fuel burning (coal, oil, and natural gas for heating and electricity, gasoline and diesel for transportation); methane generated by landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF<sub>6</sub>). Since 1750, estimated concentrations of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O in the atmosphere have increased over by 36%, 148%, and 18% respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition. Changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere (State of California 2019).

According to California's Fourth Climate Change Assessment, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snow pack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2019).

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

**Potentially Significant Impact.** The proposed project would result in emissions of greenhouse gases (GHGs) during construction and operation. Temporary GHG emissions would result from construction vehicles and equipment. Additionally, during operation, GHG emissions would result from vehicle trips generated by the proposed project, as well as building energy and water usage. Further analysis is required to determine the estimated project-generated GHG emissions and their impact on global climate change. Therefore, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The City adopted a Climate Action Plan in September 2011 (City of West Hollywood 2011). The CAP outlines a course of action to reduce municipal and communitywide GHG emissions that contribute to climate change. The CAP includes seven emission reduction strategies: 1) community leadership and engagement, 2) land use and community design, 3) transportation and mobility, 4) energy use and efficiency, 5) water use and efficiency, 6) waste reduction and recycling, and 7) green space. The proposed project would be consistent with the City's CAP if it includes provisions to implement the applicable CAP GHG reduction measures. Consistency with the applicable measures will be evaluated in the EIR.

## References

City of West Hollywood. 2011. City of West Hollywood Climate Action Plan. Adopted September 6, 2011.  
<https://www.weho.org/home/showdocument?id=7949>.

State of California. 2019. California's Fourth Climate Change Assessment Statewide Summary Report. Published January 16, 2019. Report #: SUM-CCCA4-2018-013. Accessed August 15, 2019.  
<http://www.climateassessment.ca.gov/state/>.

## 3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

**Potentially Significant Impact.** Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the proposed project. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment.

The proposed project involves the demolition of four existing commercial buildings on the project site that were developed before 1950 (GPA 2016). These buildings may contain lead based paint and asbestos, as their construction predates regulation of these materials. Although it is not known whether the existing buildings contain these materials, precautions must be taken during demolition processes. As such, there is the potential for hazardous materials impacts associated with demolition of the existing structures on the project site. During operation, hazardous materials that could be used during operation of the proposed project would include chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, pool chemicals, oils, and miscellaneous organics and inorganics that are used as part of typical building maintenance, restaurant operation, and hotel operation. Upon compliance with applicant regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur. Nevertheless, the EIR will included more details and analysis of the potential transport, use, and disposal of hazardous materials in association with construction and operation of the project.

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

**Potentially Significant Impact.** Construction activities would involve the use and storage of commonly used hazardous materials such as gasoline, diesel fuel, lubricating oil, grease, solvents, and other vehicle and equipment maintenance fluids. These substances would be used and stored in designated construction staging areas within the project site. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. However, as previously discussed, the proposed project involves the demolition of existing buildings, which could create a significant hazard to the public or the environment through the release of hazardous building materials (such as lead and/or asbestos) into the environment. Project operation is not expected to involve acutely hazardous materials. Rather, it would involve use of chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, pool chemicals, oils, and miscellaneous organics and inorganics that are used as part of typical building maintenance, restaurant operation, and hotel operation. Upon compliance with applicant regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur. Nevertheless, the EIR will include more details and analysis of the potential for project construction or operation to result in release of hazardous materials into the environment.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**Potentially Significant Impact.** The schools that are closest to the project site include West Hollywood Elementary School, located approximately 0.06 miles southwest of the project site at 970 Hammond Street; and Tree Academy (6<sup>th</sup> through 12<sup>th</sup> grade), located approximately 0.2 miles east of the project site at 8628 Holloway Drive. While the proposed project would involve use of limited quantities of hazardous materials, the transportation, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Although there would be limited use of hazardous materials associated with the proposed project and the proposed project would comply with health and safety regulations, impacts to nearby schools will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Government Code, Section 65962.5, combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances. A review of Cortese List online data resources does not identify hazardous materials or waste sites on the project site and immediately surrounding area (DTSC 2019; RWQCB 2019). However, a site-specific hazardous materials database search will be presented in the EIR and will be used to determine whether the proposed project could create a significant hazard to the public or the environment related to a hazardous materials site. As such, this issue will be further analyzed in the EIR.

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

**No Impact.** The nearest public airport to the project site is the Santa Monica Municipal Airport, located approximately 5.8 miles southwest of the project site. According to the Los Angeles County Airport Land Use Commission, the project site is located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2003). As such, the project site is not within two miles of a public airport, and the project site is not located within an airport land use plan. Therefore, the proposed project would not create an airplane safety hazard for people residing or working in the project area. No impact would occur, and this issue will not be further analyzed in the EIR.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**Potentially Significant Impact.** The City maintains the West Hollywood Emergency Plan, which is an all-hazards preparedness, emergency evacuation, response, and recovery plan. It addresses hazards including, but not limited to fires, earthquakes, flooding, terrorism, transportation accidents, public health emergencies, and hazardous materials accidents (City of West Hollywood 2011). Prior to construction of the proposed project, the proposed site plans would be required to undergo review by the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency services. The proposed project would also be required to comply with all applicable codes and ordinances for emergency access. However, the proposed project would involve increased traffic in the area during construction and operation. Increased traffic has the potential to affect emergency response and/or evacuation. While the proposed project is expected to provide for adequate emergency access, the potential for project-related traffic to affect emergency response and evacuation will be further analyzed in the EIR.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

**No Impact.** The project site is located within an urban setting, surrounded by commercial and multi-family developments. Although the area to the north of the project site, at the base of the Hollywood Hills, is within a Very High Fire Hazard Severity Zone, the project site itself is not. The project site is approximately 300 feet from the border of the Very High Fire Hazard Severity Zone in the Hollywood Hills (CAL FIRE 2019). The City has also designated areas of wildland fire hazards in its General Plan. The project site is not within a City-designated wildland fire hazard area. As stated in the City's General Plan, a fire in the Hollywood Hills would have the potential to spread to the northern region of the City (City of West Hollywood 2011). The project site is located approximately 0.2 mile from the City's northern border. However, it is separated from the nearby Very High Fire Hazard Severity Zone by urban development, including numerous structures, ornamental vegetation, and a four-lane roadway (Sunset Boulevard). In the unlikely event of a fire emergency at the project site due to wildland fires, the Los Angeles County Fire Department, specifically Fire Station 7 (864 San Vicente Boulevard; 0.3 mile south of the project site) and Fire Station 8 (7643 Santa Monica Boulevard; 1.5 miles east of the project site), both located within the City, would provide fire protection services. Due to the urbanized nature of the area and the provision of nearby firefighting protection services, implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur, and this issue will not be further analyzed in the EIR.

## References

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## 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

#### Surface Water Quality

**Potentially Significant Impact.** Short-term construction activities for the proposed project would have some potential to affect the quality of stormwater discharged from the project site. Land disturbance activities could result in erosion and sedimentation, and spills or leaks of petroleum products used by construction equipment could also affect the quality of stormwater. However, the WHMC prohibits discharges to the stormdrain system of any fuel, chemical wastes, or other materials that have potential adverse impacts on water quality (Section 15.56.060). The WHMC also requires implementation of best management practices, which “shall be used in areas exposed to storm water for the removal and lawful disposal of all fuels, chemicals, fuel and chemical wastes, animal wastes, garbage, batteries, or other materials which have potential adverse impacts on water quality” (Section 15.56.070). Standard site management practices and typical equipment maintenance, in combination with implementation of WHMC requirements involving stormwater quality, would generally preclude leaks and spills of a magnitude that would adversely affect stormwater runoff. Construction-related water quality impacts can also occur if land disturbance activities result in erosion or sedimentation downstream. However, the WHMC has numerous requirements in place that would minimize and prevent sediments from contaminating stormwater runoff. These requirements include implementation of structural controls such as berms and plastic sheeting to minimize the escape of sediment and other pollutants; situating excavated soils in a manner that minimizes the amount of sediment that runs off site; and covering of any soil piles during the rainy season (Section 15.56.090).

Additionally, the City requires a Local Storm Water Pollution Prevention Plan (LSWPPP) and preparation of an Erosion Control Plan (ECP), which would be approved by and filed with the City. The LSWPPP and ECP would identify potential pollutant sources that may be associated with construction activity, identify non-stormwater discharges, and recommend means and methods to effectively prohibit the entry of pollutants into the public storm drain system during construction.

During operation, permanent post-construction stormwater management would be implemented per the LADPW Low Impact Development Standards Manual, and the City of West Hollywood Low Impact Development Standards. Low Impact Development (LID) is a stormwater management strategy with goals to address the impacts of increased runoff and storm water pollution as close to its source as possible. Per the latest LID guidelines new construction developments must treat storm water through infiltration, capture and reuse, or biofiltration. Considering the proposed development's subterranean footprint and the existing slope of the site, the required LID volume of stormwater runoff would be treated using biofiltration systems. Biofiltration systems would consist of hard bottom biofilters with layers of mulch, soil, and gravel which treat storm water through biofiltration before discharging it into the street or the storm drain main pipe in Sunset Boulevard. These biofiltration systems could be located on podium decks on a multi-level building, as long as they are designed to accept concentrated drainage from levels above. The anticipated biofiltration systems for the proposed project would either be planter box(s) or proprietary devices. Compliance with the County's LID Manual, City's LID Standards, and other WHMC requirements pertaining to stormwater and non-stormwater runoff would reduce potential impacts relative to water quality standards and waste discharge requirements. However, the EIR will include more in-depth hydrologic information and details on the potential impacts. As such, this issue will be further analyzed in the EIR.

#### **Groundwater Quality**

**Potentially Significant Impact.** According to the City's General Plan, the existing historic high groundwater level at the project site can be approximated at 20 feet below ground surface (City of West Hollywood 2011). Due to the depth of excavation reaching below the historic high groundwater level, dewatering operations would likely be required during construction of the subterranean levels of the proposed project. If this is the case, some groundwater would be removed during excavation.

Regarding groundwater quality, BMPs required by the City's LSWPPP guidelines and included in the project's ECP would include spill prevention and cleanup guidelines, dewatering operations guidelines, and stormwater run-on prevention. These BMPs would protect the groundwater from contamination by construction activities. During normal building operations, groundwater quality would be protected, as the entire site would be covered by the impervious basement floor and walls, preventing opportunity of pollutant intrusion into the groundwater system. Although BMPs would be implemented to protect groundwater quality, the EIR will include further analysis of this topic to provide additional detail and evaluation.

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

**Potentially Significant Impact.** The proposed project involves the demolition of existing commercial buildings, surface parking lots, and billboards and the construction of a new mixed-use hotel and residential building. Project implementation would incrementally increase water consumption. The EIR will quantify the project's anticipated water demand and will address whether the increased demand would be accommodated, as well as whether the additional water demand would affect groundwater supplies. The proposed project would not increase the imperviousness of the project site compared to the site's existing and developed condition such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As such, the proposed project would not interfere with groundwater recharge; however, further analysis pertaining to groundwater supplies will be provided in the EIR.

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

- i) *result in substantial erosion or siltation on or off site;*

**Less Than Significant Impact.** The project site does not contain any streams or rivers having the potential to be altered by the proposed project. The project site is fully developed with commercial buildings and surface parking. As discussed under Section 3.10(a), all construction activities would be required to comply with the City's water quality BMPs. No ground disturbance would occur during operation of the proposed project. Additionally, the project would be consistent with City and County LID standards (as described under Section 3.10(a)), ensuring that runoff from the site would be minimized to the extent feasible. As such, the proposed project would not have the potential to result in substantial erosion or siltation on or off site. Impacts related to erosion and siltation resulting from the proposed project would be less than significant. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The project site does not contain any streams or rivers having the potential to be altered by the proposed project. The project site is fully developed and within a highly urban area. As such, the proposed project would not result in the alteration of the course of a river or stream. As discussed under Section 3.10(a), the proposed project would be required to comply with the City's water quality BMPs, the County's LID Manual, and the City's LID standards. Through compliance with the stormwater management requirements described above, the proposed project would not result in substantial flooding on or off site. Impacts related to flooding resulting from the proposed project would be less than significant. This issue will not be further analyzed in the EIR.

- iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

**Potentially Significant Impact.** Under the existing conditions, stormwater runoff from the project site is conveyed via sheet flow and curb drains to the adjacent streets. The LADPW Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The existing site's peak flow generated from a 50-year storm event is approximately 3.16 cubic feet per second.

Stormwater from the project site would be conveyed in the same manner as the existing drainage. However, the proposed storm drain design would include capture and reuse systems or other approved BMPs in order to treat stormwater runoff as required by the LADPW and the City. The proposed development would also decrease the existing impervious area by adding planting and landscaping around the site and upper levels. The additional landscape area is insignificant for hydrology purposes, as the peak flow generated from a 50-year storm event will remain 3.14 cubic feet per second. Due to the additional stormwater treatment requirements and increase in landscape area, the proposed project is not expected to exceed the capacity of the existing stormwater drainage system or provide substantial sources of polluted runoff. Although there would not be an increase in impervious surfaces as a result of implementing the proposed project, further analysis and details regarding stormwater drainage will be provided in the EIR.

**iv) *impede or redirect flood flows?***

**No Impact.** The project site does not contain any streams or rivers having the potential to be altered by the proposed project. The project site is fully developed and within a highly urban area. Additionally, the project site is located outside of the 100-year flood hazard zone (FEMA 2008). As such, the proposed project would not impede or redirect flood flows. Therefore, no impacts associated with impeding or redirecting flood flows would occur. This issue will not be further analyzed in the EIR.

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

**No Impact.** As previously addressed in Section 3.10(c)(iv), the project site is located outside of a flood hazard zone. As such, hazards related to flooding at the project site would not be expected. Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The project site is located approximately 8.5 miles northeast of the Pacific Ocean at an elevation of approximately 1,000 feet above sea level. As such, the project area would not be susceptible to inundation by tsunami.

Seiches are oscillations generated in enclosed bodies of water, usually as a result of earthquake-related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. The Franklin Canyon Reservoir is located approximately 1.5 miles northwest of the project site. However, the distance and geographic boundaries between the project area and this body of water eliminates the risk of a seiche affecting the project area. Therefore, the proposed project would result in no impacts associated with the release of pollutants due to project inundation. This issue will not be further analyzed in the EIR.

**e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

**Potentially Significant Impact.** As previously addressed in Section 3.10(a), the proposed project would comply with the County's LID Manual, City's LID Standards, and other WHMC requirements pertaining to water quality. In addition, surface water would be conveyed to the public streets via roof downspouts and site area and podium drains, in a similar manner as existing conditions. The proposed storm drain design would include capture and reuse systems or other approved BMPs in order to treat storm water runoff as required by the LADPW and the City. As a result, the proposed project would not adversely affect downstream beneficial uses of surface waters.

The proposed project would increase demand for potable water supplies. The EIR will quantify the project's anticipated water demand and will address whether the increased demand would be accommodated, as well as whether the additional water demand would affect groundwater supplies. The proposed project would not increase the imperviousness of the project site, which could decrease groundwater recharge levels such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As such, the proposed project would not interfere with groundwater recharge; however, further analysis pertaining to groundwater supplies will be provided in the EIR.



## References

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## 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### a) *Would the project physically divide an established community?*

**No Impact.** Implementation of the proposed project would not physically divide an established community. The project site is located in a developed urban area and is currently developed with existing commercial buildings, surface parking lots, and billboards. The project site is bordered to the north, east, and west by existing roadways. While there are residential neighborhoods in the vicinity of the project area, no neighborhoods would be removed or divided as a result of the proposed project. The proposed project includes the demolition of existing buildings and the construction of a new mixed-use hotel and residential building. No new through streets are proposed, no streets are proposed to be closed, and all project development would be located within the project site. Therefore, the proposed project would not divide an established community, and no impacts would occur. This issue will not be further analyzed in the EIR.

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

**Potentially Significant Impact.** The proposed project would require City approval of an amendment to the SSP, major Conditional Use Permits (alcohol sales and consumption and nightclub use), an administrative permit, a vesting tentative tract map, and a sign permit. The specific plan amendment would permit greater height and density on the site than under the current regulations in the SSP. Further analysis that considers the proposed project's compliance with the applicable City land use regulations, General Plan Land Use Element policies, and the WHMC will be provided in the EIR.

## 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no oil, gas, geothermal, or other known wells within the project area (DOGGR 2019). The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the majority of the project site as Mineral Resources Zone 1 for aggregate resources, and a small portion of the northeast corner of the project site as Mineral Resources Zone 3. Mineral Resource Zone 1 is a designation given to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. Mineral Resources Zone 3 is a designation given to areas containing mineral deposits of which the significance cannot be determined (Division of Mines and Geology 1979). Because the project site is not mapped as or known to contain an important mineral resource, the proposed project would not have the potential to cause a loss in availability of a known mineral resource that would be of value to the region and the residents of the state. The project site is developed with existing commercial buildings, surface parking lots, and four billboards, and is surrounded by commercial properties that do not involve mineral extraction. As such, the project site does not support mineral extraction activities, nor would it be expected to support such activities in the future. Furthermore, the proposed project involves constructing a new mixed-use hotel and residential building. As such, the project would not involve land use changes that would affect availability of mineral resources at the site. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

**No Impact.** According to the City's General Plan EIR, there are no designated mineral resources zones in the City (City of West Hollywood 2010). Furthermore, as discussed in Section 3.12(a), no active oil wells exist within the project area. The proposed project involves constructing a new mixed-use hotel and residential building in place of existing commercial buildings and surface parking lots. As such, the project would not involve land use changes that would affect availability of mineral resources at the site. Therefore, the

proposed project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur, and this issue will not be further analyzed in the EIR.

## References

City of West Hollywood. 2010. *Final Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan* (State Clearinghouse No. 2009091124). Adopted October 2010.  
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## 3.13 Noise

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

Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Other metrics for measuring noise include the day-night average sound level (Ldn or DNL), which is the average noise level over a 24-hour period with a 10-dBA penalty for noise occurring during nighttime (10 p.m. to 7 a.m.) hours; and the Community Noise Equivalent Level (CNEL), which is the average sound level over a 24 hour period, with a penalty of 5 dB added between 7:00 p.m.

and 10:00 p.m. and a penalty of 10 dB added for the nighttime hours of 10:00 p.m. to 7:00 a.m.. Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor and the noise source reduces noise levels by about 5 dBA, while a solid wall or berm that breaks the line-of-sight reduces noise levels by 5 to 10 dBA. The construction style for dwelling units in California generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows (DOT 2006).

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses. The sensitive receptors closest to the project site are residential uses to the southwest of the project site (across San Vicente Boulevard), to the southeast (across Larrabee Street), and to the north (across Sunset Boulevard), while the London Hotel is immediately adjacent to the south.

The City of West Hollywood adopted the 2035 General Plan Safety and Noise Element in September 2011. The Noise Element provides a description of existing noise levels and sources and incorporates comprehensive goals, policies, and implementing actions. The Noise Element includes several policies on noise and acceptable noise levels. These policies address unnecessary, excessive, and annoying noise levels and sources such as vehicles, construction, special sources (e.g., radios, musical instrument, animals, etc.), and stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.). The Noise Element also establishes land use compatibility categories for community noise exposure. The maximum “normally acceptable” noise level for the exterior of residential areas is 60 dBA CNEL or Ldn. The maximum “normally acceptable” noise level for commercial and professional uses is 65 dBA CNEL or Ldn.

To implement the City’s noise policies, the City adopted a Noise Ordinance. The Noise Ordinance is part of the WHMC. The City of West Hollywood Noise Ordinance has no numerical standards but restricts unnecessary or excessive noise within the City limits. For example, the operation of any motor may not be audible at more than 50 feet from the source (Section 9.08.050[c]); loading and unloading activities are generally prohibited from 10:00 PM to 8:00 AM (Section 9.08.050[e]); and commercial activities may not be plainly audible at any residence between 10:00 PM and 8:00 AM (Section 9.08.050[k]).

The City has not adopted any thresholds or regulations addressing vibration. Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB).

The most common sources of noise in the project site vicinity are transportation-related, such as automobiles, trucks, buses, and motorcycles. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to areas sensitive to noise exposure.

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**Potentially Significant Impact.** Implementation of the proposed project would result in two primary types of potential noise impacts: short-term (i.e., temporary) noise during construction and long-term noise during operation. Residential uses exist to the southwest (across San Vicente Boulevard), to the southeast (across Larrabee Street), and to the north (across Sunset Boulevard), while the London Hotel is immediately adjacent to the south. These land uses could be impacted by noise from project construction and operation.

### **Construction Noise**

The City does not have quantitative construction noise standards. Rather, it prohibits construction from occurring between the hours of 7:00 p.m. and 8:00 a.m. on weekdays or at any time on Saturday (except between the hours of 8:00 a.m. and 7:00 p.m., interior construction is permissible); or at any time on Sunday or on a holiday (WHMC Section 9.08.050). In the event that Sunday construction is necessary, City Manager approval and an extended hours construction permit is required. Construction activities attributable to the proposed project would create intermittent elevated noise levels at and near the project site due to construction equipment, delivery of materials, construction worker trips, and construction personnel. Construction activities would be required to comply with the construction requirements in the City's Noise Control Ordinance. Nonetheless, further evaluation will be conducted to determine potential construction noise impacts at nearby noise-sensitive land uses. Therefore, this issue will be further analyzed in the EIR.

### **Operational Noise**

The proposed project would also be required to comply with standards for operational noise established in the City's Noise Control Ordinance and General Plan. Relevant standards include WHMC Section 9.08.040, which prohibits noises that are "so loud, prolonged and harsh as to be annoying to reasonable persons of ordinary sensitivity and to cause or contribute to the unreasonable discomfort or disturbance of any persons within the vicinity." Section 9.08.050 prohibits specific types of noises, including the following: amplified sound, radios, musical instruments, etc., that are audible at a distance of 25 feet or more from the source between the hours of 10:00 p.m. and 8:00 a.m.; sustained, continuous, or repeated operation of mechanical devices near a residential district; and, any electronically amplified signal intended for non-emergency purposes that makes noise for more than ten consecutive seconds in any hourly period. Section 9.08.060 exempts certain noise sources from the provisions of the Noise Control Ordinance. Relevant exempt noise sources include outdoor gatherings and shows, provided the events are conducted pursuant to a permit issued by the City Manager, and the operation of properly maintained mechanical equipment (such as air conditioning units) that are required by the Fire Code or the Building Code.

The General Plan Safety and Noise Element contains a table that outlines land use compatibility guidelines ("Table 10-2: Noise/Land Use Compatibility Matrix"). A project is considered compatible with the noise environment if the noise level generated by the project falls within specified ranges of community noise exposure (City of West Hollywood 2011). For residential land uses, a noise level of 50 to 60 Ldn or CNEL is considered normally acceptable, and a noise level of 60 to 70 Ldn or CNEL is considered conditionally acceptable. "Conditionally acceptable means that new construction or development can be undertaken only

after a detailed noise analysis is made and noise reduction measures are identified and included in the project design.” For commercial land uses, a noise level of 55 to 65 Ldn or CNEL is considered normally acceptable, and a noise level of 60 to 75 Ldn or CNEL is considered conditionally acceptable.

Operations of the proposed project may be periodically audible at adjacent uses. Noise sources that are typical of hotel, restaurant, and mixed-use developments include background music, rooftop ventilation, heating systems, trash hauling, vehicles entering/exiting the site including loading/delivery trucks, and outside conversation from guests and visitors. Increased vehicle trips on the roadway system could also increase local traffic noise levels. In addition, the proposed project would have usable outdoor area, private open space, and outdoor pools, which would increase noise from outdoor conversations, background music, or other sources of outdoor noise. The proposed project would be required to comply with applicable regulations of the WHMC and the City’s General Plan Safety and Noise Element. Nonetheless, as the proposed project would generate an increase in noise at the site during construction and operation, this issue will be further analyzed in the EIR.

**b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

**Potentially Significant Impact.** Operation of certain types of construction equipment can cause vibrations that spread through the ground and diminish in strength with distance. There are a variety of vibration-sensitive receptors within the vicinity of the project site, including residential uses to the southwest (across San Vicente Boulevard), to the southeast (across Larrabee Street), to the north (across Sunset Boulevard). Additionally, an existing hotel use is located adjacent to the project site’s southern boundary. The EIR will quantify the anticipated vibration that could be produced by the project and will evaluate potential impacts to nearby sensitive receptors. As such, this issue be further analyzed in the EIR.

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

**No Impact.** The nearest public airport to the project site is the Santa Monica Municipal Airport, located approximately 5.8 miles southwest of the project site. According to the Los Angeles County Airport Land Use Commission, the project site is located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2003). As such, the project site is not located within 2 miles of a public airport, and the project site is not located within an airport land use plan. Additionally, project site is not located within the vicinity of a private airstrip. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels related to aircraft use. No impacts would occur, and this issue will not be further analyzed in the EIR.

## References

- City of West Hollywood. 2011. *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed June 11, 2019. <http://www.weho.org/city-hall/download-documents/-folder-155>.
- DOT (U.S. Department of Transportation Federal Transit Administration, Office of Planning and Environment). 2006. FTA-VA-90-1003-06. Transit Noise and Vibration Impact Assessment. (Prepared under contract by Harris, Miller, Miller and Hanson). Burlington, MA. Accessed August 20, 2019. [transit.dot.gov/sites/fta.dot.gov/files/docs/FTA\\_Noise\\_and\\_Vibration\\_Manual.pdf](http://transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf).

Los Angeles County Airport Land Use Commission. 2003. Santa Monica Airport, Airport Influence Area. May 13, 2003. Accessed June 11, 2019. [http://planning.lacounty.gov/assets/upl/project/aluc\\_airport-santa-monica.pdf](http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf).

### 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Potentially Significant Impact.** The proposed project includes development of a 115-room hotel and 41 dwelling units (31 market-rate units and 10 income-restricted units) on a site currently occupied by one- and two-story commercial buildings. These uses would lead to an increase in the number of employees and residents at the project site that could alter the population, employment, and housing characteristics for the area through a change in land uses and an increase in the number of jobs available on site.

Using the Southern California Association of Government's average household size of 1.6 persons for the City of West Hollywood, the proposed dwelling units are expected to accommodate 66 residents (SCAG 2019). The proposed project would also involve the construction of a 115-room hotel, along with restaurants, lounges and retail, and a new nightclub space for the Viper Room. The housing and employment opportunities available as part of the proposed project could induce population growth to the area. Therefore, this issue will be further analyzed in the EIR.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**No Impact.** The project site is located in a developed urban area and is currently developed with existing commercial buildings, surface parking lots, and billboards. While there are residential neighborhoods in the vicinity of the project site, the project site does not contain any neighborhoods or housing units. As such, implementation of the proposed project would result in displacement people or housing. Therefore, no impacts would occur and this issue will not be further analyzed in the EIR.

## References

SCAG (Southern California Association of Governments). 2019. Profile of the City of West Hollywood. May 2019. Accessed June 11, 2019. <http://www.scag.ca.gov/Documents/WestHollywood.pdf>.

## 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

### *Fire protection?*

**Potentially Significant Impact.** Fire services in the City are provided by the Los Angeles County Fire Department. Two Los Angeles County Fire Department stations are located within the City: Fire Station 7, located approximately 0.3 mile south of the project site at 864 San Vicente Boulevard and Fire Station 8, located approximately 1.6 mile east of the project area at 7643 Santa Monica Boulevard (City of West Hollywood 2011).

As identified in Section 14.04.010 of the WHMC, the City has adopted the Los Angeles County Title 32 (Fire Code), an amended California Fire Code (2016 edition), and an amended International Fire Code (2015 edition). The proposed project would be required to comply with applicable Fire Codes. However, the proposed construction of the new hotel, residential uses, and commercial uses would generate an increase in intensity of uses on the project site, which may increase the number of service calls for fire protection. Therefore, this issue will be further analyzed in the EIR.



***Police protection?***

**Potentially Significant Impact.** The Los Angeles County Sheriff's Department contracts with the City to provide police protection. The City is served by the West Hollywood Sheriff's Station, located at 720 San Vicente Boulevard, approximately 0.6 mile south of the project site (City of West Hollywood 2011).

The proposed project would lead to an increase in the number of employees and residents at the project site, which could increase the number of service calls for police protection. Therefore, this issue will be further analyzed in the EIR.

***Schools?***

**Potentially Significant Impact.** The City is served by the Los Angeles Unified School District. The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause schools to be constructed or existing schools to be expanded. Because the proposed project has a residential component, this issue will be further examined in the EIR.

***Parks?***

**Less Than Significant Impact.** The proposed project would include recreational facilities and open space for project residents and hotel guests and, therefore, is not expected to result in the need for new or expanded recreational facilities. See Section 3.16 for further details. Impacts to recreational facilities would be less than significant, and this issue will not be further analyzed in the EIR.

***Other public facilities?***

**Potentially Significant Impact.** Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at the West Hollywood Public Library, which is within the County of Los Angeles Public Library system. The West Hollywood Public Library is located approximately 1.0 mile south of the project site at 625 San Vicente Boulevard. The residents, employees, and customers of the proposed project could use the local library services. Increased use of library services is particularly associated with an increase in residents. Because the proposed project has a residential component, this issue will be further examined in the EIR.

**References**

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. <https://www.weho.org/city-government/download-documents/-folder-155>.

### 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** The City contains six municipal parks totaling 15.31 acres. The nearest park facility to the project site is the West Hollywood Park & Dog Park, located approximately 0.6 miles south of the project site at 647 San Vicente Boulevard. Based on a current population of 36,723 residents, there are approximately 0.42 acres of parkland per 1,000 residents (SCAG 2019; City of West Hollywood 2011). The City's Parks and Open Space Background Report identifies that many cities throughout California use a standard of 3.0 acres of parkland per 1,000 residents as a benchmark for sufficient park space. The City's ratio of approximately 0.43 acres of parkland per 1,000 residents is well below this typical standard. As stated in the Parks and Open Space Background Report, the City is unlikely to significantly expand park property to meet this standard due to the City's size, the absence of vacant, undeveloped properties, and high land values (City of West Hollywood 2010). Therefore, the City will likely remain below typical parkland acreage standards. However, the City has developed a variety of methods for expanding open space and green space, such as creating open and active spaces on street medians, establishing innovative development agreements, and promoting community gardens. The proposed project would be consistent with these efforts, as it would incorporate a landscaped roof with publicly accessible terraces, rows of street trees, and private open space and recreational areas for residents and hotel patrons.

As previously discussed in Section 3.14, the residential portion of the proposed project is expected to accommodate approximately 66 people. Although residents could patronize existing neighborhood and regional parks, the residential portion of the proposed project would include approximately 7,854 square feet of common outdoor area and approximately 20,983 square feet of private outdoor area. Further, the proposed project would provide a landscaped roof with publicly accessible terraces that would be visible from Sunset Boulevard on the second level, which would provide an additional open space amenity. Similarly, the proposed mixed-use hotel would include a spa/gym, outdoor pools, restaurants, lounges and retail space, and a new nightclub space for the Viper Room, all of which would serve as on-site recreational facilities for hotel guests. Further, popular tourist activities in the City are commonly

entertainment-oriented, and tourists would likely remain in the vicinity of the hotel for recreational uses. It is not anticipated that hotel guests would travel to public parks outside of the project vicinity. For these reasons, development of the proposed project would not result in substantial deterioration of existing parks or recreational facilities, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The proposed project would include approximately 7,854 square feet of common outdoor area and approximately 20,983 square feet of private outdoor area for the residential portion of the project. Further, the proposed project would provide a landscaped roof with publicly accessible terraces that would be visible from Sunset Boulevard on the second level, which would provide an additional open space amenity. Additionally, the proposed mixed-use hotel would include a spa/gym, outdoor pools, restaurants, lounges and retail space, and a new nightclub space for the Viper Room, all of which would serve as on-site recreational facilities for the hotel guests. All recreational facilities associated with the proposed project would be developed on site and are evaluated as part of the proposed project. As described above, the proposed project would result in minor increases in demand on the City's recreational resources and is not expected to result in the need for expanded facilities or new facilities. Accordingly, impacts involving construction or expansion of recreational facilities would be less than significant. This issue will not be further analyzed in the EIR.

**References**

- City of West Hollywood. 2010. *Parks and Open Space Background Report – West Hollywood General Plan*. March 2010. Accessed June 21, 2019. <https://www.weho.org/city-government/boards-commissions/committees-and-task-forces/-folder-417>.
- City of West Hollywood. 2011. *West Hollywood General Plan 2035*. September 6, 2011. <https://www.weho.org/city-government/download-documents/-folder-155>.
- SCAG (Southern California Association of Governments). 2019. *Profile of the City of West Hollywood*. May 2019. Accessed June 11, 2019. <http://www.scag.ca.gov/Documents/WestHollywood.pdf>.

### 3.17 Transportation

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

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

**Potentially Significant Impact.** The proposed project includes the demolition of existing buildings and the construction of a new mixed-use hotel and residential building. Project-generated traffic during construction would include worker-related commuter trips, trucks used for delivering construction equipment, and trucks used for delivering and hauling construction materials and wastes. Project-generated traffic during operation would include employee-related vehicle trips, vehicle trips from restaurant and retail patrons, vehicle trips from hotel guests, vehicle trips associated with loading/delivery trucks, and vehicle trips from residents of the proposed 41 dwelling units. The trips generated as a result of the proposed project have the potential to conflict with City policies for the circulation system. As such, a traffic analysis will be prepared to analyze potential conflicts with applicable plans and policies addressing the circulation system. Therefore, this issue will be further analyzed in the EIR.

- b) ***Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

**Potentially Significant Impact.** CEQA Guidelines Section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts, facilitating a shift from the use of level of service (LOS) to evaluate traffic and transportation impacts. VMT is the amount and distance of automobile travel attributable to a project, while LOS is a measure of intersection and roadway operations based on vehicle delay and congestion. CEQA Guidelines Section 15064.3(b) describes specific considerations for evaluating the transportation impacts for several categories of development and is divided into subsections addressing land use projects, transportation projects, and projects warranting qualitative traffic analysis. For land use projects, Section 15064.3(b) states that “VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should

be presumed to cause a less than significant transportation impact.” As explained in Section 3.1, the project site is located within one-half mile of an existing major transit stop. However, the provisions of Section 15064.3 apply statewide beginning July 1, 2020. Until that time, a lead agency may elect whether its projects are governed by Section 15064.3. The City has not elected to be governed by Section 15064.3. As such, until July 1, 2020, projects in the City will be evaluated for their impacts on traffic and transportation based on the City’s LOS-based thresholds. The EIR will therefore contain a traffic and transportation study for the project that includes an impact analysis based on LOS.

- c) ***Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

**Potentially Significant Impact.** The proposed project involves ingress/egress locations for the parking garage along San Vicente Boulevard and Larrabee Street. As such, the proposed project would alter existing circulation leading to the project site and create new internal circulation patterns. The proposed project would also increase pedestrian activity in the area. As such, a traffic impact analysis will be conducted to analyze project site vehicular and pedestrian access, and this issue will be further analyzed in the EIR.

- d) ***Would the project result in inadequate emergency access?***

**Potentially Significant Impact.** Construction of the proposed project may involve activities that would have the potential to impede emergency access, such as temporary closure of travel lanes and generation of construction traffic affecting the capacity of adjacent roadways. The proposed project could also alter the ingress/egress and emergency access locations for the project site. Therefore, this issue will be further evaluated in the EIR.

### 3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

- i) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

**Potentially Significant Impact.** The project would involve ground-disturbing activities that would have the potential to disturb tribal cultural resources, in the event that any are present within the project site. Outreach to local tribes is currently being undertaken by the City. If any issues related to tribal cultural resources are identified as a result of the City's ongoing outreach activities, this issue will be further discussed in the EIR. If no tribal cultural resources are identified, no further analysis will be required.

- ii) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

**Potentially Significant Impact.** See the discussion in Section 3.18(a)(i).

### 3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Because the proposed project would represent an intensification of use on the project site compared to existing conditions, project operation would increase on-site wastewater generation and water use. Further analysis is required to calculate the wastewater generation and water demand that may be associated with the proposed project to determine the adequacy of existing wastewater and water facilities.

The proposed project would be required to comply with Chapter 15.56 and Chapter 19.20.190 of the WHMC. These sections require stormwater runoff to be minimized to the extent practicable. The proposed project would also be required to implement BMPs to reduce runoff. Although there would not be an increase in impervious surfaces as a result of the proposed project, additional analysis will be provided in the EIR relative to stormwater drainage.

The proposed project would increase the demand for electricity, natural gas, and telecommunication on the project site relative to existing conditions. Because the proposed project's demand for electric power, natural gas, and telecommunications would be greater than under existing site conditions as it would increase the total amount of development on the project site, new facilities may be required to provide these services to the site, the construction of which could cause environmental effects. As such, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** The proposed project would represent an intensification of uses on the project site compared to existing conditions, which would generate an increase in on-site water use. Further analysis will be presented in the EIR to determine the sufficiency of existing water supplies relative to anticipated project demands. Therefore, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** Because the proposed project would represent an intensification of use on the project site compared to existing conditions, project operation would increase on-site wastewater generation. Further analysis will be presented in the EIR to determine the sufficiency of existing wastewater treatment facilities relative to anticipated project demands. As such, this issue will be further analyzed in the EIR.

- d) ***Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

**Potentially Significant Impact.** The proposed project would intensify development on the project site compared to existing conditions, which would increase waste generation compared to existing conditions. While the proposed project would not be expected generate sufficient solid waste to impact regional landfill capacity, the EIR will study the proposed project's anticipated solid waste generation relative to landfill capacity and its consistency with applicable solid waste reduction standards and goals.

- e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

**Potentially Significant Impact.** Construction of the proposed project would result in the generation of solid waste such as demolition debris, scrap lumber, concrete, residual wastes, packing materials, and plastics. In accordance with City requirements, 80% of all demolition and construction materials would be recycled, and the applicant would prepare a Construction and Demolition Waste Management Plan to demonstrate compliance with this requirement (City of West Hollywood 2019). Compliance with this requirement would reduce the effect of the proposed construction activities on regional landfills. Operation of the proposed project would intensify development on the project site compared to existing conditions, and would likely be associated with increased generation of solid waste. Solid waste services would be provided by Athens Services, which has a Solid Waste Franchise Agreement with the City. Athens services is required to provide for recycling services, in compliance with Section 15.20.090 - Collection of Recyclables, set forth in the WHMC. It is expected that a substantial portion of the waste generated during operation of the proposed project would be recycled and that the proposed project would comply with all applicable federal, state, and local requirements involving solid waste. Nonetheless, the EIR will further characterize applicable solid waste management and reduction regulations and will present analysis to further demonstrate compliance.

## References

City of West Hollywood. 2019. Construction and Demolition Waste Management Plan Form. Construction and Development Information. Accessed June 11, 2019. <http://www.weho.org/city-hall/city-departments/public-works/environmental-services/construction-anddevelopment-information>.



## 3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

**Less Than Significant Impact.** According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone maps and the City's General Plan Safety Element, the northern portion of the City contains Fire Hazard Severity Zones (CAL FIRE 2019; City of West Hollywood 2011). The project site is not located within a designated Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone. The project site and surrounding area is characterized as developed, which would not facilitate the spread of wildfires compared to vegetated areas. Additionally, the proposed project, including the access driveways, would be reviewed and approved by the City and the Los Angeles County Fire Department, which contracts with the City to provide fire and emergency services. The proposed project would also be required to comply with all applicable codes and ordinances for emergency access. Therefore, the proposed project would provide for emergency access and would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

**No Impact.** The project site is not located within a Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone (CAL FIRE 2019). The project site is located within a highly urbanized setting and the land uses surrounding the project site are predominantly commercial and residential uses. To the north of the project site is the base of the Hollywood Hills, which is a Very High Fire Hazard Severity Zone. However, project construction consists of demolition and building in an area of existing development. As a result, no incising of hillslopes or degradation of slope stability would occur because of project construction. The project site and immediately surrounding area do not contain slopes typical of exacerbating wildfire risks.

According to the City's General Plan, the project site is not identified as an area having potential slope instability (City of West Hollywood 2011). The areas upslope of the project site are developed with existing commercial and residential uses. As such, the surrounding areas do not contain extensive amounts of vegetation or wildland fuel. Additionally, there is existing pavement within the areas between the project site and Very High Fire Hazard Severity Zones to the north, which would provide a fire break between the project site and any wildland fuels.

Therefore, it is not anticipated that the proposed project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur, and this issue will not be further analyzed in the EIR.

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

**No Impact.** As previously discussed, the project site is not located within a Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone (CAL FIRE 2019). The proposed project involves the demolition of existing buildings and the construction of a new mixed-use hotel and residential building. The project site is currently developed, and the new building would connect to existing utilities. The proposed project would not require the installation or maintenance of roads, fuel breaks, power lines, or other utilities that would exacerbate fire risk. No impact would occur, and this issue will not be further analyzed in the EIR.

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

**No Impact.** As previously discussed, the project site is not located within a Fire Hazard Severity Zone and is approximately 300 feet south of a Very High Fire Hazard Severity Zone (CAL FIRE 2019). The project site is currently paved and is developed with existing commercial buildings, surface parking lots, and billboards. Project construction consists of demolition and building in an area of existing development and infrastructure. As a result, no incising of hillslopes or degradation of slope stability would occur as a result of project construction. According to the City's General Plan, the project site is not identified as an area having potential slope instability (City of West Hollywood 2011). In addition, as discussed in Section

3.10, the project would decrease the existing impervious area by adding planting and landscaping around the site and upper levels of the proposed building. Since the project site is paved with existing development, it is unlikely that the project would expose people or structures to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur, and this issue will not be further analyzed in the EIR.

## References

CAL FIRE. 2019. "FHSZ Viewer." Accessed June 10, 2019. <http://egis.fire.ca.gov/FHSZ/>.

City of West Hollywood. 2011. West Hollywood General Plan 2035. September 6, 2011. <https://www.weho.org/city-government/download-documents/-folder-155>.

## 3.21 Mandatory Findings of Significance

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

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

**Potentially Significant Impact.** Based on this Initial Study, the proposed project is not expected to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, further cultural resource investigations are required and will be conducted in the EIR to determine any potential impacts that the proposed project would have on important examples of the major periods of California history or prehistory. Therefore, this issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As described throughout this Initial Study, the proposed project has potentially significant impacts requiring further analysis in an EIR for all environmental issue areas except for aesthetics, agriculture and forestry resources, biological resources, mineral resources, recreation, and wildfire. It is anticipated that the proposed project may be developed while other projects in the area are being developed, and the incremental effects of this project may be cumulatively considerable. Therefore, potential cumulative impacts resulting from project construction or operations have the potential to be significant and will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As detailed throughout this Initial Study, the proposed project could result in potentially significant impacts related to air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems. These impacts could have potentially adverse effects on human beings. As such, further analysis of these impacts will be provided in the EIR.

# 4 Preparers

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