City of West Hollywood

8555 Santa Monica Boulevard Mixed-Use Project

Draft Environmental Impact Report

October 2021

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Environmental Scientists Planners Engineers

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Draft
Environmental Impact Report

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EXECUTIVE SUMMARY

This section summarizes the characteristics of the proposed project and the project alternatives, the environmental impacts associated with the project and alternatives, and required and recommended mitigation measures.

PROJECT SYNOPSIS

Lead Agency

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Project Applicant

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Project Location

The project site is located at 8555 Santa Monica Boulevard in the City of West Hollywood. The project site encompasses 61,097 square feet (sf) (approximately 1.40 acres) and includes six parcels (APNs: 4339-005-009, 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, and 4339-005-025). Figure 2-1 in Section 2.0, *Project Description,* shows the location of the site within the region and Figure 2-2 shows the site location within West Hollywood.

Project Description

A detailed description of the proposed project is included in Section 2.0, *Project Description*. The key characteristics of the proposed project are summarized below.

Project Characteristics

The proposed project would involve the demolition of the three existing two-story commercial structures (approximately 27,338 square feet) as well as four existing one-story single-family residences and surface parking areas, and the construction of a mixed-use development on the same site (see Figure 2-7 in Section 2.0, Project Description). Detailed floor plans, building elevations and landscaping plans are provided in Appendix B. The proposed project would be 55 feet in height and would include 111 apartment units (17 of which would be designated as affordable housing), 3,938 sf of restaurant and cafe uses, 15,494 sf of live/work use (12 units), 14,488 sf of retail space, a 3,643 sf hair salon, and 6,711 sf of creative office space. Commercial uses would be on the first floor and partially on the second floor. Residential units would be on

levels 2, 3, 4, and 5. Apartment units would range in size between 410 and 1,721 square feet (not including patios and balconies).

The project also includes three levels of parking with 346 vehicle parking spaces (which is 10 spaces less than City requirements for the project) and 133 bicycle parking spaces. One level of the parking structure would be fully subterranean. The first floor and mezzanine parking levels would be partially subterranean.

Consistency with Zoning Ordinance and General Plan Requirements

The larger 42,164-square-foot portion of the project site is zoned and has a General Plan land use designation of CC1 and the smaller 18,933-square-foot portion of the project site is zoned and has a General Plan land use designation of R4B. The area zoned R4B would only contain residential uses and would not include the retail or restaurant uses associated with the project. Because the project spans numerous legal lots, a lot tie is required to hold the lots together as one parcel for the purpose of creating a single building site. The resulting building site would have split zoning which is allowed in the West Hollywood Zoning Ordinance.

The proposed project would meet the requirements of Senate Bill (SB) 1818 (California Government Code Section 65915 et seq.), the State law that provides for density bonuses and incentives for projects that include affordable housing, and the City of West Hollywood's inclusionary housing ordinance by providing at least 20% of the baseline units as affordable housing. The proposed project includes 94 market rate rental units and 17 affordable rental units (6 very low-income, 4 low income, and 7 moderate-income). Accordingly, the project is eligible for a density bonus.

The applicant is also seeking height and FAR bonuses based on the proposed mixed-use nature of the project in accordance with the Mixed-Use Development Overlay Zone, a FAR bonus for the provision of affordable housing pursuant to Section 19.22.050 of the West Hollywood Municipal Code and SB 1818, and a FAR bonus available to mixed-use projects that achieve a minimum of 90 points on the West Hollywood Green Building Point System Table.

Building Architecture and Design

The proposed building would be a contemporary style building. The building is designed to include a system of horizontal and vertical layers and a framing system intended to break up the building's massing and de-emphasize the building's height. Materials used for the building's façade would include concrete, phenolic wood panels, plaster, painted corrugated metal, and painted perforated metal screens.

Open Space

The proposed project includes common and private open space per City of West Hollywood Municipal Code requirements. In total, the proposed project would have the required 2,000 sf of common open space, with an additional 5,258 sf of open space, and approximately 22,483 sf of private open space. The first floor of the building would include an approximately 26-foot wide public plaza intended for planters and a water feature. Each residential unit would include a minimum of 120 square feet of open space either in the form of a patio or balcony. The second floor of the building (the first floor of the residential space) would include all 2,000 sf of

common open space that would consist of courtyards and other useable space. In addition, the roof top would include a roof deck, pool, spa, and sundeck.

Landscaping

The proposed project would include landscaping along the building façade of Santa Monica Boulevard, on the sidewalks along Santa Monica Boulevard and West Knoll Drive, in the proposed first-floor plaza, in common open space areas, and on the roof. The eight existing Chinese Elm parkway (the space between the sidewalk and the street) trees along Santa Monica Boulevard would remain. Seven of the eight existing parkway trees and four existing parkway palm trees along West Knoll Drive would remain. Eight additional street trees (*Ulmus parviflora*) would be planted along Santa Monica Boulevard. Two trees on the sidewalk along West Knoll Drive would be removed in order to make space for the driveway entrance. One additional parkwaytree would be planted along West Knoll Drive that would match the existing trees. The proposed project would involve a "green" or "sustainable" roof with solar panels covering a portion of the roof top as well as landscaped areas, a roof deck, pool, spa, and sundeck.

Site landscaping would include climate-appropriate, drought-tolerant and native plants such as Aloe Vera, Nyalla Mat Rush (an ornamental grass), Ceanothus, Deer Grass, and Rebud trees.

Site Access, Parking, and Loading Areas

Vehicular site access would be provided by two driveways - one driveway on Santa Monica Boulevard and one on West Knoll Drive (see Appendix B, site plans and elevations for depictions of driveways, site access, parking areas, and loading areas). Primary commercial access to the project site would be from Santa Monica Boulevard and residential access would be both from Santa Monica Boulevard and West Knoll Drive. The Santa Monica Boulevard driveway would be approximately 232 feet west of West Knoll Drive and the West Knoll driveway would be approximately 111 feet north of Santa Monica Boulevard. The driveways would serve both inbound and outbound traffic. Both driveways would be right-turn-out only driveways and both driveways would allow both left and right turns into the project site.

Parking would be provided on three levels: the subterranean level, first level, and mezzanine level. All parking areas would be enclosed. The subterranean level would include a waterproofing system which would prevent water intrusion into the building. The first level would provide 82 total parking spaces. This would include 19 single parking stalls for commercial uses, 4 parking stalls in tandem for commercial uses, 1 single parking stall for residentail uses, and 58 parking stalls in tandem for live/work and residential uses. The subterranean level would provide 176 total parking spaces. This would include 94 parking stalls (54 single stalls and 40 stalls in tandem) for commercial uses (including 6 ADA), and 82 parking stalls (20 single stalls and 62 stalls in tandem) for residential uses (including 1 ADA). A roll-up gate would prevent commercial parking in the residential parking area. The mezzanine level would provide residential parking only and would include 88 parking stalls (26 single stalls and 62 stalls in tandem) including 3 ADA-accessible spaces. This level would be accessed by the driveway on West Knoll Drive. The mezzanine level is in between the first floor and second floor.

The loading area, serving all uses on the project site, would be accessed from Santa Monica Boulevard. Trucks would enter the Santa Monica Boulevard driveway and then go straight into the loading area.

Utilities

Electricity would be provided by Southern California Edison, solid waste and wastewater service would be provided by the City of West Hollywood, water service would be provided by the Los Angeles Department of Water and Power. The proposed project would connect to existing sewer and water lines in Santa Monica Boulevard, West Knoll Drive, and on the north side of the property.

The proposed project would involve bio-treatment best management practices (BMP) in order to meet the City's Low Impact Development (LID) requirements. The proposed project includes raised planters and landscaped areas (mentioned previously) that would be designed to treat stormwater runoff. Stormwater runoff from upper floors would be diverted to the second-floor and third-floor planters and the landscaped area in the northern part of the project site and along West Knoll Drive for filtration. Runoff would be diverted to existing storm drain facilities along West Knoll Drive and Santa Monica Boulevard.

Green Building Features

The proposed project includes solar panels, would use energy- and water-efficient systems and incorporates environmentally-friendly materials in order to conform to the City of West Hollywood's Green Building Program. The proposed project would include drought-tolerant landscaping.

Grading and Construction

Project construction is estimated to last approximately 23 months. The proposed project would require the export of approximately 77,000 cubic yards of earth material. Assuming an average truck load of 15 cubic yards, approximately 5,134 round trip truckloads would be needed to export the material. In addition, approximately 376 round-trip hauling trips would be needed to remove demolition debris. Hauling associated with demolition and excavation is estimated to occur over a period of approximately five months.

Project Objectives

The objectives of the proposed project are to:

- *Provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing core of nearby community facilities, employment centers, retail goods and services, and restaurants to enhance the area's overall urban character.*
- *To provide rental housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low, and moderate-income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock.*
- *Develop the site in accordance with the City of West Hollywood policies and designations while furthering the goals and objectives of the General Plan.*

- *Create a consistent pattern of development and uses along Santa Monica Boulevard that serve project residents and the surrounding community by redeveloping an underutilized site.*
- *Create a modern, high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area.*
- *Enhance pedestrian activity along Santa Monica Boulevard by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*
- *Provide housing and retail near alternative means of transportation, and provide sufficient on-site parking for the project.*
- *Expand the economic base of the City, maintain economic vitality, and foster the City's fiscal health by, among other things, providing for commercial and retail activities which generate substantial sales and property tax revenue.*
- *Promote the efficient use of water and energy through incorporation of water and energy conservation measures.*

ALTERNATIVES

As required by CEQA, the EIR examines a range of alternatives to the proposed project. The alternatives, described and evaluated in Section 6.0, include the following:

- *Alternative 1: No Project*
- *Alternative 2: Base Zoning (No Housing and Affordable Housing or Mixed Use Bonus)*
- *Alternative 3: Reduced Density Project (No Affordable Housing Bonus on CC1 Lot)*
- *Alternative 4: Boutique Hotel*
- *Alternative 5: No Subterranean Parking*

The No Project Alternative would be the overall environmentally superior alternative, but would not achieve the basic project objectives. Among the development options, Alternative 2 (Existing Zoning – *No Affordable Housing or Mixed-Use Bonus on CC1 lots*) and Alternative 3 (Reduced Density – *No Affordable Housing on CC1 lots*)would be environmentally superior to the proposed project. These alternatives would involve slightly lower air pollutant and GHG emissions, and wastewater generation than the proposed project. Nonetheless, these impacts would remain less than significant, the same as the proposed project. These alternatives would not avoid the significant and unavoidable construction noise impact. Alternatives 2 and 3 would meet some of the objectives of the proposed project but not to the same extent as the proposed project.

SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Table ES-1 summarizes the identified environmental impacts for each issue area studied in the EIR, recommended mitigation measures (if any), and the level of significance after mitigation. Class I impacts are defined as significant, unavoidable adverse impacts which require a statement of overriding considerations to be issued per CEQA Guidelines § 15093 if the project is approved. Class II impacts are significant adverse impacts that can be feasibly mitigated to less than significant levels and which require findings to be made under Section 15091 of the State CEQA Guidelines. Class III impacts are considered less than significant impacts. Class IV impacts are those for which the project's impact would be beneficial.

Table ES-1
Summary of Significant Environmental Impacts,
Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
AIR QUALITY		
Impact AQ-1 Project construction would generate temporary increases in localized air pollutant emissions. Such emissions may result in temporary adverse impacts to local air quality, but are below SCAQMD thresholds. Therefore, air quality impacts associated with construction activities would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact AQ-2 Operation of the proposed project would generate air pollutant emissions, but emissions would not exceed SCAQMD operational significance thresholds. Therefore, long-term regional air quality impacts would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact AQ-3 Population growth generated by the project would be consistent with the assumptions of the 2016 AQMP. Furthermore, the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. Therefore, impacts related to consistency with the AQMP would be Class III, less than significant.	None required.	Less than signifcant without mitigation.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
BIOLOGICAL RESOURCES		
Would the proejct 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? Impacts would be Class II, significant but mitigable. *(See Initial Study, Appendix A).*	**BIO-1 Nesting/Breeding Native Bird Protection.** To avoid impacts to nesting birds, including birds protected under the Migratory Bird Treaty Act, all initial ground disturbing activities shall be limited to the time period between August 31 and January 31 (i.e., outside the nesting season) if feasible. If initial site disturbance, grading, and vegetation removal cannot be conducted during this time period, a pre-construction survey for active nests within the project site shall be conducted by a qualified biologist at the site no more than two weeks prior to any construction activities. If active nests are identified, species specific exclusion buffers shall be determined by the biologist, and construction timing and location adjusted accordingly. The buffer shall be adhered to until the adults and young are no longer reliant on the nest site, as determined by the biologist. Limits of construction to avoid a nest shall be established in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area.	Less than significant.
CULTURAL RESOURCES		
Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? Impacts would be Class II, significant but mitigable. *(See Initial Study, Appendix A).*	**CR-1 Unanticipated Discovery of Cultural Resources.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find, the archaeologist may simply record the find and allow work to continue. If the qualified archaeologist determines that the discovery is significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, and/or data recovery may be warranted at the discretion of the qualified archaeologist.	Less than significant.
GEOLOGY AND HYDROLOGY		
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Impacts would be Class II, significant but mitigable. *(See Initial Study, Appendix A).*	**GS-1 Paleontological Resources Monitoring.** Prior to the commencement of project construction, a Qualified Paleontologist shall be retained to conduct paleontological monitoring during ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) of previously undisturbed geologic units determined to have a high paleontological sensitivity. Ground-disturbing activities of previously undisturbed areas within the project site shall be monitored on a full-time basis (i.e., all excavations in undisturbed areas underlain by Qae and excavations exceeding 10 feet bgs within undisturbed areas underlain by Qa). Monitoring shall be supervised by the Qualified	Less than significant.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
	Paleontologist and shall be conducted by a qualified paleontological monitor. The duration and timing of the monitoring shall be determined by the Qualified Paleontologist. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or may recommend that monitoring cease entirely. Monitoring shall be reinstated if any new ground disturbances of previously undisturbed areas are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time. If a paleontological resource is discovered, the monitor shall have the authority to temporarily divert construction equipment around the find until it is assessed for scientific significance and collected. Once salvaged, significant fossils shall be prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the NHMLAC and UCMP). Curation fees are the responsibility of the project owner. A final report shall be prepared describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.	
Impact GEO-1 Seismically-induced ground shaking could cause liquefiable sediments to lose supporting strength and liquefy, resulting in loss of property or risk to human health and safety. The geotechnical evaluation performed for the proposed project includes mitigation measures to prevent soil-related hazards from adversely affecting the proposed structure. In addition, the proposed project would be required to comply with California Building Code (CBC) requirements. Impacts would be Class II, less than significant with mitigation incorporated.	**GEO-1 Geotechnical Design Considerations.** The following foundation design considerations related to soil engineering, which are also included in Section 7.1 of the 2018 geotechnical report prepared by GeoDesign, Inc., must be incorporated into the proposed project grading and building plans, revised as needed for compliance with current California Building Code (CBC). Design and construction of the building shall be engineered to withstand the expected ground acceleration and potential liquefaction that may occur at this site. These include, but are not limited to: • Foundation Design. The proposed structure shall be supported on a mat foundation system established in the underlying dense to very dense native soils at the site at the planned foundation bottom level (approximately 223 feet above MSL). Mat foundations shall be established at least three feet below the lowest adjacent grade or top of floor slab and designed using an allowable bearing pressure of 7,500 pounds per square foot and a subgrade	Less than signifcant.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
	modulus of reaction equivalent to 100 pounds per square inch. Lateral loading must be designed to withstand a passive pressure of 300 pounds per square foot per foot of embedment where the concrete is put directly against the undisturbed native dense soils. A coefficient of friction of 0.4 shall be used to calculate resistance to sliding for footings bearing on native soils. The lateral bearing pressure described in the geotechnical report takes into consideration the hydrostatic pressure generated if the groundwater table rises to its historic high. Any changes to the building or foundation design that result in changes to the foundation load shall be provided to a City-approved geotechnical engineer for their evaluation and approval. Further, the construction shall comply with applicable provisions of the current CBC. The design of the foundation shall be reviewed and approved by the City Engineer prior to the issuance of the building permit.	
Impact GEO-2 The proposed project would require excavation into an existing hillside. Landslides or slope failure could occur. With implementation of mitigation measures contained in the geotechnical report and mandatory compliance with CBC requirements, impacts would be Class II, less than significant with mitigation incorporated.	**GEO-2 Geotechnical Recommendations for Foundation Construction.** The applicant shall comply with all recommendations contained in the 2018 geotechnical report prepared for the project by GeoDesign, Inc. These include, but are not limited to, the following: • Shoring Design. All recommendations presented in the geotechnical report pertaining to the shoring design considerations shall be followed. Soldier piles, lagging, and tie backs shall be designed to withstand the earth pressure resulting from adjacent soils, traffic loading, and temporary equipment used to excavate the slopes and drive the shoring. For soldier piles driven below the groundwater table, special provisions shall be followed to ensure that caving is minimized. The shoring contractor shall provide its design to a City-approved geotechnical engineer for review and comment prior to commencement of shoring. Lagging deflection and tie back resistance strength shall be measured in the field to ensure that these features are able to withstand the earth pressures that they will undergo. • Foundation Observations. All foundation excavations shall be observed by a City-approved geotechnical engineer to verify penetration into the recommended bearing materials. The observation shall be performed prior to the placement of reinforcement. All foundation pile excavations shall be performed under the continuous observation by City-approved geotechnical engineer to verify penetration into firm undisturbed natural soils. Foundations shall be deepened if necessary to extend into	Less than significant.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
	satisfactory soils, or proper compaction shall be performed to ensure that the foundation slab is built upon dense compact material. Foundation excavations shall be cleaned of all loose soils prior to placing steel and concrete. Any required foundation backfill shall be mechanically compacted, flooding is not permitted. • Construction Monitoring. Compliance with the design concepts, specifications or recommendations during construction requires review by City-approved geotechnical engineer. All foundations shall be observed by a city-approved geotechnical engineer prior to placing concrete or steel. Any fill which is placed shall be observed, tested, and verified if used for engineering purposes. It is the responsibility of the contractor to ensure that all excavations and trenches are properly sloped or shored. All temporary excavations shall be cut and maintained in accordance with applicable OSHA rules and regulations. Recommendations contained in the geotechnical report shall be reviewed and approved by the Community Development Department and incorporated into final grading and structural design plans, as deemed appropriate by the Community Development Department. In addition, all onsite structures shall be required to comply with applicable provisions of the California Building Code.	
Impact GEO-3 The lowest proposed finished floor level of the structure would be located approximately at the historic high groundwater level and provisions to resist resulting hydrostatic pressures would be required. Permanent dewatering is not required, but waterproofing will be required. Temporary dewatering may be needed during construction, which could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. However, with implementation of mitigation measures, impacts would be Class II, less than significant with mitigation incorporated.	**GEO-3(a) Groundwater Monitoring.** A groundwater well shall be installed at the project site prior to construction to determine the location of groundwater. If groundwater would be encountered during construction and dewatering would be needed, than Mitigation Measure GEO-3(b) would be required. **GEO-3(b) Dewatering Plan.** If dewatering occurs during construction then a dewatering plan shall be prepared by the applicant and presented to the City Engineer for review and approval. The dewatering plan shall identify the groundwater flow rate, groundwater capture zone, means of discharge of groundwater, and procedures for monitoring discharges. Proper permits for the discharge of the water shall be obtained and approved by the appropriate regulatory oversight agency and included in the dewatering plan. If contaminated groundwater is encountered during dewatering, then contaminated groundwater shall be managed in accordance with applicable regulatory requirements, including the requirements in Section 9.70.040 of the WHMC and Regional Water Quality Control Board Groundwater Permit requirements. The dewatering plan shall describe the operation and maintenance tasks to be performed and identify who	Less than signifcant.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
	will be responsible for the operation, maintenance, and permit compliance obligations. If the discharge of groundwater is to be done through the sanitary sewer, then the proper connections to the sewer shall be designed and depicted on the plans. If the groundwater is to be discharged into the storm drain, all pipes and pumps shall be properly designed to manage the expected maximum flows and shall meet all construction requirements of the City of West Hollywood. Backup systems, if required, shall be included on the plans. A sufficient amount of area near the dewatering system shall be allocated in case filtration of contaminated groundwater is required after groundwater dewatering commences.	
GREENHOUSE GAS EMISSIONS		
Impact GHG-1 Construction and operation of the anticipated mixed-use residential-commercial development would generate temporary and long-term increases in GHG emissions. However, these emissions would be below the project-specific efficiency threshold based on the State Scoping Plan and would not be deemed to cause a significant contribution to global climate change. Therefore, no mitigation measures are required. The impact would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact GHG-2 The proposed mixed-use project would be consistent with the statewide goals for GHG emissions reduction, as embodied in AB 32, SB 32 and SB 375, as well as the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the 2017 State Scoping Plan and the City of West Hollywood Climate Action Plan. Therefore, the impact related to consistency with applicable GHG plans and policies would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
LAND USE AND PLANNING		
Impact LU-1 The proposed project would be consistent with the City's General Plan and Zoning Ordinance. Impacts related to consistency with plans, policies, and regulations would therefore be Class III, less than significant.	None required.	Less than signifcant without mitigation.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
NOISE		
Impact N-1 Project construction would intermittently generate high noise levels on and adjacent to the site. This would affect existing noise-sensitive receptors near the project site. This impact would be Class I, significant and unavoidable.	**N-1(a) Noise Complaints.** A sign shall be provided at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager shall respond to and investigate noise complaints and take corrective action if necessary in a timely manner. The sign shall have a minimum dimension of 48 inches wide by 24 inches high. The sign shall be placed 5 feet above ground level. **N-1(b) Noise Measurements.** If a noise complaint(s) is registered, the contractor shall retain a City-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint within one week of the registered complaint. The noise measurements shall be conducted for a minimum of one hour and shall include one-minute intervals. The consultant shall prepare a letter report summarizing the measurements and potential measures to reduce noise levels to the maximum extent feasible. The letter report shall include all measurement and calculation data used in determining impacts and resolutions, such as the construction of temporary sound barriers. The letter report shall be provided to code enforcement for determining adequacy and recommendations, as well potential revocation of construction permits if measures are inadequate. **N-1(c) Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities. **N-1(d) Construction Notice.** Two weeks prior to the commencement of construction at the project site, notification shall be provided to the owners and tenants of residential properties located along West Knoll Drive between Santa Monica Boulevard and Westmount Drive, and the manager of the Ramada Plaza Hotel, disclosing the planned construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. This notification shall also provide a contact name and phone number for residents to call for construction noise related complaints. All reasonable concerns shall be rectified within 24 hours of receipt. **N-1(e) Equipment Idling.** Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use. **N-1(f) Workers' Radios**. All noise from workers' radios	Significant and unavoidable with implementation of mitigation.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
	shall be controlled to a point that they are not audible at sensitive receptors near construction activity. **N-1(g) Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.	
Impact N-2 Project construction would intermittently generate groundborne vibration on and adjacent to the site. However, vibration felt at nearby structures would not exceed applicable thresholds. Therefore, impacts would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact N-3 Project-generated traffic has the potential to increase traffic-related noise on study area roadway segments under existing plus project and future plus project conditions. However, the change in noise levels would not exceed applicable thresholds. Therefore, the effect of increased traffic noise on existing uses would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact N-4 Noise generated by existing traffic near the project site could expose new sensitive receptors to noise levels that exceed City standards. With compliance with California Building Code requirements, impacts would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact N-5 On-site activities associated with project operation would generate noise levels that may periodically be audible to existing uses near the project site. On-site noise sources include stationary equipment such as rooftop ventilation and heating systems, a generator, deliveries, trash hauling, general retail and restaurant activities, and rooftop conversational noise. Generator noise would exceed noise standards at adjacent residents and impacts would be Class II, less than significant with mitigation incorporated.	**N-5 Generator Shielding.** The applicant shall install an acoustical enclosure around the generator, with noise reduction higher than a Level 1 acoustical enclosure, and/or rooftop screening to ensure that generator noise meets the City's noise standards. The acoustical enclosure and/or shall provide at least 4 dBA of noise reduction and shall block the line of sight between the generator and adjacent multi-family residential building west of the project site.	Less than signifcant.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
TRANSPORTATION AND CIRCULATION		
Impact T-1 The proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact T-2 The proposed project would meet the VMT screening criteria and would not meet the VMT exclusion criteria. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts to VMT would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
Impact T-3 The proposed project would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be Class III, less than significant.	None required.	Less than signifcant without mitigation.
TRIBAL CULTURAL RESOURCES		
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is (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 (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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? Impacts would be Class II, less than significant with mitigation incorporated.	**TCR-1 Unanticipated Discovery of Tribal Cultural Resources.** In the event that Traditional Cultural Resources and/or unique archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, and/or data recovery may be warranted. Treatment of any such resources shall be completed in consulting with the consulting tribes for the project.	Less than signifcant.

Table ES-1
Summary of Significant Environmental Impacts, Mitigation Measures and Residual Impacts

Impact	Mitigation Measures	Significance After Mitigation
UTILITIES		
Impact UTIL-1 The proposed project would generate an estimated 18,299 gallons of wastewater per day above existing conditions. The existing main sewer line along Santa Monica Boulevard and the Hyperion Treatment Plant has sufficient capacity to accommodate this increase in wastewater. Therefore, impacts would be Class III, less than significant.	None required.	Less than signifcant without mitigation.

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1.0 INTRODUCTION

This document is a Recirculated Draft Environmental Impact Report (EIR) for the proposed mixed-use project located at 8555 Santa Monica Boulevard. Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a), the City of West Hollywood is required to recirculate a Draft Environmental Impact Report (EIR) when significant new information is added to the Draft EIR after public review of the Draft EIR, but before certification. Significant new information can include changes in the project or environmental setting, as well as additional data or other information. New information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project's proponents have declined to implement.

The City prepared a Draft EIR for the project that was circulated for public review from July 29, 2017 to August 21, 2017. The EIR was not certified. Since the time of circulation, the project site has been expanded to include an adjacent single-family residential property at 8552 West Knoll Drive, adjacent to the existing project site. In addition, Senate Bill (SB) 743 eliminated level of service (LOS) as a basis for determining significant transportation impacts, effective July 1, 2020, and in November 2020 the City adopted new Guidelines to measure transportation impacts under CEQA based on the vehicle miles traveled (VMT). The City has determined that the changes to the project and the new VMT guidelines constitute significant new information such that recirculation of the Draft EIR is required.

This section discusses: (1) the environmental impact report background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) issues found not to be significant; (5) lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA). The proposed project is described in detail in Section 2.0, *Project Description*.

1.1 ENVIRONMENTAL IMPACT REPORT BACKGROUND

A Notice of Preparation (NOP) of an environmental impact report was distributed for a 30-day agency and public review period, along with an Initial Study, on April 12, 2013. The Initial Study concluded that the proposed project may have significant environmental impacts and that the City would prepare an EIR to address these impacts. The City held an EIR Scoping Meeting on April 22, 2013, at West Hollywood City Hall. Approximately 35 people attended the Scoping Meeting and the City received 20 letters in response to the NOP. The letters are listed and their content summarized in Table 1-1. At that time, issues brought up at the scoping meeting and in the scoping comment letters did not identify additional issue areas requiring EIR analysis beyond those previously identified in the Initial Study.

Table 1-1
Scoping Comments Received - April-May 2013

Subject	Where Subject is Addressed in EIR
Aesthetics • Compatibility of scale, character, and height of building with neighborhood • Consistency with the West Hollywood streetscape plan. • Loss of scenic view of Hollywood Hills • Shade/shadow/solar access	See Initial Study, Section I, *Aesthetics* (Appendix A), Section 1.0, *Introduction*
Air Quality • Odors from restaurants, • Odors from smoking and barbequing on residential balconies • Construction and operational emissions • CO exhaust from enclosed parking areas • Emissions from hauling trucks	See Initial Study, Section III, *Air Quality* (Appendix A) and Section 4.1, *Air Quality*
Geology/Hydrology • Geologic and hydrologic hazards at neighboring properties • High water table and water pumping • Earth movement from subterranean parking • Expansive soils • Subsidence and sink holes from groundwater removal • Earthquake and landslide	See Initial Study Sections VI, Geology and Soils, and IX, Hydrology and Water Quality (Appendix A), and Section 4.2, Geology and Hydrology
Land Use • Compatibility of Transit Overlay District • Compatibility with lot zoned as residential with project	See Initial Study, Section X, *Land Use and Planning* (Appendix A) and Section 4.4, Land Use and Planning
Noise • Construction equipment vibration • Noise from residential balconies and restaurants • Construction noise • Noise from mechanical systems on roof	See Initial Study, Section XII, *Noise* (Appendix A) and Section 4.5, *Noise*
Population and Housing • Doubling size of neighborhood	See Initial Study, Section XIII, *Population and Housing* (Appendix A)
Transportation/Circulation • Increased congestion • Traffic safety • General site access • Commercial vehicle access/loading/unloading • Emergency Access • Construction staging • Pedestrian safety • Parking • Connectivity to transit	See Section 4.6, *Transportation and Circulation*
Utilities and Service Systems/Public Services • Landfills in LA County are closing, solid waste impacts • Wastewater generated by the project • Runoff from the project site • Fire and police protection	See Initial Study, Section XVII, *Utilities and Service Systems* (Appendix A) and Section 4.7, *Utilities and Service Systems*
Cumulative impacts	Cumulative impacts are discussed at the end of each subsection of Section 4.0, *Environmental Impact Analysis*

In 2016, the applicant added two residential lots to the project site (8538 and 8546 West Knoll) and revised the proposed project, also incorporating modifications to design, height, setbacks, and driveways based onneighborhood and the City of West Hollywood Design Review Subcommittee input. Thisproject was analyzed in the Draft EIR that was circulated to the public for review in 2017, asdiscussed on page 1-1. Compared to the original proposal, the revised project analyzed in theDraft EIR reduced the amount of restaurant and retail space (from 6,720 square feet and 27,840square to 2,820 square feet and 15,678 square feet respectively), increased the number oflive/work units (from five to twelve), added creative office space (6,079 square feet), added a3,718 square foot hair salon, and reduced the number of driveways on West Knoll Drive fromtwo to one. The 2016 revised project also increased the number of apartment units from 95 unitsto 97 units.

A second scoping meeting was held on August 22, 2016 to review the revised project with community members. Approximately 25 people attended the meeting and six filled out comment cards. The comments/questions received for the project during this meeting are summarized in Table 1- 2.

Table 1-2
Scoping Comments Received - August 2016

Subject	Where Subject is Addressed in EIR
Aesthetics • Building height? Will the building be taller than the Ramada? • Loss of natural light and sunlight • Light/glare generated by project	Specific height details are provided in Section 2.0, *Project Description*, and the potential impact associated with the building height is discussed in Section 4.4, *Land Use and Planning*. In addition, as discussed in Section I, *Aesthetics* in the Initial Study (Appendix A), the project is a mixed-use project on an infill site in a transit priority area. According to Senate Bill (SB) 743, "aesthetics… impacts of a residential, mixed-use, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Therefore, the EIR does not include an analysis of potential aesthetic impacts. Nonetheless, based on these comments, the potential loss of sunlight/solar access is discussed below in Section 1.4.1. In addition, the architectural features and mass and scale of the project were evaluated through the City's design review process.
Air Quality • AQ emissions from construction • Vehicle/long-term AQ emissions, diesel particulates emissions	See Section 4.1, *Air Quality*.
Biological Resources • Concern about loss of tree canopy • Impacts to trees/landscaping from mold due to insufficient drainage	See Section 4.4, *Land Use and Planning,* regarding the loss of tree canopy. See Section IX, *Hydrology and Water Quality,* in the Initial Study (Appendix A) regarding potential impacts to trees/landscaping.
Geology/Hydrology • Site development may cause hydrologic changes that would affect downgradient properties (south of Santa Monica Blvd) • Liquefaction/subsidence • Settlement at neighboring properties due to excavation, there are already subsidence issues • Impact to landscape on properties due to loss of groundwater	See Section 4.2, *Geology and Hydrology*.

Table 1-2
Scoping Comments Received - August 2016

Subject	Where Subject is Addressed in EIR
Greenhouse Gas • What criteria are used to define the proposed project as a "green building"? • Need to consider the State requirement for Zero Net Energy measures and consider effects of loss of sunlight/solar access at neighboring properties.	See Sections 2, *Project Description*, and 4.3, *Greenhouse Gas Emissions* regarding the project's compliance with the City's Green Building Ordinance. The City is working on developing a program and policies to implement the State's Zero Net Energy (ZNE) goals; however, no requirements are currently in place. In addition, it is anticipated that the ZNE program and policies will apply to new residential construction consisting of single-family homes and multifamily developments of three stories or less. As such, the proposed project would not fall within this parameter. The potential loss of sunlight/solar access is discussed below in Section 1.4.1,
Hydrology • Concern about loss of percolation • What happens to the displaced water that is pushed around the building onto neighboring properties?	See Section IX, *Hydrology and Water Quality,* in the Initial Study (Appendix A).
Land Use and Planning • Concern about loss of green space • How do two new lots translate into the increase of units/sf • How does height/setbacks compare to neighboring properties/neighborhood compatibility?	See Section 4.4, *Land Use and Planning*.
Transportation/Circulation • Accessing SM Blvd is already difficult • Impacts of moving vans/trash vehicles • West Knoll is a bottleneck, cars parked on both sides of the street • Left turns onto SM Blvd from La Cienega are difficult, and there's a short signal • Holloway traffic will worsen/already long queues, potential accident hazard • Concern about increased traffic, including from other nearby projects • Concern about lack of guest parking/street parking • Traffic on Westbourne – it's the only intersection with a signal, safety concern due to traffic speed • Concern about feasibility of right turn mechanism onto West Knoll • Preference for access from SM Blvd rather than West Knoll • Concern about generation of left turn onto West Knoll, removal of left turn into Ramada (farther from La Cienega) • Consider new left turn in traffic analysis • Can delivery/moving trucks access the site? • Where will delivery truck park? • Consider changes to parking restrictions on local streets • Parking permits can be obtained from sheriff – not tied to City system(day passes)	See Section 4.6, *Transportation and Circulation.*

Table 1-2
Scoping Comments Received - August 2016

Subject	Where Subject is Addressed in EIR
• Concern about live/work employees (traffic and parking)	
Utilities and Service Systems • Concern about landfills capacity and adequacy of infrastructure with all new development	See Section XVII, *Utilities and Service Systems,* in the Initial Study (Appendix A).
Cumulative Impacts • Concern about density and adequacy of infrastructure with all new development	See the cumulative impact analyses throughout Section 4.
Aging in Place • Does project comply with the "aging in place" requirements?	The City's *Aging in Place Strategic Plan* outlines guidelines for the City to create ordinances and incentivize elderly appropriate development in the City. However, there are no specific regulations that apply to new development such as the proposed project; therefore, the project would not conflict with the Plan.
Live/Work Units • Concern about potential impacts associated with the employees of the live/work units	Residents of the project would be required to comply with the regulations outlined in WHMC 19.36.160 Live/Work Facilities. Section 4.6, *Transportation and Circulation,* accounts for the live/work units in the traffic analysis.
Impact of short-term rentals	Residents of the project would be required to comply with the regulations outlined in WHMC 19.36.331, which prohibits rentals of 30 days or less.

As noted previously, the City prepared a Draft EIR for the project that was circulated for public review from July 29, 2017 to August 21, 2017. Following circulation, in 2019 the applicant acquired another single-family residential property at 8552 West Knoll Drive, adjacent to the existing project site. The project has since been revised and would include construction of 28,780 square feet of commercial space, 12 live work units, and 111 residential units. Compared to the project originally analyzed in the 2017 Draft EIR, commercial space would decrease by 485 square feet and the number of units would increase by 14. Table 1-3 identifies the differences between the original project EIR with the new revised project.

Table 1-3
Comparison of 2016 Draft EIR Project with the Current Revised Project

Characteristic	2016 Proposed Project (EIR)	Current Revised Project	Difference
Restaurant/Café Floor Area (sf)	2,820	3,938	1,118
Retail Floor Area (sf)	15,678	14,488	(1,190)
Office Floor Area (sf)	6,079	6,711	632
Hair Salon Floor Area (sf)	3,718	3,643	(75)
Live/Work Floor Area (sf)	16,673	15,494	(1,179)
Misc. (lobby, storage, recreation, circulation, waste, electrical) (sf)	7,948	10,496	2,548
Residential Floor Area (sf)	90,819	104,066	13,370
Total Floor Area of Project (sf)	***143,735***	***158,836***	***15,224***
Number of Residential Units	97	111	14
Number of Live Work Units	12	12	None
Number of Affordable Units	15	17	2

( ) denotes subtraction

1.2 PURPOSE AND LEGAL AUTHORITY

The proposed project requires the discretionary approval of the City of West Hollywood Planning Commission. Therefore, it is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines,* the purpose of this EIR is to serve as an informational document that:

> *...will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.*

This EIR has been prepared as a Project EIR pursuant to Section 15161 of the *CEQA Guidelines.* A Project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines:*

> *This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.*

This EIR is to serve as an informational document for the public and City of West Hollywood decision-makers. The process will culminate with a Planning Commission hearing to consider certification of a Final EIR and approval of the proposed project.

1.3 SCOPE AND CONTENT

This EIR addresses impacts identified by the Initial Study to be potentially significant. The following issues were found to include potentially significant impacts and have been studied in the EIR:

- *Air Quality*
- *Geology and Hydrology*
- *Greenhouse Gas Emissions*
- *Land Use and Planning*
- *Noise*
- *Transportation and Circulation*
- *Utilities*

Issue areas found to have less than significant impacts and not studied in this EIR are discussed below in Section 1.4.

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and background documents prepared by the City. A full reference list is contained in Section 7.0, *References and Report Preparers*.

The alternatives section of the EIR (Section 6.0) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines.* The alternatives discussion evaluates the CEQA-required "no project" alternative and four alternative development scenarios for the site.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. The *CEQA Guidelines* provide the standard of adequacy on which this document is based. The *Guidelines* state:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure. (Section 15151)*

1.4 ISSUE AREAS FOUND NOT TO HAVE SIGNIFICANT IMPACTS

The following issues on the environmental checklist were addressed in the Initial Study (Appendix A). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur in any of these issue areas. Therefore, further discussion of these issues in the EIR is not warranted.

1.4.1 Aesthetics

Senate Bill (SB) 743 was signed into law on September 27, 2013, after publication of the Initial Study. According to SB 743, which became effective January 1, 2014, "aesthetics…impacts of a residential, mixed-use, or employment center project on an infill site within a transit priority

area shall not be considered significant impacts on the environment." Pursuant to Section 450.216 or 450.322 of the Code of Federal Regulations, a "transit priority area" is defined in as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in Section 21064.3 of the California Public Resources Code as a 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.

The proposed project is a mixed-use project on an infill site in the City of West Hollywood. The project site is located with one-half mile (approximately 700 feet) from the intersection of Santa Monica Boulevard and La Cienega Boulevard. Santa Monica Boulevard is served by Metro Line 4 and Metro Rapid Line 704 and La Cienega Boulevard is served by Metro Line 105 and Metro Rapid Line 705. All these Metro Lines have a service interval of less than 15 minutes during the morning and afternoon peak commute periods. Therefore, the proposed project is in a transit priority area and meets the criteria of SB 743. As such, aesthetics changes are not be considered significant impacts on the environment under CEQA.

Some aspects of the project related to aesthetics, such as the project's architectural design and detailing, landscaping, and the mass and scale of the project, were considered by the City as part of the Design Review Process in accordance with WHMC Sections 19.46.010 – 19.46.050. The proposed project was reviewed by the City's Design Review Subcommittee on September 13, 2012, June 12, 2014, January 22, 2015, and December 8, 2016. Recommendations provided by the Design Review Subcommittee were incorporated into the project including:

- Reducing the number of driveways on West Knoll Drive from two to one;
- Increasing the setback above the second floor on the elevation facing the Ramada Inn;
- Changing the accent color; and,
- Moving the mechanical equipment further away from the building's edge.

After the project was expanded and revised in 2019, it was reviewed by the City's Design Review Subcommittee on December 12, 2019. Additional recommendations from the Design Review Subcommittee were incorporated into the project.

During the second scoping meeting held on August 22, 2016, a member of the public provided a comment stating a concern about the potential loss of sunlight/solar access at neighboring properties due to the proposed project. As such, shadow modeling was conducted and is presented in Figure 1a and Figure 1b. Based on this modeling shown in these figures, during the summer months, shadows would not be cast onto neighboring uses. During the evening around 5:00 p.m., shadows would be cast onto the southeast corner of the commercial building directly east of the project site (on the northeast corner of West Knoll Drive and Santa Monica Boulevard). However, given that the shadows during this time would only affect the southeast corner of the building, the majority of the building would not be affected by the project. In addition, as the building is a commercial land use, no residences would be affected.

For most of the day in the winter months, shadows from the proposed project would be cast onto West Knoll Drive. In the morning hours, shadows would affect the lower south-facing portions of certain neighboring structures to the north but would not be cast onto the rooftops

of these structures. For the commercial building directly east of the project site, shadows would be cast onto West Knoll Drive and would reach the commercial building in the afternoon, covering a substantial portion of the building by sunset; however, as this is a commercial use, no residences would be affected. Therefore, because shadows would not be cast onto light-sensitive uses for extended periods of time and would not completely cover any land uses, shadow impacts of the proposed project would be less than significant.

During the second scoping meeting held on August 22, 2016, a member of the public provided a comment stating a concern about light and glare generated by the project. As described above, because the project is in a Transit Priority Area, aesthetic impacts, including impacts related to light and glare, would not be significant under CEQA. Nonetheless, for informational purposes it is noted that because of the existing, relatively high ambient lighting levels in the vicinity of the project site, project development would not substantially alter this condition. In addition, the project would be required to comply with Section 19.20.100 of the Municipal Code, which limits the design, intensity and impacts of night lighting. The project site is in an urban environment with numerous existing sources of glare. The proposed project would not substantially alter this condition.

1.4.2 Agricultural and Forestry Resources

The project site is currently developed with commercial, residential, and parking uses. There are no agricultural activities onsite and the project site does not contain forestry resources. Implementation of the proposed project would not require conversion of farmland to non-agricultural uses or non-forestry resources. No impact would occur.

Figure 1-1a: Shadow Modeling Views from the Northwest

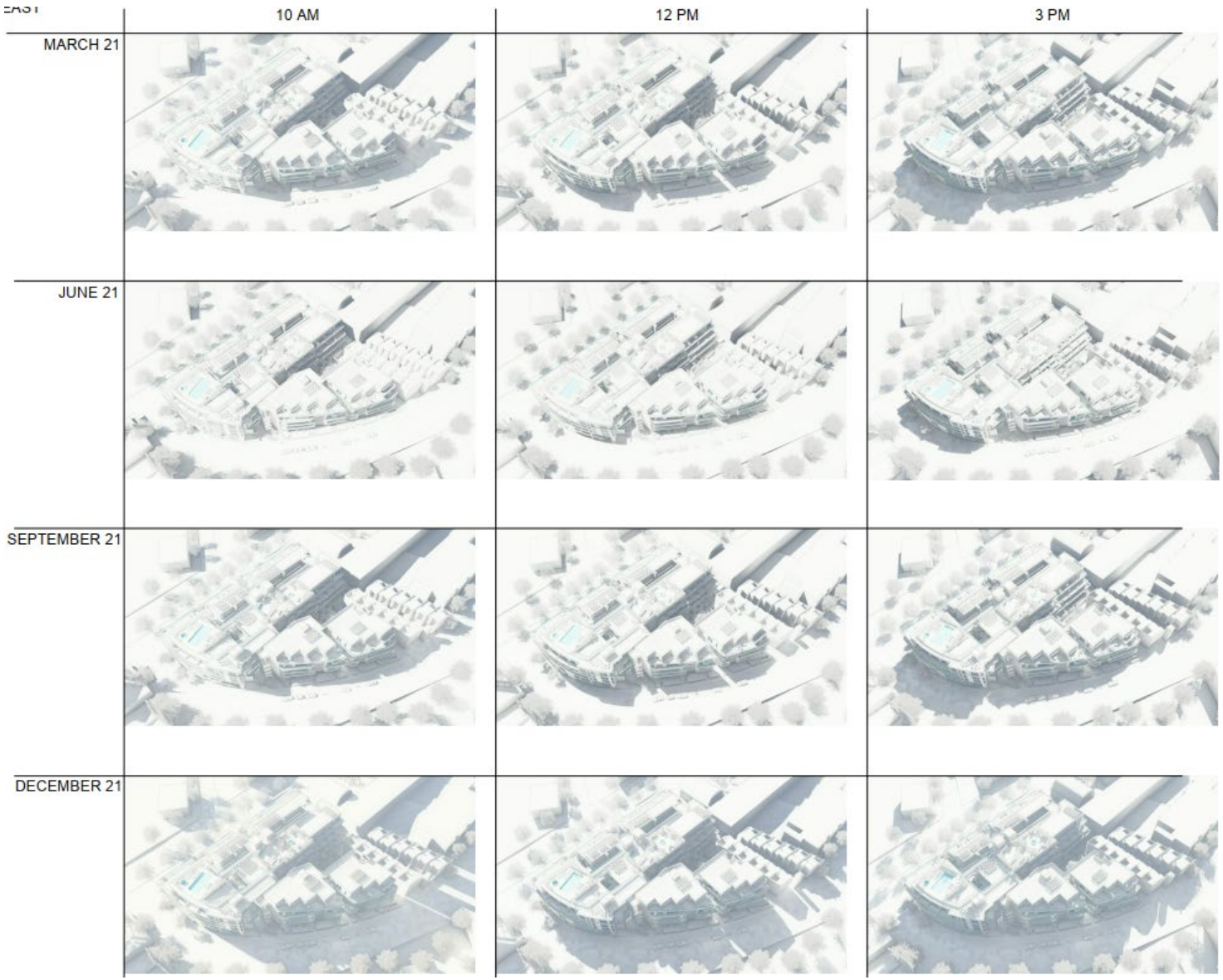
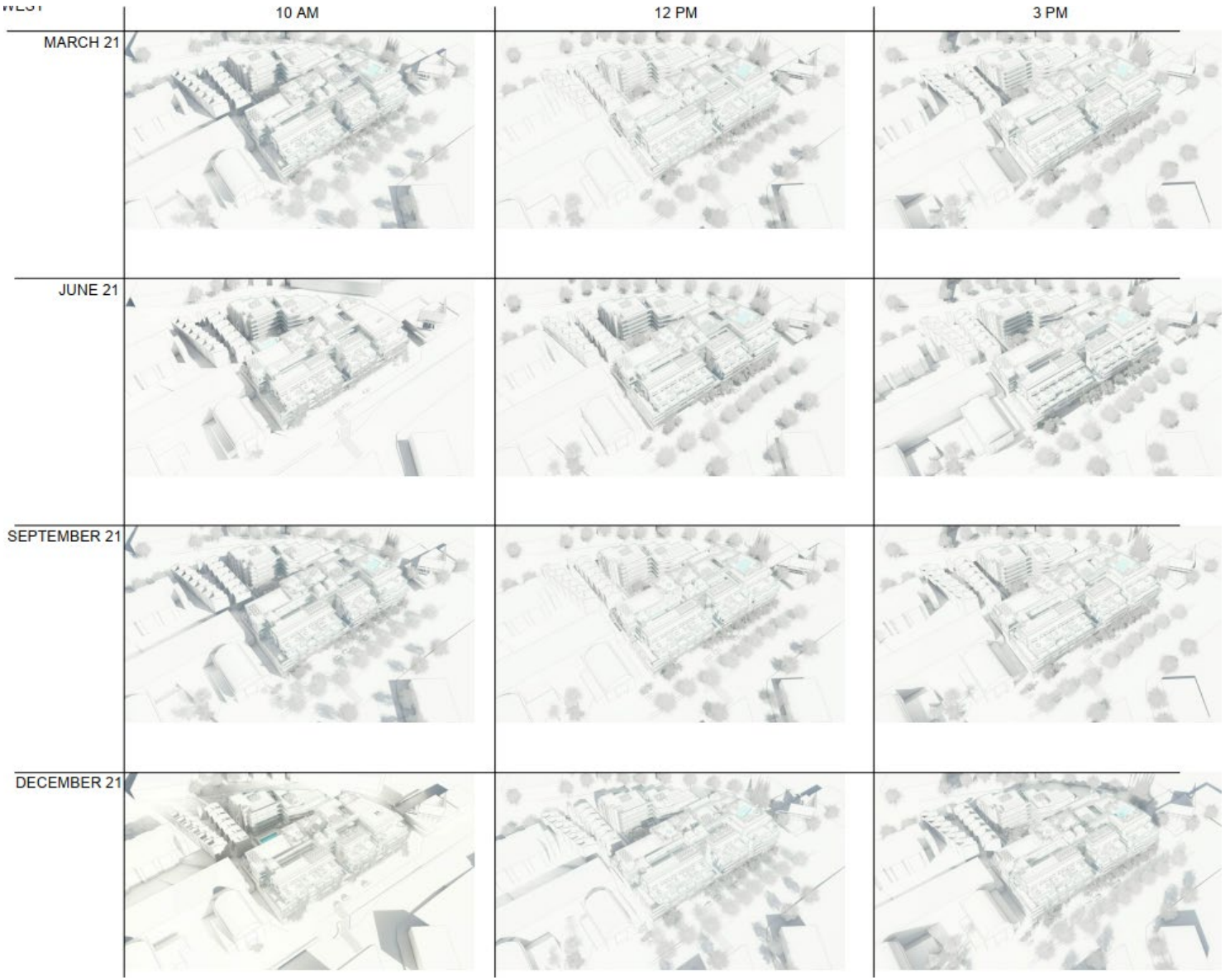


Figure 1-1b: Shadow Modeling View from the Southwest



1.4.3 Biological Resources

The project site does not contain riparian habitat or other sensitive natural communities, federally protected wetlands or waters of the U.S. or State. The project site is not located within or adjacent to a regionally significant wildlife movement corridor, nor does it contain identifiable local wildlife movement corridors (e.g., streams). The project site is not located within the boundaries of a Habitat Conservation Plan or Natural Community Conservation Plan area or other approved conservation plan area. The proposed project would involve removing trees that may contain nesting birds. However, with adherence to Mitigation Measure BIO-1, impacts to nesting birds would not occur. Impacts would be less than significant with mitigation. Further, the project site does not contain any heritage trees as defined by the City's Heritage Tree protection program and the proposed project would not conflict with the City's tree protection ordinance.

1.4.4 Cultural Resources

The existing residences that would be demolished as part of the proposed project were built in the 1920s, but are not designated as a historic or cultural resource or a potential historic or cultural resource by the City of West Hollywood. The commercial buildings on the project site that would be demolished were built in 1924, 1940, and 1972. These also are not designated as a historic or cultural resource or a potential historic or cultural resource by the City of West Hollywood. The project site is within an urbanized area and is on a disturbed site. Mitigation Measure CR-1 has been required to address the potential unanticipated discovery of archaeological resources. Impacts would be less than significant with mitigation.

1.4.5 Energy

The proposed project would involve the use of energy during the construction and operational phases of the project. The proposed project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11) as well as the City's green building ordinance (WHMC Section 19.20.060). The proposed project is estimated to achieve 90 points on the City's Green Building Point System. In order to reduce energy use, the proposed project would exceed Title 24 energy efficiency standards by 15% and would include Energy Star appliances, lighting and signage. Additionally, the project would be consistent with the City of West Hollywood Climate Action Plan. Impacts would be less than significant.

1.4.6 Hazards and Hazardous Materials

The proposed project would involve replacement of existing commercial and residential uses with a mix of residential and commercial uses and would not involve the routine transport, use or disposal of hazardous substances, other than minor amounts typically used for cleaning and maintenance. The proposed project would not emit or handle hazardous materials near a school. Demolition of the existing structures may release asbestos and lead-based paints or materials; however, compliance with SCAQMD Rule 1403 and OSHA regulations would reduce impacts. The project site does not appear on any hazardous material list compiled pursuant to Government Code Section 65962.5. The project site is not located in the vicinity of a public or private airstrip, is an infill site which would not alter or block emergency response or

evacuation routes, and is not located within a wildland fire hazard area. These impacts are less than significant.

1.4.7 Mineral Resources

The project site is in an urbanized area that is not used for mineral resource extraction. No impact would occur.

1.4.8 Population and Housing

The project site currently contains four residences that would be demolished as part of the proposed project but would not displace substantial numbers of people. The proposed project would involve a net increase in 119 new dwelling units (111 new apartment units plus 12 live/work units minus the four existing housing units on the project site) which would generate approximately 181 residents within the City. This would be within the Southern California Association of Governments and City of West Hollywood population forecasts. Impacts would be less than significant.

1.4.9 Public Services

The proposed project would increase the population density on the project site, which would incrementally increase demand for fire and police protection services. However, the proposed project would comply with existing regulations and is within the capacities and service areas of existing fire and police facilities. Impacts would be less than significant. The proposed project would generate new students and increase demand for park facilities; however, with payment of school impact fees and park impact fees, impacts would be less than significant.

1.4.10 Recreation

The proposed project would incrementally increase the use of and demand for parks and recreational facilities. However, the project applicant would be required to pay Quimby Act and Public Open Space Development fees that would be used by the City to acquire parkland as it becomes available and/or to expand and maintain existing recreational facilities. Impacts would be less than significant.

1.4.11 Tribal Cultural Resources

The City sent Assembly Bill (AB) 52 consultation notification letters to seven tribal governments, one of which requested consultation: the Gabrieleno Band of Mission Indians-Kizh Nation. This tribe identified the project area as being highly sensitive to tribal cultural resources and requested specific mitigation measures to ensure that impacts would be reduced to less than significant. These requested mitigation measures were incorporated into the Initial Study and attachments, as appropriate (Appendix A). Impacts would be less than significant with mitigation.

1.4.12 Wildfire

The project site is not located in a State Responsibility Area or Very High Fire Hazard Severity Zone (VHFHSZ). The project would not impair emergency vehicle access to the project site or result in conflicts with adopted emergency response or evacuation plans. Additionally, the project would not require the installation of infrastructure that could exacerbate wildfire risk. Impacts would be less than significant.

1. 5 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of West Hollywood is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no responsible or trustee agencies for the proposed project.

1.6 ENVIRONMENTAL REVIEW PROCESS

The major steps in the environmental review process, as required under CEQA, are outlined below and illustrated on Figure 1-2. The steps are presented in sequential order.

1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency (City of West Hollywood) must file an NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing *(CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the proposed project could create significant environmental impacts.

2. **Draft Environmental Impact Report (DEIR) Prepared.** The DEIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.

3. **Notice of Completion.** The lead agency must file a Notice of Completion with the State Clearinghouse when it completes a DEIR and prepare a Public Notice of Availability of a DEIR. The lead agency must place the Notice in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the Notice to anyone requesting it *(CEQA Guidelines* Section 15087). Additionally, public notice of DEIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public, and respond in writing to all comments received (Public Resources Code

Sections 21104 and 21253). The minimum public review period for a DEIR is 30 days. When a DEIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the Clearinghouse approves a shorter period (Public Resources Code 21091).

4. **Final EIR (FEIR).** An FEIR must include: a) the DEIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.

5. **Certification of FEIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the FEIR has been completed in compliance with CEQA; b) the FEIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the FEIR prior to approving a project (CEQA Guidelines Section 15090).

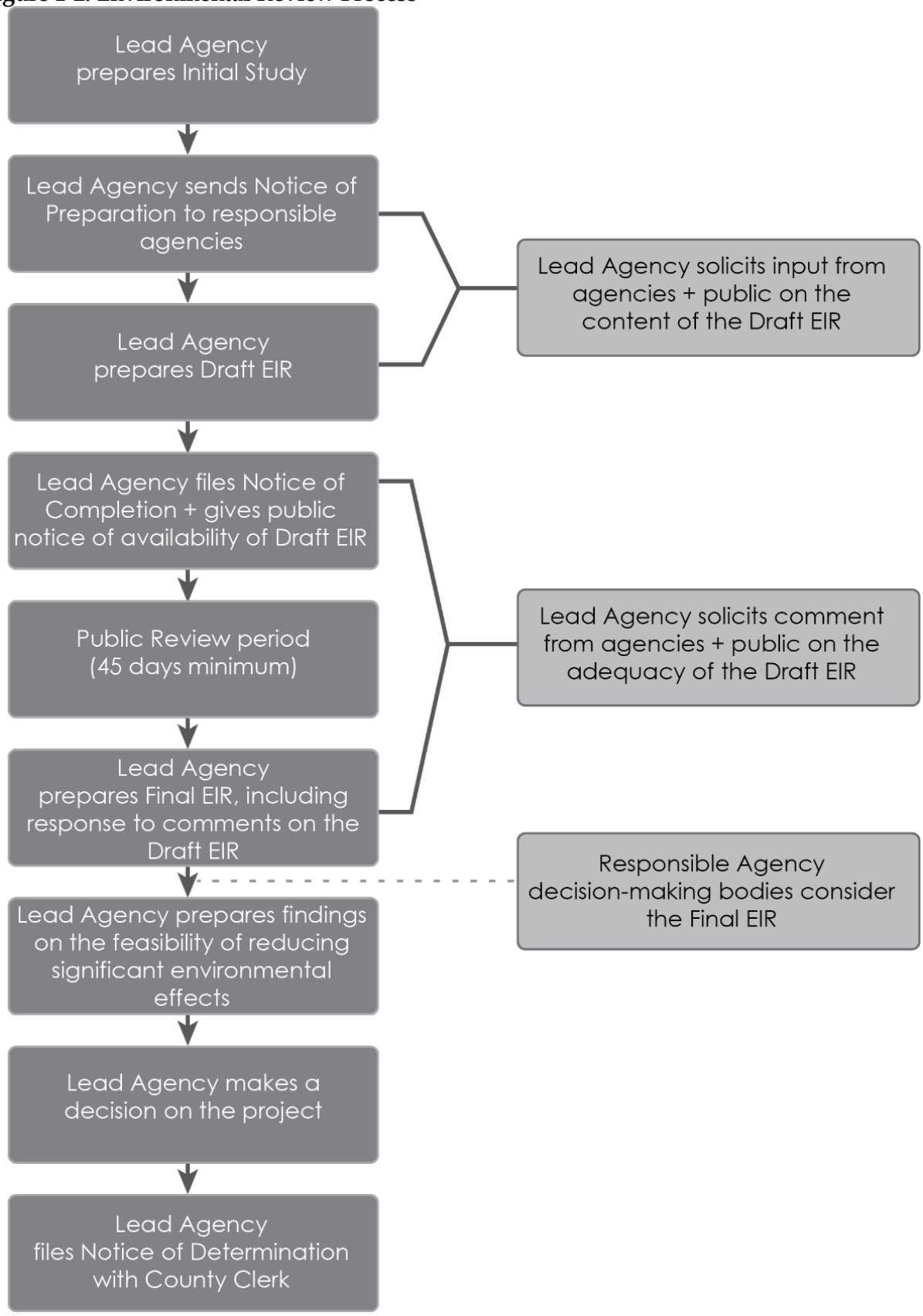
6. **Lead Agency Project Decision.** The lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted *(CEQA Guidelines* Sections 15042 and 15043).

7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible *(CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.

9. **Notice of Determination.** The lead agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-2: Environmental Review Process



2.0 PROJECT DESCRIPTION

This section describes the proposed project, including the project applicant, project location, major project characteristics, project objectives, and discretionary approvals needed for project approval.

2.1 PROJECT APPLICANT

Soto Capital LP
P.O. Box 17119
Beverly Hills, CA 90209

2.2 LEAD AGENCY AND CONTACT PERSON

City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069
Contact: Laurie Yelton, Associate Planner, (323) 848-6890

2.3 PROJECT LOCATION

The project site is located at 8527-8555 Santa Monica Boulevard and 8532, 8538, 8546, and 8552 West Knoll in the City of West Hollywood. The project site encompasses 61,097 square feet (approximately 1.40 acres) and includes six parcels (APNs: 4339-005-009, 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, and 4339-005-025). Figure 2-1 shows the location of the site within the region and Figure 2-2 shows the site location within West Hollywood.

2.4 EXISTING SITE CHARACTERISTICS

2.4.1 Current Land Uses and Designations

The project site currently contains three two-story commercial buildings and two surface parking lots on commercial parcels comprised of five lots that are 42,164 square feet in size and four single-family residences (approximately 5,109 square feet) on four residential lots that are 18,933 square feet in size. The commercial buildings (which total approximately 27,388 square feet) contain a restaurant (2,475 square feet), office space (4,211 square feet), a health club (4,058 square feet), a hair salon (6,218 square feet), and other retail shops including a pharmacy, IV and injection theraphy office, tobacco shop, vitamin store, and framing gallery (collectively 10,426 square feet). A surface parking lot for retail customers is located on the western portion of the project site and is accessible from Santa Monica Boulevard. A second surface parking lot with single and tandem spaces for business owners and employees is located on the northern portion of the project site and accessible from West Knoll Drive. Regional access is provided by the U.S. 101 and Santa Monica Boulevard (Highway 2).

Figure 2-3 shows photos of existing site conditions.

Figure 2-1 Regional Location

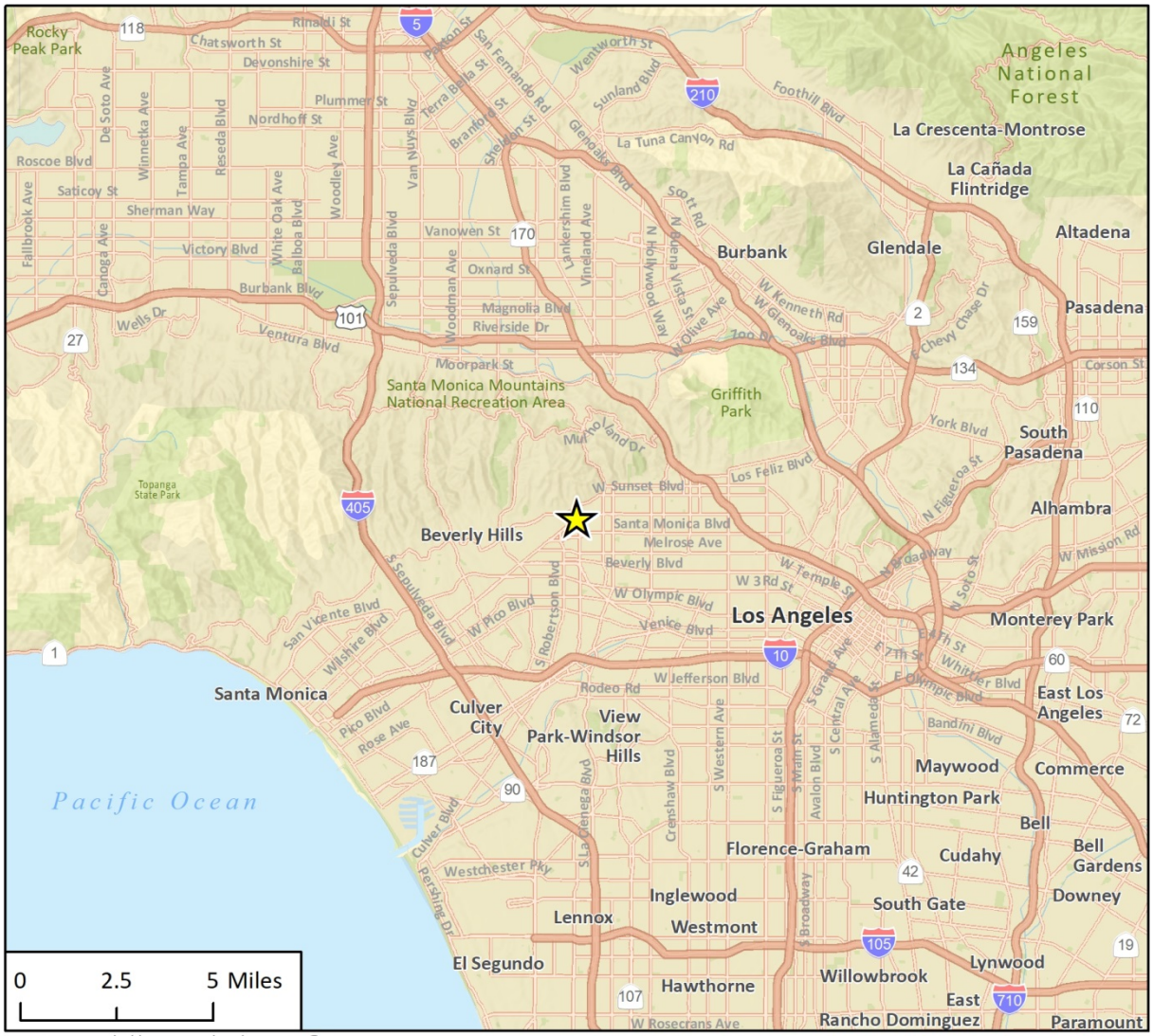


Figure 2-2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2019.

Fig 2 -2 Project Site Location_JPGFormat

Figure 2-3 Photographs of Project Site

Photo 1: Existing retail/commercial uses on the project site.

Photo 2: Existing single-family residence located at 8532 West Knoll Drive on the residential portion of the project site.

The 42,164-square-foot portion of the project site that currently contains commercial buildings is zoned and has a General Plan land use designation of Commercial, Community 1 (CC1). This portion of the site is also within the West Hollywood General Plan's Commercial Subarea 2, Transit Overlay Zone, and Mixed-Use Incentive Overlay Zone (West Hollywood 2011a). The 18,933-square-foot northern portion of the project site that currently contains four single-family residences is zoned Residential, Multi-Family High Density (R4B) and has a General Plan Land Use Designation of High Density Residential (R4B). Figure 2-4 shows the zoning for the project site and surrounding uses and Figure 2-5 shows the General Plan land use designations for the project site and surrounding uses.

The CC1 land use designation provides for commercial and mixed-use development along major corridors, including Santa Monica Boulevard. The designation allows for a variety of commercial uses, including retail, offices, and restaurants, as well as a mix of residential, commercial, and office uses. The base Floor Area Ratio (FAR) is 1.5 and the base height is 35 feet. The Transit Overlay Zone is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips. The Mixed-Use Incentive Overlay Zone encourages a mix of residential and commercial uses and allows mixed-use projects to receive an additional 0.5 FAR (maximum of 2.0) and 10 feet in height (maximum of 45 feet). The R4B designation provides for high-density multi-family housing and allows for residential buildings that are four stories and 45 feet in height. In areas designated CC1 and R4B, density bonuses are allowed for projects that include affordable housing. The density bonus allows increases of up to 35% in FAR (equivalent to an additional 0.7 FAR based on the 2.0 FAR inclusive of the mixed-use bonus) and/or unit count, and allows up to three affordable housing incentives or concessions, including an additional 10 feet in height, reductions in setbacks, and other concessions necessary to facilitate the provision of affordable housing. In addition, mixed-use projects that achieve a minimum of 90 points on the West Hollywood Green Building Point System Table are eligible to receive an additional 0.1 FAR. Table 4.5-2 in Section 4.5, *Land Use and Planning*, of this EIR shows the Zoning Ordinance and General Plan requirements for the CC1 and R4B zones.

2.4.2 Surrounding Land Uses

The project site is located in a neighborhood characterized by a mix of residential and commercial uses. Figure 2-6 shows the project site and surrounding uses. To the west of the project site is the Ramada Plaza Hotel, a four-story hotel building with ground-floor retail. The Ramada complex also includes a 28-unit apartment complex at the rear of the site at 940 Westmount Drive. Immediately northwest of the project site is a three-story multi-family condominium building. East of the project site is the one-story commercial store Healthy Spot. Across Santa Monica Boulevard to the south are one- to two-story commercial, retail, and restaurant buildings. A three-story building with 42,300 square feet of commercial space (including a 20,000 square foot Sprouts grocery store) is located at 8550 Santa Monica Boulevard immediately across the street from the project site. Across West Knoll Drive to the north are one- to four-story multi-family residential uses.

Figure 2-4 Project Site Zoning

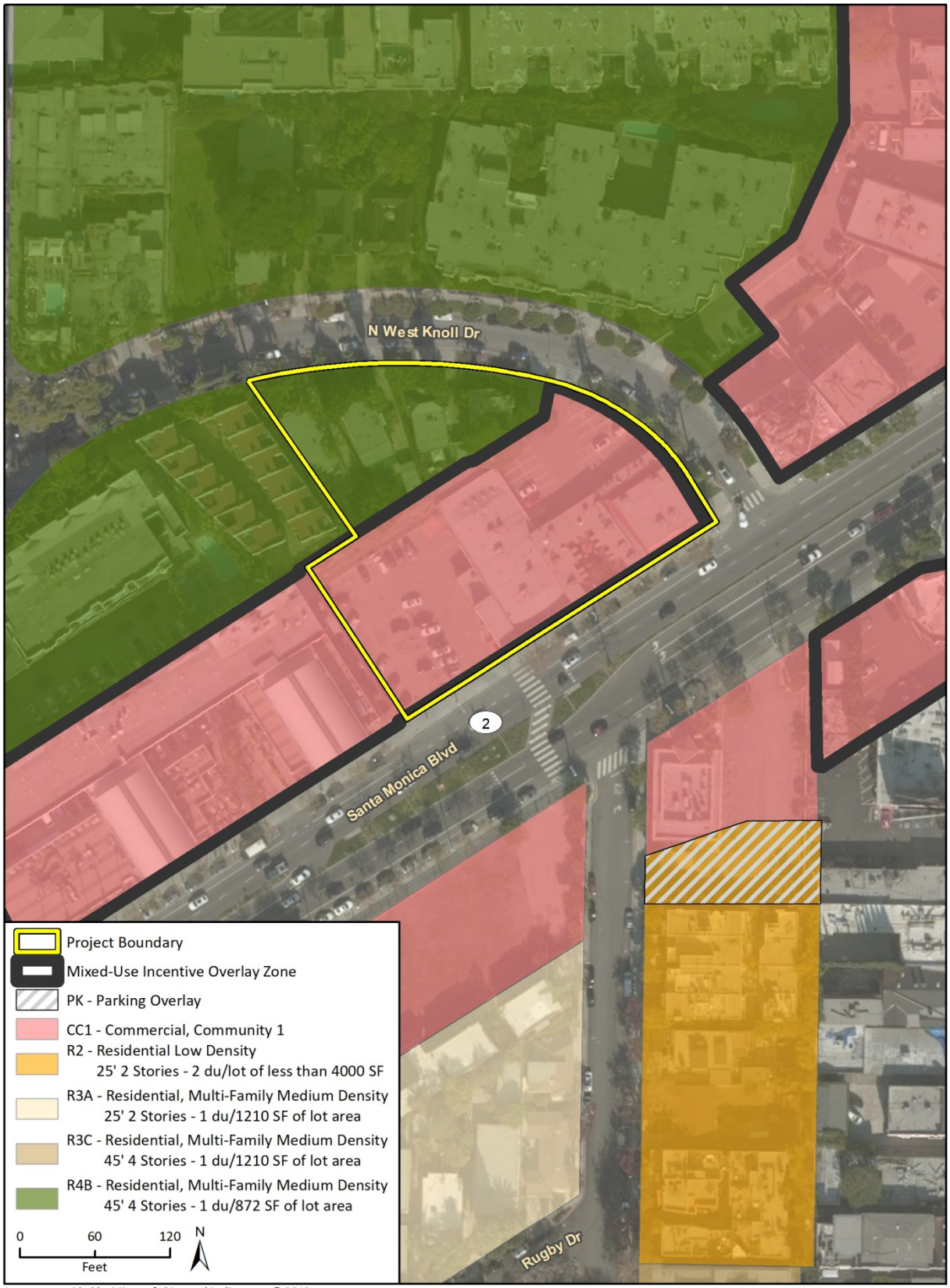


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Fig 2-4 Project Site Zoning_JPGFormat

Figure 2-5 Project Site General Plan Land Use Designation

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Fig 2-5 Land Use Designation

Figure 2-6 Project Site and Surrounding Uses

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Fig 2-6 Project Site and Surrounding Uses

2.5 PROJECT CHARACTERISTICS

The proposed project would involve the demolition of the three existing two-story commercial structures (approximately 27,388 square feet) as well as four existing one-story single-family residences and surface parking areas, and the construction of a mixed-use development on the same site (see Figure 2-7). Detailed floor plans, building elevations and landscaping plans are provided in Appendix B. The proposed project would be 55 feet in height and would include 111 apartment units (17 of which would be designated as affordable housing), 3,983 square feet of restaurant and cafe uses, 15,494 square feet of live/work use (12 units), 14,488 square feet of retail space, a 3,643 square foot hair salon, and 6,711 square feet of creative office space. Commercial uses would be on the first floor and partially on the second floor. Residential units would be on levels 2, 3, 4, and 5. Apartment units would range in size between 410 and 1,721 square feet (not including patios and balconies).

The project also includes three levels of parking with 346 vehicle parking spaces (which is 10 spaces less than the required number of spaces for the project) and 133 bicycle parking spaces. One level of the parking structure would be fully subterranean. The first floor and mezzanine parking levels would be partially subterranean.

The major characteristics of the proposed project are summarized in Table 2-1. Details regarding consistency with the Zoning Ordinance and General Plan, building architecture and design, site access and parking, landscaping, green building features, and utilities are described below.

2.5.1 Consistency with Zoning Ordinance and General Plan Requirements

The larger 42,164-square-foot portion of the project site is zoned and has a General Plan land use designation of CC1 and the smaller 18,933-square-foot portion of the project site is zoned and has a General Plan land use designation of R4B (West Hollywood 2011a). The area zoned R4B would only contain residential uses and would not include the retail or restaurant uses associated with the project. Because the project spans multiple legal lots, a lot tie is required to hold the lots together as one parcel for the purpose of creating a single building site. The resulting building site would have split zoning which is allowed in the West Hollywood Zoning Ordinance.

The proposed project would meet the requirements of SB 1818 (California Government Code Section 65915 et seq.), the State law that provides for density bonuses and incentives for projects that include affordable housing, and the City of West Hollywood's inclusionary housing ordinance, by providing at least 20% of the baseline units as affordable housing. The proposed project would provide 20% of the baseline units as affordable housing by providing 17 affordable rental units (6 very low-income, 4 low income, and 7 moderate-income). Accordingly, the project is eligible for a 35% density bonus on the CC1 portion of the project site and a 32% density bonus on the R4B portion of the site (see calculations in Section 4.4, *Land Use and Planning,* of this EIR).

Figure 2-7 Project Site Plans

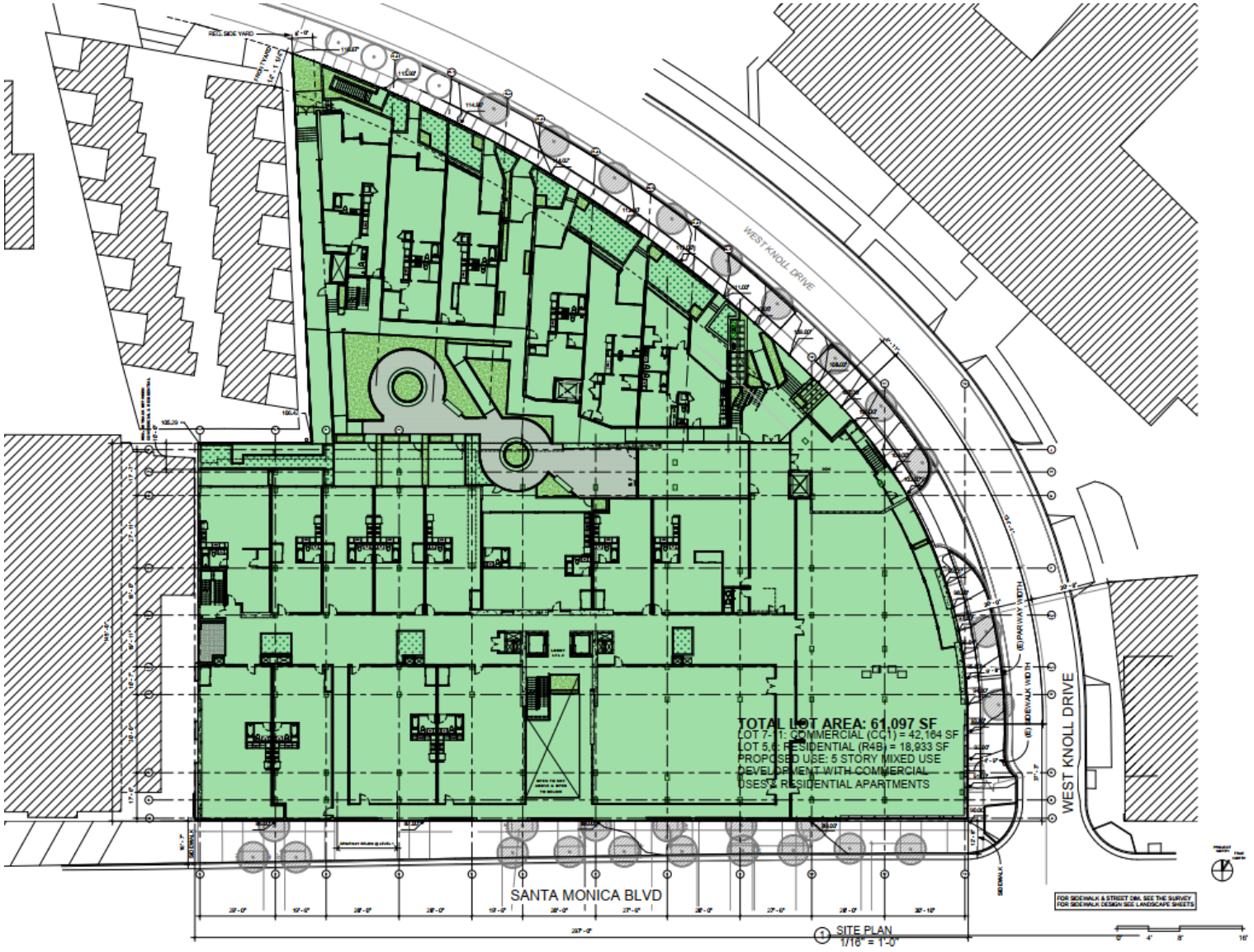

Table 2-1
Project Characteristics

Project Site Size	61,097 square feet (sf) (1.40 acres)
Parcel Numbers	4339-005-009 4339-005-010 4339-005-011 4339-005-012 4339-005-013 4339-005-025
Building Floor Area	Commercial Restaurant/Café: 3,938 sf Live/work space: 15,494 sf Retail: 14,488 sf Office: 6,711 sf Hair Salon: 3,643 sf *Subtotal: 44,274 sf* Residential Apartments: 104,066 sf Residential Lobby: 833 sf Residential Recreation Room: 892 sf Residential Storage: 4,777 sf *Subtotal: 110,568 sf* Residential and Commercial Circulation (stairs, elevators, corridors, trash chute); waste/recycling; electrical; shower/locker: 3,994 sf **Total Floor Area: 158,836 sf**
Parking	Commercial: 117 Live/Work Single: 0 Live/Work in Tandem: 54 Residential Single: 47 Residential in Tandem: 128 Parking credit needed for spaces: 10 **Total provided: 346 spaces** **Bicycle: 133 spaces**
Unit Summary	Studio: 6 1-bedroom: 41 2-bedroom: 64 **Total Apartment Units: 111 units** **Live Work/Units: 12 units**
Affordable Housing	*Very Low Income Units: 6* *Low Income Units: 4* *Moderate Income Units: 7* ***Total Affordable Housing: 17 units (out of the 111 total units)***
Height	55 feet
Floor Area Ratio (FAR)	2.8 (CC1 portion only)
Setbacks	**Commercial Zone** Front (facing SMB): 0 feet Rear: 10 feet & 25 feet Side: 5'-0" to15'-0" feet **Residential Zone** Front (facing West Knoll): 14 feet 1 &1/4 inches Side (facing adjacent multi-family residences): 8 feet

The project applicant is seeking a density bonus based on the percentage of affordable units, as well as three associated regulatory "concessions" pursuant to state law (SB 1818 and West Hollywood Municipal Code (WHMC) Section 19.22.050). The requested concessions are:

- *An additional story (adding not more than 10 feet to overall project height)*

- *An extra mezzanine level for residential parking (vehicle and bicycle) consisting of a partial level located above a portion of the first floor and below a portion of the second floor, open to the first floor and partially subterranean, and creating no greater volume in the project's envelope than that authorized under the Code (including height incentive and concession).*

The applicant is also seeking height and FAR bonuses based on the proposed mixed-use nature of the project in accordance with the Mixed-Use Development Overlay Zone, a FAR bonus for the provision of affordable housing pursuant to Section 19.22.050 of the WHMC and SB 1818, and a FAR bonus available to mixed-use projects that achieve a minimum of 90 points on the West Hollywood Green Building Point System Table (West Hollywood 2009).

The project height is measured as provided by Section 19.20.080.B.2 of the WHMC.[1] The proposed mixed-use structure at the north side facing West Knoll would be 55 feet in height measured from the ground surface at the property line. At the south side of the structure facing Santa Monica Boulevard, the height of the building would be approximately 48 feet from the ground surface to the top of the third floor. At the front of the building facing Santa Monica Boulevard, the building would have 5 stories above ground, and the fourth floor would be set back approximately 8 feet from the façade. The fifth floor would be set back approximately 27 feet from the façade, and the roof approximately 34 feet from the façade. Facing West Knoll, the building would have five stories above ground and set back 14 feet 1 & ¼ inches from the property line (see Appendix B for building elevations).

The total floor area for the project would be 158,836 square feet. On the commercial lot, the total floor area would be 118,059 square feet on a 42,164 square foot lot for an FAR of 2.8. While the City does not apply an FAR to calculate density on the residential lot, for informational purposes, the FAR for the combined commercial and residential lots is 2.6 (158,836 square feet on a 61,097-square-foot project site).

Consistency with the applicable requirements of the Zoning Ordinance and General Plan are shown in Table 2-2.

[1] *The proposed structure at the north side facing West Knoll would be 55 feet in height measured from the ground surface at the property line. At the south side of the structure facing Santa Monica Boulevard, the height of the building would be approximately 48 feet from the ground surface to the top of the third floor. The fourth floor would be set back approximately 8 feet from the façade. The fifth floor would be set back approximately 27 feet from the facade, and the roof set back approximately 34 feet from the façade (see Appendix B for building elevations).*

Table 2-2
Consistency with Zoning Ordinance and General Plan Requirements

Requirement	Allowed	Actual Provided by Proposed Project
Floor Area Ratio (FAR)	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.8* R4B: N/A	CC1: 2.8 R4B: N/A
Building Height	CC1 Allowed Height: 35 ft, 3 stories + Mixed-Use Bonus Height: 10 feet, 1 story + Affordable Housing Concession: 10 ft, 1 story *Total Allowed: 55 feet, 5 stories* R4B Allowed Height: 45 ft, 4 stories + Affordable Housing Concession: 10 ft, 1 story *Total Allowed: 55 ft, 5 stories*	CC1: 55 ft, 5 stories R4B: 55 ft, 5 stories

2.5.2 Building Architecture and Design

The proposed building would be a contemporary style building. The building is designed to include a system of horizontal and vertical layers and a framing system intended to break up the building's massing and de-emphasize the building's height. Materials used for the building's façade would include concrete, phenolic wood panels, plaster, painted corrugated metal, and painted perforated metal screens.

The first story would include concrete and glass construction. The frontage along Santa Monica Boulevard includes a plaza to accommodate planters, a water feature, and access to an elevated sidewalk on the second level. The fourth and fifth levels would include a colorful phenolic wood paneling system. The façade on the third, fourth, and fifth levels facing Santa Monica Boulevard is set back with the use of balconies in order to reduce the overall scale of the building.

The first level will include concrete and storefront glazing. On the east side of the building as it follows the curve of West Knoll Drive towards residential uses, more neutral colors and materials would be used. These include plaster, corrugated metal painted grey and glass. The north façade that faces West Knoll Drive would include warmer materials such as wood wall panels, wood slat railings, and landscaped balconies.

The west façade of the building, at the southwest portion, is set back approximately 15 feet at the property line, above the third floor, to accommodate approximately 800 square feet of open and landscaped space. At the northwest portion, the building is set back approximately 5 feet to accommodate additional balconies. The third floor balconies and open space would include planters.

2.5.3 Open Space

The proposed project includes common and private open space per City of West Hollywood Municipal Code requirements. In total, the proposed project would have the required 2,000 square feet of common open space, with an additional 5,258 square feet of open space, and approximately 22,483 square feet of private open space. The first floor of the building would include an approximately 26-foot wide public plaza intended for planters and a water feature. Each residential unit would include a minimum of 120 square feet of open space either in the form of a patio or balcony. The second floor of the building (the first floor of the residential space) would include a residential lobby and a recreation room and 2,000 square feet of common open space that would consist of courtyards and other useable space. The roof top would include a roof deck, pool, spa, and sundeck.

2.5.4 Landscaping

The landscaping plan is shown in Appendix B. The proposed project would include landscaping along the building façade of Santa Monica Boulevard, on the sidewalks along Santa Monica Boulevard and West Knoll Drive, in the proposed first-floor plaza, in common open space areas, and on the roof. The eight existing Chinese Elm parkway (the space between the sidewalk and the street) trees along Santa Monica Boulevard would remain. Seven of the eight parkway trees and the four existing parkway palm trees along West Knoll Drive would remain. Eight additional street trees (*Ulmus parviflora*) would be planted along Santa Monica Boulevard. Two trees on the sidewalk along West Knoll Drive would be removed in order to make space for the driveway entrance. One additional parkway tree would be planted along West Knoll Drive that would match the existing parkway trees.

Colored concrete planters would be located on both sides of the building entrance plaza on Santa Monica Boulevard. California-native plants would be utilized along West Knoll Drive. The northern and northwest boundary of the project site would include a high wood fence with green screen vines.

The proposed project would involve a "green" or "sustainable" roof with solar panels covering a portion of the roof top, landscaped areas, a roof deck, pool, spa, and sundeck, and mechanical equipment integrated in the roof top design.

Site landscaping would include climate-appropriate, drought-tolerant and native plants such as Aloe Vera, Nyalla Mat Rush (an ornamental grass), Ceanothus, Deer Grass, and Rebud trees.

2.5.5 Site Access, Parking, and Loading Areas

Vehicular site access would be provided by two driveways - one driveway on Santa Monica Boulevard and one on West Knoll Drive (see Appendix B, site plans and elevations for depictions of driveways, site access, parking areas, and loading areas). Primary commercial access to the project site would be from Santa Monica Boulevard and residential access would be both from Santa Monica Boulevard and West Knoll Drive. The Santa Monica Boulevard driveway would allow right and left-turns into the project site, and right-turns only out of the

project site. The driveway on West Knoll Drive would allow left- and right-turns for ingress and egress.

The Santa Monica Boulevard driveway would be approximately 232 feet west of West Knoll Drive and the West Knoll driveway would be approximately 111 feet north of Santa Monica Boulevard. The driveways would serve both inbound and outbound traffic. The Santa Monica Boulevard driveway would be a right-turn-out only driveway, while the West Knoll drive would allow both left and right turns out of the project site, and both driveways would allow both left and right turns into the project site. The Santa Monica Boulevard driveway would be 24 feet wide and the West Knoll Drive driveway would be just over 20 feet wide.

Parking would be provided on three levels: the subterranean level, first level, and mezzanine level. All parking areas would be enclosed. The subterranean level would include a waterproofing system which would prevent water intrusion into the building.

First floor and subterranean parking levels would be accessed by the driveway on Santa Monica Boulevard. These levels would serve commercial, live/work and residential uses. Level 1 would provide 82 total parking spaces. This would include 19 single parking stalls for commercial uses, 4 parking stalls in tandem for commercial uses, 1 single parking stall for residential uses, and 58 parking stalls in tandem for live/work and residential uses. The first floor would be partially subterranean.

The subterranean level would provide 176 total parking spaces. This would include 94 parking stalls (54 single stalls and 40 stalls in tandem) for commercial uses (including 6 ADA), and 82 parking stalls (20 single stalls and 62 stalls in tandem) for residential uses (including 1 ADA). A roll-up gate would prevent commercial parking in the residential parking area.

The mezzanine level would provide residential parking only and would include 88 parking stalls (26 single stalls and 62 stalls in tandem) including 3 ADA accessible spaces. This level would be accessed by the driveway on West Knoll Drive. The mezzanine level is a partial level located above a portion of the first floor and below a portion of the second floor. The mezzanine level is also open to the first floor and partially subterranean.

Inside the parking areas, the drive aisle widths would vary from 24 feet to 28 feet with two-way operation. The ramps providing access between the parking levels are 26 feet wide. Most of the proposed parking spaces would be standard or modified standard spaces and 41 of the proposed parking spaces would be compact parking spaces, in compliance with WHMC 19.28.090. The driveway entrance on Santa Monica would have a 3% grade and the driveway entrance ramp on West Knoll would have a 5% grade with 10% grade transition at the top. The ramp between the first level and the subterranean level would have a 20% grade with an 8-foot, 10% grade transition at the top.

The loading area, serving all uses on the project site, would be accessed from Santa Monica Boulevard. Trucks would enter the Santa Monica Boulevard driveway and then go straight into the loading area.

2.5.6 Utilities

Electricity would be provided by Southern California Edison and the project would include a rooftop industrial diesel backup generator for use during power outages. Solid waste and wastewater service would be provided by the City of West Hollywood and water service would be provided by the Los Angeles Department of Water and Power. The proposed project would connect to existing sewer and water lines in Santa Monica Boulevard, West Knoll Drive, and on the north side of the property.

The proposed project would involve bio-treatment best management practices (BMPs) in order to meet the City's Low Impact Development (LID) requirements. The proposed project includes raised planters and landscaped areas (mentioned previously) that would be designed to treat storm water runoff. Stormwater runoff from upper floors would be diverted to the second-floor and third-floor planters and the landscaped area in the northern part of the project site and along West Knoll Drive for filtration. Runoff would be diverted to existing storm drain facilities along West Knoll Drive and Santa Monica Boulevard.

2.5.7 Green Building Features

The proposed project includes solar panels, would use energy- and water-efficient systems and would incorporate environmentally-friendly materials in order to conform to the City of West Hollywood's Green Building Program. The proposed project would achieve 90 points on the City's Green Building Point System Checklist. In order to reduce energy use, the proposed project would include a rooftop solar photovoltaic system which would offset a portion of the building's energy use with renewable energy. The solar panels are estimated to generate at least 87,000 kilowatt-hours of electricity per year. In addition, the proposed project would exceed Title 24 California Building Code energy efficiency standards by 15% and would include Energy Star appliances, lighting, and signage. The proposed project would also include programmable thermostats and ceiling fans in residential units. In order to reduce water use, the proposed project would install low-flow showerheads, tankless water heaters and water-efficient toilets and faucets.

The proposed project would include recycled-content materials in the foundation, insulation, and landscaping. In addition, the interior spaces would use materials composed of recycled content or rapidly renewable and sustainably harvested resources. In order to provide increased indoor air quality, No-VOC paints and low-VOC sealants and adhesives will be used and carpet will not be installed. High-efficiency HVAC systems will be used to minimize exposure to toxins and dust by managing ventilation and filtration. Three cubic feet of space for the collection and storage of recyclables would be provided in each unit.

2.6 GRADING AND CONSTRUCTION

Project construction is estimated to last approximately 23 months. The estimated construction schedule would be as follows:

- *Demolition, excavation & shoring - 6 months*
- *Underground utilities & waterproofing - 2 month*

- *Construction of subterranean parking and level one - 3 month*
- *Construction of concrete levels (mezzanine level and level 2) - 2 months*
- *Steel frame and deck, upper floors - 4 months*
- *Facade and tenant improvements - 3 months*
- *Finish and site work - 3 months*

The subterranean parking level would have a depth of up to 11 feet with an additional 3-foot deep footing. The proposed project would require the export of approximately 77,000 cubic yards of earth material. Assuming an average truck load of 15 cubic yards, approximately 5,134 round trip truckloads would be needed to export the material. In addition, approximately 376 round-trip hauling trips would be needed to remove the approximately 5,638 cubic yards of demolition debris. Hauling associated with demolition and excavation is estimated to occur over a period of approximately five months. Haul and export routes available include:

- *East on Santa Monica Boulevard to U.S. 101*
- *South on La Cienega Boulevard to I-10*
- *West on Santa Monica Boulevard to I-405*

2.7 PROJECT OBJECTIVES

The objectives of the proposed project are to:

1. *Provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing core of nearby community facilities, employment centers, retail goods and services, and restaurants to enhance the area's overall urban character.*
2. *To provide rental housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low, and moderate-income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock.*
3. *Develop the site in accordance with the City of West Hollywood policies and designations while furthering the goals and objectives of the General Plan.*
4. *Create a consistent pattern of development and uses along Santa Monica Boulevard that serve project residents and the surrounding community by redeveloping an underutilized site.*
5. *Create a modern, high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area.*
6. *Enhance pedestrian activity along Santa Monica Boulevard by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*
7. *Provide housing and retail near alternative means of transportation, and provide sufficient on-site parking for the project.*
8. *Expand the economic base of the City, maintain economic vitality, and foster the City's fiscal health by, among other things, providing for commercial and retail activities which generate substantial sales and property tax revenue.*
9. *Promote the efficient use of water and energy through incorporation of water and energy conservation measures.*

2.8 REQUIRED APPROVALS

The proposed project would require the discretionary approval of the City of West Hollywood Planning Commission. If appealed, the City Council would make decisions related to approval prior to initiation of construction.

Specifically, the following approvals would be required:

- *Certification of the Final EIR;*
- *Approval of Development and Demolition Permits;*
- *Approval of a Density Bonus pursuant to WHMC Section 19.22.050(D);*
- *Approval of Affordable Housing Concessions, pursuant to WHMC Section 19.22.050(E), as follows:*
  1) *An additional story, not to exceed 10 feet of total project height (WHMC Section 19.22.050.E.2(a);*
  2) *A extra mezzanine level for residential parking (vehicle and bicycle) consisting of a partial level located above a portion of the first floor and below a portion of the second floor, open to the first floor and partially subterranean and creating no greater volume in the project's envelope than that authorized under the Code (including height incentive and concession.*
- *Approval of building design and materials, as well as landscaping;*
- *Approval of 10 sharing parking credits to meet project parking requirements;*
- *Any other approvals or permits that would be necessary for construction and operation of the project, including a lot tie agreement and utility relocation permits*

3.0 ENVIRONMENTAL SETTING

This section provides a general overview of the environmental setting for the project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4.0, *Environmental Impact Analysis*.

3.1 REGIONAL SETTING

The project site is located in the City of West Hollywood (City), in western Los Angeles County (refer to figures 2-1, *Regional Location*, and 2-2, *Project Location*, in Section 2.0, *Project Description*). Incorporated in 1984, West Hollywood encompasses approximately 1.9 square miles immediately east of Beverly Hills and west of the community of Hollywood (City of Los Angeles). The City is in a highly urbanized area of the greater Los Angeles region and is almost entirely developed.

The estimated 2021 population of the City is 36,125 persons. The City's current housing stock consists of an estimated 25,890 units. The average household size in the City is about 1.52 persons per unit (California Department of Finance 2021).

A series of east-west and north-south arterial roadways provide vehicular access to the City. Major east-west thoroughfares include Sunset Boulevard, Santa Monica Boulevard, and Fountain Avenue. Major north-south thoroughfares include Doheny Drive, La Cienega Boulevard, Fairfax Avenue, and La Brea Avenue.

West Hollywood is characterized by a dense, compact urban form with small lots, a mix of land uses, and a walkable street grid. According to Walk Score, a website that ranks cities based on walkability, West Hollywood is the most walkable city in California with a Walk Score of 91 (Walk Score 2019). The City's population density is 19,013 people per square mile.

The Mediterranean climate of the region and the coastal influence produce moderate temperatures year round, with rainfall concentrated in the winter months. Though air quality in the area has steadily improved in recent years, the Los Angeles region remains a non-attainment area for ozone (urban smog) (SCAQMD 2016).

3.2 PROJECT SITE SETTING

The project site is located on the Santa Monica Boulevard commercial corridor in the northwest portion of the City of West Hollywood (see figures 2.1 and 2.2 in Section 2.0, *Project Description*). The project site is located in a neighborhood characterized by a mix of residential and commercial uses. According to the West Hollywood 2035 General Plan, Land Use and Urban Form Element (West Hollywood 2011a), the area around the project site (known as Santa Monica Boulevard West) is "a destination for nightlife and entertainment, a focus of the LGBT community, and a center for neighborhood-serving retail and restaurants." Commercial structures along Santa Monica Boulevard have varying architectural styles.

Figure 2-6 in Section 2.0, *Project Description*, shows the project site and surrounding uses. Immediately west of the project site is the Ramada Plaza Hotel, a four-story hotel building with ground-floor retail and restaurants. The Ramada Plaza Hotel complex also includes a 28-unit

apartment complex at 940 Westmount Drive northwest of the project site. Immediately northwest of the project site is a three-story multi-family condominium building. Across West Knoll Drive to the north are a four-story multi-family residential building and single-family residences. East of the project site is a one-story retail store, the Healthy Spot. Across Santa Monica Boulevard to the south are one- to three-story commercial, retail, and restaurant buildings.

The project site itself encompasses approximately 61,097 square feet and includes a 42,164-square-foot commercially-zoned area and an 18,933-square-foot residentially-zoned area. The commercial lot is developed with three adjoining two-story commercial structures and two parking lots. The commercial buildings include approximately 26,436 square feet of retail, office and restaurant uses. The residential area includes four parcels developed with four one-story, single-family residences (8532, 8538, 8546, and 8552 West Knoll Drive). Photographs of the project site are shown on Figure 2-3 in Section 2.0, *Project Description.*

On the commercial portion of the project site, landscaping is minimal and includes street trees on the sidewalks along West Knoll Drive and Santa Monica Boulevard as well as planter boxes in near entrances to existing retail shops and in the courtyard of the existing commercial buildings. The single-family residences on the northeast portion of the project site include ornamental lawns, plants, and trees. See Figure 2-3 in Section 2.0, *Project Description*, for photos of the project site.

3.3 CUMULATIVE PROJECTS SETTING

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in West Hollywood and surrounding areas (including the City of Los Angeles and City of Beverly Hills) are listed in Table 3-1. Projects included in this list are within 1.5 miles of the project site. These projects are considered in the cumulative analyses in Section 4.0, *Environmental Impact Analysis.* Table 3-2 summarizes cumulative development in West Hollywood by land use.

Table 3-1
Cumulative Projects

Location	Land Use	Size Units	Units
City of West Hollywood			
8713 Beverly	Apartments	30	DU
	Retail	6	KSF
	Commercial/Office	3	KSF
	Gallery	1	KSF
8816 Beverly	Restaurant	21	KSF
	Furniture Showroom	25	KSF
	Medical Office	77	KSF
	Restaurant	1	KSF
	Research & Development	9	KSF
8899 Beverly	Apartments	12	DU
	Condominiums	56	DU
	Townhomes	13	DU
	Retail	20	KSF
	Restaurant	4	KSF
	Commercial/Office	11	KSF
1150 Clark	Apartments	7	DU
1012 Cory	Condominiums	6	DU
1011 Crescent Heights	Apartments	12	DU
1317 Crescent Heights	Apartments	75	DU
1048 Curson	Condominiums	5	DU
1006 Edinburgh	Condominiums	10	DU
900 Fairfax	Apartments	6	DU
	Retail	1	KSF
	Restaurant	2	KSF
1236 Fairfax	Apartments	7	DU
1250 Fairfax	Condominiums	53	DU
1301 Fairfax	Condominiums	10	DU
511 Flores	Apartments	10	DU
528 Flores	Apartments	4	DU
1216 Flores	Condominiums	14	DU
8000 Fountain	Apartments	30	DU
8210 Fountain	Condominiums	9	DU
1027 Gardner	Condominiums	5	DU
938 Genessee	Condominiums	5	DU
947 Genessee	Condominiums	10	DU
1005 Genessee	Condominiums	5	DU
1046 Genessee	Condominiums	5	DU
1003 Hancock	Apartments	3	DU
1006 Hancock	Apartments	6	DU
1264 Harper	Condominiums	14	DU
1223 Hayworth	Apartments	12	DU
926 Hilldale	Condominiums	3	DU
621 Huntley	Apartments	3	DU
634 Huntley	Apartments	3	DU
649 Huntley	Apartments	3	DU
812 Huntley	Apartments	5	DU
933 Huntley	Condominiums	5	DU
621 Kings	Apartments	4	DU
600 La Cienega	Apartments	5	DU
	Retail	5	KSF
	Restaurant	7	KSF
	Commercial/Showroom	16	KSF
624 La Cienega	Apartments	6	DU
	Retail	54	KSF
1136 La Cienega	Condominiums	23	DU
829 Larrabee	Apartments	13	DU

Table 3-1
Cumulative Projects

Location	Land Use	Size Units	Units
1120 Larrabee	Apartments	22	DU
1041 Martel	Condominiums	25	DU
8465 Melrose	Retail	4	KSF
8583 Melrose	Retail	10	KSF
8650 Melrose	Apartments	7	DU
	Retail	16	KSF
7914 Norton	Condominiums	8	DU
8008 Norton	Condominiums	8	DU
8017 Norton	Condominiums	34	DU
8116 Norton	Apartments	8	DU
901 Ogden	Apartments	4	DU
950 Ogden	Apartments	10	DU
1001 Ogden	Condominiums	5	DU
1008 Ogden	Condominiums	7	DU
1153 Ogden	Apartments	6	DU
1019 Orange Grove	Apartments	9	DU
1150 Orange Grove	Condominiums	7	DU
507 Orlando	Condominiums	9	DU
923 Palm	Senior Housing	49	DU
417 Robertson	Commercial/Showroom	8	KSF
460 Robertson	Restaurant	1	KSF
510 Robertson	Restaurant	1	KSF
645 Robertson	Retail	18	KSF
	Restaurant	33	KSF
	Hotel	241	RMS
	Commercial/Showroom	10	KSF
	Commercial/Nightclub	4	KSF
7905 Romaine	Condominiums	35	DU
	Restaurant	1	KSF
	Office	1	KSF
8763 Rosewood	Retail	5	KSF
948 San Vicente	Condominiums	18	DU
972 San Vicente	School	72	STUDENTS
7401 Santa Monica	Retail	1	KSF
7617 Santa Monica	Condominiums	71	DU
	Retail	5	KSF
	Restaurant	4	KSF
7811 Santa Monica	Apartments	95	DU
	Restaurant	376	KSF
	Hotel	37	RMS
	Gallery	138	KSF
7965 Santa Monica	Retail	1	KSF
	Restaurant	14	KSF
	Office	55	KSF
	Nightclub	3	KSF
8445 Santa Monica	Condominiums	79	DU
	Retail	5	KSF
	Restaurant	9	KSF
	Hotel	88	RMS
	Commercial/Nightclub	3	KSF
8550 Santa Monica	Restaurant	1	KSF
	Commercial/Office	4	KSF
	Commercial/Market	25	KSF
	Commercial/Personal Services	8	KSF
	Commercial/Personal Services	4	KSF
9001 Santa Monica	Retail	10	KSF
	Restaurant	10	KSF

Table 3-1
Cumulative Projects

Location	Land Use	Size Units	Units
9040 Santa Monica	Apartments	76	DU
	Retail	45	KSF
	Commercial/Office	137	KSF
	Art Gallery	16	KSF
	Design Showrooms	12	KSF
	Restaurant	8	KSF
8760 Shoreham	Apartments	11	DU
1011 Sierra Bonita	Condominiums	5	DU
1017 Sierra Bonita	Condominiums	5	DU
1030 Sierra Bonita	Condominiums	5	DU
939 Spaulding	Condominiums	22	DU
1013 Spaulding	Condominiums	5	DU
1041 Spaulding	Condominiums	14	DU
1236 Spaulding	Apartments	3	DU
943 Stanley	Apartments	5	DU
8430 Sunset	Residences	44	DU
	Hotel	149	ROOMS
	Retail	2	KSF
	Drinking Place	7	KSF
	Spa/Gym	4	KSF
	Restaurant	2	KSF
	Restaurant	4	KSF
8497 Sunset	Restaurant	10	KSF
	Commercial/Office	12	KSF
8920 Sunset	Retail	10	KSF
	Restaurant	2	KSF
	Office	46	KSF
	Museum	2	KSF
	Arts Club	7	MEMBERS
8950 Sunset	Apartments	4	DU
	Restaurant	30	KSF
	Hotel	165	ROOMS
9034 Sunset	Condominiums	10	DU
	Restaurant	11	KSF
	Hotel	237	ROOMS
9040 Sunset	Condominiums	20	DU
	Fractional Share	46	DU
	Restaurant	6	KSF
	Hotel	102	ROOMS
	Day Spa	8	KSF
	Retail	18	KSF
545 Sweetzer	Apartments	9	DU
1253 Sweetzer	Condominiums	8	DU
1257 Sweetzer	Condominiums	12	DU
1280 Sweetzer	Condominiums	9	DU
1035 Vista	Condominiums	4	DU
852 West Knoll	Condominiums	6	DU
8553 West Knoll	Condominiums	5	DU
8557 West Knoll	Condominiums	6	DU
629 Westbourne	Condominiums	3	DU
916 Westbourne	Condominiums	8	DU
Subtotal – West Hollywood	**Residential**	**1,368**	**DU**
	Commercial	**889**	**KSF**
	Restaurant	**559**	**KSF**
	Hotel	**1,019**	**Rooms**

Table 3-1
Cumulative Projects

Location	Land Use	Size Units	Units
City of Los Angeles			
8000 West 3rd Street	Apartments	50	DU
	Retail	6	KSF
7901 Beverly Boulevard	Apartments	71	DU
	Retail	12	KSF
7951 Beverly Boulevard	Apartments	57	DU
	Restaurant	6	KSF
	Retail	1	KSF
8000 Beverly Boulevard	Apartments	48	DU
	Restaurant	7	KSF
8001 Beverly Boulevard	Restaurant	23	KSF
	Office	11	KSF
8052 Beverly Boulevard	Synagogue	5	KSF
	Apartments	102	DU
	Office	15	KSF
	Retail	1	KSF
750 N Edinburgh Avenue	Single-family Residential	8	DU
320 Fairfax Avenue	Office	N/A	N/A
7900 Hollywood	Apartments	**50**	DU
316 N La Cienega Boulevard	Apartments	50	DU
	Retail	4	KSF
333 S La Cienega Boulevard	Apartments	145	DU
	Retail	28	KSF
	Restaurant	3	KSF
431 N La Cienega Boulevard	Apartments	72	DU
333 San Vicente Boulevard	Apartments	153	DU
	Church	31	KSF
488 San Vicente Boulevard	Apartments	53	DU
	Retail	7	KSF
8150 Sunset	Apartments	219	DU
	Condominiums	30	DU
	Retail	4	KSF
	Supermarket	25	KSF
	Bank	5	KSF
	Restaurant	23	KSF
	Dance/Yoga Studio	8	KSF
8418 Sunset Boulevard	Mixed Use	75	KSF
		138	DU
300 S Wetherly Drive	Condominiums	140	DU
Subtotal – Los Angeles	**Residential**	**1,386**	**DU**
	Commercial	**238**	**KSF**
	Restaurant	**63**	**KSF**
	Hotel	**0**	**Rooms**
City of Beverly Hills			
154-168 N La Peer Drive	Condominiums	16	DU
325 N Maple Drive	Commercial	50	KSF
457 N Oakhurst Drive	Condominiums	8	DU
425 N Palm Drive	Condominiums	20	DU
Subtotal – Beverly Hills	**Residential**	**44**	**DU**
	Commercial	**50**	**KSF**
	Restaurant	**0**	**KSF**
	Hotel	**0**	**Rooms**

Source: Fehr & Peers 2021; provided in Appendix G
du = dwelling unit; ksf = thousand square feet
Note: All totals are approximate based on standard uncertainties related to specific project information

Table 3-2
Approximate Total Cumulative Development by Land Use

Land Use Type	Total Cumulative Development
Residential	2,798 DU
Commercial (Retail, Office, etc.)	1,176 KSF
Restaurant	622 KSF
Hotel	1,019 Rooms

Source: See Table 3-1
du = dwelling unit; ksf = thousand square feet

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4.0 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the possible environmental effects of the proposed project for the issue areas that were identified through preliminary analysis and the Initial Study and NOP process as having the potential to experience significant impacts. "Significant effect" is defined by the State *CEQA Guidelines §15382* as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant."

The assessment of environmental effects contained in each issue area begins with a discussion of the setting. Following the setting is a discussion of the project's impacts. Within the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria used for this analysis to determine whether potential impacts are significant. The next subsection describes the impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. The significance of the project's environmental impacts was identified based on the following classifications:

> ***Class I, Significant and Unavoidable:*** *An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved.*
>
> ***Class II, Less than Significant with Mitigation Incorporated:*** *An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings to be made.*
>
> ***Class III, Less than Significant:*** *An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.*
>
> ***Class IV, Beneficial:*** *An impact that would reduce existing environmental problems or hazards.*

The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other future development in the area.

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4.1 AIR QUALITY

This section analyzes the proposed project's temporary and long-term impacts to local and regional air quality.

4.1.1 Setting

a. Climate and Meteorology. West Hollywood is located in the western portion of Los Angeles County. Average daytime temperatures range from highs of 84 degrees Fahrenheit in July, August, and September to 68 degrees in January and February. Overnight low temperatures vary from an average of 48 degrees in January and February to 70 degrees in August. High temperatures occur when Santa Ana wind conditions create an offshore flow. Santa Ana winds are strong northerly or northeasterly winds that originate from the desert of the Great Basin and predominantly occur from September through March. Usually warm, dry, and full of dust, these winds are particularly strong in passes and at the mouths of canyons. Sustained winds of 60 miles per hour, with higher gusts, are common for these conditions. On average, Santa Ana wind conditions occur five to ten times per year, with each event lasting up to a few days. Annual precipitation in West Hollywood averages around 15 inches. Rainfall occurs almost exclusively from late October to early April.

b. Air Pollution Regulation. The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards for the protection of public health (CARB 2016a). The U.S. Environmental protection Agency (EPA) is the federal agency designated to administer federal air quality regulation, while the California Air Resources Board (CARB) is the state equivalent and operates under the auspices of the California Environmental Protection Agency (CalEPA). Local control in air quality management is provided through county-level or regional (multi-county) air pollution control districts (APCD). CARB establishes statewide air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins statewide. West Hollywood is located in the South Coast Air Basin (the Basin) which is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

Federal and state ambient air quality standards have been established for six criteria pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb). Table 4.1-1 lists the current federal and state standards for these criteria pollutants. California air quality standards are identical to or stricter than federal standards for all criteria pollutants. California has also set ambient standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Table 4.1-1
Current Federal and State Ambient Air Quality Standards

Pollutant	Federal Standard	California Standard
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	9.0 ppm (8-hr avg) 35.0 ppm (1-hr avg)	9.0 ppm (8-hr avg) 20.0 ppm (1-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.03 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 $\mu g/m^3$ (3-mo avg)	1.5 $\mu g/m^3$ (30-day avg)
Particulate Matter (PM_{10})	150 $\mu g/m^3$ (24-hr avg)	50 $\mu g/m^3$ (24-hr avg) 20 $\mu g/m^3$ (annual avg)
Particulate Matter ($PM_{2.5}$)	12 $\mu g/m^3$ (annual avg) 35 $\mu g/m^3$ (24-hr avg)	12 $\mu g/m^3$ (annual avg)

ppm= parts per million $\mu g/m^3$ = micrograms per cubic meter
Source: CARB, 2016a

Characteristics of ozone, carbon monoxide, nitrogen dioxide, and suspended particulates are described below.

Ozone. Ozone is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_X) and volatile organic compounds (VOC).[1] Nitrogen oxides are formed during the combustion of fuels, while reactive organic gases are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, persons with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide. Carbon monoxide (CO) is a colorless, odorless, poisonous gas. The major source of CO in California is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Nitrogen Dioxide. Nitrogen dioxide (NO_2) is a by-product of fuel combustion, with the primary sources being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur.

[1] *Volatile organic compounds (VOC) are also referred to as reactive organic gases (ROG) or reactive organic compounds (ROC)*

Nitrogen dioxide absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10}, $PM_{2.5}$ and acid rain.

Suspended Particulates. PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and remain there and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

CARB currently recommends that local agencies avoid siting new sensitive land uses, including residences, within 500 feet of a freeway (CARB 2005). The recommendation is based on research showing that concentrations of traffic related pollutants decline with distance from major roads, primarily in the first 300 - 500 feet. These recommendations are strictly advisory, and local agencies are expected to balance them with other considerations, which presumably include the land use context and local land use priorities, including housing needs. The handbook also notes that the relative exposure and health risk drops substantially within the first 300 feet, and that the impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution.

c. Current Air Quality. The local air quality management agency, the SCAQMD, is required to monitor air pollutant levels to assure that the ambient air quality standards are met and, in the event that they are not, to develop strategies to meet these standards. Depending on whether each standard is met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment" with that standard. The South Coast Air Basin (Basin), in which the project site is located, is a non-attainment area for the federal standards for ozone, $PM_{2.5}$ and lead and the state standards for ozone PM_{10}, $PM_{2.5}$, NO_2 and lead (SCAQMD 2016).

The South Coast Air Basin monitoring station located nearest to the project site is the Veteran's Administration Hospital in West Los Angeles, approximately 6 miles west of the site. However, particulate matter data is not available from the West Los Angeles monitoring station; therefore, data for this pollutant has been taken from the Los Angeles-North Main Street station, located in downtown Los Angeles. Table 4.1-2 provides the number of days each of the standards has been exceeded at these stations.

Table 4.1-2
Ambient Air Quality Data

Pollutant	2015	2016	2017
[a]Ozone, ppm - Worst Hour	0.102	0.085	0.099
Number of days of State exceedances (>0.09 ppm)	2	0	1
[a]Ozone, ppm – Worst 8 Hours	0.072	0.073	0.077
Number of days of State exceedances (>0.07 ppm)	2	2	3
Number of days of Federal exceedances (>0.075 ppm)	0	0	1
[a]Carbon Monoxide, ppm - Worst 8 Hours	N/A	N/A	N/A
Number of days of State/Federal exceedances (>9.0 ppm)	N/A	N/A	N/A
[a]Nitrogen Dioxide, ppm - Worst Hour	0.067	0.054	0.056
Number of days of State exceedances (>0.25 ppm)	0	0	0
[b]Particulate Matter <10 microns, $\mu g/m^3$ Worst 24 Hours	88.5	74.6	96.2
Number of samples of State exceedances (>50 $\mu g/m^3$)	30	21	40
Number of samples of Federal exceedances (>150 $\mu g/m^3$)	0	0	0
[b]Particulate Matter <2.5 microns, $\mu g/m^3$ Worst 24 Hours	56.4	44.3	54.9
Number of samples of Federal exceedances (>35 $\mu g/m^3$)	7	2	6

[a] West Los Angeles-VA Hospital Monitoring Station
[b] Los Angeles-North Main Street Monitoring Station
Source: CARB 2018
N/A = not available, insufficient data available to determine the value

As shown in Table 4.1-2, ozone, $PM_{2.5}$, and PM_{10} concentrations exceeded state and federal standards several times between 2015 and 2017. No exceedances of either the state or federal standards for NO_2 occurred. No information about CO was available on the ARB website; however, no exceedances of either the state or federal standards for CO occurred.

d. Sensitive Receptors in the Project Area. Certain population groups are more sensitive to air pollution than others. Sensitive receptors include children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases. Sensitive land uses would include those locations where such individuals are concentrated, such as hospitals, schools, residences, and parks with active recreational uses. Sensitive receptors located in the vicinity of the project site include residential uses and a school. The nearest sensitive receptors to the project site are the multi-family residences located between approximately 13 and 50 feet immediately north and northwest of the project site. Additional residences are located about 70 feet northeast of the project site across West Knoll Drive. Pacific Hills School is located approximately 650 feet northwest of the project site at 8628 Holloway Drive.

e. Air Quality Management. Under state law, the SCAQMD is required to prepare an overall plan for air quality improvement for pollutants for which the District is in non-

attainment. Every few years, SCAQMD prepares an overall plan for the air quality improvement. Each iteration of the plan is an update of the previous plan and has a 20-year horizon. The Air Quality Management Plan (AQMP) was last updated in 2016. The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the first AQMP in 1997. The AQMP is incorporated by reference and available online at http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

4.2.2 Impact Analysis

a. Methodology and Significance Thresholds. Air quality impacts related to the proposed project would be considered significant if the project would:

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

The Initial Study (see Appendix A) concluded that the proposed project would result in less than significant impacts with respect to odors. Hence, only impacts related to consistency with the AQMP as well as construction and long-term emissions and related exposure of sensitive receptors to pollutant concentrations are addressed in this section.

Construction activities facilitated by the proposed project would generate diesel emissions and dust. Construction equipment that would generate criteria air pollutants includes excavators, graders, dump trucks, and loaders. Some of this equipment would be used during grading activities as well as when structures are constructed. It is assumed that all construction equipment used would be diesel-powered. The regional construction emissions associated with development of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 computer program by estimating the types and number of pieces of equipment that would be used on-site during each of the construction phases. Construction emissions are analyzed using the regional thresholds established by the SCAQMD and published in the CEQA Air Quality Handbook.

Construction of the proposed project is expected to occur over 23 months. Estimated preliminary project grading would include approximately 77,000 cubic yards of exported earth material. Assuming approximately 15 cubic yards of material per truck trip, the proposed project would result in approximately 5,134 round-trip hauling truck trips. In addition, the project would result in approximately 376 round-trip hauling trips for removal of approximately 5,683 cubic yards of demolition debris.

In certifying the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, the City adopted mitigation measures 3.2-1 and 3.2-2 for the reduction of air pollution emissions during construction. These mitigation measures apply to all new

development in the City. It is assumed that the proposed project would comply with these requirements. The requirements of these measures include the following:

3.2-1 The City shall implement the following measures to reduce the amount of fugitive dust that is re-entrained into the atmosphere from parking lots and construction sites.

- *Require the following measures to be taken during the construction of all projects to reduce the amount of dust and other sources of PM_{10}, in accordance with SCAQMD Rule 403:*
  - *Dust suppression at construction sites using vegetation, surfactants, and other chemical stabilizers*
  - *Wheel washers for construction equipment*
  - *Watering down of all construction areas*
  - *Limit speeds at construction sites to 15 miles per hour*
  - *Cover aggregate or similar material during transportation of material*
- *Adopt incentives, regulations, and/or procedures to reduce paved road dust emissions through targeted street sweeping of roads subject to high traffic levels and silt loadings.*

3.2-2 The City shall require each project applicant, as a condition of project approval, to implement the following measures to reduce exhaust emissions from construction equipment.

- *Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas-powered electric generators and equipment.*
- *Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set).*
- *To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions.*
- *On-site equipment shall not be left idling when not in use.*
- *The hours of operation of heavy-duty equipment and/or the amount of equipment in use at any one time shall be limited.*
- *Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors.*
- *Before construction contracts are issued, the project applicants shall perform a review of new technology, in consultation with SCAQMD, as it relates to heavy-duty equipment, to determine what (if any) advances in emissions reductions are available for use and are economically feasible. Construction contract and bid specifications shall require contractors to utilize the available and economically feasible technology on an established percentage of the equipment fleet. It is anticipated that in the near future, both NOX and PM10 control equipment will be available (West Hollywood 2010).*

Operational emissions associated with the proposed project were also estimated using CalEEMod. Operational emissions include mobile source emissions, energy emissions, area source emissions and stationary source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the project site associated with operation of on-site development. The trip generation rates were based on trip rates from the Transportation Analysis Report (Appendix G), which relies on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) for Land Use Codes 221, 230, 710, 826, 918, and 932 (Appendix G). In addition, the "Increase Density," "Increase Diversity," "Improve Destination Accessibility," "Increase Transit Accessibility," and "Integrate Below Market Rate Housing"

features were incorporated into the VMT calculations in CalEEMod to account for the project's net increase in density of 85 dwelling units per acre (net increase of 119 dwelling units on 1.40 acres), its mixed use nature, its location in a Central Business District, its proximity to the Santa Monica/Westborne bus stop for the City of West Hollywood Cityline Commuter and LAMetro Route 4 lines (approximately 0.1 mile to the southwest), and its inclusion of 17 units of affordable housing.

Emissions attributed to energy use include natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products and architectural coating. Stationary source emissions are generated by the use of stationary equipment, which would consist of a diesel backup generator. It was assumed the generator would be tested for up to one hour on any given day and would operate for a total of approximately 36 hours per year for testing and maintenance.

This analysis also takes into account the removal of existing on-site uses that generate emissions. As described in Section 2.0, *Project Description,* the project site currently contains three commercial buildings and four single-family residences. The commercial buildings contain a restaurant (2,475 sf), office space (4,211 sf), a health club (4,058 sf), a hair salon (6,218 sf), and other retail shops, including a pharmacy, massage parlor, pet supply store, shipping store, vitamin store, and framing gallery (totaling 10,426 sf). Emissions associated with existing uses were estimated using CalEEMod and subtracted from emissions associated with the proposed project in order to calculate the net new emissions associated with the project. To determine whether a significant regional air quality impact would occur, the increase in emissions was compared with the SCAQMD's recommended regional thresholds for operational emissions.

The SCAQMD has developed specific numeric thresholds that apply to projects in the South Coast Air Basin. The SCAQMD has established the significance thresholds for both construction activities and project operations. These thresholds are shown in Table 4.1-3.

Table 4.1-3
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	**Operation Thresholds (lbs/day)**	**Construction Thresholds (lbs/day)**
NO_X	55	100
VOC	55	75
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550
Lead	3	3

Source: SCAQMD April 2019.

In addition to the regional air quality thresholds shown in Table 4.1-4, the SCAQMD has also developed Localized Significance Thresholds (LST) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook*. LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size, distance to the sensitive receptor, etc. However, LSTs only apply to emissions produced on the project site, including idling emissions during both project construction and operation. LSTs have been developed for NO_X, CO, PM_{10} and $PM_{2.5}$. LSTs are not applicable to mobile sources off-site such as cars on a roadway (SCAQMD, 2008).

LSTs have been developed for emissions within areas up to 5 acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure 1, 2 or 5 acres. The project site measures approximately 1.40 acres and is located in Source Receptor Area 2 (SRA-2), which is designated by the SCAQMD as Northwest Coastal Los Angeles and includes the project site. The LST construction emission thresholds for a 1-acre site in SRA-2 are shown in Table 4.1-4. According to the SCAQMD's publication, *Final Localized Significant (LST) Thresholds Methodology* (2008), the use of LSTs is voluntary, to be implemented at the discretion of local agencies. LSTs are provided for receptors at a distance of 82 to 1,640 feet (25 to 500 meters) from the project boundary. According to the LST methodology document, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet.

Table 4.1-4
SCAQMD LSTs for Construction

Pollutant	Allowable emissions from a one-acre site in SRA-2 for a receptor 82 feet away	
	Operation Thresholds (lbs/day)	Construction Thresholds (lbs/day)
Gradual conversion of NO_X to NO_2	103	103
CO	562	562
PM_{10}	1	4
$PM_{2.5}$	1	3

Source: SCAQMD, 2009
Note: LSTs are provided for receptors at a distance of 82 to 1,640 feet away.

In addition, SCAQMD recommends that a local CO hotspot analysis be conducted if an intersection meets one of the following criteria: 1) the intersection is at LOS D or worse and where the project increases the volume to capacity ratio by 2 percent, or 2) the project decreases Levels of Service (LOS) at an intersection to D or worse. A CO hotspot is a localized concentration of CO that is above the state or national 1-hour or 8-hour CO ambient air standards. Localized CO "hotspots" can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high

such that the local CO concentration exceeds the federal AAQS of 35.0 parts per million (ppm) or the state AAQS of 20.0 ppm.

b. Project Impacts and Mitigation Measures.

Impact AQ-1 Project construction would generate temporary increases in localized air pollutant emissions. Such emissions may result in temporary adverse impacts to local air quality, but are below SCAQMD thresholds. Therefore, air quality impacts associated with construction activities would be Class III, *less than significant*.

Construction-Related Emissions. The proposed project involves development of a mixed-use structure with 111 apartment units as well as retail, restaurant, office, live/work, hair salon, and parking uses on an approximately 1.40-acre site.

Construction activities associated with demolition of existing uses and construction of the proposed mixed-use project would result in temporary air quality impacts. Ozone precursors NO_X and VOC, as well as CO, would be emitted by the operation of construction equipment such as graders, backhoes, and generators, while particulate matter (PM_{10} and $PM_{2.5}$) would be emitted by activities that disturb the soil, such as grading and excavation, road construction and building construction. Table 4.1-5 shows estimates of maximum daily construction emissions associated with the proposed project. Lead emissions are not analyzed because pollutant quantities are negligible and there is no risk of exceeding the SCAQMD threshold of 3 pounds per day.

As shown in Table 4.1-5, emissions of VOC, NO_X, CO, $PM_{10,}$ and $PM_{2.5}$ would be below SCAQMD regional thresholds for all criteria pollutants. The LST thresholds only apply to those emissions which are generated by on-site construction activities, such as emissions from on-site grading, and do not apply to off-site mobile emissions. As indicated in Table 4.1-5, construction emissions would not exceed applicable LSTs, which are designed to be protective of public health and sensitive receptors. Therefore, project construction would not 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 or expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Because emissions would not exceed the applicable thresholds, project impacts to human health as it relates to criteria air pollutant emissions during construction would also be less than significant.

Table 4.1-5
Estimated Construction Maximum Daily Air Pollutant Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Maximum Daily Construction Emissions	17	33	19	6	3	<1
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Daily On-Site Construction Emissions	17	17	14	4[3]	2	<1
Localized Significance Thresholds[2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod winter calculations, see Appendix C.
n/a = not applicable, no threshold
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Construction emissions assumed to comply with Mitigation Measures 3.2-1 and 3.2-2 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, which apply to all development in the city. Architectural coating phase assumed to last 56 days, use non-VOC paint (<=5 g/L VOC) in accordance with project description green building features, and comply with SCAQMD Rule 1113.
[2] LSTs are for a one-acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary.
[3] Rounded up from a value of 3.97 pounds per day.

Lead and Asbestos. Due to the age of the existing buildings on-site, there is the potential for asbestos and lead to be emitted into the air during their demolition. Lead-based materials are regulated by the California Occupational Safety and Health Administration (Cal OSHA). The California Code of Regulations (CCR), §1532.1, requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal OSHA standards. Under this rule, construction workers may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the work day exceeds eight hours. Similarly, CCR §1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

Asbestos is categorized as a hazardous air pollutant by the U.S. EPA and is regulated at the federal level under the Clean Air Act, at the state level under Cal OSHA, and at the local level by SCAQMD. Federal asbestos requirements are listed under the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (Code of Federal Regulations [CFR] Title 40, Part 61, Subpart M), and require the control of asbestos during the renovation and demolition of buildings. The asbestos NESHAPs require a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable (U.S. EPA 2016). At the state level, CCR §1529 sets requirements for

asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers. At the local level, SCAQMD Rule 1403 establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from being released during renovation and demolition activities. Rule 1403 incorporates NESHAP requirements and SCAQMD has the authority to enforce the federal asbestos NESHAP and is responsible for enforcement at a local level.

Demolition of existing structures would be required to comply with applicable federal, state, and local regulations pertaining to lead and asbestos. This would reduce potential impacts associated with exposure of sensitive receptors to lead and asbestos to a less than significant level.

Toxic Air Contaminants. Construction-related activities would result in temporary project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2021a) and is therefore the focus of this analysis.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 23 months. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time.

According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., 23 months) is approximately six percent of the total exposure period used for 30-year health risk calculations. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (Bay Area Air Quality Management District 2017).

Maximum PM_{10} and $PM_{2.5}$ exhaust emissions would occur during demolition activities. These activities would last for approximately one month. PM emissions would decrease for the remaining construction period because construction activities such as grading, building construction, and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with demolition activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent less than one percent of the total 30-year

exposure period for health risk calculation. Given the aforementioned discussion, DPM generated by project construction would not create conditions where the probability is greater than one in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs exceeding a Hazard Index greater than one for the Maximally Exposed Individual. Therefore, project construction would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. Because emissions would not exceed applicable thresholds, the project's human health impacts related to TAC emissions during construction would be less than significant.

Mitigation Measures. Construction emissions associated with the proposed project would not exceed SCAQMD thresholds. Therefore, project construction would not 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 or expose sensitive receptors to substantial pollutant concentrations. No mitigation measures would be required.

Significance After Mitigation. The impact would be less than significant without mitigation.

Impact AQ-2 Operation of the proposed project would generate air pollutant emissions, but emissions would not exceed SCAQMD operational significance thresholds. Therefore, long-term regional air quality impacts would be Class III, *less than significant*.

The net increase in long-term emissions associated with the proposed project, as presented in Table 4.1-6, includes those emissions associated with vehicle trips (mobile emissions), the use of natural gas (energy emissions), testing of the diesel backup generator (stationary source emissions), and consumer products, architectural coatings, and landscaping equipment (area emissions). CalEEMod was used to calculate emissions based on the proposed land uses for the site and the number of trips generated. Mobile emissions are based on the estimated trip generation rates determined by the project traffic study (see Section 4.6, *Transportation and Circulation*). Lead emissions are not analyzed because pollutant quantities are negligible and there is no risk of exceeding the SCAQMD threshold of 3 pounds per day.

Table 4.1-6
Project Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Proposed Project						
Area	4	2	11	<1	<1	<1
Energy	<1	1	<1	<1	<1	<1
Mobile	4	3	24	4	1	<1
Stationary	<1	<1	1	<1	<1	<1
Subtotal	*8*	*6*	*36*	*4*	*1*	*<1*
Existing Uses to be Removed						
Area	(2)	(<1)	(1)	(<1)	(<1)	(<1)
Energy	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	(3)	(3)	(19)	(2)	(1)	(<1)
Subtotal[1]	*(5)*	*(3)*	*(21)*	*(3)*	*(1)*	*(<1)*
Total Net Emissions	**3**	**3**	**15**	**1**	**<1**	**<1**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Maximum Daily On-Site Operational Emissions (area emissions only)[2]	**4**	**2**	**11**	**<1**	**<1**	**<1**
Localized Significance Thresholds[3] *(on-site only)*	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***

Source: Table 2.2, "Overall Operational", CalEEMod summer and winter calculations, see Appendix C.
Note: ( ) indicates subtraction, Numbers may not add due to rounding, n/a = not applicable, no threshold.
[1]No stationary sources are present at the existing site.
[2] On-site emissions include area emissions (consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[3] LSTs are for a one acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary

As shown in Table 4.1-6, the project would generate a net increase in total operational emissions of 3 pounds of VOC, 3 pounds of NO_X, 15 pounds of CO, 1 pound of PM_{10}, and less than 1 pound of SO_X and $PM_{2.5}$ per day. No SCAQMD regional or localized significance thresholds would be exceeded; therefore, impacts would be less than significant. Because emissions would not exceed applicable thresholds, the project's human health impacts related to criteria air pollutant emissions during operation would be less than significant.

Local Carbon Monoxide Hotspot Impact. A carbon monoxide (CO) hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

The entire South Coast Air Basin is in conformance with state and federal CO standards, and most air quality monitoring stations no longer report CO levels. No stations in the vicinity of the project site have monitored CO in the last four years. In 2012, the West Los Angeles-VA Hospital detected an eight-hour maximum CO concentration of 1.2 ppm, which is substantially below the state and federal standard of 9.0 ppm (CARB 2018a).

As shown in Table 4.1-6, maximum daily CO emissions would be 36 pounds per day and maximum on-site emissions would be 11 pounds per day, which would not exceed SCAQMD's regional threshold (550 lbs/day) or LST (562 lbs/day) for CO. Both the SCAQMD's regional thresholds and LSTs are designed to be protective of public health. Based on the low background level of CO in the project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the project's low level of operational CO emissions, the project would not create new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hot spots and associated human health effects would be less than significant.

Mitigation Measures. Operational emissions associated with the proposed project would not exceed SCAQMD thresholds. Therefore, project operation would not 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 or expose sensitive receptors to substantial pollutant concentrations. As such, mitigation is not required.

Significance after Mitigation. Impacts would be less than significant without mitigation.

Impact AQ-3 **Population growth generated by the project would be consistent with the assumptions of the 2016 AQMP. Furthermore, the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. Therefore, impacts related to consistency with the AQMP would be Class III, *less than significant*.**

A project may be inconsistent with the AQMP if it would generate population, housing or employment growth exceeding the forecasts used in the development of the AQMP because vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. In addition, a project may be inconsistent with the AQMP if it would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

As described in Section XIII, *Population and Housing*, of the Initial Study (Appendix A), the proposed project is consistent with regional and local population and housing projections. The AQMP for the SCAQMD relies on population data from the Southern California Association of Governments (SCAG). According to SCAG's latest growth forecast (2020-2045 RTP/SCS Final Growth Forecast), the City of West Hollywood is projected to have a population of 42,600 in 2045. According to the City's General Plan EIR (October 2010), the population in General Plan buildout year 2035 is estimated at 44,182.

The addition of 119 new units on the project site (111 new apartment units plus 12 live/work units minus the four units that would be demolished as part of the project) could cause a direct increase in the City's population. Using the California State Department of Finance average

household size for West Hollywood of 1.52 persons, the 119 units would generate an average resident population of 181 persons (119 units x 1.52 persons/unit) (California Department of Finance 2021). The current City population is approximately 36,125, according to the most recent (May 2021) California Department of Finance estimate. Therefore, the proposed project would result in a total population of approximately 36,306 persons (36,125 + 181). This increase in population would not exceed SCAG's or the City's growth forecast for 2045. Furthermore, as discussed under Impacts AQ-1 and AQ-2, the project would not generate emissions exceeding SCAQMD's regional and localized significance thresholds during construction and operation and therefore would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. Because project-generated population growth would be within SCAG population growth forecasts for the City and project-related emissions would not exceed SCAQMD thresholds, the project would be consistent with the AQMP. Impacts would be less than significant.

Mitigation Measures. No mitigation measures are required.

Significance after Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. The South Coast Air Basin is a non-attainment area for the federal and state standards for ozone and $PM_{2.5}$ and the state standards for NO_2 and PM_{10} (SCAQMD 2016). Any growth in the Los Angeles metropolitan area would contribute to existing exceedances of ambient air quality standards when taken as a whole with existing development. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. The SCAQMD's approach to determining cumulative air quality impacts for criteria air pollutants is to first determine whether or not the proposed project would result in a significant project-level impact to regional air quality based on SCAQMD significance thresholds. If the project does not exceed SCAQMD thresholds, then the lead agency needs to consider the additive effects of related projects only if the proposed project is part of an ongoing regulatory program or is contemplated in a program EIR, and the related projects are located within an approximately one mile of the project site. If there are related projects within the vicinity (one-mile radius) of the project site that are part of an ongoing regulatory program or are contemplated in a Program EIR, then the additive effect of the related projects should be considered.

The proposed project is not part of an ongoing regulatory program; therefore, the SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed in Impact AQ-1, daily emissions of construction-related pollutants would not exceed SCAQMD significance thresholds. As discussed in Impact AQ-2, the proposed project would result in an increase in daily operational emissions; however, this increase would not exceed the SCAQMD thresholds.

By applying the SCAQMD cumulative air quality impact methodology, implementation of the proposed project would not result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects, would occur. Because the proposed project would not generate emissions that exceed the SCAQMD's thresholds and the project is consistent with

the AQMP, the project would not make a cumulatively considerable contribution with regard to criteria pollutants. Therefore, the project's contribution to cumulative regional air quality impacts would not be cumulatively considerable.

4.2 GEOLOGY and HYDROLOGY

This section analyzes potential impacts to groundwater and impacts associated with geologic processes, including hazards associated with liquefaction and other soil-related risks. A geotechnical evaluation of the site was conducted for the proposed project by GeoDesign, Inc ("GeoDesign") dated July 23, 2018 and revised October 31, 2019. The following analysis is based in part on the GeoDesign report as well as the Updated Recommendations memorandum prepared by Zadoorian & Associates, Inc. dated July 9, 2019, both of which can be found in Appendix D of this EIR.

4.2.1 Setting

a. Site Geology. The project site is located in northwestern West Hollywood along the northern margin of the Los Angeles Basin. The City is located just south of the Hollywood Hills at the base of the Santa Monica Mountains and declines in elevation to the south. Geological materials at the site consist of Holocene and Pleistocene age alluvial fan deposits derived from the erosion of the Santa Monica Mountains. The alluvial fan deposits form alternating layers of silty sand and sand with lesser amounts of clayey sand, silt, and clay. Together, the Holocene and Pleistocene age alluvial fan sediments are approximately 600 feet thick in the site vicinity and are underlain by Tertiary Age sedimentary.

The project site is located in the northern-most portion of the Peninsular Ranges Geomorphic Province, near the Transverse Ranges Geomorphic Province to the north. The Peninsular Ranges is characterized by northwest-trending geologic structures in contrast to the Transverse Ranges which is characterized by east-west trending geologic structures. The boundary between the two geomorphic provinces is a system of faults that include the active Malibu Coast, Santa Monica, Hollywood, Raymond, and Sierra Madre fault zones.

The closest active fault to the site capable of surface rupture is the Hollywood Fault. Splays of the Hollywood Fault zone are located approximately 600 feet north of the site. The project site is not within an Alquist-Priolo Earthquake Fault Zone. The City has established a Fault Precaution (FP) zone along the Hollywood Fault zone. Fault Zone 1 requires a site-specific surface fault rupture evaluation and FP Zone 2 requires either a site-specific fault rupture evaluation or foundation strengthening to mitigate up to 2 inches of ground displacement. The project site is not located in FP Zone 1 or FP Zone 2.

The ground surface level of the project site varies from approximately 264 feet above mean seal level (MSL) at the north side of the site to an elevation of 235 feet above MSL at the southeastern corner of the site (GeoDesign 2019).

b. Site Hydrogeology. The City of West Hollywood is within the Hollywood Groundwater Subbasin, which is part of the Los Angeles Groundwater Basin. The first groundwater encountered in this basin generally flows southward, away from the Santa Monica Mountains. There are different groundwater bearing zones within the basin. Deeper groundwater in the basin typically flows from east to west and the depth is as much as 660 feet (West Hollywood General Plan FEIR 2010). Explorations by GeoDesign in August 2011, May 2017, and June 2018 encountered groundwater at the project site at depths of between 30 and 49 feet below

ground surface. The differences in depth to groundwater resulted from the variable ground surface elevations at the site. The depth to groundwater encountered in the exploration borings corresponds to elevations of between 201 and 207 feet above mean sea level. Fluctuations in the elevation of groundwater are primarily due to seasonal and annual variations in rainfall and other factors not evident at the time of the measurements. Fluctuations also may occur across the site. The historic high groundwater level on the project site ranges from approximately 221 to 225 feet above MSL (see Table 2 of GeoDesign 2019).

c. Seismic and Soil Hazards.

Liquefaction. Liquefaction is a temporary, but substantial, loss of shear strength in granular solids, such as sand, silt, and gravel, usually occurring during or after a major earthquake. This occurs when the shock waves from an earthquake of sufficient magnitude and duration compact and decrease the volume of the soil; if drainage cannot occur, this reduction in soil volume will increase the pressure exerted on the water contained in the soil, forcing it upward to the ground surface. This process can transform stable granular material into a fluid-like state. The potential for liquefaction to occur is greatest in areas with loose, granular, low-density soil, where the water table is within the upper 40 to 50 feet of the ground surface. Liquefaction can result in slope and foundation failure. Other effects of liquefaction include lateral spread, flow failures, ground oscillations, and loss of bearing strength. Liquefaction is intrinsically linked with the depth of groundwater below the site and the types of sediments underlying an area. According to the GeoDesign geotechnical report, there is the potential for liquefaction to occur at this site (GeoDesign 2019). The site is located in an area designated as having a potential for liquefaction as indicated on the State of California Seismic Hazard Zone map for the area.

Subsidence and Settlement. Subsidence involves deep seated settlement due to the withdrawal of fluid (oil, natural gas, or water). Seismically induced settlement occurs in loose to medium dense unconsolidated soil above groundwater. These soils compress (settle) when subject to seismic shaking. The settlement can be exacerbated by increased loading, such as from the construction of onsite buildings. Settlement can also result solely from human activities including improperly placed artificial fill, and structures built on soils or bedrock materials with differential settlement rates. This settlement can be mitigated prior to development through the removal and recompaction of loose soils.

Seismic-induced settlement or compaction of dry or moist, cohesionless soils can be an effect related to earthquake ground motion. Uniform settlement beneath a given structure would cause minimal damage; however, because of variations in distribution, density, and confining conditions of the soils, seismic-induced settlement is generally non-uniform and can cause serious structural damage. Dry and partially saturated soils as well as saturated granular soils are subject to seismic-induced settlement. According to the geotechnical report, the potential for dry seismic settlement is not present at this site with respect to the proposed development. The geotechnical study determined that there is a potential to have some liquefaction-related settlement at this site. The amount of liquefaction-induced settlement computed in the geotechnical analysis ranges from 0.9 inch to 1.8 inches (GeoDesign 2019).

Lateral Spreading. As discussed in the geotechnical report, lateral spreading may occur when potentially liquefiable soils are present and exposed in conjunction with a sloping ground surface. If soils within the slope liquefy, the result may be temporary instability resulting in movement of sediments within the slope and could include slope failure. For this to occur, the liquefiable soils need to be continuous and the toe of the slope needs to be unsupported.

The distance from the ground surface to potentially liquefiable sediments is below the lowest floor level of the proposed structure. The depth to the liquefiable sediments is about 30 feet below the ground surface measured at Santa Monica Boulevard adjacent to the site. These sediments are not exposed at the ground surface near the site. According to the GeoDesign geotechnical report, the potential for lateral spreading is not present at the site.

Landslides. Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are generally considered to be rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more shallow type of slope failure compared to landslides. These typically affect the upper soil horizons, and are not bedrock features. Historically, mudslides and slumps occur during or soon after periods of rainfall. Erosion can occur along manufactured slopes that are improperly designed or not adequately re-vegetated.

The size of a landslide can vary from minor rock falls to large hillside slumps. The underlying bedrock bedding planes, degree of water saturation of a material, steepness of a slope and the general strength of the soil all contribute to the stability of a hillside. Basal erosion caused by water or human-induced modifications to the natural contour of a hill, including grading, have the potential to destabilize a hillside.

The California Division of Mines and Geology (CDMG) prepared Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* (CDMG 2008). This document provides recommendations to effectively reduce seismic hazards to acceptable levels, as defined in California Code of Regulations (CCR Title 14, Section 3721). For landslides, CDMG Special Publication 117 recommends that the following be performed:

- *A screening investigation to determine the possible presence of landslides.*
- *If the screening investigation identifies the likely presence of landslides, then perform a quantitative evaluation of earthquake-induced landslide potential. This task includes field exploration, site sampling, and geotechnical testing. A slope stability analysis might also be appropriate here.*
- *Evaluation of potential earthquake-induced landslide hazards.*
- *Mitigation of earthquake-induced landslide hazards.*

The geology of the Beverly Hills quadrangle, including the project site, has been mapped. Although landslides are identified on the map for portions of the Beverly Hills Quadrangle, no mapped landslides are shown as being present at the subject site. The geotechnical report did not identify any landslides present at the site. In addition, the Seismic Hazard Zone map for the Beverly Hills Quadrangle (California Geologic Survey [CGS] 1999) does not depict the site as in an area with the potential to experience earthquake-induced landslides. Based on the lack of any mapped landslides and the fact that the geotechnical report does not identify landslides affecting the site, the potential for a landslide hazard at this site is low.

Tsunamis and Seiches. Tsunamis are large ocean surges that are created as a result of a subsea earthquake or landslide. The waves created by the subsea earthquake or landslide travel across the ocean at high speeds (several hundreds of miles per hour). As the waves reach shore, their amplitudes increase. Once the waves reach land, they can cause widespread flooding. The areas susceptible to tsunamis are those near to the ocean and along low-lying river channels.

A seiche is a wave or series of waves that are produced within an enclosed or partially enclosed body of water (such as a lake or bay). Most seiches are created as landslides fall into the body of water and displace the water. The water then sloshes out of the bay or lake, creating the seiche. If a seiche overtops a dam, the water can erode the dam face to the point where the dam can fail.

The project site is located over 10 miles from the Pacific Ocean at elevations ranging over 200 feet above mean sea level. As such, the potential for a tsunami affecting the site is not present. The site does not lie in an area near any large bodies of water or bays that could be affected by a seiche. Therefore, the potential for a seiche at the site is not present.

4.2.2 Environmental Impact Analysis

a. Methodology and Significance Thresholds. This evaluation is based on review of existing information that has been developed for the project site, including a geotechnical evaluation and report prepared for the project by GeoDesign, the City of West Hollywood General Plan Safety and Noise Element, and other available sources (GeoDesign 2019, City of West Hollywood 2011a).

The project would result in a significant impact related to geology and soils if it would:

1. *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;*
    ii. *Strong seismic ground shaking;*
    iii. *Seismic-related ground failure, including liquefaction; or*
    iv. *Landslides;*
2. *Result in substantial soil erosion or the loss of topsoil;*
3. *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;*
4. *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; or*
5. *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.*
6. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The Initial Study (Appendix A) determined that the proposed project could result in potentially significant impacts related to liquefaction (first criterion, part iii), landslides (first criterion, part

iv), and geologic instability (third criterion). As such, an analysis of these issues is included in this section of the EIR.

Hydrology and water quality effects are considered significant if the project would:

1. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.*
2. *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.*
3. *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.*
   ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*
   iii. *create or contribute runoff water which would exceed the capacity of existing or*
4. *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*
5. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The Initial Study (Appendix A) determined that the proposed project could result in potentially significant impacts related to the second criterion listed above. As such, an analysis of impacts related to possible groundwater withdrawal is included in this section of the EIR. Impacts related to all other criteria listed above were found to be less than significant and, therefore, are not further discussed in this section.

b. Project Impacts and Mitigation Measures.

Impact GEO-1 **Seismically-induced ground shaking could cause liquefiable sediments to lose supporting strength and liquefy, resulting in loss of property or risk to human health and safety. The geotechnical evaluation performed for the proposed project includes mitigation measures to prevent soil-related hazards from adversely affecting the proposed structure. In addition, the proposed project would be required to comply with California Building Code (CBC) requirements. Impacts would be Class II, *less than significant with mitigation incorporated.***

The project site is located in an area designated as having the potential for liquefaction as indicated on the CGS Seismic Hazard Zone map for the area. GeoDesign evaluated the liquefaction potential of soils on-site as part of its 2018 geotechnical report. The analysis found that potentially liquefiable soils are present at the project site. The report calculated that up to 1.9 inches of settlement could occur, which could cause damage to building foundations. Therefore, the potential for liquefaction and associated settlement exists at the site and impacts would be potentially significant.

Mitigation Measures. The following measure would reduce seismic-related soil hazard impacts to a less than significant level:

GEO-1 **Geotechnical Design Considerations.** The following foundation design considerations related to soil engineering, which are also included in Section 7.1 of the 2018 geotechnical report prepared by GeoDesign, Inc., must be incorporated into the proposed project grading and building plans, revised as needed for compliance with current California Building Code (CBC). Design and construction of the building shall be engineered to withstand the expected ground acceleration and potential liquefaction that may occur at this site. These include, but are not limited to:

- *Foundation Design. The proposed structure shall be supported on a mat foundation system established in the underlying dense to very dense native soils at the site at the planned foundation bottom level (approximately 223 feet above MSL). Mat foundations shall be established at least three feet below the lowest adjacent grade or top of floor slab and designed using an allowable bearing pressure of 7,500 pounds per square foot and a subgrade modulus of reaction equivalent to 100 pounds per square inch. Lateral loading must be designed to withstand a passive pressure of 300 pounds per square foot per foot of embedment where the concrete is put directly against the undisturbed native dense soils. A coefficient of friction of 0.4 shall be used to calculate resistance to sliding for footings bearing on native soils. The lateral bearing pressure described in the geotechnical report takes into consideration the hydrostatic pressure generated if the groundwater table rises to its historic high. Any changes to the building or foundation design that result in changes to the foundation load shall be provided to a City-approved geotechnical engineer for their evaluation and approval.*

Further, the construction shall comply with applicable provisions of the current CBC. The design of the foundation shall be reviewed and approved by the City Engineer prior to the issuance of the building permit.

Significance After Mitigation. The probability of a larger than expected earthquake occurring cannot be eliminated. Any structure built in California is susceptible to failure due to seismic activity. However, structural failure due to seismic ground shaking resulting in liquefaction of the sediments would be reduced to a less than significant level by implementing Mitigation Measure GEO-1.

Impact GEO-2 **The proposed project would require excavation into an existing hillside. Landslides or slope failure could occur. With implementation of mitigation measures contained in the geotechnical report and mandatory compliance with CBC requirements, impacts would be Class II, *less than significant with mitigation incorporated.***

As discussed in the GeoDesign geotechnical report, the geologic investigation of the project site encountered native stiff sandy clay in the portion of the hillside on-site that is to be excavated. The project involves cutting into the hillside to build a structure of five above-ground floors and subterranean and partially subterranean parking below the elevation of Santa Monica Boulevard. The sitetopography rises to the north, away from Santa Monica Boulevard.

According to geotechnical report, the lowest finished floor level for the proposed project would be at approximately 225 to 227 feet above MSL. The building would be supported on a mat foundation that would be established approximately three to five feet below the lowest finish floor level, between approximately elevations of 221 and 224 feet above MSL. Santa Monica Boulevard adjacent to the site is at an elevation of about 235 MSL. The top of the hillside at the northern boundary of the project site is at an elevation of about 264 MSL. Thus, when measured from the top of the hill to the base of the building, excavation would be up to 43 (264 minus 221) vertical feet. The base of the building would be about 14 (235 minus 221) feet below the adjacent surface grade of Santa Monica Boulevard. Because the site is sloped, the north wall of the project would be notched into the hillside and would be below the ground surface. In addition, the subterranean parking level would be below the ground surface.

Because the proposed project would require the excavation into an existing hillside, small landslides or slope failure could occur. The GeoDesign geotechnical report states that shoring of the hillside cut would be necessary to maintain the integrity of the slope that is to be cut. Therefore, mitigation measures GEO-2 is required.

Mitigation Measure. Implementation of GEO-1 above and the following measure would reduce impacts related to slope failure to a less than significant level.

GEO-2 **Geotechnical Recommendations for Foundation Construction.** The applicant shall comply with all recommendations contained in the 2018 geotechnical report prepared for the project by GeoDesign, Inc. These include, but are not limited to, the following:

- *Shoring Design. All recommendations presented in the geotechnical report pertaining to the shoring design considerations shall be followed. Soldier piles, lagging, and tie backs shall be designed to withstand the earth pressure resulting from adjacent soils, traffic loading, and temporary equipment used to excavate the slopes and drive the shoring. For soldier piles driven below the groundwater table, special provisions shall be followed to ensure that caving is minimized. The shoring contractor shall provide its design to a City-approved geotechnical engineer for review and comment prior to commencement of shoring. Lagging deflection and tie back resistance strength shall be measured in the field to ensure that these features are able to withstand the earth pressures that they will undergo.*

- *Foundation Observations. All foundation excavations shall be observed by a City-approved geotechnical engineer to verify penetration into the recommended bearing materials. The observation shall be performed prior to the placement of reinforcement. All foundation pile excavations shall be performed under the continuous observation by City-approved*

geotechnical engineer to verify penetration into firm undisturbed natural soils. Foundations shall be deepened if necessary to extend into satisfactory soils, or proper compaction shall be performed to ensure that the foundation slab is built upon dense compact material. Foundation excavations shall be cleaned of all loose soils prior to placing steel and concrete. Any required foundation backfill shall be mechanically compacted, flooding is not permitted.

- *Construction Monitoring. Compliance with the design concepts, specifications or recommendations during construction requires review by City-approved geotechnical engineer. All foundations shall be observed by a city-approved geotechnical engineer prior to placing concrete or steel. Any fill which is placed shall be observed, tested, and verified if used for engineering purposes. It is the responsibility of the contractor to ensure that all excavations and trenches are properly sloped or shored. All temporary excavations shall be cut and maintained in accordance with applicable OSHA rules and regulations.*

Recommendations contained in the geotechnical report shall be reviewed and approved by the Community Development Department and incorporated into final grading and structural design plans, as deemed appropriate by the Community Development Department. In addition, all onsite structures shall be required to comply with applicable provisions of the California Building Code.

Significance After Mitigation. Implementation of Mitigation Measures GEO-1 and GEO-2 would ensure that the project is consistent with the project-specific design recommendations included in the Geotechnical Study. This would ensure that the project is designed to withstand potential slope instability. Further, the measures would require the use of proper construction techniques to address potential slope instability during construction. Therefore, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides or unstable soils during construction or building operation. With Mitigation Measure GEO-1 and GEO-2, the potential for structural failure due to an in adequate foundation and/or unstable slopes would be reduced to a less than significant level.

Impact GEO-3 **The lowest proposed finished floor level of the structure would be located approximately at the historic high groundwater level and provisions to resist resulting hydrostatic pressures would be required. Permanent dewatering is not required, but waterproofing will be required. Temporary dewatering may be needed during construction, which could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. However, with implementation of mitigation measures, impacts would be Class II, *less than significant with mitigation incorporated.***

Construction. The historic high groundwater level at the site ranges from approximately 221 to 225 MSL depending on location within the site (Table 2 of GeoDesign 2019). In the borings drilled by GeoDesign as part of the geotechnical evaluation, groundwater was encountered at between 201 and 207 MSL. The lowest proposed finished floor level would be established at approximately 225 to 227 feet above MSL. Including the mat foundation, excavation could occur at depths of 221 to 224 feet above MSL. Therefore, the groundwater level based on the most recent exploration data is approximately 18 to 26 feet below the lowest planned finished floor level and approximately 12 to 20 feet below the anticipated bottom of the foundation. Nonetheless, the historical high groundwater level is approximately at the lowest planned finished floor level.

Therefore, excavation activities would occur near the historical high groundwater level. Localized deeper excavations may also be required for elevator pits, during installation of the slop shoring features, and/or other depressed building features, which could extend below the historical high groundwater level. Therefore, groundwater may be encountered during construction at the bottom of the excavation and dewatering would be needed. The temporary construction dewatering would occur over approximately eight months during the excavation, underground utilities, and construction of subterranean parking phases (see Section 2.0, *Project Description,* for estimated construction schedule). Once these construction phases are finished, the dewatering would no longer be necessary.

Because temporary dewatering may be needed during construction, which could affect the local groundwater table and result in the discharge of potentially contaminated groundwater, impacts related to dewatering during construction are potentially significant. Mitigation measures GEO-3(a) and GEO-3(b) are required.

The adjacent properties do not rely on groundwater for water supply; rather, water is delivered by the City. Therefore, any potential dewatering would not affect groundwater wells. Further, temporary dewatering during construction would not cause any subsidence of the overlying sediments. Sediments beneath the project site and surrounding areas have already been subject to naturally-occurring episodes of saturation and unsaturation. Therefore, dewatering of the groundwater would have no impact on any ground settlement or sediment compaction.

Operation. As stated above, the lowest planned finish floor level is approximately at the historical high groundwater level. Therefore, groundwater intrusion into the structure could occur once the project is built during project operation. CBC Sections 8005.1.3 and 1005.3 define the conditions in which waterproofing would be required when the groundwater level is within six inches of the lowest planned finish floor level or higher. As the lowest finish floor level for the proposed project is approximately at the historical high levels at the site, waterproofing of the mat foundation is required per CBC requirements.

As stated in Section 2.0, *Project Description,* the subterranean level of the proposed project would include a waterproofing system such as an asphalt membrane barrier which would prevent water intrusion into the building. As the proposed structure would be waterproof in accordance with CBC requirements, then no permanent dewatering would be needed in the event that the groundwater table rises above the bottom of the building. Rather, the building mat foundation and walls below grade will be designed to resist the nominal hydrostatic pressure that would

develop in the event that the groundwater rises to the historic high levels. Since the proposed project would not involve permanent dewatering, groundwater impacts associated with operation of the proposed project would be less than significant.

Mitigation Measures. The following measures shall be implemented to reduce impacts related to groundwater dewatering during construction to a less than significant level.

GEO-3(a) Groundwater Monitoring. A groundwater well shall be installed at the project site prior to construction to determine the location of groundwater. If groundwater would be encountered during construction and dewatering would be needed, than Mitigation Measure GEO-3(b) would be required.

GEO-3(b) Dewatering Plan. If dewatering occurs during construction then a dewatering plan shall be prepared by the applicant and presented to the City Engineer for review and approval. The dewatering plan shall identify the groundwater flow rate, groundwater capture zone, means of discharge of groundwater, and procedures for monitoring discharges. Proper permits for the discharge of the water shall be obtained and approved by the appropriate regulatory oversight agency and included in the dewatering plan. If contaminated groundwater is encountered during dewatering, then contaminated groundwater shall be managed in accordance with applicable regulatory requirements, including the requirements in Section 9.70.040 of the WHMC and Regional Water Quality Control Board Groundwater Permit requirements. The dewatering plan shall describe the operation and maintenance tasks to be performed and identify who will be responsible for the operation, maintenance, and permit compliance obligations. If the discharge of groundwater is to be done through the sanitary sewer, then the proper connections to the sewer shall be designed and depicted on the plans. If the groundwater is to be discharged into the storm drain, all pipes and pumps shall be properly designed to manage the expected maximum flows and shall meet all construction requirements of the City of West Hollywood. Backup systems, if required, shall be included on the plans. A sufficient amount of area near the dewatering system shall be allocated in case filtration of contaminated groundwater is required after groundwater dewatering commences.

Significance after Mitigation. Implementation of the above mitigation measure would ensure that dewatering would not impact sewer or storm drain systems or affect water quality by requiring that should dewatering occur, the City would confirm that dewatering occurs in accordance with proper City-approved procedures in a manner that would not exceed sewer capacity and would not release contaminated groundwater into the sewer system. Impacts would be reduced to a less than significant level.

c. Cumulative Impacts. Proposed development, in conjunction with other cumulative projects proposed in the City of West Hollywood, would expose additional people and property to seismically related hazards that are present throughout the region. If all of the development indicated in Table 3-2 (Section 3.0, *Environmental Setting*) were to proceed, individual construction projects located throughout the City and in adjacent cities would add approximately 2,666 residential units and 1.3 million square feet of other non-residential development. None of the planned or pending projects are located within ¼ mile of the project site. Therefore, simultaneous construction of multiple projects within the immediate vicinity of the project site would not occur such that cumulative local impacts to the groundwater table and impacts to water quality could occur. Cumulative impacts related to groundwater as well as liquefaction and soil-related hazards would be similar to what is described for project-specific impacts, and would be addressed on a project-by-project basis through compliance with existing building codes and any site-specific mitigation measures for individual projects. Compliance with applicable code requirements and the recommendations of site-specific geotechnical evaluations on a case-by-case basis would reduce cumulative impacts relating to geologic hazards to a less than significant level.

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4.3 GREENHOUSE GAS EMISSIONS

This section analyzes greenhouse gas (GHG) emissions associated with the proposed project and potential impacts related to climate change.

4.3.1 Setting

a. Climate Change and Greenhouse Gases. Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming", but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-20th century (IPCC 2014).

GHGs are gases that absorb and re-emit infrared radiation in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Observations of CO_2 concentrations, globally-averaged temperatures, and sea level rise are generally well within the range of earlier IPCC projections. The recently observed increases in CH_4 and N_2O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment has used new projections of future climate change that have become more detailed as the models have become more advanced.

Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (United States Environmental Protection Agency [U.S. EPA] 2019). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. CO_2 has a

100-year GWP of one. By contrast, CH_4 has a GWP of 25, meaning its global warming effect is 25 times greater than CO_2 on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 34° C cooler (CalEPA 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Some of the potential impacts in California of global warming may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (State of California 2018). While these potential impacts identify the possible effects of climate change at a global and potentially statewide level, in general, scientific modeling tools are currently unable to predict what impacts would occur locally.

Carbon Dioxide. The global carbon cycle is made up of large carbon flows and reservoirs. Billions of tons of carbon in the form of CO_2 are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, carbon fluxes among these various reservoirs are roughly balanced (U.S. Department of State, 2002). CO_2 was the first GHG demonstrated to be increasing in atmospheric concentration, with the first conclusive measurements being made in the second half of the 20th Century. Concentrations of CO_2 in the atmosphere have risen approximately 40% since the industrial revolution. The global atmospheric concentration of CO_2 has increased from a pre-industrial value of about 280 parts per million (ppm) to 391 ppm in 2011 (IPCC, 2007; National Oceanic and Atmospheric Association [NOAA] 2016). The average annual CO_2 concentration growth rate was larger between 1995 and 2005 (average: 1.9 ppm per year) than it has been since the beginning of continuous direct atmospheric measurements (1960–2005 average: 1.4 ppm per year), although there is year-to-year variability in growth rates (NOAA, 2016). Currently, CO_2 represents an estimated 82.8% of total GHG emissions (US EIA, 2011). The largest source of CO_2 emissions, and of overall GHG emissions, is fossil fuel combustion.

Methane. Methane (CH_4) is an effective absorber of radiation, though its atmospheric concentration is less than that of CO_2 and its lifetime in the atmosphere is limited to 10 to 12 years. It has a GWP approximately 21 times that of CO_2. Over the last 250 years, the concentration of CH_4 in the atmosphere has increased by 148% (IPCC 2007), although emissions have declined from 1990 levels. Anthropogenic sources of CH_4 include enteric fermentation associated with domestic livestock, landfills, natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, stationary and mobile combustion, and certain industrial processes (USEPA, 2016).

Nitrous Oxide. Concentrations of nitrous oxide (N_2O) began to rise at the beginning of the industrial revolution and continue to increase at a relatively uniform growth rate (NOAA, 2016). N_2O is produced by microbial processes in soil and water, including those reactions that occur in fertilizers that contain nitrogen, fossil fuel combustion, and other chemical processes. Use of these fertilizers has increased over the last century. Agricultural soil management and mobile source

fossil fuel combustion are the major sources of N_2O emissions. The GWP of nitrous oxide is approximately 310 times that of CO_2.

Fluorinated Gases (HFCS, PFCS and SF_6). Fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfurhexafluoride (SF_6), are powerful GHGs that are emitted from a variety of industrial processes. Fluorinated gases are used as substitutes for ozone-depleting substances such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and halons, which have been regulated since the mid-1980s because of their ozone-destroying potential and are phased out under the Montreal Protocol (1987) and Clean Air Act Amendments of 1990 (UN, 1987; USEPA, 2017). Electrical transmission and distribution systems account for most SF_6 emissions, while PFC emissions result from semiconductor manufacturing and as a by-product of primary aluminum production. Fluorinated gases are typically emitted in smaller quantities than CO_2, CH_4, and N_2O, but these compounds have much higher GWPs. SF_6 is the most potent GHG the IPCC has evaluated.

b. Greenhouse Gas Emissions Inventory. Worldwide anthropogenic emissions of GHG were approximately 46,000 million metric tons (MMT, or gigatonne) of CO_2e in 2010 (IPCC 2014). CO_2 emissions from fossil fuel combustion and industrial processes contributed about 65 percent of total emissions in 2010. Of anthropogenic GHGs, CO_2 was the most abundant accounting for 76 percent of total 2010 emissions. CH_4 emissions accounted for 16 percent of the 2010 total, while N_2O and fluorinated gases account for six and two percent respectively (IPCC 2014).

Total United States GHG emissions were 6,456.7 million metric tons (MMT or gigatonnes) of CO_2e in 2017 (USEPA 2019). Total United States emissions have increased by 1.3 percent since 1990; emissions decreased by 0.5 percent from 2016 to 2017 (USEPA 2019). The decrease from 2016 to 2017 was a result of multiple factors, including: (1) a continued shift from coal to natural gas and other non-fossil energy sources in the electric power sector and (2) milder weather in 2017 resulting in overall decreased electricity usage (USEPA 2019). Since 1990, U.S. emissions have increased at an average annual rate of 0.05 percent. In 2017, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of GHG emissions (with electricity-related emissions distributed). Meanwhile, the residential and commercial end-use sectors accounted for 15 percent and 16 percent of GHG emissions, respectively (USEPA 2019).

Based on CARB's California Greenhouse Gas Inventory for 2000-2016, California produced 424.1 MMT of CO_2e in 2017 (CARB 2019a). The major source of GHGs in California is associated with transportation, contributing 41 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 24 percent of the state's GHG emissions, and electric power accounted for approximately 15 percent (CARB 2019a). California emissions are due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. In 2016, the State of California achieved its 2020 GHG emission reduction targets as emissions fell below 431 MMT of CO_2e (CARB 2018a). The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017). With implementation of the 2017 Scoping Plan, regulated GHG emissions are projected to decline to 260 MMT of CO_2e per year by 2030. Per Executive Order (EO) B-55-18, the statewide goal for 2045 is to achieve carbon neutrality and maintain net negative emissions thereafter. This goal supersedes the 2050 goal of an 80 percent reduction in GHG

emissions below 1990 levels established by EO S-3-05, and CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

c. Potential Effects of Climate Change. Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature (GMST) for the decade from 2006 to 2015 was approximately 0.87°C (0.75°C to 0.99°C) higher than the average GMST over the period from 1850 to 1900. Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations are in agreement that LSAT as well as sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014 and 2018).

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 2018). While there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state as well as regionally-specific climate change case studies (State of California 2018). Below is a summary of some of the potential effects that could be experienced in California as a result of climate change.

Hydrology and Sea Level Rise. As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Climate change has the potential to induce substantial sea level rise in the coming century (State of California 2018). The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 mm per year, which is double the observed 20th century trend of 1.6 mm per year (World Meteorological Organization [WMO] 2013). As a result, global mean sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO 2013). Sea levels are rising faster now than in the previous two millennia, and the rise is expected to accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a global mean sea–level rise of 10 to 39 inches by 2100 (IPCC 2013). A mid to high rise in sea levels could completely erode 31 to 67 percent of southern California beaches, result in flooding of approximately 370 miles of coastal highways during 100-year storm events, jeopardize California's water supply due to salt water

intrusion, and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018). In addition, increased CO_2 emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Air Quality. Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. As temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have been occurring at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality would worsen. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (California Natural Resources Agency 2009).

Water Supply. Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. For example, many southern California cities have experienced their lowest recorded annual precipitation twice within the past decade; however, in a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources [DWR] 2008). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. However, the average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 5.9 inches along the central and southern California coast (State of California 2018). The Sierra snowpack provides the majority of California's water supply by accumulating snow during the state's wet winters and releasing it slowly during the state's dry springs and summers. A warmer climate is predicted to reduce the fraction of precipitation falling as snow and result in less snowfall at lower elevations, thereby reducing the total snowpack (DWR 2008; State of California 2018). The State of California projects that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline to less than two-thirds of its historical average by 2050 (State of California 2018).

Agriculture. California has a $50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2018). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent; water demand could increase as hotter conditions lead to the loss of soil moisture;

crop-yield could be threatened by water-induced stress and extreme heat waves; and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems and Wildlife. Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California 2018). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

Local Effects of Climate Change. While the above discussion identifies the possible effects of climate change at a global and potentially statewide level, in general scientific modeling tools are currently unable to predict what impacts would occur locally with a similar degree of accuracy. In general, regional and local predictions are made based on downscaling statewide models (CalEPA 2010).

d. Regulatory Setting. The following state and local regulations address both climate change and GHG emissions.

California Regulations. The State of California considers GHG emissions and the impacts of climate change to be a serious threat to the public health, environment, economic well-being, and natural resources of California and has taken an aggressive stance to mitigate the State's impact on climate change through the adoption of policies and legislation. California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. California has a numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On July 30, 2009, USEPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emissions Vehicles (LEV), Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80% of 1990 levels (CalEPA 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

CARB Resolution 07-54, signed in December 2007, establishes 25,000 metric tons of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold was just over 0.005% of California's total inventory of GHG emissions for 2004.

Senate Bill (SB) 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Southern California Association of Governments (SCAG) was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by

2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

In April 2011, Governor Brown signed SB 2X requiring California to generate 33% of its electricity from renewable energy by 2020.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan adopted in 2008. The 2013 Scoping Plan update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 statewide goals. The update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

Adopted on October 7, 2015, SB 350 supports the reduction of GHG emissions from the electricity sector through a number of measures, including requiring electricity providers to achieve a 50 percent renewables portfolio standard by 2030, a cumulative doubling of statewide energy efficiency savings in electricity and natural gas by retail customers by 2030.

Adopted in September 2016, SB 1383 requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

- *Methane: 40 percent below 2013 levels*
- *Hydrofluorocarbons: 40 percent below 2013 levels*
- *Anthropogenic black carbon: 50 percent below 2013 levels*

The bill also requires the California Department of Resources Recycling and Recovery, in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies and policies, such as SB 350 and SB 1383 (see below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with statewide per capita goals of six metric tons (MT) CO_2e by 2030 and two MT CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

Also, on September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100. EO B-55-18 also tasks CARB with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

For more information on the Senate and Assembly bills, Executive Orders, and reports discussed above, and to view reports and research referenced above, please refer to the following websites: www.climatechange.ca.gov and http://www.arb.ca.gov/cc/cc.htm.

Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the *CEQA Guidelines* for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted *CEQA Guidelines* provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Local Regulations. In October 2007, the City adopted a mandatory green building ordinance (WHMC Section 19.20.060). The ordinance establishes new standards for all new development projects such as drought-tolerant landscaping, low-flow plumbing fixtures, and energy efficient appliances. The ordinance also develops a Green Building Point System for new construction with incentives for projects that exceed minimum requirements.

The City of West Hollywood adopted a Climate Action Plan (CAP) in September 2011 which implements policy IRC-6.3 of the West Hollywood General Plan 2035 Infrastructure, Resources, and Conservation Element (West Hollywood, 2011b). The CAP outlines a course of action to reduce municipal and community-wide GHG emissions that contribute to climate change. The plan includes seven emission reductions 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 land use and community design strategy and the transportation and mobility strategy encourage development in areas to promote transit use, walking and bicycling in order to improve health and decrease driving. According to the CAP, a project-specific GHG analysis "must identify the specific CAP measures applicable to the project and how the project incorporates the measures." If the project is not consistent with the CAP measures or if the measures are not otherwise binding, they must be incorporated as mitigation measures applicable to the project. Additionally, the City of West Hollywood is in the process of preparing an updated CAP that is consistent with SB 32.

The City's 2017 *Climate Action Plan Annual Progress Report* included a Citywide inventory of GHG emissions conducted in 2016 and found that the City has made progress towards the 2020 GHG reduction goals set forth in the 2011 CAP. The report found that the City has reduced emissions associated with water and wastewater by 85%, emissions associated with natural gas by 40% and emissions associated with electricity by 27%. Annual emissions have decreased for multiple reasons, including implementation of the City's CAP, as well as State and regional legislation that have decreased energy-related and transportation fuel-related emissions.

4.3.2 Impact Analysis

a. Methodology. Estimated CO_2, CH_4, and N_2O emissions were calculated to identify the magnitude of potential project effects. The analysis focuses on CO_2, CH_4, and N_2O because these make up 98.9% of all GHG emissions by volume (IPCC 2007) and are the GHG emissions that the project would emit in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF_6, were also considered for the analysis. However, because the project is a residential and commercial development, the quantity of fluorinated gases would not be significant since fluorinated gases are primarily associated with industrial processes. Emissions of all GHGs are converted into their equivalent GWP in terms of CO_2 (CO_2e). GHG emissions associated with the proposed project were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 (see Appendix E for calculations). Emissions were modeled for year 2030 to provide an appropriate comparison with the locally-applicable, project-specific efficiency threshold for year 2030, which is described further under Section 4.3.2(b), *Significance Thresholds*.

Operational Emissions. Operational emissions include mobile source emissions, energy emissions, area source emissions, water emissions, solid waste emissions, and stationary source emissions. Emissions from energy use include emissions from electricity and natural gas use. As a result of the consumption of electricity and natural gas during project operation, GHGs are emitted on-site during the combustion of natural gas for space and water heating and cooking and off-site during the generation of electricity from fossil fuels in power plants. CalEEMod estimates GHG emissions from energy use by multiplying average rates of non-residential energy consumption by the quantity of non-residential square footage entered in the land use module to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the project location and utility provider. The project would be served by Southern California Edison (SCE). Therefore, SCE's specific energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) are used in the calculations of GHG emissions. The energy intensity factors included in CalEEMod are based on 2021 data by default at which time SCE had only achieved a 31.5 percent procurement of renewable energy. Per SB 100, the statewide Renewable Portfolio Standard (RPS) Program requires electricity providers to increase procurement from eligible renewable energy sources to 60 percent by 2030. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by SCE. SCE energy intensity factors that include this reduction are shown in Table 4.3-1.

Table 4.3-1
SCE Energy Intensity Factors

	2021 (lbs/MWh)	2030 (lbs/MWh)[2]
Percent procurement	31.5%[1]	60%
Carbon dioxide (CO_2)	390.98	240.97
Methane (CH_4)	0.033	0.020
Nitrous oxide (N_2O)	0.004	0.002

[1] *Source: California Energy Commission 2020*

[2] *RPS goal established by SB 100*

Area sources include consumer products, landscape maintenance, and architectural coatings. The use of landscape equipment emits GHGs associated with the equipment's fuel combustion. The landscaping equipment emission values were derived from the 2011 Off-Road Equipment Inventory Model. Emissions associated with consumer products and architectural coating were calculated in CalEEMod and utilize standard emission rates from CARB, U.S. EPA, and district supplied emission factor values (CAPCOA 2021).

The disposal of solid waste produces GHG emissions from the transportation of waste, anaerobic decomposition in landfills, and incineration. To calculate the GHG emissions generated by solid waste disposal, the total volume of solid waste was calculated using waste disposal rates identified by the California Department of Resources Recycling and Recovery (CalRecycle, CAPCOA 2021). The methods for quantifying GHG emissions from solid waste are based on the IPCC method using the degradable organic content of waste (CAPCOA 2021). GHG emissions associated with the project's waste disposal were calculated using these parameters.

Emissions from water and wastewater usage calculated in CalEEMod were based on the default water use intensity from the California Energy Commission's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California. The indoor and outdoor water use consumption data for each land use subtype comes from the Pacific Institute's *Waste Not, Want Not: The Potential for Urban Water Conservation in California* (2003) (CAPCOA 2021). Based on that report, a percentage of total water consumption was dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation was similarly based on a reported percentage of total indoor water use. CalEEMod does not incorporate water use reductions achieved by 2019 CALGreen (Part 11 of Title 24). New development would be subject to CalGreen, which requires a 20 percent increase in indoor water use efficiency and use of water efficient irrigation systems. Thus, in order to account for compliance with CalGreen, a 20 percent reduction in indoor water use and use of water efficient irrigation systems was included in the water consumption calculations for new development.

Mobile sources emissions from vehicle trips to and from the project site were quantified using CalEEMod based on the vehicle type and the trip rate for each land use. The estimate of total daily trips associated with the proposed project was based on the project traffic study and was calculated and extrapolated to derive total annual mileage in CalEEMod. The vehicle emission factors and fleet mix used in CalEEMod are derived from CARB's EMission FACtors 2017 model. In addition, the "Increase Density," "Increase Diversity," "Improve Destination Accessibility," "Increase Transit Accessibility," and "Integrate Below Market Rate Housing" features were incorporated into the VMT calculations in CalEEMod to account for the project's net increase in density of 85 dwelling units per acre (net increase of 119 dwelling units on 1.40 acres), its mixed use nature, its location in a Central Business District (CARB 2021b), its proximity to the Santa Monica/Westborne bus stop for the City of West Hollywood Cityline Commuter and LA Metro Route 4 lines (approximately 0.1 mile to the southwest), and its inclusion of 17 units of affordable housing. A limitation of the quantitative analysis of emissions from mobile combustion is that emission models, such as CalEEMod, evaluate aggregate emissions, meaning that all vehicle trips and related emissions assigned to a project are assumed to be new trips and emissions generated by the project itself. Such models do not demonstrate, with respect to a

regional air quality impact, what proportion of these emissions are actually "new" emissions, specifically attributable to the project in question. For most projects, the main contributor to regional air quality emissions is from motor vehicles; however, the quantity of vehicle trips appropriately characterized as "new" is usually uncertain as traffic associated with a project may be relocated trips from other locales. In other words, vehicle trips associated with the project may include trips relocated from other existing locations, as people begin to use the proposed project instead of similar existing retail and commercial uses. Therefore, because the proportion of "new" versus relocated trips is unknown, the VMT estimate generated by CalEEMod is used as a conservative, "worst-case" estimate.[1]

Stationary source emissions are generated by the use of stationary equipment, which would consist of a diesel backup generator. It was assumed the generator would be tested for up to one hour on any given day and would operate for a total of approximately 36 hours per year for testing and maintenance.

Construction Emissions. Construction activities emit GHGs primarily though combustion of fuels (mostly diesel) in the engines of off-road construction equipment and through combustion of diesel and gasoline in on-road construction vehicles and in the commute vehicles of construction workers. Smaller amounts of GHGs are also emitted indirectly through the energy use embodied in any water use for fugitive dust control and lighting for construction activity. Every phase of the construction process, including demolition, grading, paving, and building, emits GHG emissions in volumes proportional to the quantity and type of construction equipment used. Heavier equipment typically emits more GHGs per hour of use than lighter equipment due to greater fuel consumption and engine design.

Construction of the proposed project would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. CalEEMod was used to estimate emissions associated with the construction period, based on parameters such as the duration of construction activity, area of disturbance, and anticipated equipment used during construction. Complete results from CalEEMod and assumptions can be viewed in Appendix E.

Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches adequately address impacts from temporary construction activity. As stated in the *CEQA and Climate Change* white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA 2008). Nevertheless, air districts such as the SCAQMD have recommended amortizing construction-related emissions over a 30-year period in conjunction with the proposed project's operational emissions (SCAQMD 2015).

b. Significance Thresholds. Impacts related to GHG emissions from the proposed project would be significant if the project would:

[1] It should be noted that an analysis of VMT-related impacts is included in Section 4.6, *Transportation and Circulation*.

- *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or*
- *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

In addition, CEQA Guidelines Section 15064.4(b) states that a lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- *The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;*
- *Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and*
- *The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.*

The vast majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environmental effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (CEQA Guidelines Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7[c]).

According to CEQA Guidelines Section 15183.5, project-specific environmental documents can tier from, or incorporate by reference, the existing programmatic review in a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. CEQA Guidelines Section 15183.5 defines the following requirements for a qualified GHG emission reduction plan:

1. *Quantify existing and projected GHG emissions within the plan area;*
2. *Establish a reduction target based on substantial evidence, where GHG emissions are not cumulatively considerable;*

3. *Identify and analyze sector specific GHG emissions from plan activities;*
4. *Specify policies and actions (measures) that local jurisdictions will enact and implement over time to achieve the specified reduction target;*
5. *Establish a tool to monitor progress and amend if necessary; and*
6. *Adopt in a public process following environmental review.*

A key aspect of a qualified GHG reduction plan is substantial evidence that the identified reduction target establishes a threshold where GHG emissions are not cumulatively considerable. The Association of Environmental Professionals (AEP) Beyond Newhall and 2020 white paper identifies this threshold as being a local target that aligns with the statewide legislative targets.

As an implementation measure of General Plan 2035, the City of West Hollywood adopted a CAP in 2011 with a target of reducing communitywide emissions by 20 to 25 percent below baseline (2008) GHG emissions levels by year 2035. AB 32 established a target of reducing GHG emissions to 1990 levels (i.e., reducing annual emission levels from years 2005 to 2008 by 15 percent[2]) by 2020, and SB 32 established a target of a 40 percent reduction in 1990 GHG emission levels by 2030. Therefore, the City's target is not consistent with the statewide target established by SB 32 because it does not include a target of reducing emissions by 40 percent below 1990 levels (or 55 percent below 2008 levels) by 2030. While the City's 2011 CAP took early strides to reduce emissions, the targets do not align with the more recently adopted long-term state goals. Even though the City has an aggressive CAP, it would not be considered a "qualified" GHG reduction plan under CEQA for purposes of this analysis.

Therefore, the CEQA analysis in this section is based on quantitative and qualitative factors. The quantitative analysis for this project evaluates GHG emissions generated by the proposed project against a locally-appropriate, project-specific efficiency threshold derived from the SB 32 target and the City's GHG inventory, which is consistent with current best practices in the industry (AEP 2016). This provides a quantitative assessment of the project's GHG emissions compared to a project-specific threshold. Because the GHG emissions target set by SB 32 is significantly more stringent than the AB 32 target, if the project is found to be consistent with the SB 32 emission reduction target, then it is considered consistent with the AB 32 reduction target as well. This analysis also qualitatively analyzes consistency with applicable GHG reduction plans, including the City's CAP.

Locally-Applicable, Project-Specific Efficiency Threshold. The locally-appropriate, project-specific efficiency threshold used in this analysis was developed to comply with the CEQA Guidelines and interpretative GHG case law. An efficiency threshold is calculated by dividing the allowable GHG emissions inventory in a selected calendar year by the service population (residents plus employees) in that year. This calculation identifies the quantity of emissions that can be generated on a per service person basis without significantly impacting the environment. This approach is appropriate for the proposed project because it measures the project's emissions on a local per service person basis to determine its overall GHG emissions efficiency relative to regulatory GHG emission reduction goals.

[2] *Because few jurisdictions completed a 1990 GHG emissions inventory, the State of California considers 1990 levels to be equivalent to 15 percent below GHG emissions levels inventoried between years 2005 to 2008 (CARB 2008).*

For the proposed project, an efficiency threshold was calculated based on West Hollywood's target GHG emission levels that would be consistent with the State 2030 target using the service population of West Hollywood in year 2030. This locally-appropriate, project-specific quantitative threshold is derived, in part, from the City's 2008 GHG inventory in line with CARB's recommendations in the 2008 Climate Change Scoping Plan and the 2017 Scoping Plan (CARB 2008 and 2017).

Consistent with the legal guidance provided in the Golden Door (2018) and Newhall Ranch (2015) decisions, regarding the correlation between state and local conditions, the City's 2008 GHG inventory was used to calculate a locally-appropriate, evidence-based, project-specific threshold consistent with California's SB 32 target. As noted above, because few jurisdictions completed a 1990 GHG emissions inventory, the State of California considers 1990 levels to be equivalent to 15 percent below GHG emissions levels inventoried between years 2005 to 2008 (CARB 2008). Accordingly and although the City has prepared an updated GHG inventory in 2016, the 2008 inventory is used for the purposes of this analysis for consistency in comparison with reduction below 2008 numbers.

The City completed a 2008 GHG inventory that calculated communitywide emissions of 583,213 MT of CO_2e per year (see Table 4.3-2).[3] All sectors included in the 2008 inventory are appropriate to use in calculating a project-specific threshold because the project is a mixed-use development and future residents and employees of the project would consume energy, generate on-road vehicle trips, consume water, and produce solid waste and wastewater.

Table 4.3-2
City of West Hollywood 2008 Inventory

Source	2008 Total (MT of CO_2e)
Transportation	361,350
Commercial/Industrial Energy Use	116,197
Residential Energy Use	70,378
Wastewater Treatment	20,981
Solid Waste	8,543
Water Consumption	5,764
Total Emissions	**583,213**

Source: City of West Hollywood 2011b

AB 32 set a statewide target of reducing GHG emissions to 1990 levels by 2020. Therefore, for the City of West Hollywood to be consistent with AB 32, annual GHG emissions levels would need to be reduced by 15 percent below 2008 levels by 2020 to approximately 495,731 MT of CO_2e per year. In addition, SB 32 set a statewide GHG emission reduction target of 40 percent below 1990 levels. Therefore, annual GHG emissions levels would need to be reduced by 40 percent below 1990 levels to approximately 297,439 MT of CO_2e per year to be consistent with SB 32 (see Table 4.3-3).

[3] Note: the City's 2016 inventory calculated communitywide emissions to be 498,751 MT of CO_2e per year, a 14.5 percent reduction from 2008 emissions.

Accordingly, the 2030 project-specific efficiency threshold can be calculated by dividing total citywide GHG emissions by the citywide service population (residents + employees) for year 2030. Based on SCAG data, the City's service population was 58,400 persons in 2016 and is forecast to increase to 80,700 persons by 2045 (SCAG 2020). Therefore, using linear interpolation between 2016 and 2045, the City's 2030 service population would be approximately 69,166 persons. Therefore, the 2030 locally-appropriate, project-specific threshold would be approximately 4.3 MT of CO_2e per year (see Table 4.3-3).

Table 4.3-3
Locally-Applicable, Project-Specific Threshold

1990 Baseline Levels[1]	583,213 MT of CO_2e/year
2020 Target (AB 32)[2]	495,731 MT of CO_2e/year
2030 Target (SB 32)[3]	297,439 MT of CO_2e/year
2030 Service Population	69,166 persons
2030 Project-Specific Efficiency Threshold	4.3 MT of CO_2e per service person per year

MT = metric tons, CO_2e = carbon dioxide equivalents
[1] 15 percent below 2008 emission levels from project-applicable sectors (Table 4.3-2)
[2] AB 32 sets a target of reducing GHG emissions to 1990 levels by 2020.
[3] SB 32 sets a target of reducing GHG emissions by 40 percent below 1990 levels by 2030.

At this time, the State has codified a target of reducing emissions to 40 percent below 1990 emissions levels by 2030 (SB 32) and has developed the 2017 Scoping Plan to demonstrate how the State will achieve the 2030 target and make substantial progress toward the 2050 goal of an 80 percent reduction in 1990 GHG emission levels set by EO S-3-05. In the recently signed EO B-55-18, which identifies a new goal of carbon neutrality by 2045 and supersedes the goal established by EO S-3-05, CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

While State and regional regulators of energy and transportation systems, along with the State's Cap and Trade program, are designed to be set at limits to achieve most of the reductions needed to hit the State's long-term targets, local governments can do their fair share toward meeting the State's targets by siting and approving projects that accommodate planned population growth and projects that are GHG-efficient. The AEP Climate Change Committee recommends that CEQA GHG analyses evaluate project emissions in light of the trajectory of state climate change legislation and assess their "substantial progress" toward achieving long-term reduction targets identified in available plans, legislation, or EOs. Consistent with AEP Climate Change Committee recommendations, GHG impacts are analyzed in terms of whether the anticipated mixed residential-commercial development would impede "substantial progress" toward meeting the reduction goal identified in SB 32 and EO B-55-18. As SB 32 is considered an interim target toward meeting the 2045 State goal, consistency with SB 32 would be considered contributing substantial progress toward meeting the State's long-term 2045 goals. Avoiding interference with, and making substantial progress toward, these long-term State targets is important because these targets have been set at levels that achieve California's fair share of international emissions reduction targets that will stabilize global climate change effects and avoid the adverse environmental consequences described under Section 4.3.1, *Setting* (EO B-55-18).

Service Population. The following data from Southern California Association of Governments (SCAG) was used to estimate the number of employment opportunities provided by the proposed project (SCAG 2001):

- *"Other Retail/Service" land uses employ approximately one employee per 424 square feet in Los Angeles County, which was used as a proxy for the retail space, hair salon, and restaurant/café*
- *"Low-Rise Office" employs approximately one employee per 319 square feet*

As described in Section 5.0, *Other CEQA Required Sections*, the existing site use employs approximately 69 people and the proposed project would employ approximately 85 people. Therefore, the project would result in a net increase of 16 employees. In addition, the proposed project would result in a net increase of an estimated 181 residents (CDF 2021).[4] Therefore, the net increase in service population of the anticipated mixed-use development would be approximately 197 persons.[5]

c. Project Impacts and Mitigation Measures.

Impact GHG-1 Construction and operation of the anticipated mixed-use residential-commercial development would generate temporary and long-term increases in GHG emissions. However, these emissions would be below the project-specific efficiency threshold based on the State Scoping Plan and would not be deemed to cause a significant contribution to global climate change. Therefore, no mitigation measures are required. The impact would be Class III, *less than significant*.

To determine whether project emissions exceed the per service population emission threshold in line with the State's 2017 Scoping Plan, a quantitative analysis of GHG emissions associated with construction emissions and operational emissions from the proposed project is provided below. Table 4.3-4 shows emissions expected from the proposed project (see Appendix E for detailed CalEEMod worksheets).

Construction Emissions. For the purpose of this analysis, construction activity is assumed to occur over a period of approximately 23 months (see Section 2.0, *Project Description*). Construction activity for the proposed project would generate an estimated 1,012 metric tons of CO_2e (MT of CO_2e).[6] Following the SCAQMD's recommended methodology to amortize emissions over a 30-year period (the assumed life of the project), construction of the proposed project would generate an estimated 34 metric tons of CO_2e per year.

Operational Indirect and Stationary Direct Emissions. Long-term emissions relate to area sources, energy use, solid waste, water use, and transportation. Each of these sources is discussed below.

[4] (119 dwelling units x 1.55 people per dwelling unit)
[5] (18,131 square feet divided by 424 square feet per employee [43]) + 6,711 square feet divided by 319 square feet per employee [21] + 3,938 square feet divided by 424 square feet per employee [9] + 12 live/work units times one employee per unit [12])
[6] The unit "CO_2e" represents an amount of a GHG whose atmospheric impact has been standardized to that of one-unit mass of carbon dioxide (CO_2), based on the global warming potential (GWP) of the gas.

Area Source Emissions. CalEEMod was used to calculate direct sources of air emissions located at the project site. These include consumer product use and landscape maintenance equipment. Area emissions are estimated at 29 metric tons of CO_2e per year.

Table 4.3-4
Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2e)
Proposed Project	
Project Construction[1]	34
Project Operational	
Area	29
Energy	308
Mobile	522
Stationary	1
Solid Waste	65
Water	34
Project Subtotal	**993**
Existing Uses	
Existing Operational	
Area	(1)
Energy	(105)
Mobile	(324)
Solid Waste	(40)
Water	(11)
Existing Conditions Subtotal	**(481)**
Total Emissions from Proposed Project (Project minus Existing)	**512**
Service Population (SP)	197
Emissions per Service Population (MT CO_2e/SP/year)	2.6
Project-Specific Efficiency Threshold (MT CO_2e/SP/year)	4.3
Exceed Project-Specific Threshold?	**No**

Source: Tables 2.1 2.2 and 4.2 in CalEEMod annual worksheets, see Appendix E for calculations and for GHG emission factor assumptions.
( ) denotes subtraction
[1] Construction CO_2e emissions from Table 2.1 in CalEEMod annual worksheets added and amortized over 30 years.

Energy Use. Operation of on-site development would consume both electricity and natural gas. The generation of electricity through combustion of fossil fuels emits CO_2, and to a smaller extent, N_2O and CH_4. As discussed above, annual electricity and natural gas emissions can be calculated using average rates of residential and non-residential energy consumption multiplied by the square footage entered in CalEEMod as well as the local utility provider's GHG emission factors. Electricity consumption associated with the project would generate approximately 190 metric tons of CO_2e per year. Natural gas use would generate approximately 118 metric tons of CO_2e per year. Thus, overall energy use at the project site would generate an estimated 308 metric tons of CO_2e per year.

Solid Waste Emissions. CalEEMod was used to calculate waste decomposition emissions from waste disposal at landfills. Based on this estimate, solid waste associated with the project would generate approximately 65 metric tons of CO_2e per year.

Stationary Emissions. CalEEMod was used to calculate stationary source emissions from one on-site emergency/standby generator. Based on this estimate, the emissions associated with the project would generate approximately one metric ton of CO_2e per year.

Water Use Emissions. Based on the amount of electricity generated in order to supply and convey water for the proposed project, the project would generate an estimated 34 metric tons of CO_2e per year.

Transportation Emissions. Mobile source GHG emissions were estimated using the average daily trips for the proposed project according to the project traffic study (see Appendix G for traffic study) and based on the total vehicle miles traveled (VMT) estimated in CalEEMod.[7] The proposed project would generate about 1.6 million annual VMT. The project would generate an estimated 522 metric tons of CO_2e per year from mobile sources.

Combined Construction and Operational Emissions. Table 4.3-4 combines the construction and operational GHG emissions associated with development of the proposed project, and subtracts operational emissions associated with existing development on the project site. As shown in the table, combined annual GHG emissions from the proposed project would be approximately 993 MT of CO_2e per year. The net increase in GHG emissions from the current site use would be approximately 512 MT of CO_2e per year. Therefore, the proposed project's per service person emissions would be 2.6 MT of CO_2e per year, which would be less than the locally-appropriate, project-specific threshold of 4.3 MT of CO_2e per service person per year. Therefore, this impact would be less than significant.

Mitigation Measures. Mitigation would not be required.

Significance after Mitigation. Emissions from the proposed development would not either directly or indirectly generate emissions anticipated to have a significant impact on the environment and would not exceed the State-based project-level efficiency threshold. Emissions would therefore be less than significant (Class III) and no mitigation would be required.

Impact GHG-2 **The proposed mixed-use project would be consistent with the statewide goals for GHG emissions reduction, as embodied in AB 32, SB 32 and SB 375, as well as the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the 2017 State Scoping Plan and the City of West Hollywood Climate Action Plan. Therefore, the impact related to consistency with applicable GHG plans and policies would be Class III, less than significant.**

[7] The CalEEMod estimate for VMT was used because the Traffic Study (Appendix G) did not quantify VMT.

As discussed under Section 4.3.1, *Setting*, a number of plans have been adopted to reduce GHG emissions in the City of West Hollywood and at the state level. The project's consistency with the SCAG 2045 RTP-SCS, the 2017 Scoping Plan, B-55-18, and the City of West Hollywood Climate Action Plan are discussed below.

SCAG RTP-SCS. To be consistent with SB 375, as described in *Regulatory Setting* above, SCAG adopted an RTP/SCS through 2045 in September 2020. The RTP/SCS sets a VMT reduction target of 5 percent per capita, and encourages VMT reduction by promoting alternative and active transportation. The proposed project would be infill development that would be located within walking and biking distance of commercial and recreational activities as well as public transportation.

SCAG's 2045 RTP-SCS provides land use and transportation strategies to reduce regional GHG emissions. Major goals of the RTP/SCS include:

1. *Encourage regional economic prosperity and global competitiveness*
2. *Improve mobility, accessibility, reliability, and travel safety for people and goods*
3. *Enhance the preservation, security, and resilience of the regional transportation system*
4. *Increase person and goods movement and travel choices within the transportation system*
5. *Reduce greenhouse gas emissions and improve air quality*
6. *Support healthy and equitable communities*
7. *Adapt to a changing climate and support an integrated regional development pattern and transportation network*
8. *Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
9. *Encourage development of diverse housing types in areas that are supported by multiple transportation options*
10. *Promote conservation of natural and agricultural lands and restoration of habitats*

The proposed project is situated to facilitate use of transit and active transportation (walking, bicycling), which would help reduce VMT. The project's consistency with applicable goals and objectives from the 2045 RTP-SCS are discussed in Table 4.3-5.

The GHG emissions reduction targets set by CARB for the SCAG 2045 RTP-SCS are intended to contribute to achieving the statewide SB 375 goal. As a result, if the project reduces GHG emissions to a level consistent with the SB 375 target for 2030, then the project would be consistent with the SCAG 2045 RTP-SCS. As summarized in Table 4.3-5, the project would be consistent with the GHG emission reduction goals of the SCAG 2045 RTP-SCS as net GHG emissions from the anticipated mixed-use development would be below the per service person threshold set in the State Scoping Plan for 2030. Therefore, no mitigation would be required to be consistent with the statewide SB 32 target and the SCAG 2045 RTP-SCS.

Table 4.3-5
Project Consistency with Applicable SCAG 2045 RTP-SCS Goals and Objectives

Goals and Objectives	Project Consistency
Land Use Actions and Strategies	
Focus Growth Near Destinations & Mobility Options ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Consistent** The proposed project would involve a mixed use infill development on Santa Monica Boulevard in the City's Mixed-Use Incentive Overlay Zone and Transit Overlay Zone, which is a zone intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips and associated VMT. The project includes 12 live/work units. Commercial and retail establishments are located adjacent to the project site and a Metro bus stop is located approximately 250 feet to the east of the project site. Additionally, the project would include 133 bicycle parking spaces and 36 electric vehicle charging spaces. Walking or biking would be viable modes of transportation to reach numerous destinations or public transit.
Promote Diverse Housing Choices ▪ Preserve and rehabilitate affordable housing and prevent displacement	**Consistent** The proposed project would involve construction of a mixed-use development with 17 affordable housing units and 12 live/work units.
Leverage Technology Innovations ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments	**Consistent** The proposed project would involve a mixed use development on Santa Monica Boulevard in the City's Mixed-Use Incentive Overlay Zone and Transit Overlay Zone, which is a zone intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips and associated VMT. The project includes 12 live/work units. Commercial and retail establishments are located adjacent to the project site and a Metro bus stop is located approximately 250 feet to the east of the project site. Additionally, the project would include 133 bicycle parking spaces. Walking or biking would be viable modes of transportation to reach numerous destinations or public transit. Additionally, per the 2019 CALGreen requirements for the residential and non-residential component of the project, 36 electric vehicle (EV) charging stations would be required. These spaces would be included in the parking structure and would support EV use and the regional EV charging network.

Source: SCAG 2020

2017 Scoping Plan and EO B-55-18. The 2017 Scoping Plan outlines a pathway to achieving the reduction targets set under SB 32, which is considered an interim target toward meeting the State's long-term 2045 goal established by EO B-55-18. CARB's 2017 Scoping Plan indicates that local actions that reduce vehicle miles traveled (VMT) are necessary to meet transportation sector-specific goals and achieve the 2030 GHG emission reduction target under SB 32. In its evaluation of the role of the transportation system in meeting the statewide emissions targets, CARB determined that VMT reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs) are necessary. A 7 percent VMT reduction translates to a reduction, on average, of 1.5 miles/person/day from projected levels in 2030. To that end, the 2017 Scoping Plan recommends that local governments consider policies to reduce VMT to help achieve these reductions, including: land use and community design that reduces VMT; transit-oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.

As discussed above and in Sections 2.0, *Project Description*, and 4.4, *Land Use and Planning*, the project site is located in an urbanized area on a site within the City's Transit Overlay Zone and Mixed-Use Incentive Overlay Zone. It is immediately adjacent to a range of transit options, as noted in Table 4.3-5. In addition, the project site is within walking distance of multiple commercial opportunities which would provide a range of goods and services to site residents, employees, and visitors. Finally, the project is a relatively high density mixed-use development that provides housing, jobs, and visitor amenities in proximity to both transit options, jobs, and services. Based on these facts, the project is consistent with the general goal of reducing GHG emissions by reducing VMT.

The 2017 Scoping Plan also recommends that, for discretionary approvals and entitlements of individual development projects, lead agencies should prioritize on-site design features that reduce emissions, especially from VMT, and direct investments in GHG reductions. For example, CARB suggests consideration of design options that reduce VMT, promote transit-oriented development, promote street design policies that prioritize transit, biking, and walking, and increase low carbon mobility choices, including improved access to viable and affordable public transportation, and active transportation opportunities. CARB notes that additional GHG reductions can be achieved through investment in local building retrofit programs that can pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, energy efficient windows, insulation, and water conservation measures, as well as local direct investment to finance installation of regional electric vehicle (EV) charging stations and enhancement of local urban forests.

As discussed above, the proposed project is a transit-oriented development on a site located in proximity to a range of transit options. Again, the site is also within walking distance of a range of goods and services in downtown West Hollywood. As discussed in Section 2.0, *Project Description*, the project would be designed exceed Title 24 California Building Code energy efficiency standards by 15% and would include Energy Star appliances, lighting, and signage. It would also achieve 90 points on the City's Green Building Point System Checklist. It would include Energy Star lighting, appliances, and signage and energy efficient HVAC systems and insulation, as well as water conserving features. The project also includes sustainable roofing, roof top solar panels, LED lighting, and bicycle and pedestrian amenities including 133 bicycle

parking spaces. Finally, it would maintain vegetative landscaping on-site with two landscaped areas planted with climate-appropriate, drought-tolerant and native plants, planters along the building façade, and replacement of removed trees with trees matching the existing landscaping. Based on these design features, the project would implement 2017 Scoping Plan recommendations for individual development projects.

In order to evaluate the project's consistency with the 2017 Scoping Plan, this analysis includes an evaluation of project emissions against a 2030 project-specific efficiency threshold that is derived from the Scoping Plan, as discussed in Section 4.3.2(b) *Impact Analysis: Significance Thresholds*. As discussed in Section 4.3.2(b), the project would impede "substantial progress" toward meeting the SB 32 and EO B-55-18 targets if per service person GHG emissions exceeded the locally-appropriate, project-specific 2030 efficiency threshold. As discussed above under Impact GHG-1, the project's GHG emissions would be below the 2030 project-specific efficiency threshold without mitigation and would therefore be consistent with the 2017 Scoping Plan and EO B-55-18.

City of West Hollywood Climate Action Plan. The City of West Hollywood Climate Action Plan (CAP) adopted in 2011 outlines a course of action to reduce municipal and communitywide GHG emissions that contribute to climate change. The area of GHG analysis is quickly evolving. Although the 2011 CAP's emissions targets were adopted before SB 32 was passed, and therefore it is not consistent with the State's 2030 emissions targets, the CAP provides a hyper-local list of measures by which development projects must comply. The City is currently in the process of updating the CAP to be consistent with long-term state targets.

According to the 2011 CAP, a project-specific GHG analysis "must identify the specific CAP measures applicable to the project and how the project incorporates the measures." If the project is not consistent with the CAP measures or if the measures are not otherwise binding, they must be incorporated as mitigation measures applicable to the project.

The CAP includes seven emission reductions 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. Table 4.3-6 compares the proposed project to applicable CAP measures.

The proposed project would comply with applicable GHG reduction measures, as shown in Table 4.3-6. The proposed project exceeds the minimum requirements of the City's Green Building Ordinance and is estimated to achieve 90 points on the City's Green Building Point System in order to receive a FAR bonus (see Section 4.4, *Land Use and Planning*). Therefore, the proposed project would be consistent with the CAP.

Table 4.3-6
Project Consistency with Applicable West Hollywood Climate Action Plan Reduction Measures

Measure	Project Consistency
Land Use and Community Design	
LU-1.1: Facilitate the establishment of mixed-use, pedestrian- and transit-oriented development along the commercial corridors and in Transit Overlay Zones.	**Consistent** The proposed project is a mixed-use, pedestrian-friendly development located along a commercial corridor and within the General Plan's Transit Overlay Zone.
Transportation and Mobility	
T-1.1: Increase the pedestrian mode share in West Hollywood with convenient and attractive pedestrian infrastructure and facilities.	**Consistent** The proposed project is located within walking distance of retail facilities, restaurants, and public transportation.
T-2.1: Increase the bicycle mode share by providing accessible, convenient, and attractive bicycle infrastructure.	**Consistent** The proposed project is located adjacent to a bike lane along Santa Monica Boulevard and includes 133 bicycle parking spaces for residents, employees, and customers visiting restaurants and retail.
T-2.2: Install bike racks and bike parking in the City where bike parking infrastructure currently does not exist.	**Consistent** The proposed project includes bicycle parking for residents, employees and customers.
Energy Use and Efficiency	
E-2.2: Require all new construction to achieve California Building Code Tier II Energy Efficiency Standards (Section 503.1.2).	**Consistent** The proposed project would exceed California Building Code Energy Efficiency Standards by 15%. This would be achieved through energy efficiency features and installation of solar panels.
E-3.1: Require that all new construction and condominium conversions be sub-metered to allow each tenant the ability to monitor their own energy and water use.	**Consistent** Residential and commercial units would be sub-metered.
E-3.2: Require the use of recycled materials for 20% of construction materials in all new construction.	**Consistent** As described in the project's green building checklist, the proposed project would include recycled-content materials in the foundation, insulation, and landscaping. The interior spaces would use materials composed of recycled content or rapidly renewable and sustainably harvested resources. The exact percentage of building materials that would use recycled content is unknown; however, the project is consistent with the intent of this policy.
Water Use and Efficiency	
W-1.1: Reduce per capita water consumption by 30% by 2035.	**Consistent** In order to reduce water use, the proposed project would, install low-flow showerheads, tankless water heaters and water-efficient toilets and faucets. In addition, the proposed project would use drought-tolerant landscaping.
W-1.2: Encourage all automated irrigation systems installed in the City to include a weather-based control system.	**Consistent** The proposed project would include drought-tolerant, climate appropriate landscaping to reduce the amount of irrigation needed.
Waste Reduction and Recycling	
SW-1.1: Establish a waste reduction target not to exceed 4.0 pounds per person per day (by 2035).	**Consistent** The City of West Hollywood's Public Works Department is responsible for complying with AB 939. The City has enacted numerous programs to achieve the mandated diversion rates

Table 4.3-6
Project Consistency with Applicable West Hollywood Climate Action Plan Reduction Measures

Measure	Project Consistency
	and continues to implement projects to reduce per capita waste generation in order to achieve a 4.0 pounds per person per day target (City of West Hollywood, April 2014). In 2007 and 2008, the per capita disposal rate per day in West Hollywood was 5.6 pounds per resident which is below CalRecycle's target of 5.8 pounds per capita per day, meaning that the City is exceeding CalRecycle's target (City of West Hollywood General Plan Final EIR, October 2010). The proposed project would provide space for the collection and storage of recyclables in each unit. In addition, the proposed project would divert at least 80% of construction and demolition waste in accordance with WHMC Section 19.20.060. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future. Therefore, the project would be consistent with City requirements which are designed to help the City achieve the target of 4.0 pounds per person per day.
Urban Forest	
G-1.1: Increase and enhance the City's urban forest to capture and store carbon and reduce building energy consumption.	**Consistent** The proposed project includes landscaping on the sidewalks surrounding the project site, throughout the project site in the pool/spa area in other seating areas, on the roof, using concrete planters where appropriate, in order to increase the amount of landscaping onsite as compared to existing conditions.
G-1.2 Establish a green roof and roof garden program to standardize, promote, and incentivize green roofs and roof gardens throughout the City.	**Consistent** To date, the City has not established a green roof and roof garden program. The City's Green Building Program allows projects to earn up to 6 points on the West Hollywood Green Building Point System Table for projects that install extensive vegetated green roof. Most of the proposed project's rooftop space would be occupied by solar panels in order to achieve the energy reductions in accordance with policy E-2.2. However, the portion of the roof not occupied by solar panels or mechanical equipment would include landscaping. Therefore, some portions of the rooftop would include roof gardens and the project is consistent with this goal to the extent feasible.

Mitigation Measures. The project includes numerous design features and is in a location that would be consistent with facilitating the goals and emissions targets of the SCAG 2045 RTP-SCS, 2017 Scoping Plan, EO B-55-18 and the City of West Hollywood Climate Action Plan. Therefore, mitigation is not required.

Significance after Mitigation. The project would be consistent with applicable GHG reduction plans, policies, and regulations and impacts would be less than significant with no mitigation measures required (Class III).

c. Cumulative Impacts. Growth in the City of West Hollywood would result in increased GHG emissions from vehicle trips, energy consumption, and other sources. According to the City's CAP, GHG emissions in the City are projected to be approximately 646,000 MT CO_2E in 2020 and 712,000 MT CO_2E in 2035. The proposed project's net annual contribution of 467 MT CO_2E would be approximately 0.07% of 2020 emissions and 0.07% of

2035 emissions. Analyses of GHGs are cumulative in nature because project-level GHG emissions contribute to the cumulative impact of the accumulation of GHGs in the atmosphere. Projects falling below the impact thresholds discussed above would have a less than significant impact, both individually and cumulatively. As indicated above, due to the project's location and incorporation of efficient design features, GHG emissions associated with the proposed project would be less than significant and do not require mitigation. Because emissions associated with the proposed project would not exceed quantitative thresholds and proposed development would comply with and implement applicable plans, policies and regulations pertaining to GHG reduction, the project's contribution to significant cumulative impacts related to GHG emissions is not cumulatively considerable.

4.4 LAND USE and PLANNING

This section analyzes the proposed project's consistency with applicable land use policies.

4.4.1 Setting

a. Regulatory Setting. The City of West Hollywood General Plan 2035 and the City's Zoning Ordinance (Article 19 of the West Hollywood Municipal Code (WHMC)) serve as the primary land use planning tools for the City.

General Plan 2035. The General Plan 2035 (adopted in 2011) is the primary means for guiding future change in West Hollywood and provides a guide for land use decision-making. The General Plan includes the following elements: Land Use and Urban Form; Historic Preservation; Economic Development; Mobility; Human Services; Parks and Recreation; Infrastructure, Resources, and Conservation; Safety and Noise; and Housing. A discussion of the Land Use and Urban Form and Housing elements is included below. Other General Plan elements are discussed throughout this EIR in other sections as applicable.

Land Use and Urban Form Element. The Land Use and Urban Form Element establishes a vision for the City's built environment by establishing goals and policies for the City's land use patterns and setting guidelines for land use designations. Guidelines include permitted uses, density, design standards, height, and etc. for each land use designation. Figure 4.4-1 shows the General Plan land use designations throughout West Hollywood.

Housing Element. The Housing Element provides a profile of the City's resident population and housing stock, projects future housing needs, and includes policies to address projected housing needs across the economic and social spectrum of the City. According to the Housing Element, the City has extensive needs for affordable housing. Goal H-1 of the Element is to "provide affordable rental housing" and Goal H-3 is to "encourage a diverse housing stock to address the needs of all socioeconomic segments of the community."

Zoning Ordinance. Applicable sections of the West Hollywood Zoning Ordinance are discussed below. Figure 4.4-2 shows the city's zoning map.

Affordable Housing. The City's Zoning Ordinance includes provisions to incentivize the development of affordable housing. Section 19.22.030 requires projects with 41 units or more to make at least 20% of the units available to very low-, low- and moderate-income households. In addition, section 19.22.050 of the WHMC implements the provisions of California Government Code Section 65915 and provides for density bonuses and regulatory concessions in order to encourage the construction of affordable housing. Table 4.4-1 shows the density bonuses permitted. The density bonus allows an increase in Floor Area Ratio (FAR) and/or unit count based on the percentages shown in Table 4.4-1 and requires the City to grant up to three affordable housing incentives or concessions. These may include an additional 10 feet in height, reductions in setbacks, and other concessions necessary to facilitate the provision of affordable housing.

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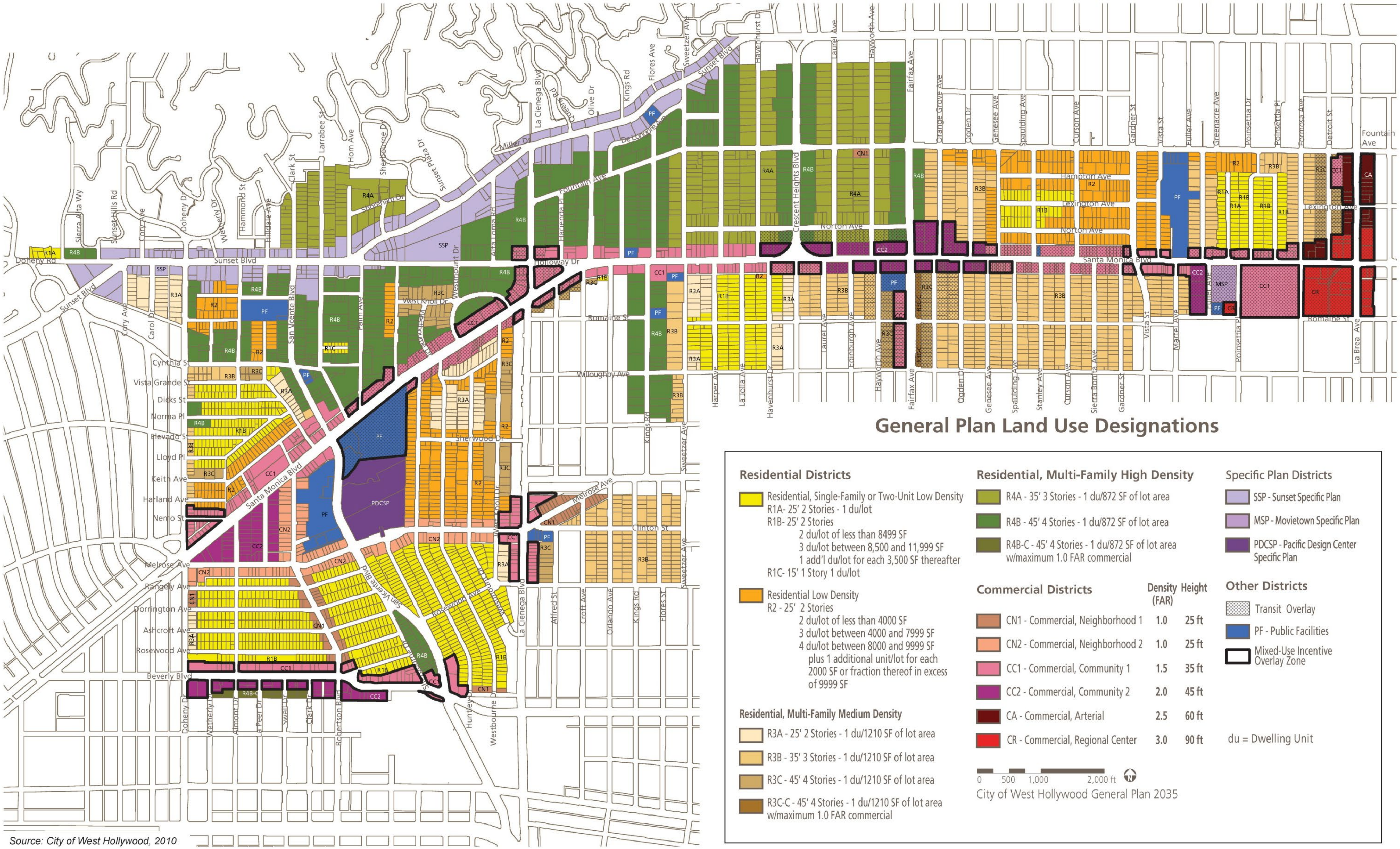
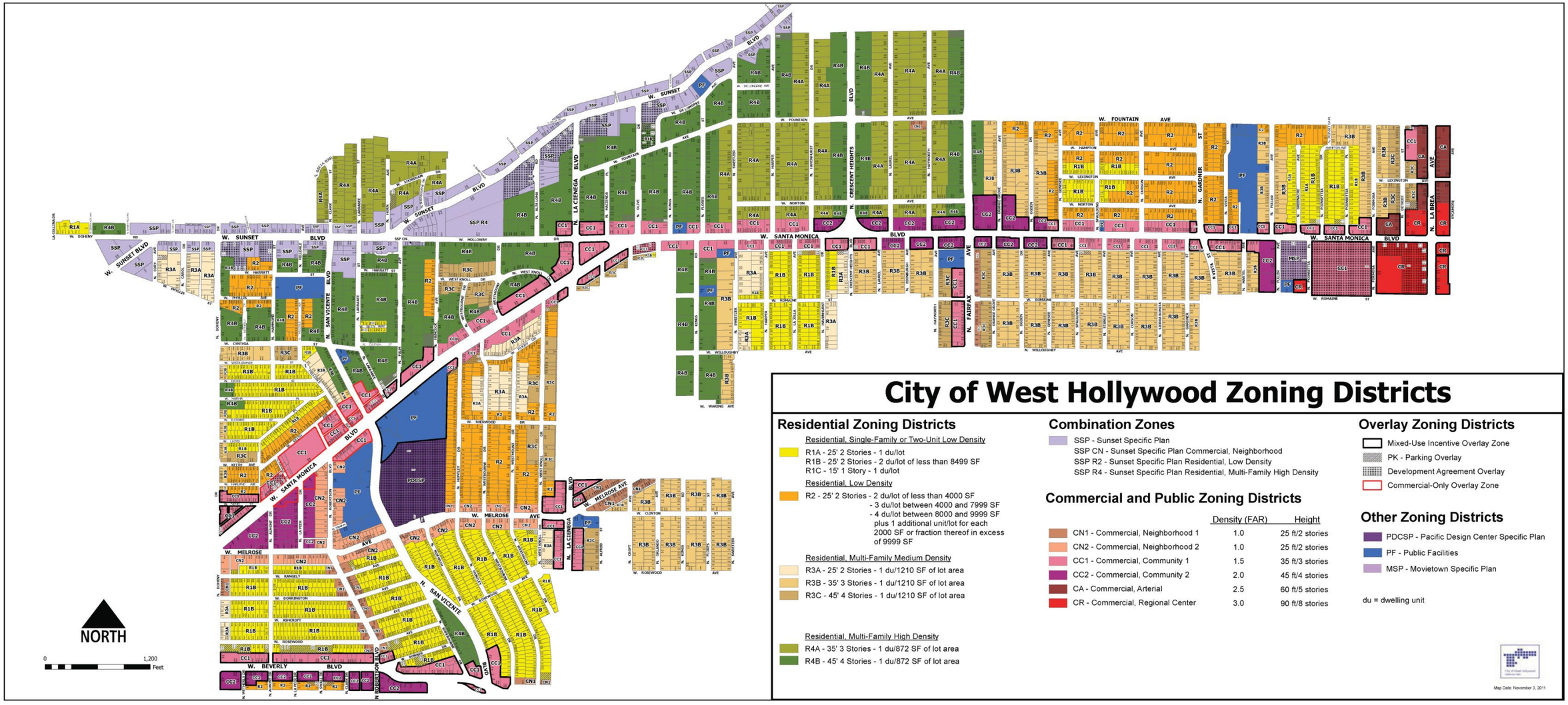
Figure 4.4-1 City of West Hollywood General Plan Land Use Map



Source: City of West Hollywood, 2010

Figure 4.4-2 City of West Hollywood Zoning Map



Source: City of West Hollywood, 2011

Table 4.4-1
Density Bonuses Permitted by WHMC Section 19.22.030

Type of Affordable Housing Units	Minimum % of Affordable Units	Density Bonus Granted	Additional Bonus for Each 1% increase in Affordable Units
Very Low Income	5%	20%	2.5%
Low Income	10%	20%	1.5%
Moderate Income	10%	5%	1%

Open Space. Per Section 19.36.280(A)(1) of the Municipal Code, mixed-use developments containing residential uses with more than 31 residential units are required to provide private open space at a ratio of 120 square feet per dwelling unit, and a minimum of 2,000 square feet of common open space. Private open space must have a minimum dimension of 7 feet and common open space areas must have a minimum dimension of 15 feet. Sixty percent of the required common open space must be located at grade or at the level of the first habitable floor.

b. Existing Land Uses and Land Use Designations. The project site is developed and contains three adjoining two-story commercial buildings and two surface parking lots on a commercial area and four one-story single-family residences on four residential lots. The 42,164 square -foot portion of the project site that currently contains commercial buildings (8527-8555 Santa Monica Boulevard, APN 4339-005-025 and 4339-005-013) is zoned and has a West Hollywood General Plan land use designation of Commercial, Community 1 (CC1). This portion of the site is also within the West Hollywood General Plan's Commercial Subarea 2, Transit Overlay Zone, and Mixed-Use Incentive Overlay Zone (West Hollywood, 2011a).

A 18,933-square foot northern portion of the project site currently contains four single-family residences (8532, 8538, 8552, and 8546 West Knoll Drive, APNs 4339-005-009, 4339-005-010, 4339-005-011, and 4339-005-012). These parcels are zoned Residential, Multi-Family High Density (R4B) and have a General Plan Land Use Designation of High Density Residential (R4B). Figure 2-4 in Section 2.0, *Project Description,* shows the zoning for the project site and surrounding uses and Figure 2-5 in Section 2.0 shows the General Plan land use designations for the project site and surrounding uses.

The CC1 land use designation provides for commercial and mixed-use development along major corridors, including Santa Monica Boulevard. The designation allows for a variety of commercial uses, including retail, offices, and restaurants, as well as a mix of residential, commercial, and office uses. The base FAR is 1.5 and the base height is 35 feet. The Transit Overlay Zone is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips; however, the City has not yet codified the Transit Overlay Zone provisions into the WHMC. The Mixed-Use Incentive Overlay Zone encourages a mix of residential and commercial uses and allows mixed-use projects to receive an additional 0.5 FAR (maximum of 2.0) and 10 feet in height (maximum of 45 feet). The R4B designation provides for high-density (up to 50 units per acre) multi-family housing and allows for residential buildings that are four stories and 45 feet in height. In areas designated CC1 and R4B, density bonuses shall be granted for projects that include affordable housing. The density bonus allows increases of up to 35% in FAR (equivalent to an additional 0.7 FAR, based on the

2.0 FAR inclusive of the mixed-use bonus) and/or unit count, and requires the City to grant up to three affordable housing incentives or concessions. In addition, mixed-use projects that achieve a minimum of 90 points on the West Hollywood Green Building Point System Table are eligible to receive an additional 0.1 FAR. Table 4.4-2 shows the Zoning Ordinance and General Plan requirements for the CC1 and R4B zones.

Table 4.4-2
Zoning and General Plan Requirements

	Community, Commercial 1 (CC1)	**Residential, Multi-Family, High Density (R4B)**
Purpose	Provide a wide variety of commercial uses such as retail, offices, entertainment, restaurants, etc. Mixed-use developments with residential and office uses above businesses are encouraged *Transit Overlay Zone: Intended to encourage mixed-use development in location with adequate transit service to reduce the need for auto trips* *Mixed Use Incentive Overlay Zone: Intended to focus residential mixed-use projects in high priority nodes, focused on commercial corridors and including locations with high transit levels of service and near major intersections*	Provide for the development of wide range of high-density multi-family housing, including apartments and condominiums
Height	Base Height Allowed: 35 ft, 3 stories *Mixed-Use Incentive Overlay Zone Bonus: Additional 10 feet in height* *Density Bonus Height Concession:* *Additional story, not to exceed 10 ft in height* *Total Allowable Height: 55 ft, 5 stories*	Base Height Allowed: 45 ft, 4 stories *Density Bonus Height Concession:* *Additional story, not to exceed 10 ft in height* *Total Allowable Height: 55 ft, 5 stories*
Floor Area Ratio (FAR)	Base FAR Allowed: 1.5 *Mixed-Use Incentive Overlay Zone Bonus: Additional 0.5 FAR* *35% Density Bonus: Additional 0.7 FAR* *Green Building Bonus: Additional 0.1 FAR* *Total Allowable FAR: 2.8*	N/A
Residential Density	N/A	1 unit for each 872 sf of site area *Density Bonus: 35% increase in density*
Inclusionary Housing	20% of the baseline units as affordable housing units	20% of the baseline units as affordable housing units

c. Surrounding Land Uses. The project site is located in a neighborhood characterized by a mix of residential and commercial uses. Figure 2-6 in Section 2.0, *Project Description,* shows the project site and surrounding uses. Surrounding uses and corresponding designations/zones are described below.

North: Immediately north of the project site is a three-story multi-family condominium building (8562 West Knoll Drive). This property is zoned and has a land use designation of R4B.

South: The site is bordered on the south by Santa Monica Boulevard. Across Santa Monica Boulevard is a one-story restaurant (Shake Shack, located at 8520 Santa Monica Boulevard), a two-story restaurant (Blackship Restaurant, 8512 Santa Monica Boulevard), and a three-story commercial building (The Wing, 8550 Santa Monica Boulevard). Properties south of the project site are zoned and have a land use designation of CC1.

East: To the east, the project site is bordered by West Knoll Drive. Across West Knoll Drive are a one-story retail building (Healthy Spot, 8525 Santa Monica Boulevard) on a lot zoned CC1 and a four-story multi-family residential building (8535 West Knoll Drive) zoned and with a land use designation of R4B.

West: Immediately west of the project site is the Ramada Plaza Hotel (8585 Santa Monica Boulevard), a four-story hotel building with ground-floor retail that includes a bank, shops, and several restaurants. The Ramada Plaza Hotel complex also includes a 28-unit apartment complex at 940 Westmount Drive northwest of the project site. The Ramada Plaza Hotel property is zoned and has a land use designation CC1.

4.4.1 Impact Analysis

a. Methodology and Significance Thresholds. The effects of the proposed project on land use are considered to be significant if the proposed project would:

1) *Physically divide an established community*
2) *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*

The Initial Study (see Appendix A) concluded that only the second criterion could be applicable to the project potentially resulting in a significant impact. Hence, only impacts related to consistency with applicable land use plans are addressed in this section.

b. Project Impacts and Mitigation Measures.

Impact LU-1 **The proposed project would be consistent with the City's General Plan and Zoning Ordinance. Impacts related to consistency with plans, policies, and regulations would therefore be Class III, *less than significant.***

The project site contains a 42,164 square foot commercial area that is zoned and has a General Plan land use designation of Commercial, Community 1 (CC1) and an 18,933 square foot residential area that is zoned and has a General Plan land use designation of Residential, Multi-Family High Density (R4B). (See Figure 2-3 in the Project Description for the project site and the surrounding properties' land use designations.)

The area zoned R4B would only contain residential uses and would not include the retail or restaurant uses associated with the project. Because the project spans multiple legal lots, a lot tie is required to hold the lots together under one owner for the purpose of creating a single building site. The resulting building site would have split zoning, which is allowed in the West Hollywood Zoning Ordinance.

The following discussions summarize the proposed project's consistency with requirements in the City's General Plan and Zoning Ordinance related to: affordable housing; development standards (density, height, FAR, and setbacks); open space; and applicable General Plan policies.

Affordable Housing. Table 4.4-3 summarizes the affordable housing associated with the proposed project for the portion of the project in the CC1 zone and Table 4.4-4 summarizes the affordable housing for the portion of the project in the R4B zone. The maximum allowed density bonus is 35%.

Table 4.4-3
Project Affordable Housing and Density Bonuses – CC1 Zone

	# Units	% of Baseline (60 units)[1]	Density Bonus Granted
Very Low Income	6	10%	30%[2]
Moderate Income	6	10%	5%[3]
Total Inclusionary Housing Units – CC1 Zone	**12**	**20%**	**35%**

[1] The baseline number of units is the number of units proposed to be constructed in the zone in which the project is located, prior to the inclusion of the Density Bonus. This is based on either the maximum density in residential areas or the maximum FAR in commercial areas. For the portion of the project site in the CC1 zone, the baseline number of units proposed is 60 based on the FAR 2.0 (1.5 base FAR + 0.5 mixed use bonus FAR) (see Table 4.4-5 below)
[2] As shown in Table 4.4-1, 20% density bonus for providing 5% very low income units +2.5% bonus for each additional 1% increase in affordable units above 5% = 30%. [3] As shown in Table 4.4-1, 5% density bonus for providing 10% moderate income units.

Table 4.4-4
Project Affordable Housing and Density Bonuses – R4B Zone

	# Units	% of Baseline (22 units)[1]	Density Bonus Granted
Low Income	4	18%	32%[2]
Moderate Income	1	5%	0%[3]
Total Inclusionary Housing Units – R4B Zone	**5**	**23%**	**32%**

[1] The baseline number of units is the number of units proposed to be constructed in the zone in which the project is located, prior to the inclusion of the Density Bonus. This is based on either the maximum density in residential areas or the maximum FAR in commercial areas. For the portion of the project site in the R4B zone, the baseline is 22 baseline units based on the maximum density of 1 unit for every 872 sf of site area (see also Table 4.4-5).
[2] As shown in Table 4.4-1, 20% density bonus for providing 10% low income units, plus 1.5% bonus for each 1% increase over 10% (8 x 1.5% = 12%).
[3] As shown in Table 4.4-1, 5% density bonus granted for providing 10% moderate income units.

As shown in the two tables, 21% (5 + 12 =17 units) of the baseline apartment units associated with the proposed project would be designated for affordable housing. Therefore, the proposed project would meet the City of West Hollywood's inclusionary housing ordinance and the requirements of SB 1818 (California Government Code 65915 et. seq.) by providing at least 20% of the baseline units as affordable housing. Accordingly, the proposed project would be allowed a 35% density bonus on the CC1 zone and a 32% density bonus in the R4B zone, as discussed below.

Development Standards. The project applicant is seeking a 35% density bonus based on the percentage of affordable units, as well as two associated regulatory "concessions" pursuant to Government Code Section 65915 and WHMC Section 19.22.050. The requested concessions are:

- *An additional story (adding not more than 10 feet to overall project height)*
- *An extra mezzanine level for residential parking (vehicle and bicycle) consisting of a partial level located above a portion of the first floor and below a portion of the second floor, open to the first floor and partially subterranean, and creating no greater volume in the project's envelope than that authorized under the Code (including height incentive and concession).*

The applicant is seeking height and FAR bonuses based on the proposed mixed-use nature of the project in accordance with the Mixed-Use Development Overlay Zone, a 35% FAR bonus for the provision of affordable housing pursuant to Section 19.22.050 of the WHMC and GC 65915, and a FAR bonus available to mixed-use projects that achieve a minimum of 90 points on the West Hollywood Green Building Point System Table (West Hollywood, 2009).

Consistency with the applicable requirements of the Zoning Ordinance[1] and General Plan are shown in Table 4.4-5. In the CC1 zone, the base FAR is 1.5. With the mixed-use development incentive bonus (additional 0.5 FAR), 35% affordable housing density bonus (additional 0.7 FAR), and green building bonus (additional 0.1 FAR), the allowed FAR for the project would be 2.8. The floor area on the commercial zone of the proposed project would be 118,059 sf on the 42,164 sf CC1 site for an FAR of 2.8. The proposed project would be consistent with the City's commercial FAR requirements.

[1] *Under WHMC Section 19.01.040.E.1, the application for the proposed project is processed under the standards in effect at the time the application was deemed complete.*

Table 4.4-5
Consistency with Zoning Ordinance and General Plan Requirements

Requirement	Allowed	Actual Provided by Proposed Project
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 + Green Building Bonus FAR: 0.1 *Total Allowed = 2.8*	**Consistent** 2.8
Density[2]	1 unit for each 872 sf of site area (22 units total in 18,933 sf area) + 32% Density Bonus for Affordable Housing (8 additional units) *Total Allowed = 30 units*	**Consistent** 30 units
Building Height	CC1 Allowed Height: 35 ft, 3 stories + Mixed-Use Bonus Height: 10 feet, 1 story + Affordable Housing Concession: 10 ft, 1 story *Total Allowed: 55 feet, 5 stories* R4B Allowed Height: 45 ft, 4 stories + Affordable Housing Concession: 10 ft, 1 story *Total Allowed: 55 ft, 5 stories*	**Consistent** CC1: 55 ft, 5 stories R4B: 55 ft, 5 stories
Setbacks	CC1: Front: none Side and Rear: 0-10 ft (10 ft if adjacent to a parcel in aresidential zoning district) R4B: Front: Average of the front setbacks of the two structures closest to the front property lines on the two adjacent parcels (avg of 2 adj. lots is 14 feet, 1 inch) Side: 5 ft, an additional 1 ft for setback for each story above the 2nd story, total required 8 ft Rear: None required	**Consistent** CC1: Front (facing SMB): 0 feet Rear: 10 feet Side: 5 feet (where not adjacent to a residential parcel) to 15 feet R4B: Front (facing West Knoll): 14 feet, 1 inch Side (facing adjacent residence): 8 feet Rear: 0 feet

[1] FAR used in commercial zoning only
[2] Density used in residential zoning only

In the R4B zone, the allowed density is 1 unit for each 872 sf of site area. The portion of the project site zoned R4B is 18,933 sf. Therefore, 22 units would be allowed without the density bonus. With the 32% density bonus, the project would be able to include up to 30 units (22 baseline units x 1.32 = 29.04 units, rounded up to 30). The proposed project would include 30 units in the R4B zone. Therefore, the proposed project would be consistent with permitted residential density.

In the CC1 zone, the allowed height is 35 feet or three stories. With the mixed-use development incentive bonus the allowed height would be 45 feet or four stories. In the R4B zone, the allowed height is 45 feet or four stories. The proposed mixed-use structure would be 55 feet in height at the north side facing West Knoll measured from the ground surface at the property line. As mentioned previously, the project is allowed regulatory concessions pursuant to Section 19.22.050 of the West Hollywood Zoning Ordinance and Section 65915 of the California

Government Code for providing affordable housing. The applicant is requesting a concession of an additional 10 feet and one story in height, pursuant to Section 19.22.050.E.2.a of the WHMC. With this concession, the allowed height for the proposed project would be 55 feet and five stories. The proposed project would be 55 feet, five stories in the CC1 zone and 55 feet, five stories in the R4B zone. Therefore, the proposed project would be consistent with the allowed height for the project site.

At the south side of the structure facing Santa Monica Boulevard, the height of the building would be approximately 48 feet from the ground surface to the top of the third floor. The fourth floor would be set back approximately 8 feet from Santa Monica Boulevard. The fifth floor would be set back approximately 27 feet from the façade and the roof would be set back approximately 34 feet from the façade. Facing Santa Monica Boulevard, the building would have five stories above ground. Facing West Knoll, the building would have five stories above ground (see Appendix B for building elevations).

Open Space. The proposed project provides a minimum of 120 sf of private open space per dwelling unit, either in the form of a patio or balcony. In addition, the proposed project provides the required 2,000 square feet of common open space, plus another 5,292 square feet of open space. Therefore, the proposed project would be consistent with the Zoning Ordinance requirements of 120 sf of open space per unit and 2,000 sf of common open space.

General Plan Policies. The proposed project would be subject to the goals and policies set forth in the West Hollywood General Plan 2035. In the determination of the significance of a land use impact, consideration is given to the type of land uses within the area, the extent an area would be impacted, the nature and degree of impacts, and the extent to which existing communities or land uses would be disrupted, divided, or isolated by the proposed Project. State CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans that the decision-makers should address. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.[2] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan. If a project is determined to be inconsistent with specific objectives or policies of a land use plan, but not inconsistent overall with the land use goals of that plan and would not preclude the attainment of the primary intent of the plan, that project would be considered generally consistent with the plan on an overall basis. Table 4.4-6 outlines the applicable goals and discusses the proposed project's consistency with each of these goals. As shown in the table, the proposed project would be consistent with all applicable General Plan goals.

[2] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

Table 4.4-6
Consistency with Applicable Goals of the West Hollywood General Plan

Policy	Discussion
Land Use and Urban Form Element	
Goal LU-1: Maintain an urban form and land use pattern that enhances quality of life and meets the community's vision for its future.	**Consistent.** The land use pattern of the area includes retail and other commercial along Santa Monica Boulevard surrounded by single- and multi-family residential uses. The proposed project would include development of a mixed-use structure to include residential, retail, office, and restaurant uses. The project is located in a Mixed-Use Incentive Overlay Zone and therefore implements the City's vision for the site. In addition, the proposed project would provide housing choices, retail businesses, and employment opportunities within the City.
Goal LU-2: Maintain a balanced mix and distribution of land uses that encourage strategic development opportunities and mobility choices within the City.	**Consistent.** The proposed project would include development of a mixed-use structure to include residential, retail, office, and restaurant uses within a Mixed-Use Incentive Overlay Zone located along Santa Monica Boulevard. Therefore, the proposed project would provide a mix of land uses on a site designated for such a purpose by the City. Further, the location of the project site and proposed project features would be designed to prioritize pedestrian, bicycle, and transit mobility options and reduce the demand for motorized transportation. The proposed project is within the Transit Overlay Zone which is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips. The proposed project involves a mixed-use structure on a site served by several existing bus transit lines (Metro lines 2/302, 4/704, 10, 30/330, 105/705, Cityline Blue Route, and Cityline Orange Route). Additionally, the proposed project would provide 133 bicycle parking spaces to serve the project's residents, employees, and visitors. The project site is also located within walking distance of multiple commercial opportunities. Further, the proposed project would include site landscaping to enhance the pedestrian experience trees and planters along Santa Monica Boulevard.
Goal LU-4: Provide for an urban environment oriented and scaled to the pedestrian.	**Consistent.** The proposed project would be designed to enhance pedestrian activity. Vehicular access to the site would be provided via one driveway on Santa Monica Boulevard and one driveway on West Knoll Drive, thereby minimizing vehicle intrusions across the sidewalks on Santa Monica Boulevard and on West Knoll Drive. The restaurant and retail uses and the entrance to the plaza would front Santa Monica Boulevard. All parking areas would be contained on the interior of the project site. The proposed project would include site landscaping to enhance the pedestrian experience along Santa Monica Boulevard and West Knoll Drive, including trees and planters. Additionally, the proposed project includes ground floor level neighborhood-serving retail and restaurant uses with pedestrian scale design fronting Santa Monica Boulevard.

Table 4.4-6
Consistency with Applicable Goals of the West Hollywood General Plan

Policy	Discussion
Goal LU-5: Encourage a high level of quality in architecture and site design in all construction and renovation of buildings.	**Consistent.** The proposed building would be contemporary in style in a neighborhood with diverse architectural styles. The proposed project would incorporate high-qualify, environmentally-friendly materials that would be long-lasting. The building materials and architecture and design of the project has been reviewed by the City's Planning Commission Design Review Subcommittee (see Subsection 1.4 of Section 1.0, *Introduction,* for additional detail about the design review process.
Goal LU-6: Create a network of pedestrian-oriented, human-scale and well-landscaped streets and civic spaces throughout the City.	**Consistent.** As mentioned previously, the proposed project is designed to improve the pedestrian experience. The proposed project would include site landscaping to enhance the pedestrian experience along Santa Monica Boulevard and West Knoll Drive, including trees and planters. Additionally, the proposed project includes ground floor level neighborhood-serving retail and restaurant uses with pedestrian scale design fronting Santa Monica Boulevard. The proposed project would include a plaza with outdoor planters and fountain areas accessible to the public.
Goal LU-7: Seek to expand urban green spaces and sustainable landscapes.	**Consistent.** The proposed project would keep existing and add to street trees along Santa Monica Boulevard and West Knoll Drive, where feasible and any new street trees would be consistent with the City's street tree specifications. Site landscaping would include climate-appropriate, drought-tolerant and native plants. The proposed project would include a green or sustainable roof in several areas, with solar panels and other landscaped spaces.
Goal LU-12: Enhance Santa Monica Boulevard West as a destination for nightlife and entertainment, a focus of the LGBT community, and a center for neighborhood-serving retail and residential.	**Consistent.** The proposed project is a mixed-use development with over 22,000 square feet of neighborhood-serving commercial uses and over 6,000 square feet of creative office. The proposed project includes ground floor retail and restaurants along Santa Monica Boulevard. The proposed project has the capacity for outdoor dining as it provides restaurant uses facing Santa Monica Boulevard which will engage pedestrians. The proposed project includes 111 apartment units and 12 live/work units.
Housing Element	
Goal H-2: Maintain and enhance the quality of the housing stock and residential neighborhoods.	**Consistent.** The proposed project involves construction of a mixed-use development consisting of 111 apartment units and over 22,000 square feet of ground floor level retail and restaurant uses. The project would serve the needs of site residents and adjacent residents in a pedestrian-friendly manner and in close proximity to public transportation.
Goal H-3: Encourage a diverse housing stock to address the needs of all socioeconomic segments of the community.	**Consistent.** The proposed project involves a mixed-use structure that would add 111 new residential rental units to the City's housing stock, including 94 market rate units, 7 moderate-income units, 4 low-income units, and 6 very low-income units. As such, the proposed project would provide a share of the City's regional housing needs and would accommodate households of varying size, type, and income.
Goal H-4: Provide for adequate opportunities for new construction of housing.	**Consistent.** The proposed project involves construction of a mixed-use development consisting of 111 apartment units, including 94 market rate units, 7 moderate-income units, 4 low-income units, and 6 very low-income units, and over 18,000 square feet of ground floor level retail and restaurant uses.

As described in this analysis, the project is a mixed-use residential and commercial project that provides additional housing as encouraged by City policies to address the housing crisis. The project assists the City in meeting its Regional Housing Needs Allocation requirements in the General Plan Housing Element by putting multi-family residential housing in a location containing single-family residences and by placing housing near neighborhood serving uses and public transportation. Further, the project is consistent with zoning requirements. Overall, the project does not impede the City's ability to meet general plan goals and provides housing in line with General Plan goals and policies.

Based on the above, the proposed project would be consistent with the West Hollywood General Plan and Zoning Ordinance, including the affordable housing requirements. The project would not 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. Therefore, impacts would be less than significant.

Mitigation Measures. Mitigation would not be required as this impact would be less than significant.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. As shown in Table 3-2 in Section 3.0, *Environmental Setting,* planned and pending development in and around West Hollywood includes approximately 2,666 residential units, and over 1,300 KSF of non-residential development. Consistency with the West Hollywood General Plan 2035 and Zoning Ordinance would be addressed on a case-by-case basis and, as discussed above, the project would be consistent with applicable West Hollywood plans, policies, and regulations. This area is designated for commercial and mixed use projects and the density and height associated with these types of projects. Therefore, the project's contribution to cumulative land use impacts would be less than significant.

4.5 NOISE

This section evaluates the proposed project's potential impact to local noise conditions. Both temporary construction noise and long-term noise generated by the proposed project are evaluated.

4.5.1 Setting

a. Fundamentals of Sound, Environmental Noise, and Sound Measurement. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, 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 those along 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. Table 4.5-1 illustrates representative noise levels for the environment.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources such as industrial machinery. 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.

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period.

The actual time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. Two commonly used noise metrics – the Day-Night average level (Ldn) and the Community Noise Equivalent Level (CNEL) - recognize this fact by weighting hourly Leqs over a 24-hour period. The Ldn is a 24-hour average noise level that adds 10 dBA to actual nighttime (10:00 PM to 7:00 AM) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the Ldn, except it also adds a 5 dBA penalty for noise occurring during the evening (7:00 PM to 10:00 PM).

Table 4.5-1
Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 1,000 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Source: Caltrans, 1998: http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf

b. Fundamentals of Groundborne Vibration. Vibrating objects in contact with the ground radiate energy through that medium; if a vibrating object is massive enough and/or close enough to the observer, its vibrations are perceptible. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean square (RMS) vibration velocity. Particle velocity is the velocity at which the ground moves. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the greatest magnitude of particle velocity associated with a vibration event. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required

to describe vibration (FTA 2018). Vibration significance ranges from approximately 50 VdB (the typical background vibration-velocity level) to 100 VdB, the general threshold where minor damage can occur in fragile buildings (FTA 2018). The general human response to different levels of groundborne vibration velocity levels is described in Table 4.5-2.

Table 4.5-2
Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.

Source: FTA 2018

Damage to structures occurs when vibration levels range from 2 to 6 in/sec PPV. One half this minimum threshold, or 1 in/sec PPV is considered a safe criterion that would protect against structural damage (Caltrans 2020).

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

c. Sensitive Receptors. The City of West Hollywood General Plan Safety and Noise Element describes sensitive receptors as residences, schools, hospitals, religious facilities, theatres, concert halls, libraries, offices, and parks (West Hollywood, 2011a). These uses are considered sensitive because the presence of excessive noise may interrupt normal activities typically associated with their use. Noise sensitive receptors located in the vicinity of the project site include multi-family residences approximately 25 feet immediately west of the project site and single and multi-family residences located approximately 50 feet north of the project site across West Knoll Drive. Although hotels are not considered noise-sensitive receptors according to the City's General Plan, for the purpose of this analysis the Ramada Plaza Hotel is considered a noise-sensitive receptor. Guest rooms are located between approximately 15 to 28 feet west of the project site; therefore, due to their proximity they are included in this analysis.

d. Regulatory Setting.

City Noise Policies. 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, as shown in Table 4.5-3. The maximum "normally acceptable" noise level for the exterior of commercial and professional uses is 65 dBA CNEL or Ldn. As shown on Figure 10-4 of the 2035 General Plan Safety and Noise Element, the project site is located within both the 65 dBA and 70 dBA CNEL contours for Santa Monica Boulevard.

Table 4.5-3
Land Use Compatibility for Noise Environments

Land Use Category	Community Noise Exposure Level (CNEL or Ldn)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential	50-60	60-70	70-75	70-85
Transient Lodging – Motel, Hotels	50-60	60-75	75-80	80-85
Schools, Libraries Churches, Hospitals, Nursing Homes	50-60	60-70	70-80	80-85
Auditoriums, Concert Halls, Amphitheaters	NA	50-70	NA	70-85
Sports Arenas, Outdoor Spectator Sports	NA	50-75	NA	75-85
Playgrounds, Parks	50-70	NA	70-75	75-85
Golf Courses, Riding Stable, Water Recreation, Cemeteries	50-70	NA	70-80	80-85
Office Buildings, Business Commercial and Professional	50-65	60-75	75-85	NA
Industrial, Manufacturing, Utilities, Agriculture	50-70	70-80	80-85	NA

Source: West Hollywood, 2011a.
Notes: NA - Not Applicable
Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements
Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable – New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Clearly Unacceptable – New construction or development should generally not be undertaken.

In certifying the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, the City adopted mitigation measures 3.9-1, 3.9-2, 3.9-5, and 3.9-6 for the reduction of noise during construction (West Hollywood, 2010). These mitigation measures apply to all new development in the City. The requirements of these measures include the following:

3.9-1 The City shall use the following thresholds and procedures for CEQA analysis of proposed projects, consistent with policies adopted within the General Plan:

- *The City shall apply the noise standards specified in Table 10-1 and Table 10-2 of the Safety and Noise Element to proposed projects analyzed under CEQA.*
- *In addition to the foregoing, an increase in ambient noise levels is assumed to be a significant noise concern if a proposed project causes ambient noise levels to exceed the following:*
- *Where the existing ambient noise level is less than 60 dB, a project-related permanent increase in ambient noise levels of 5 dB Ldn or greater.*
- *Where the existing ambient noise level is greater than 60 dB, a project-related permanent increase in ambient noise levels of 3 dB Ldn or greater.*
- *A project-related temporary increase in ambient noise levels of 10 dB Leq or greater.*

3.9-2 The City shall require construction contractors to implement the following measures during construction activities through contract provisions and/or conditions of approval as appropriate:

- *Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc.).*
- *Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.*
- *Construction operations and related activities associated with the proposed project shall comply with the operational hours outlined in the WHMC Noise Ordinance, or mitigate noise at sensitive land uses to below WHMC standards. Construction equipment should not be idled for extended periods of time in the vicinity of noise-sensitive receptors.*
- *Locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers). Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on powered construction equipment.*
- *Where feasible, temporary barriers shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Acoustical barriers shall be constructed of material having a minimum surface weight of 2 pounds per square foot or greater, and a demonstrated STC rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.*
- *Music from a construction site shall not be audible at offsite locations.*

3.9-5 When the City exercises discretionary review, provides financial assistance, or otherwise facilitates residential development within a mixed-use area, provide written warnings to potential residents about noise intrusion and condition of that approval, assistance, or facilitation. The following language is provided as an example:

"All potential buyers and/or renters of residential property within mixed-use areas in the City of West Hollywood are hereby notified that they may be subject to audible noise levels generated by business- and entertainment-related operations common to such areas, including amplified sound, music, delivery and passenger vehicles, mechanical noise,

pedestrians, and other urban noise sources. Binding arbitration is required for disputes regarding noise in mixed-use buildings that require legal action."

3.9-6 The City shall require future developments to implement the following measures to reduce the potential for human annoyance and architectural/structural damage resulting from elevated groundborne noise and vibration levels.

- *Pile driving within a 50-foot radius of historic structures or sensitive land uses shall utilize alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers). Specifically, geo pier style cast-in-place systems or equivalent shall be used where feasible as an alternative to impact pile driving to reduce the number and amplitude of impacts required for seating the pile.*
- *The preexisting condition of all designated historic buildings within a 50-foot radius of proposed construction activities shall be evaluated during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) prior to construction. All damage will be repaired back to its preexisting condition.*
- *Vibration monitoring shall be conducted prior to and during pile driving operations occurring within 100 feet of the historic structures. Every attempt shall be made to limit construction-generated vibration levels in accordance with Caltrans recommendations during pile driving and impact activities in the vicinity of the historic structures.*
- *Provide protective coverings or temporary shoring of on-site or adjacent historic features as necessary, in consultation with the Community Development Director or designee.*

To implement the City's noise policies, the City adopted a Noise Ordinance. The Noise Ordinance is part of the West Hollywood Municipal Code (WHMC). The City of West Hollywood Noise Ordinance has no numerical standards, but restricts unnecessary or excessive noise within the City limits. Section 9.08.040 prohibits "sounds or vibrations that in view of the totality of the circumstances 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." Factors that should be taken into consideration when considering whether a noise, sound or vibration is unreasonable include:

a. The volume and intensity of the noise, particularly as it is experienced within a residence or place of business;
b. Whether the noise is prolonged and continuous;
c. How the noise contrasts with the ambient noise level;
d. The proximity of the noise source to residential and commercial uses;
e. The time of day;
f. The anticipated duration of the noise; and
g. Any other relevant circumstances or conditions.

In addition, radios, musical instruments or similar devices operated between 10:00 PM and 8:00 AM may not be operated at a level to be plainly audible at a distance of 50 feet (Section 9.08.050[a]); 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 to 8:00 AM (Section 9.08.050[k]). The City Manager has responsibility, with the assistance of the Sheriff's Department if necessary, to enforce these noise regulations (Section 9.08.070).

Section 9.08.050 of the City's Municipal Code sets limits on when construction activities can occur. Construction activities are not permitted between the hours of 7:00 PM and 8:00 AM on weekdays and Saturdays, or at any time on Sundays or City holidays. Pursuant to Section 9.08.050 of the City's Municipal Code, the loading, unloading, opening, closing or other handling of boxes, containers, building materials, solid waste and recycling containers or similar objects is not permitted between the hours of 10:00 PM and 8:00 AM in such manner as to cause unreasonable noise disturbance, excluding normal handling of solid waste and recycling containers by a franchised collector.

d. Existing Noise Conditions and Sources. The most common sources of noise in the project vicinity are transportation-related, such as automobiles, trucks, 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. The primary sources of roadway noise near the project site are automobiles traveling on Santa Monica Boulevard immediately south of the project site as well as automobile traffic on West Knoll Drive, which borders the project site on its eastern and northern boundaries. Two late afternoon 15-minute noise measurements were taken using an ANSI Type II integrating sound level meter on July 30, 2019. Noise monitoring results are shown in Table 4.5-4. Sound levels in the southern portion of the site adjacent to Santa Monica Boulevard were more than 13 dBA higher than in the northern portion of the site. Complete noise monitoring data can be found in Appendix F.

Table 4.5-4
Noise Monitoring Results

Measurement Location	Primary Noise Source	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	Nearest Sensitive Receptor
West Knoll Drive on Northwestern Boundary of Project Site	Traffic on West Knoll and Santa Monica Boulevard	25 feet from center line of West Knoll Drive	56.2	Single- and multi-family residences
Southwestern boundary of project site adjacent to Santa Monica Boulevard	Traffic on Santa Monica Boulevard	55 feet from center line of Santa Monica Boulevard	68.7	Multi-family residences; hotel

Source: Field measurements using ANSI Type II Integrating sound level meter (Appendix F).
See Appendix F for noise monitoring data sheets

4.5.2 Impact Analysis

a. Methodology and Significance Thresholds. Impacts would be potentially significant if the proposed project would result in:

1) *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;*
2) *Generation of excessive ground-borne vibration or ground-borne noise levels; or*
3) *For a project located in 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, exposure of people residing or working in the project area to excessive noise levels.*

The Initial Study (see Appendix A) concluded that the proposed project would result in no impact with respect to noise exposure from public or private airports. Therefore, the third criterion is not discussed in this EIR.

According to the Noise Element of the General Plan, the exterior noise standards for non-transportation sources affecting noise-sensitive land uses are 55 dBA during the daytime (8:00 AM to 10:00 PM) and 50 dBA during the nighttime (10:00 PM to 8:00 AM). According to Mitigation Measure 3.9-1 of the 2035 General Plan FEIR, an increase in ambient noise levels is assumed to be a significant noise concern if a proposed project causes ambient noise levels to exceed the following:

- *Where the existing ambient noise level is less than 60 dB, a project-related permanent increase in ambient noise levels of 5 dB Ldn or greater.*
- *Where the existing ambient noise level is greater than 60 dB, a project-related permanent increase in ambient noise levels of 3 dB Ldn or greater.*
- *A project-related temporary increase in ambient noise levels of 10 dB Leq or greater.*

Noise levels associated with existing and future traffic along area roadways were calculated using traffic data from the EIR traffic study (see Appendix G). The proposed project would generate an estimated 838 new vehicle trips. Cumulative conditions correspond to the assumed buildout of pending development within the City as indicated in Section 3.0, *Environmental Setting*, Table 3-1.

For traffic-related noise, impacts would be considered significant if project-generated traffic would result in exposure of sensitive receivers to an unacceptable increase in noise levels. For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dB or more where the ambient noise level is 75 dBA CNEL or greater (i.e., those with-project conditions that fall within the "normally unacceptable" or "clearly unacceptable" land use categories). In addition, a significant impact would also occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 5 dB or more regardless of the ambient noise level under with-project conditions.

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FHWA 2018). Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels.

Construction activity would result in temporary noise in the project area, exposing surrounding sensitive receivers to increased noise levels. The project would involve demolition, site preparation, grading, building construction, paving, and architectural coating. Construction noise would typically be higher during the heavier periods of initial construction (i.e., grading) and would be lower during the later construction phases. Typical heavy construction equipment during project grading could include dozers, excavators, loaders, and dump trucks. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location. In addition, construction equipment would not be in constant use during the 8-hour operating day.

A potential construction scenario includes an excavator, loader, and a dump truck working to grade the site. Therefore, an excavator, loader and dump truck were analyzed together for construction noise impacts due to their likelihood of being used in conjunction at the same time and therefore a conservative scenario for the greatest noise generation during construction. At a distance of 50 feet, an excavator, loader, and dump truck would generate a noise level of 79.9 dBA L_{eq} (RCNM calculations are included in Appendix F).

Operation of the proposed project would not include any substantial vibration sources. Thus, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers, especially during grading and excavation of the project site. The greatest vibratory source during construction would be a vibratory roller used during paving. Neither blasting nor pile driving would be required for construction of the proposed project. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2020, FTA 2018). Table 4.5-5 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Vibration limits used in this analysis to determine a potential impact to local land uses from construction activities, including vibratory compaction, demolition, drilling, and excavation, are based on information contained in Caltrans' Transportation and Construction Vibration Guidance Manual and the Federal Transit Administration and the FTA Transit Noise and Vibration Impact Assessment Manual (Caltrans 2020; FTA 2018). Maximum recommended vibration limits by the American Association of State Highway and Transportation Officials (AASHTO) are identified in Table 4.5-6.

Table 4.5-5
Vibration Levels Measured During Construction Activities

Equipment		PPV at 25 ft. (in./sec.)
Hydromill (slurry wall)	Soil	0.008
	Rock	0.017
Clam Shovel Drop (slurry wall)		0.202
Vibratory Roller		0.210
Hoe Ram		0.089
Large Bulldozer		0.089
Caisson Drilling		0.089
Loaded Trucks		0.076
Jackhammer		0.035
Small Bulldozer		0.003

Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance.
Source: FTA 2018

Table 4.5-6
AASHTO Maximum Vibration Levels for Preventing Damage

Type of Situation	Limiting Velocity (in./sec.)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

Source: Caltrans 2020

Based on AASHTO recommendations, limiting vibration levels to below 0.4 PPV in./sec. at residential structures would prevent structural damage regardless of building construction type. These limits are applicable regardless of the frequency of the source. However, potential human annoyance associated with vibration is usually different if it is generated by a steady state or a transient vibration source. The vibration level threshold at which steady vibration sources are considered to be distinctly perceptible is 0.035 in./sec. PPV. This is roughly equivalent to the FTA identified threshold of 78 VdB for assessing impacts to residential land uses from infrequent events. This threshold is used for assessing passing trains in the FTA Manual. However, the vibration level threshold at which transient vibration sources (such as construction equipment) are considered to be distinctly perceptible is 0.24 in./sec. PPV. This is roughly equivalent to 94 VdB. This analysis uses the distinctly perceptible threshold for transient vibration sources purposes of assessing vibration impacts.
Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors and the vibration level threshold for human

perception is assessed at occupied structures (FTA 2018). Therefore, vibration impacts are assessed at the structure of an affected property.

b. Project Impacts and Mitigation Measures.

Impact N-1 Project construction would intermittently generate high noise levels on and adjacent to the site. This would affect existing noise-sensitive receptors near the project site. This impact would be Class I, *significant and unavoidable*.

Nearby noise-sensitive receptors, including the multi-family residences immediately north of the project site and the Ramada Plaza Hotel[1] immediately west of the project site, would be exposed to temporary construction noise during development of the proposed project. Over the course of a typical construction day, construction equipment would be located as close as 25 feet to the nearest sensitive receptors, the residences to the west, but would typically be located at an average distance further away due to the nature of construction where equipment is mobile throughout the day. Therefore, it is conservatively assumed that over the course of a typical construction day the construction equipment would operate on average 50 feet from the nearest sensitive receptors the multi-family residences to the west.

As described in Section 4.5.2(a), *Methodology and Significance Thresholds*, at a distance of 50 feet, an excavator, loader, and dump truck would generate a noise level of 79.9 dBA L_{eq} (8-hour).The grading/excavation phase of project construction tends to create the highest construction noise levels because of the operation of heavy equipment, although only a limited amount of equipment can operate near a given location at a particular time. In addition, construction vehicles traveling on local roadways can generate intermittent noise levels that affect adjacent receptors.

Based on the RCNM modeling for the project, temporary construction noise could affect sensitive noise receptors near the project site, particularly the multi-family residences west of the project site. Construction noise could be as loud as approximately 79.9 dBA L_{eq} at the multi-family residences, which would be an increase of more than 10 dBA above the existing ambient noise level of 56.2 dBA L_{eq} along West Knoll Drive. This would be a significant temporary or periodic increase in noise levels.

Mitigation Measures. The Final Program EIR for the City of West Hollywood General Plan 2035 mitigation measure 3.9-2 for the reduction of noise during construction and the following mitigation measures are required to reduce construction-related noise impacts to nearby sensitive receptors.

N-1(a) Noise Complaints. A sign shall be provided at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager shall respond to and investigate noise complaints and take corrective action if necessary in a timely manner.

[1] As stated in subsection 4.5.1(c), hotels are not considered noise-sensitive receptors according to the City's General Plan but the Ramada Plaza Hotel is considered a noise-sensitive receptor for the purposes of this analysis due to the proximity of guest rooms to the project site. This analysis is therefore conservative.

The sign shall have a minimum dimension of 48 inches wide by 24 inches high. The sign shall be placed 5 feet above ground level.

N-1(b) **Noise Measurements.** If a noise complaint(s) is registered, the contractor shall retain a City-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint within one week of the registered complaint. The noise measurements shall be conducted for a minimum of one hour and shall include one-minute intervals. The consultant shall prepare a letter report summarizing the measurements and potential measures to reduce noise levels to the maximum extent feasible. The letter report shall include all measurement and calculation data used in determining impacts and resolutions, such as the construction of temporary sound barriers. The letter report shall be provided to code enforcement for determining adequacy and recommendations, as well potential revocation of construction permits if measures are inadequate.

N-1(c) **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.

N-1(d) **Construction Notice**. Two weeks prior to the commencement of construction at the project site, notification shall be provided to the owners and tenants of residential properties located along West Knoll Drive between Santa Monica Boulevard and Westmount Drive, and the manager of the Ramada Plaza Hotel, disclosing the planned construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. This notification shall also provide a contact name and phone number for residents to call for construction noise related complaints. All reasonable concerns shall be rectified within 24 hours of receipt.

N-1(e) **Equipment Idling.** Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use.

N-1(f) **Workers' Radios.** All noise from workers' radios shall be controlled to a point that they are not audible at sensitive receptors near construction activity.

N-1(g) **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.

Significance After Mitigation. As shown in Table 4.5-4, the measured ambient noise levels on the project site range from 56.2 to 68.7 dBA L_{eq}. Therefore, a significant impact would occur if the project resulted in noise levels above 66.2 to 78.5 dBA L_{eq} (a temporary increase in ambient noise levels of 10 dB L_{eq} or greater). Implementation of mitigation measures N-1(a) through N-1(g) would reduce the impacts associated with temporary construction activities. It is estimated that these measures would reduce noise levels by 10-20 dBA L_{eq}. Temporary noise barriers would provide up to 10 dBA of noise reduction and eliminating traditional back-up alarms, locating stationary equipment as far as possible or within an enclosure, shielding impact tools, and limiting idling time would provide an additional 5-10 dBA reduction. Since construction noise levels are estimated to be 79.9 dBA L_{eq} at the nearest sensitive receptor, the project may result in noise levels above 66.2 dBA L_{eq} if only the lower end estimate of a 10 dBA reduction is achieved. Therefore, construction activities would still result in a significant and unavoidable short-term noise impact.

Impact N-2 Project construction would intermittently generate groundborne vibration on and adjacent to the site. However, vibration felt at nearby structures would not exceed applicable thresholds. Therefore, impacts would be Class III, *less than significant*.

Vibration from construction activities could have an impact on nearby noise-sensitive land uses. Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the project. The greatest anticipated source of vibration during general project construction activities would be from a vibratory roller, which may be used during paving activities and may be used within 25 feet of the nearest off-site residential structure. A vibratory roller would create approximately 0.210 in./sec. PPV at a distance of 25 feet (Caltrans 2020). This would be lower than what is considered a distinctly perceptible impact for humans of 0.24 in./sec. PPV and the structural damage impact to residential structures of 0.4 in./sec. PPV. There are no vibration sensitive structures, such as historic sites, in the project site vicinity. Therefore, temporary impacts associated with the roller and other equipment would be less than significant.

Mitigation Measures. Mitigation is not required.

Significance After Mitigation. The proposed project's impact related to groundborne vibration would be less than significant without mitigation.

Impact N-3 Project-generated traffic has the potential to increase traffic-related noise on study area roadway segments under existing plus project and future plus project conditions. However, the change in noise levels would not exceed applicable thresholds. Therefore, the effect of increased traffic noise on existing uses would be Class III, *less than significant*.

The proposed project would increase the number of vehicle trips to and from the site, which would incrementally increase traffic noise on study area roadways. The project could therefore incrementally increase noise at neighboring uses. Estimated daily traffic values from the transportation impact analysis (Fehr & Peers 2021, Appendix G) were used to model the change

in noise levels resulting from increased traffic on eight roadway segments. Projected increases in traffic are shown in Table 4.5-7.

As shown in Table 4.5-7, the largest percentage increase in project traffic would occur on West Knoll Drive between Westmount Drive and Santa Monica Boulevard under the existing plus project scenario and under the cumulative plus project scenario. Traffic on West Knoll Drive between Westmount Drive and Santa Monica Boulevard would increase by approximately eight percent as compared to existing conditions, which is equivalent to a less than 0.4 dBA increase in noise. Therefore, project traffic noise would not double and result in an increase of 3 dBA or higher under existing conditions. Off-site traffic noise increases from the project would not be perceptible and impacts would be less than significant.

Mitigation Measures. Mitigation is not required.

Significance After Mitigation. The proposed project's impact related to traffic noise levels on study roadway segments would be less than significant without mitigation.

Table 4.5-7
Project and Cumulative Traffic Increase

Roadway	Existing ADT (2019)[1]	Existing plus Project ADT (2019)[1]	Existing Percent Increase	Significant*	Cumulative plus Project ADT (2023)	Cumulative Percent Increase	Significant*
Hancock Avenue between Holloway Drive and West Knoll Drive	2,955	3,026	2.4	No	3,213	8.7	No
Hancock Avenue between West Knoll Drive and Santa Monica Boulevard	3,489	3,524	1.0	No	3,716	6.5	No
West Knoll Drive between Hancock Avenue and Westbourne Drive	1,433	1,468	2.5	No	1,609	12.3	No
Westbourne Drive between West Knoll Drive and Santa Monica Boulevard	1,563	1,678	7.3	No	1,838	17.6	No
Westbourne Drive between Rugby Drive and Sherwood Drive	2,295	2,405	4.8	No	2,597	13.2	No
Sherwood Drive between Westbourne Drive and Westmount Drive	2,085	2,085	0.0	No	2,209	5.9	No
Westmount Drive between Holloway Drive and West Knoll Drive	2,562	2,589	1.0	No	2,787	8.8	No
West Knoll Drive between Westmount Drive and Santa Monica Boulevard	1,480	1,604	8.4	No	1,763	19.1	No

[1] Source: Fehr & Peers 2021, Appendix G.
**significant impact would occur if traffic is doubled and would result in a 3 dBA increase, which equates to a doubling of traffic*
ADT = average daily trips

Impact N-4 Noise generated by existing traffic near the project site could expose new sensitive receptors to noise levels that exceed City standards. With compliance with California Building Code requirements, impacts would be Class III, *less than significant*.

The project site is on the north side of Santa Monica Boulevard and the west side of West Knoll Drive. As show in on Table 4.5-4 (measured noise levels) existing noise on Santa Monica Boulevard in front of the project site was measured at 68.7 dBA Leq and existing noise on West Knoll Drive was measured at 56.2 dBA Leq.

Table 4.5-3 shows the West Hollywood General Plan Safety and Noise Element land use compatibility criteria. For new residential uses, noise levels between 70-75 dBA CNEL are considered "normally unacceptable" and noise insulation features should be included in the project design. The ambient noise level in CNEL is typically within (+/-) 2 dBA of the measured peak hour L_{eq}. Therefore, based on the measured noise levels, ambient noise on-site near Santa Monica Boulevard may be within the normally unacceptable range due to existing noise levels.

The 2019 California Building Code (Title 24, Part 2, Volume 1, Chapter 12, Section 1206.4) requires that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. Habitable rooms include any space for living, sleeping, eating, or cooking. With compliance with California Building Code requirements, residents would not be exposed to noise levels that exceed City standards. Impacts would be less than significant.

Mitigation Measures. None required.

Significance After Mitigation. Noise impacts related to existing traffic-related noise would be less than significant without mitigation.

Impact N-5 On-site activities associated with project operation would generate noise levels that may periodically be audible to existing uses near the project site. On-site noise sources include stationary equipment such as rooftop ventilation and heating systems, a generator, deliveries, trash hauling, general retail and restaurant activities, and rooftop conversational noise. Generator noise would exceed noise standards at adjacent residents and impacts would be Class II, *less than significant with mitigation incorporated*.

Existing uses near the project site may periodically be subject to noises associated with operation of the proposed project, including noise that is typical of residential and retail developments such as light machinery, conversations, music, and delivery trucks.

Existing uses on the project site include two parking lots: one on the northeast section of the project site and one on the western half of the project site (see Figure 2-2 in Section 2.0, *Project Description*). The proposed project includes three levels of enclosed parking. Therefore, noise associated with parking lots, such as the movement of vehicles through the parking area and the slamming of doors, conversations, would be reduced as parking would be moved from outdoors to an enclosed garage.

The proposed project involves ground-level patios for residential units on the north side of the second floor of the project, common space on the second floor, private balconies for residential units on the second through fifth floors, and a rooftop deck, pool, spa, and sundeck. The western façade facing existing multi-family residences would not include any balconies, but would include a side yard as close as 15 feet to the existing residences. The patios and balconies on the northern side of the proposed mixed-use structure would face existing multi-family and single-family residences north of the project site across West Knoll Drive (see Figure 2-6 in Section 2.0, *Project Description*). Balconies and patios would be between approximately 50 feet from the property line of adjacent residences. The rooftop pool would be located in the eastern corner of the project site nearest the Santa Monica Boulevard and Northwest Knoll Drive intersection, at least 100 feet from the nearest residences. The rooftop deck would be located in the central portion of the project site, approximately 50 feet from the nearest residences. Conversations and music from residents on these balconies, patios, open space, and rooftop amenities could be audible at these nearby residences. Normal conversational levels range from approximately 60-65 dBA at 3 feet. Assuming a sound attenuation level of 6 dBA per doubling of distance, conservations would be approximately 51 dBA at the single family residences to the north and 45 dBA at the adjacent multi-family residences. The level of noise at nearby residences from music on balconies, patios, and rooftop amenities at nearby residences would depend on the volume the music is being played. Residents living in units with balconies and patios or using the common space facing adjacent noise-sensitive receptors would be subject to WHMC noise ordinance requirements, specifically Section 9.08.040 which prohibits prolonged and harsh sound which would disturb any persons in the vicinity and Section 9.08.050[a] which prohibits loud radios or similar devices between 10:00 PM and 8:00 AM.

Noise generated by on-site operations is expected to also include noise associated with rooftop ventilation and heating systems. Heating, ventilation, and air condition equipment (HVAC) units usually have noise shielding cabinets placed on the roof or are in mechanical equipment rooms. Typically, the shielding and location of these units reduces noise levels to no greater than 55 dBA at 50 feet from the source. The rooftop HVAC systems for the proposed project would be at least approximately 28 feet from the Ramada Hotel to the west and 45 feet from the multi-family residences to the north. At a distance of 28 feet, noise levels may reach approximately 60 dBA, which is lower than measured ambient noise levels of 68.7 dBA along Santa Monica Boulevard near the Ramada Hotel. At a distance of 45 feet, noise levels would reach approximately 56 dBA, which is approximately the same as the measured ambient noise level along West Knoll Drive of 56.2 dBA. The HVAC systems would also be located on the roof of the proposed project which would be higher in elevation compared to the surrounding buildings with noise sensitive receivers. Therefore, additional noise distance attenuation would occur. Due to the distance and the elevation change, HVAC systems associated with the project would not substantially increase noise levels at nearby noise-sensitive receptors.

The project would include a rooftop industrial diesel generator with a Level 1 acoustical enclosure (model no. SD050). The generator would be a continuous noise source that operates at approximately 73 dBA at 23 feet at full load (see Appendix F for equipment specifications). The generator would be located on the northwestern portion of the rooftop (see floor plans in Appendix B) approximately 20 feet from the nearest sensitive receivers, multi-family residences west of the project site. The rooftop is approximately 25 feet higher than the existing multi-family building, therefore receivers on the top floor of the multi-family residences would be

approximately 32 feet from the generator. Noise levels from the generator would be approximately 70 dBA at 32 feet. The generator would be approximately 3 feet tall and the 4-foot-tall mechanical units would block the line of site between the generator and receivers to the west. Therefore, generator noise would be reduced by 5 dBA to 65 dBA at the receivers (FHWA 2017). The existing ambient noise level at the northern portion of the project site along West Knoll Drive is approximately 56 dBA. Generator noise would increase existing noise levels to approximately 65 dBA, which is an increase of 9 dBA. The proposed generator would increase ambient noise levels above 5 dBA and impacts would be potentially significant.

Operation of the proposed mixed-use project would involve delivery trucks and trash hauling trucks going to and from the project site and occasional moving vans. An individual delivery truck can generate noise of up to 85 dB, which could be disruptive if it were to occur at night or in the early morning hours. However, the loading zone for the proposed project would be within the enclosed first floor parking garage (see site plans in Appendix B). Further, as described in *Methodology and Significance Thresholds,* pursuant to Section 9.08.050 of the City's Municipal Code, commercial deliveries that would cause unreasonable noise disturbance are not permitted between the hours of 10:00 PM and 8:00 AM, except for normal handling of solid waste and recycling containers by a franchised collector. Noise generated by daytime deliveries and trash pickups would not adversely affect nearby sensitive receptors due to their relatively low frequency, the location of the loading zone with an enclosed area, and the lower noise level sensitivity of receptors during the day when deliveries would occur.

Due to the design features associated with the proposed project, and assuming compliance with West Hollywood Noise Ordinance regulations, impacts related to operational noise would be less than significant.

Mitigation Measures. The following mitigation measure is required to reduce generator noise at nearby sensitive receptors.

N-5 **Generator Shielding.** The applicant shall install an acoustical enclosure around the generator, with noise reduction higher than a Level 1 acoustical enclosure, and/or rooftop screening to ensure that generator noise meets the City's noise standards. The acoustical enclosure and/or shall provide at least 4 dBA of noise reduction and shall block the line of sight between the generator and adjacent multi-family residential building west of the project site.

Significance After Mitigation. Rooftop screening, such as SonaGuard Fiberglass Sound Absorptive Noise Barriers, can reduce noise levels by approximately 25 dBA and noise wraps, such as Hushcore covers can reduce noise by up to 6 dBA (see Appendix F for equipment specifications). Therefore, with implementation of the above mitigation measure requiring an acoustical enclosure and/or rooftop screening, would ensure that exterior noise levels would not exceed the City's standards at adjacent land uses.

c. Cumulative Impacts. The proposed project and related projects in the area, as identified in Table 3-1 in Section 3.0 *Environmental Setting*, would generate temporary noise during construction. As discussed in Impact N-1, impacts related to noise generated by construction of the proposed project would be significant and unavoidable. Construction

activities on the related projects in the area would generate similar noise levels as the proposed project. Construction noise is localized and rapidly attenuates within an urban environment. Most of the related projects outside the immediate site vicinity are located too far from the project site to contribute to increases in ambient noise levels associated with construction in the project area. Therefore, the proposed project would not contribute to a significant cumulative construction noise impact.

Traffic noise impacts associated with cumulative development within the City would incrementally increase noise levels along roadways. As shown in Table 4.5-7, under cumulative plus project conditions traffic on West Knoll Drive between Westmount Drive and Santa Monica Boulevard would increase by approximately 19 percent, which equates to an approximately 0.8 dBA noise increase. Therefore, traffic noise would not double and result in an increase of 3 dBA or higher under cumulative conditions. Off-site traffic noise increases from cumulative development would not be perceptible. As such, cumulative traffic noise impacts would be less than significant.

Cumulative development would result in stationary (non-traffic) operational noise increases in the project vicinity. Based on the long-term stationary noise analysis, impacts from the proposed project's operational noise would be potentially significant. However, implementation of Mitigation Measure N-4 to provide acoustical shielding would reduce impacts to a less-than-significant level. Because noise dissipates as it travels away from its source, noise impacts associated with on-site activities and all other stationary sources would be limited to the project site and vicinity. There is one recently constructed project across the street from the proposed project (8550 Santa Monica Boulevard). However, 8550 Santa Monica Boulevard is located across the street from the project site and approximately 250 feet south of the nearest residential receptors from the proposed project. Therefore, stationary noise sources from the proposed project, including the generator, and 8550 Santa Monica Boulevard would not have a cumulative impact at noise sensitive receptors surrounding the project site. Cumulative operational (non-traffic) noise impacts would be less than significant.

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4.6 TRANSPORTATION AND CIRCULATION

This section analyzes the proposed project's impacts to the local transportation and circulation system. The analysis is based in part upon the Transportation Analysis Report prepared for the proposed project by Fehr & Peers in August 2021. The study is included in its entirety in Appendix G. On September 27, 2013, Senate Bill (SB) 743 was signed into law, initiating a process to change transportation impact analyses completed in support of CEQA documentation. As of July 1, 2020, SB 743 eliminated level of service (LOS) as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, vehicle miles traveled (VMT). As a result, the State is shifting from measuring a project's impact to drivers (LOS) to measuring the impact of driving (VMT) as it relates to achieving State goals of reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health through active transportation. The City of West Hollywood City Council adopted VMT Guidelines, which include VMT Thresholds, in November 2020 to measure transportation impacts of proposed projects under CEQA. The VMT Guidelines supersede and replace the existing LOS thresholds for the City of West Hollywood that were adopted in 2009. Therefore, LOS-based analyses are not included in this EIR.

4.6.1 Setting

a. Existing Street System. The project site is located at the corner of Santa Monica Boulevard and West Knoll Drive in the City of West Hollywood. The study area for this analysis is generally bordered by Sunset Boulevard to the north, Kings Road to the east, Melrose Avenue to the south, and San Vicente Boulevard to the west. Primary regional access to the study area is provided by Santa Monica Boulevard, which runs east-west through the study area and the Hollywood Freeway (U.S. 101), which generally runs northwest-southeast approximately two miles northeast of the project site. Access to the U.S. 101 is provided at the Highland Avenue interchange.

Surface street north-south regional project access is provided by San Vicente Boulevard and La Cienega Boulevard and east-west regional access is provided by Sunset Boulevard and Santa Monica Boulevard. Localized access is provided by Fountain Avenue, Holloway Drive, Westbourne Drive, and West Knoll Drive.

The following is a brief description of the streets that serve the site:

- <u>San Vicente Boulevard</u> – *San Vicente Boulevard is a north-south arterial south of Santa Monica Boulevard and a collector between Santa Monica Boulevard and Sunset Boulevard west of the project site. It provides two lanes in each direction during the peak hours, along with turning lanes at major intersections. A bicycle lane is also provided starting just north of Santa Monica Boulevard. Parking is generally allowed on both sides of the street north of Santa Monica Boulevard. The posted speed limit is 35 miles per hour (mph).*

- <u>La Cienega Boulevard</u> – *La Cienega Boulevard is a north-south arterial south of Santa Monica Boulevard and a collector between Santa Monica Boulevard and Sunset Boulevard east of the project site. It provides four travel lanes with two lanes in each direction. La Cienega also provides regional access with a connection to the I-10 ramps, south of the study*

area. Parking is generally allowed on both sides of the street in the project vicinity. The posted speed limit is 30 mph.

- *Santa Monica Boulevard – Santa Monica Boulevard is an east-west arterial. In the project area, it provides four travel lanes with two lanes in each direction. Parking is available but limited in the study area. The posted speed limit is 35 mph.*

- *Sunset Boulevard – Sunset Boulevard is an east-west arterial that provides four travel lanes during the peak periods, with two lanes in each direction. Parking is prohibited during the AM and PM peak periods and limited between the peak periods. The posted speed limit is 35 mph.*

- *Fountain Avenue – Fountain Avenue is an east-west collector street. Four travel lanes are provided East of La Cienega Boulevard during the PM peak period in the study area. Parking is generally allowed in the study area between 7:00 AM and 4:00 PM without a permit. The posted speed limit is 35 mph.*

- *Holloway Drive – Holloway Drive is an east-west collector street north of the project site. Two travel lanes are provided on the undivided roadway; parking is available on the street. The speed limit is 30 mph.*

- *Hancock Avenue – Hancock Avenue is an east-west local street to the north of the project site. The speed limit is 25 mph. Two travel lanes are provided on the undivided roadway; parking is available on the street for permit holders only. The speed limit is 25 mph.*

- *Sherwood Drive – Sherwood Drive is an east-west local street to the south of the project site. Two travel lanes are provided on the undivided roadway; parking is available on the street for permit holders only, except for a small portion of the street adjacent to La Cienega Boulevard, which allows for two-hour parking during the daytime and evening period. The speed limit is 25 mph.*

- *Westmount Drive – Westmount Drive is a north-south local street to the west of the project site. Two travel lanes are provided on this undivided roadway; parking is available on the street for permit holders only. The posted speed limit is 20 mph. Of note, this street has two sections, which are blocked off from each other to prevent through traffic. The first segment starts at Santa Monica Boulevard, where it continues north for approximately 225 feet. The second segment immediately picks up on the other side of a set of bollards, and continues through a roundabout intersection with West Knoll Drive, and lets out to Holloway Drive.*

- *Westbourne Drive – Westbourne Drive is a north-south local street to the west of the project site. Two travel lanes are provided on the undivided roadway; parking is available on the street. The speed limit is 25 mph.*

- *West Knoll Drive – West Knoll Drive is a north-south local street to the east of the project site. Two travel lanes are provided on the undivided roadway; parking is available on the street. The speed limit is 25 mph, except in the vicinity of the roundabout intersection with Westmount Drive, where it is 20 mph.*

d. Existing Transit Service. The study area is served by bus transit lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood CityLine system. Lines that serve the project site are described below:

- *Metro Line 2 – Line 2 is a local service that runs along Sunset Boulevard between downtown Los Angeles and Pacific Palisades. In the AM peak hour, the line operates with average 15-minute headways in the eastbound direction and average 13-minute headways in the westbound direction. In the PM peak hour, the line operates at average 15-minute headways in the eastbound direction and average 14-minute headways in the westbound direction.*

- *Metro Lines 4 and 704 – Line 4 is a local east-west line that travels from Santa Monica to downtown Los Angeles. Line 704 is a Metro Rapid line that provides limited-stop service along the same route. Line 4 and Line 704 provide service to Echo Park, Silver Lake, Hollywood, West Hollywood, Beverly Hills, Century City, Westwood and Santa Monica. Lines 4 and 704 both travel along Santa Monica Boulevard in the study area. In the AM peak hour, Metro Line 4 and 704 operate at 14- and 22-minute headways in the eastbound direction and average 14- and 19-minute headways in the westbound direction, respectively. In the PM peak hour, the lines operate at average 14-minute headways in the eastbound direction and average 13- and 21-minute headways in the westbound direction, respectively.*

- *Metro Line 10 – Line 10 is a local east-west line that travels from West Los Angeles to Downtown Los Angeles via Temple Street and Melrose Avenue. Line 10 travels along Melrose Avenue in the study area. In the AM peak hour, the line operates with average 23-minute headways in the eastbound direction and average 25-minute headways in the westbound direction. In the PM peak hour, the line operates at average 27-minute headways in the eastbound direction and average 24-minute headways in the westbound direction.*

- *Metro Lines 30– Line 30 is a local east-west line that travels from West Hollywood to east Los Angeles. Line 30 provides service to Mid-city, downtown Los Angeles, Boyle Heights, and east Los Angeles. Line 30 travels along San Vicente Boulevard in the study area. In the AM peak hour, Metro Line 30 operates at average 30-minute headways in the eastbound direction and average 28-minute headways in the westbound direction. In the PM peak hour, Line 30 operates at average 32-minute headways in the eastbound direction and average 28-minute headways in the westbound direction.*

- *Metro Lines 105– Line 105 is a local southeast-northwest line that travels from West Hollywood to Vernon. Line 105 provides service to West Hollywood, Beverly Hills, Baldwin Hills, Leimert Park, Exposition Park, and Vernon. Line 105 travels along La Cienega Boulevard in the study area. In the AM peak hour, Metro Line 105 operates at average 9-minute headways in the southbound/eastbound direction and average 10-minute headways in the westbound/northbound direction. In the PM peak hour, the line operates at average 12-minute headways in the southbound/eastbound direction and 10-minute headways in the westbound/northbound direction.*

- *CityLine Blue Route – The West Hollywood CityLine Blue Route provides local circulation service to the City of West Hollywood, traveling westbound and linking the east and west communities while primarily traveling on Santa Monica Boulevard. Near the project site, the Blue Route stops include Santa Monica Boulevard & La Cienega Boulevard, Santa Monica*

Boulevard & West Knoll Drive, and Santa Monica Boulevard & Hancock Avenue. The Blue Route operates at average 30-minute headways during the day.

- *CityLine Orange Route – The West Hollywood CityLine Orange Route provides local circulation service to the City of West Hollywood, traveling eastbound along the same path as the Cityline Blue Route. Near the project site, the Orange Route stops include Santa Monica Boulevard & Westbourne Drive and Santa Monica Boulevard & La Cienega Boulevard. The Orange Route operates at average 30-minute headways during the day.*

- *Commuter Route – The West Hollywood Cityline Commuter Route provides service between the City of West Hollywood and the Hollywood & Highland Metro Red Line Station. Near the project site, the Commuter Route stops include Santa Monica Boulevard & San Vicente Boulevard, Santa Monica Boulevard & Westbourne Drive, and Santa Monica Boulevard & La Cienega Boulevard. The Commuter Route operates at up to 15-minute headways in the eastbound and westbound directions.*

e. Existing Bicycle and Pedestrian Facilities. The existing bicycle network in the study area consists of Class II facilities (designated bicycle lane noted by striping and signage) on San Vicente Boulevard between Santa Monica Boulevard and Beverly Boulevard and on Santa Monica Boulevard between North Almont Drive and North Flores Street.

The pedestrian network in the study area consists of crosswalks, pedestrian crossings, and sidewalks. Sidewalks are available on all streets bordering the project site and all study intersections have a crosswalk on at least one approach, with the exception of La Cienega Boulevard & Sherwood Drive. Additionally, several of the stop-controlled intersections and mid-block locations in the study area have marked pedestrian crossings with high visibility signage and/or crosswalk markings.

4.6.2 Impact Analysis

a. Methodology and Significance Thresholds. This evaluation is based on review of existing information that has been developed for the project and the project site, including a Transportation Analysis Technical Memorandum prepared for the project by Fehr & Peers in 2021 (Appendix G).

According to Appendix G of the *State CEQA Guidelines,* the project would result in a significant impact related to transportation and circulation if it would:

1. *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*
2. *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
3. *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
4. *Result in inadequate emergency access?*

The Initial Study (Appendix A) determined that the proposed project would result in less than significant impacts related to emergency access (fourth criterion). As such, an analysis of this issue is not included in this section of the EIR.

Vehicle Miles Traveled Methodology and Evaluation Criteria**.** On September 27, 2013, Governor Jerry Brown signed SB 743 into law, which initiated a process to change transportation impact analyses completed in support of CEQA documentation. SB 743 provides a new performance metric, which is vehicle miles traveled (VMT). As a result, the State is shifting from measuring a project's impact to drivers to measuring the impact of driving (VMT) as it relates to achieving State goals of reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health through active transportation. To help lead agencies with SB 743 implementation, the Governor's Office of Planning and Research (OPR) produced a Technical Advisory (OPR 2018).

The CEQA Guidelines states that "…generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts…" and defines VMT as "…the amount and distance of automobile travel attributable to a project…" "Automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Therefore, VMT is an estimate of the distance traveled by these vehicles, which means that impacts are now based on the distance that vehicles travel to a proposed development and how many vehicles are making those trips.

The City of West Hollywood staff used extensive studies and research, including OPR's Technical Advisory, to establish an approach that best meets the City of West Hollywood's unique and densely built urban environment. This approach was reviewed at the City of West Hollywood Transportation Commission, Planning Commission and City Council meetings. The City of West Hollywood City Council adopted the VMT thresholds on November 16, 2020 and developed the West Hollywood Transportation Impact Study Guidelines that were released in April 2021.

The first step of a VMT analysis is to determine what type of analysis, if any, is needed. Pursuant to OPR guidance, the City of West Hollywood is screening out all development projects, both residential and commercial, from CEQA transportation analysis that are 1) within an area that OPR defines as a high-quality-transit area (HQTA) and 2) do not trigger five exclusion criteria, which are detailed below.

High Quality Transit Area. OPR's Technical Advisory states that certain projects (e.g., residential, retail, office projects, and projects that are a mix of these uses) proposed in a High Quality Transit Area (HQTA), defined as an area within 0.5 mile of an existing major transit stop or an existing stop along a high quality transit corridor, can be presumed to have a less-than-significant impact on VMT. A major transit stop is defined 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. A high-quality transit corridor is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hour. OPR's guidance is based on the California Code of Regulations Guidelines for Implementation of the California Environmental Quality Act, which state that projects within 0.5 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. The Southern California Association of Governments (SCAG) and Los Angeles County Metro consider the entire City of West Hollywood to be within a HQTA.

Exclusion Criteria. The presumption that a project in a HQTA will have a less-than-significant impact on VMT would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. Therefore, based on OPR guidance, the City of West Hollywood has identified the following exclusion criteria that would prevent a project from screening out from the required VMT analysis:

1. *A project with a floor area rate (FAR) of less than 0.75.*
2. *A project with more than the required number of parking spaces.*
3. *A project that is inconsistent with the applicable Sustainable Communities Strategy.*
4. *A project that replaces affordable residential units with fewer, moderate- or high-income residential units.*
5. *A project with the potential for significant regional draw.*

The first four types of projects are excluded from screening because they are identified in the Technical Advisory and are considered counter to the goals of SB 743 and other important State priorities, such as the production of affordable housing. The fifth exclusion category includes development projects that have potential for significant regional draw. These types of projects may require a skilled and specialized workforce, which could draw employees from greater distances in the region and would not be considered a low VMT generator. Examples of such projects include media production stage and studio projects (The Lot) and the Pacific Design Center. Project size is not an indication that a development project would have a significant regional draw. Projects that have a more typical work force, such as hotels, restaurants/bars, office buildings and event spaces would not be considered to have a significant regional draw.

Projects excluded from screening need to conduct a quantitative VMT analysis.

VMT Impacts Significance Criteria. Pursuant to OPR guidance, the City of West Hollywood adopted a Local Threshold of Significance of 15% reduction below local average for all projects that are excluded from screening. Therefore, the level of project-generated VMT would be compared to the local average, based on the City's Travel Demand Model. If the number is not at least 15% below the local average VMT, the project would have a significant impact on transportation**.**

Site Plan, Access, & Circulation Review. The City of West Hollywood requires site plan review and analysis for informational purposes and to contribute to the CEQA determination related to consistency with Programs, Plans, Ordinances, and Policies and identification of project-related geometric hazards. The site plan review and analysis considers a project within the four corners of the project site, intersections that provide immediate access, and includes a discussion of the following components:

- *Consistency with Programs, Plans, Ordinances, and Policies identified in the City of West Hollywood's General Plan Circulation Element, Pedestrian and Bicycle Master*

Plan, and Climate Action Plan and other local/regional documents such as the Southern California Association of Government Regional Transportation Plan/Sustainable Communities Strategies (SCAG RTP/SCS).

- *Identification of on-site geometric hazards (i.e., sharp curves; conflict zones between pedestrians, bicyclists, and vehicles; sight-line issues; driveway queuing that creates hazards onsite).*

Project Trip Generation. The trip generation estimates for the project were using trip generation rates from the Institute of Transportation Engineers, *Trip Generation, 10th Edition* (cited in Fehr & Peers 2021). No trip credits were applied other than those for the existing land uses. Two categories of trip credits (internal capture/transit/walk and pass-by reductions) were considered for application to the trip generation estimates; however, based on the intensity and mix of land uses and discussions with City staff, these trip credits were not applied in an effort to provide a conservative analysis. See Table 4.6-1 for trip generation rates, and Table 4.6-2 for trip generation estimates.

Table 4.6-1
Trip Generation Rates

				AM Peak Hour			MD Peak Hour [a]			PM Peak Hour		
Land Use	**ITE#**	**Rate**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Apartment	221	per du	5.44	20%	80%	0.36	29%	71%	0.32	65%	35%	0.44
Single-Family Detached House	210	per du	9.44	25%	75%	0.74	26%	74%	0.76	63%	37%	0.99
Condominium	230	per du	5.81	17%	83%	0.44	19%	81%	0.44	67%	33%	0.52
Health/ Fitness Club	492	per ksf	32.93	50%	50%	1.31	47%	53%	1.40	57%	43%	3.45
Office [b]	710	per ksf	13.68	88%	12%	0.83	88%	12%	0.91	17%	83%	0.87
Specialty Retail [c]	826	per ksf	44.32	62%	38%	0.70	48%	52%	6.84	44%	56%	2.71
Hair Salon [d]	918	per ksf	16.47	100%	0%	1.21	100%	0%	1.21	17%	83%	1.45
High-Turnover Restaurant	932	per ksf	112.18	55%	45%	9.94	53%	47%	14.04	60%	40%	9.77

Source: Fehr & Peers 2021 (Appendix G)
du = dwelling unit, ksf = 1,000 square feet
[a] Weekday midday peak hour trip rate was assumed to be the AM peak hour of generator
[b] The AM peak hour generator is equivalent to the AM peak hour of adjacent street traffic for ITE 710
[c] AM rate was derived from the proportional relationship of PM rates between ITE 814 and Shopping Center (ITE 820) and applied to ITE 820 AM rate
[d] Condominium trip generation is used for live/work space; there are 12 units total in the proposed project

Table 4.6-2
Project Trip Generation

Land Use	Size	Weekday Daily	AM Peak Hour			Midday Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total	In	Out	Total
Proposed Project											
Apartments	111 du	604	8	32	40	10	26	36	32	17	49
Live/Work*	12 units	70	1	4	5	1	4	5	4	2	6
Office	6.71 ksf	92	5	1	6	5	1	6	1	5	6
Specialty Retail	1449 ksf	642	6	4	10	48	51	99	17	22	39
High-Turnover Restaurant	3.94 ksf	442	21	18	39	29	26	55	23	15	38
Hair Salon	3.64 ksf	60	4	0	4	4	0	4	1	4	5
Subtotal		1,910	45	59	104	97	108	205	78	65	143
Existing Uses (to be removed)											
Single-Family Detached House	4 du	38	1	2	3	1	2	3	3	1	4
Health/Fitness Club	4.06 ksf	134	2	3	5	3	3	6	8	6	14
Office	4.21 ksf	58	3	0	3	4	0	4	1	3	4
Specialty Retail	10.43 ksf	462	4	3	7	34	37	71	12	16	28
Hair Salon	6 ksf	102	8	0	8	8	0	8	2	7	9
High-Turnover Restaurant	2.48 ksf	278	14	11	25	19	16	35	14	10	24
Subtotal		1,088	32	19	51	69	58	127	40	43	83
Net New Trips		**838**	**13**	**40**	**53**	**28**	**50**	**78**	**38**	**22**	**60**

Source: Fehr & Peers 2021 (Appendix G)
ksf = 1,000 square feet, du = dwelling unit
**Condominium trip generation is used for live/work space.*

b. Project Impacts and Mitigation Measures. The analysis herein includes both project-related and cumulative impacts.

Impact T-1 The proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be Class III, *less than significant*.

Site Plan Review for Consistency with Programs, Plans, Ordinances, and Policies. Fehr & Peers reviewed the City of West Hollywood's General Plan Mobility Element, Pedestrian and Bicycle Master Plan, Climate Action Plan and the SCAG RTP/SCS to determine whether the project is consistent with relevant programs, plans, ordinances, and policies. The proposed project mix of uses, location, and design support multimodal transportation and would be

consistent with goals and policies that support active transportation, sustainability, and livability found in the City's Mobility Element, Pedestrian and Bicycle Master Plan, Climate Action Plan, and SCAG RTP/SCS. By locating commercial uses on the first floor and partially on the second floor, the proposed project would support the Mobility Element goal to maintain and enhance a pedestrian-oriented city by activating the proposed project frontage along the sidewalk. By providing more bicycle parking spaces than required by City code, the proposed project would support the West Hollywood Pedestrian & Bicycle Mobility Plan goal to support multi-modal transportation options and improve the end-of-trip experience for bicyclists. The proposed project would also support the City's Climate Action Plan goal to increase pedestrian mode share and to establish mixed-used, pedestrian, and transit-oriented development along commercial corridors and in Transit Overlay Zones as it proposes a mix of uses, with commercial uses on the ground floor, and is located in a Transit Overlay Zone along Santa Monica Boulevard. The project's mix of uses and location in a Transit Overlay Zone and High Quality Transit Area supports the SCAG RTP/SCS core vision to expand mobility choices by locating housing, jobs, and transit closer together. The project's design of the parking area, including parking spaces and aisle widths, complies with the City of West Hollywood Municipal Code (Fehr & Peers 2021). See also Section 4.2, *Greenhouse Gas Emissions,* for discussions of consistency with the City's Climate Action Plan and the SCAG RTP/SCS and Section 4.4, *Land Use and Planning,* for a discussion of consistency with the City's General Plan.

Access and Circulation Review for Consistency with Programs, Plans, Ordinances, and Policies. The existing bicycle network in the study area consists of Class II facilities (designated bicycle lane noted by striping and signage) on San Vicente Boulevard between Santa Monica Boulevard and Beverly Boulevard and on Santa Monica Boulevard between North Almont Drive and North Flores Street. The pedestrian network in the study area consists of crosswalks, pedestrian crossings, and sidewalks. Sidewalks are available on all streets bordering the project site. LA Metro and West Hollywood CityLine provide transit service with stops on Santa Monica Boulevard and La Cienega Boulevard. The existing bicycle network, pedestrian facilities, and transit service in the vicinity of the project site support the City's Mobility Element, Pedestrian & Bicycle Mobility Plan, and Climate Action Plan goals to support multi-modal transportation. By providing a mix of uses, the project would support the Mobility Element's goals to create a comprehensive bicycle network throughout the City, maintain and enhance a pedestrian-oriented City, and create an environmentally sustainable transportation network by creating additional destinations that encourage people to walk, bike, and take transit. The project site location near the existing bicycle network, pedestrian facilities, and transit service also support the core vision of the SCAG RTP/SCS to foster Complete Streets and development of transit-oriented-communities.

Overall, the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be less than significant.

Mitigation Measures. No mitigation measures are necessary.

Significance after Mitigation. Impacts would be less than significant without mitigation.

Impact T-2 The proposed project would meet the VMT screening criteria and would not meet the VMT exclusion criteria. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts to VMT would be Class III, *less than significant*.

The proposed project was analyzed under the VMT screening criteria outlined above. Since the entire City of West Hollywood is within a HQTA, the proposed project was evaluated based on the five exclusion criteria to determine whether a quantitative VMT analysis is needed. The exclusion criteria are listed below with project-specific responses for each criterion.

1. *A project with a floor area rate (FAR) of less than 0.75.*
    a. The proposed project has a floor area ratio of 2.8, which is greater than 0.75.
2. *A project with more than the required number of parking spaces.*
    a. The proposed project is required to provide 359 parking spaces and will provide 346 parking spaces, which is less than the required number of parking spaces.
3. *A project that is inconsistent with the applicable Sustainable Communities Strategy.*
    a. With its mix of land uses, the proposed project is consistent with and supports the Sustainable Communities Strategy that encourages a diverse mix of land uses in urban environments.
4. *A project that replaces affordable residential units with fewer moderate- or high-income residential units.*
    a. The proposed project is not replacing affordable residential units with fewer moderate- or high-income residential units.
5. *A project with the potential for significant regional draw.*
    a. The proposed project would not include uses that would require a skilled and specialized workforce that may draw employees from a greater distance in the region.

As described above, the project has a floor area ratio greater than 0.75, is providing fewer than the required number of parking spaces, supports the Sustainable Communities Strategy by providing a mix of land uses, would not replace affordable units with higher-income units, and would not result in significant regional draw. The proposed project would not meet any of the exclusion criteria and therefore can be presumed to have a less-than-significant VMT impact. The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Mitigation Measures. Mitigation is not necessary.

Significance after Mitigation. Impacts would be less than significant without mitigation.

Impact T-3 The proposed project would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be Class III, *less than significant*.

Site Plan Evaluation of Potential On-Site Geometric Design Hazards. Fehr & Peers reviewed the proposed project's internal circulation and access points for vehicles, pedestrians, and bicyclists to determine if there are potential on-site geometric design hazards. The project includes one driveway on Santa Monica Boulevard for commercial and residential access and one driveway on West Knoll Drive for residential access. The driveway on Santa Monica Boulevard would intersect at a right angle and would have adequate sight distance for drivers to see pedestrians and oncoming traffic. This driveway will be designed consistent with City standards. The driveway is designed to include access gates that are located approximately 60 feet into the property. This would allow for two to three vehicles to queue in the driveway without encroaching into the street or travel lanes, should the storage space be required. The estimated inbound trip generation is estimated at 28 vehicles in the AM peak hour and 38 vehicles in the PM peak hour. Since some of these trips are residential trips that would utilize the West Knoll driveway. With peak inbound trip generation estimated to be up to 38 vehicles, vehicles would be arriving every minute and a half, on average, which is not expected to result in any additional queuing on streets in the City of West Hollywood.

The driveway on West Knoll Drive is located at a slight angle since the street is curved. The driveway on West Knoll Drive has a 30-foot apron and sidewalk that will be maintained clear of sight obstructions to help drivers see pedestrians and oncoming traffic. The driveway will be constructed to the City of West Hollywood's design standards and limited to residential access. This driveway is not anticipated to pose a geometric design hazard as driveway activity would be limited to residential access and drivers would have adequate sight distance.

Pedestrian entrances are separated from vehicular driveways as pedestrians would primarily access the project site from Santa Monica Boulevard either from the sidewalk or through an entry plaza. The existing sidewalk on Santa Monica Boulevard is approximately 15 feet wide and would limit conflicts between pedestrians and vehicles as pedestrians would have sufficient space to see vehicles entering and exiting the project site at the driveway along Santa Monica Boulevard. Residents, visitors, patrons, and employees arriving to the Project site by bicycle would have the same access opportunities as pedestrians. Residential and employee bicycle parking is provided on the subterranean and mezzanine parking levels. The bicycle parking spaces are located immediately adjacent to vehicle parking spaces and are separated from other parking areas as required by WHMC 19.28.150. Based on the site access design and analysis of the pedestrian, vehicle, and bicycle entrances, the project would not introduce a geometric design hazard. This impact would be less than significant

Access and Circulation Evaluation of Potential Geometric Design Hazards. The driveways on Santa Monica Boulevard and West Knoll Drive would not pose any geometric design hazards. In the immediate vicinity of the project site, West Knoll Drive and Westmount Drive intersect Santa Monica Boulevard at right angles and would not pose any geometric design hazards. Since West Knoll Drive is a residential street with relatively low speed limit and traffic volumes, West Knoll Drive would not introduce geometric design hazards. This impact would be less than significant.

Mitigation Measures. Mitigation is not necessary.

Significance after Mitigation. Impacts would be less than significant without mitigation.

b. Cumulative Impacts and Mitigation Measures.

As discussed under Impact T-2, the proposed project would have a less than significant impact related to VMT. Based on technical guidance from the Governor's Office of Planning and Research, if a project has a less than significant impact on VMT and is aligned with long-term environmental goals and relevant plans, this implies that the project would not contribute to a cumulative VMT impact (OPR 2018). Therefore, because the project would have a less than significant VMT impact and is consistent with long-term goals and environmental plans (such as the City's General Plan, the SCAG RTP/SCS EIR, and the City's CAP) as discussed in this section and throughout this EIR, the proposed project would not result in a considerable contribution to a cumulative VMT impact.

4.7 UTILITIES and SERVICE SYSTEMS

This section analyzes the proposed project's potential impacts to wastewater service and infrastructure. This section is based on a sewer capacity study prepared by VCA Engineers, Inc., in June 2019, included in Appendix H.

4.7.1 Setting

a. Wastewater Conveyance. The City's Department of Public Works maintains the sewer collection and distribution systems located throughout West Hollywood. The City's system ties into trunk lines owned by the Los Angeles County Sanitation Districts (LACSD) and the City of Los Angeles. Wastewater from the project site would discharge to a local sewer line for conveyance to the LACSD's 12-inch diameter Sherman Trunk Sewer located in Santa Monica Boulevard and Huntley Drive. This trunk sewer has a design capacity of 3.7 million gallons per day and conveyed a peak flow of 0.7 million gallons per day when last measured in 2009 (LACSD 2013).

Within West Hollywood, the sewer system consists of 39 miles of gravity piping. This gravity sewer system includes over 850 pipe reaches and manholes, providing local sewer service to every parcel within the City. Approximately 75% of the citywide sewer system was constructed in the 1920s; the other 25% was constructed in the 1960s (City of West Hollywood 2010).

The City of West Hollywood requires developers to pay a wastewater mitigation fee to offset any net increases in wastewater flow from new construction. The fee is based on net sewage unit of proposed land use for projects with new construction. The City has an annual assessment for a sewer service charge. This funds the ongoing operation and maintenance of the sewer system. These services include routine cleaning, root and grease control, and spot repairs, as well as 24-hour emergency call-out service for line blockages. The City is under contract with the County of Los Angeles to provide routine and emergency sewer maintenance services. Also, the City uses private contractors for specialized sewer maintenance services such as root control and video inspection (City of West Hollywood 2010).

b. Wastewater Treatment. The City of West Hollywood has a contract with Sanitation District No. 4 of LACSD to receive wastewater (not including stormwater) generated in West Hollywood and transport that sewage to the City of Los Angeles Sanitation Bureau's trunk, interceptor, and outfall sewer system. Eventually, wastewater from the City is treated at the Los Angeles Hyperion Wastewater Treatment Plant (HTP), located at 12000 Vista Del Mar in El Segundo.

The HTP is the oldest and largest of four wastewater treatment plants in the area surrounding the City of Los Angeles. The HTP receives wastewater from much of Los Angeles and 29 contracting cities. Its primary treatment is completed with retention ponds, chemical coagulants and settling tanks. The plant also has full secondary treatment, biosolids handling, and biogas generation (LASAN 2018).

The HTP has a dry weather capacity of 450 million gallons per day (MGD) for full secondary treatment and an 800 MGD peak wet weather capacity. Current average flow to the plant on an

average dry weather day is 275 million gallons per day (LADWP 2020). Therefore, the current capacity of the HTP is 175 MGD. The City of West Hollywood does not have a specific wastewater discharge entitlement with the HTP.

c. Existing Wastewater Service. The project site currently contains three two-story commercial buildings and four single-family residences. The commercial buildings contain a restaurant with indoor (32 seats) and outdoor (37 seats) seating, office space (4,211 sf), a health/fitness store and gym (4,058 sf), a hair salon (6,218 sf), other retail (10,426 sf), and surface parking areas (21,130 sf).

Existing on-site wastewater generation is shown in Table 4.7-1. Existing wastewater generation on-site is approximately 6,991 gallons per day.

Table 4.7-1
Existing On-site Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)	Amount (gpd)
Restaurant (Indoor Seating)	32 seats	30 gallons/seat	960
Restaurant (Outdoor Seating	37 seats	18 gallons/seat	666
Office	4,211 sf	150 gallons/1,000 sf	632
Gymnasium (Health/Fitness)	4,058 sf	250 gallons/1,000 sf	1,015
Beauty Parlor (Hair Salon/Facial)	6,218 sf	280 gallons/1,000 sf	1,741
Retail Store	10,426 sf	80 gallons/1,000 sf	834
Auto Parking	21,130 sf	20 gallons/1,000 sf	423
Residence: Single-Family Detached, 2-Bedroom	4 units	180 gallons/unit	720
Existing Wastewater Generation			**6,991 gpd**
Existing Flow Rate			**0.01081 cfs**
Existing Peak Flow Rate[1]			**0.02703 cfs**

Source: VCA Engineers, Inc. (2019) based on land use table from the LA County Sanitation District No 4.

Notes: sf=square feet, gpd = gallons per day, cfs = cubic feet per second

[1] To determine the maximum peak flow rate for sewer diameters less than 15 inches, a peaking factor of 2.5 was used per City of West Hollywood requirements

The project site is served by the main sanitary sewer line on Santa Monica Boulevard, which consists of an 8-inch vitrified clay pipe (VCP). This main sewer line is owned and operated by the City of West Hollywood. VCA Engineers, Inc. prepared a sewer capacity study for the proposed project in July 2019 (included in Appendix H). This study analyzed the existing peak flow demand on the Santa Monica Boulevard sewer main line downstream of the project site from West Knoll Drive to Westbourne Drive. Flow tests were conducted from April 9th to April 20th, 2014. Tests were conducted at sewer manhole #166 located at the intersection of Santa Monica Boulevard and Westbourne Drive and at sewer manhole #176 located at the intersection of Santa Monica Boulevard and Westmount Drive.

Table 4.7-2 shows the observed flow conditions at these manholes. The main sewer line downstream from the project site is operating at less than 50% capacity.

Table 4.7-2
Observed Flow Conditions

	Size (in)	Inlet Pipe Slope	Sewer Flow Monitoring Results				Sewer Pipe Capacity (cfs)	Demand to Capacity Ratio
			Existing Average Quantity (MGD)	Existing Maximum Quantity (MGD)	Existing Average Flow (cfs)	Existing Peak Flow (cfs)		
Sewer Manhole #176	8	2.12%	0.041	0.201	0.063	0.311	0.88	35%
Sewer Manhole #166	8	2.20%	0.072	0.251	0.111	0.390	0.90	43%

Source: VCA Engineers, Inc., 2019
MGD = million gallons per day, cfs = cubic feet per second

4.7.2 Impact Analysis

a. Methodology and Significance Thresholds. According to Appendix G of the *CEQA Guidelines*, impacts to utilities are considered to be significant if the proposed project would:

- *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects;*
- *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;*
- *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;*
- *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; or*
- *Comply with federal, state, and local management and reduction statutes, and regulations related to solid waste.*

The Initial Study (see Appendix A) concluded that the proposed project would result in less than significant impacts with respect to solid waste, water supply and infrastructure, stormwater, electricity, natural gas, and telecommunications infrastructure. Therefore, only the first and third criteria, related to wastewater generation, are discussed in this EIR.

b. Project Impacts and Mitigation Measures.

Impact UTIL-1 The proposed project would generate an estimated 18,299 gallons of wastewater per day above existing conditions. The existing main sewer line along Santa Monica Boulevard and the Hyperion Treatment Plant has sufficient capacity to accommodate this increase in wastewater. Therefore, impacts would be Class III, *less than significant.*

As shown in Table 4.7-1, existing on-site uses generate approximately 6,991 gallons of wastewater per day. The proposed project includes development of a mixed-use structure with 111 residential apartments (47 one-bedroom and 64 two-bedroom), 12 live/work units, 6,711 square feet of office space, 14,488 square feet of retail space, a 3,643 square foot hair salon, and indoor restaurant space capable of accommodating 98 seats. As indicated in Table 4.7-3, the

project would generate about 25,290 gpd of wastewater, which is an increase of approximately 18,299 gpd above current on-site wastewater generation.

Table 4.7-3
Estimated Proposed Project Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)	Amount (gpd)
Residential Apt 1 BD	47 units	120 gallons/unit	5,640
Residential Apt 2 BD	64 units	160 gallons/unit	10,240
Residential Live/Work	12 units	120 gallons/unit	1,440
Auto Parking	113,225 sf	20 gallons/1000 sf	2,265
Restaurant (Indoor Seating)	98 seats	30 gallons/seat	2,940
Hair Salon	3,643 sf	100 gallons/1000 sf	364
Office	6,711 sf	150 gallons/1000 sf	1,007
Retail	14,488 sf	80 gallons/1000 sf	1,159
Storage	4,777 sf	20 gallons/1000 sf	96
Residential Lobby	833 sf	80 gallons/1000 sf	67
Residential Recreation Room (Lounge)	892 sf	80 gallons/1000 sf	72
Proposed Project Wastewater Generation			**25,290 gpd**
Flow Rate (Proposed Project Only)			**0.03913 cfs**
Peak Flow Rate (Proposed Project Only)[2]			**0.09783 cfs**

Source: VCA Engineers, Inc. (2019) based on land use table from the LA County Sanitation District No 4.
Notes: sf = square feet, gpd = gallons per day, bd= bedroom, cfs = cubic feet per second
[1] Kitchen area excluded from analysis, only seating area included in analysis
[2] To determine the maximum peak flow rate for sewer diameters less than 15 inches, a peaking factor of 2.5 was used per City of West Hollywood requirements

The project site is served by the City-owned main sanitary sewer line along Santa Monica Boulevard. Under existing conditions the sewer line is operating at less than 50% of capacity (see Table 4.7-2).

Table 4.7-4 shows the post-development peak flow based on the analysis in the project's sewer capacity study (VCA Engineers, Inc. 2019). Peak sewer flow post development was determined by adding the proposed project's estimated peak flow to the measured existing peak flow and subtracting the existing peak flow from the uses on-site, which would be demolished. The sewer main at sewer manhole #176 has a sewer pipe capacity of 0.88 cfs and the peak post-development flow would be 0.38 cfs, which is 43% of the pipe capacity. The sewer main at sewer manhole #166 has a capacity of 0.90 cfs and the peak post-development flow would be 0.45 cfs, which is 50% of capacity.

Table 4.7-4
Sewer Capacity Analysis

	Existing Peak Flow (cfs)	Post-Development Peak Flow (cfs)	Sewer Pipe Capacity (cfs)	Demand to Capacity Ratio
Sewer Manhole #176	0.31	0.38	0.88	43%
Sewer Manhole #166	0.39	0.45	0.90	50%

Source: VCA Engineers, Inc. 2019MGD = million gallons per day, cfs = cubic feet per second

Post-development, the sewer line would continue to operate at no more than 50% capacity. Therefore, the sewer line serving the project site has no capacity problems and can carry the increased wastewater generated by the proposed project.

The Hyperion Treatment Plant, which ultimately treats the City's sewage, is operating at 175 MGD below capacity. The projected net increase in wastewater of 18,299 gpd (25,290 gpd minus 6,991 gpd, see Tables 4.7-1 and 4.7-3) that would be generated by the proposed project represents 0.01% of the plant's excess capacity. Therefore, the HTP has sufficient available treatment capacity to serve the proposed project. The plant would be able to adequately treat project-generated sewage in addition to existing sewage, and the treatment requirements of the RWQCB would not be exceeded. No relocation or construction of new or modified wastewater conveyance and treatment systems would be required to serve the project. Impacts to wastewater systems would be less than significant.

Mitigation Measures. No mitigation is necessary, as impacts would be less than significant.

Significance after Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. The potential for cumulative impacts to wastewater treatment and conveyance is assessed based upon consideration of the proposed project in combination with the list of cumulative projects identified in Table 3-1 and Table 3-2 in Section 3.0, *Environmental Setting*. Table 4.7-5 illustrates that planned and pending development in the City would generate approximately 0.49 million gallons per day (mgd) of wastewater.
Daily wastewater generated by cumulative development plus wastewater generation from the proposed project would represent about 0.3% of the HTP's current daily available treatment capacity of 175 mgd. Because available capacity can serve planned and pending development, facility expansions would not be required and cumulative impacts would be less than significant. In addition, according to the City's 2035 General Plan EIR, the City's projected wastewater increase with implementation of the 2035 General Plan, in terms of the overall capacity of the HTP system, is small and there would be no impact on the facilities (City of West Hollywood, 2010). As discussed in the Initial Study, Appendix A of this EIR, and Section 4.4, *Land Use and Planning,* the proposed project is consistent with the City's 2035 General Plan (West Hollywood 2011a).

Table 4.7-5
Cumulative Wastewater Generation – City of West Hollywood

Land Use	Quantity	Generation Factor [a] (gal/day)	Daily Generation (gpd)	Daily Generation (mgd)
Commercial	889 ksf	80 gallons/ksf	71,120	0.07
Hotel	1,019 rooms	130 gallons/room	30,570	0.03
Residential [b]	1,368 du	160 gallons/unit	218,880	0.22
Restaurant	559 ksf	300 gallons/ksf	167,700	0.17
Total			**488,270**	**0.49**

[a] VCA Engineers, Inc., 2019

gal = gallon, du = dwelling unit, sf = square feet, gpd = gallons per day, gpy = gallons per year

[b] Based on condominium 2-bedroom rate due to residential mix comprised of high number of condo and apartment units from Table 3-1.

5.0 OTHER CEQA-REQUIRED DISCUSSIONS

This section discusses growth-inducing impacts and removal of obstacles to growth that would be caused by the project. Energy impacts are discussed in the Initial Study (Appendix A to this EIR).

5.1 ECONOMIC AND POPULATION GROWTH

Section 15126.2(d) of the *CEQA Guidelines* requires a discussion of a proposed project's potential to induce growth by, for example, fostering economic or population growth, or removing an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth-inducing potential is therefore considered significant if growth induced by the project could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

The proposed project would result in a net increase in 119 new residential units (111 new apartment units plus 12 live/work units minus the four units that would be demolished as part of the project). The estimated 2021 population of West Hollywood is 36,125 and the City has approximately 1.52 persons per household (CDF 2021). Development of the proposed project would therefore add an estimated 181 residents (119 dwelling units x 1.52 people/dwelling unit), thus increasing the City's population to 36,306. The latest Southern California Association of Government's (SCAG) growth forecast (SCAG 2020) projects the population of the City of West Hollywood will be 42,600 in 2045. According to the City's General Plan EIR, the population in General Plan buildout year 2035 is estimated at 44,182 (City of West Hollywood 2010). The increase in population associated with the proposed proejct would be within SCAG's growth forecasts and within the City's General Plan population forecast. Consequently, the population increase generated by the proposed project would not exceed SCAG or the City of West Hollywood citywide population forecasts.

As discussed in Section 3.0, *Environmental Setting*, planned and pending development within the City would add approximately 1,368 residential units. Based on the estimate of 1.52 persons per household, cumulative development within the City (including the proposed project) would add 2,261 people (1,368 units x 1.52 people/unit + 181 residents for proposed project) bringing the total population to 38,386 (36,125 + 2,261). This would not exceed SCAG's growth forecast for 2045 or the City's General Plan population forecast. The exceedance of SCAG's forecast would not create any specific environmental impacts. Cumulative development is within the planned buildout of the City based on the City's General Plan and General Plan EIR. The proposed project is generally consistent with the environmental goals of the regional SCS (see Section 4.4, *Greenhouse Gas Emissions*, for further discussion). For example, a goal of the SCS is to "encourage land use and growth patterns that facilitate transit and active transportation." The proposed project would be infill development that would be located within walking and biking distance of employment opportunities, commercial uses, and recreational activities as well as public transportation. Therefore, the proposed project is situated to facilitate transit and active transportation. The project is consistent with the intent of the SCS and would not directly

induce growth such that significant physical environmental impacts related to growth would occur.

5.1.2 Economic Growth

The proposed project would involve a net increase in commercial building area on-site. The project would generate temporary employment opportunities during construction, which would draw workers from the existing regional work force. It would also add long-term employment opportunities associated with operation of the commercial portion of the proposed project.

Table 5-1 shows the potential increase in job opportunities as a result of the proposed project. As shown, the proposed project would result in a net increase of approximately 16 jobs on-site. This is an incremental increase. Further, it is anticipated that long-term employment opportunities generated by operation of the commercial project would draw workers from the existing regional work force. Therefore, the proposed project would not be growth-inducing with respect to jobs and the economy.

Table 5-1
Employment Increase Resulting from Proposed Project

Commercial Land Use	Amount	Employment Density	Total
Proposed Project			
Retail*	18,131 sf	424 sf/employee**	43
Retaurant	3,983 sf	424 sf/employee**	9
Office	6,711 sf	319 sf/employee**	21
Live/Work	12 units	1 employee/unit***	12
Subtotal Proposed Project			***85***
Existing Uses			
Retail/Restaurant	23,117 sf	424 sf/employee**	(55)
Office	4,211 sf	319 sf/employee**	(14)
Subtotal Existing Uses			***(69)***
Total Net New Employees			**16**

sf= square feet, ( ) denotes removal
** Includes hair salon*
*** SCAG, 2001*
**** Assumes 1 employee per live/work unit*

With the proposed project, there would be a net increase in population of approximately 181 people and a net increase of approximately 16 jobs. This may indirectly contribute to economic growth. The additional population would likely contribute to the local economy as demand for general goods increases, which in turn could result in economic growth for various sectors. The latest SCAG growth forecast (SCAG 2020) projects the City's employment was 26,000 in 2016 and will grow to 31,600 in 2045. This is an increase of 5,600 jobs by 2045. The addition of 16 jobs would be within SCAG's forecasted job growth for the City. The proposed project would not

induce economic expansion to the extent that significant environmental impacts directly associated with the project's contribution would occur.

5.2 REMOVAL OF OBSTACLES TO GROWTH

The project site is located in a fully urbanized area that is well served by existing infrastructure. As discussed in Section 4.7, *Utilities and Service Systems*, of the EIR and Sections XVII, *Utilities and Service Systems*, and IX, *Hydrology and Water Quality*, in the Initial Study (Appendix A), existing utilities are adequate to serve the proposed project. Minor improvements to water, sewer, and circulation systems and drainage connection infrastructure could be needed, but would be sized to specifically serve the proposed project. No new or widened/expanded roads would be required. Because the project constitutes redevelopment within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, project implementation would not remove an obstacle to growth.

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6.0 ALTERNATIVES

The *CEQA Guidelines* require EIRs to identify and evaluate a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the proposed project, while still satisfying most of the basic project objectives. The *CEQA Guidelines* also set forth the intent and extent of alternatives analysis to be provided in an EIR.

The following discussion evaluates alternatives to the proposed project and examines the potential environmental impacts associated with each alternative. Through comparison of these alternatives to the proposed project, the relative environmental advantages and disadvantages of each are weighed and analyzed. The *CEQA Guidelines* require that the range of alternatives addressed in an EIR should be governed by a rule of reason. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (*CEQA Guidelines* Section 15126.6[a]). Section 15126.6 of the *CEQA Guidelines* states that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency or other plans or regulatory limitations, and jurisdictional boundaries. Section 15126.6(b) of the *CEQA Guidelines* states that the discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives or would be more costly. The alternatives discussion should not consider alternatives whose implementation is remote or speculative, and the analysis of alternatives need not be presented in the same level of detail as the assessment of the proposed project.

Based on the *CEQA Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in the EIR and the level of analytical detail that should be provided for each alternative. These factors include: (1) the nature of the significant impacts of the proposed project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the proposed project, (3) the ability of the alternatives to meet the objectives of the proposed project, and (4) the feasibility of the alternatives. The analysis in this EIR shows that the proposed project would result in a significant and unavoidable impact with respect to construction noise. All other impacts of the project can either be mitigated to a level of less than significant or are less than significant. The alternatives examined herein represent alternatives that could potentially reduce or avoid the significant and less than significant impacts associated with implementation of the proposed project.

As required by Section 15126.6 of the *CEQA Guidelines*, this section of the EIR examines a range of reasonable alternatives to the proposed project. The following alternatives are evaluated in this EIR:

- *Alternative 1: No Project*
- *Alternative 2: Base Zoning (No Housing and Affordable Housing or Mixed Use Bonus on CC1 lot)*
- *Alternative 3: Reduced Density (No Affordable Housing Bonus on CC1 Lot)*
- *Alternative 4: Boutique Hotel*
- *Alternative 5: No Subterranean Parking*

As discussed in Section 1.0, *Introduction,* of this EIR, this document is a recirculated Draft EIR. The original Draft EIR circulated in 2017 included two additional alternatives: Alternative 6 (Reduced Density on R4B Lots) and Alternative 7 (Modified Project). These alternatives included a modified access scheme that would allow right and left turns out of the driveway on West Knoll Drive, whereas the original project analyzed in the 2017 Draft EIR would not allow left turns out of that driveway. The current project under consideration allows left turns out of the West Knoll Drive driveway. Because the modified access scheme is now part of the proposed project, these alternatives are no longer under consideration.

Table 6-1 provides a summary comparison of the development characteristics of the proposed project and the alternatives. A more detailed description of the alternatives is included in the impact analysis for each alternative. This section also includes a discussion of the "environmentally superior alternative" among the alternatives analyzed.

As indicated above, project alternatives should feasibly be able to attain "most of the basic objectives of the project" (Section 15126.6[a] of the *CEQA Guidelines*), even though implementation of the project alternatives might, to some degree, impede the attainment of those objectives or be more costly (Section 15126.6[b] of the *CEQA Guidelines*). According to *CEQA Guidelines* Section 15124(b), "the statement of objectives should include the underlying purpose of the project and may discuss the project benefits." The following are the project objectives as described in Section 2.0, *Project Description*.

1) *Provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing core of nearby community facilities, employment centers, retail goods and services, and restaurants to enhance the area's overall urban character.*
2) *To provide rental housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low, and moderate-income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock.*
3) *Develop the site in accordance with the City of West Hollywood policies and designations while furthering the goals and objectives of the General Plan.*
4) *Create a consistent pattern of development and uses along Santa Monica Boulevard that serve project residents and the surrounding community by redeveloping an underutilized site.*
5) *Create a financially viable, modern, high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area.*
6) *Enhance pedestrian activity along Santa Monica Boulevard by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*
7) *Provide housing and retail near alternative means of transportation, and provide sufficient on-site parking for the Project.*
8) *Develop multiple commercial and residential parcels to provide for an integrated urban design with integrated mobility.*

Table 6-1
Comparison of Proposed Project Alternatives Characteristics

Characteristic	Alternatives					
	Proposed Project	**Alternative 1: No Project**	**Alternative 2: Base Zoning**	**Alternative 3: Reduced Density**	**Alternative 4: Boutique Hotel**	**Alternative 5: No Subterranean Parking**
Restaurant/café floor area (sf)	3,938	0	1,054	2,820	14,820	3,938
Retail floor area (sf)	14,488	0	17,444	14,500	3,678	14,488
Office floor area (sf)	6,711	0	46,002	30,000	0	6,711
Hair salon floor area (sf)	3,643	0	0	0	0	3,643
Hotel floor area (sf)	0	0	0	0	78 rooms 42,900 sf	0
Live/work floor area (sf)	15,494	0	0	12,912	0	15,494
Residential floor area (sf)	104,066	0	36,000	60,410	36,000	104,066
Misc. (Lobby, storage, recreation, circulation, waste, electrical) (sf)	10,496	0	5,302	6,242	8,404	10,496
Total Floor Area (sf)	***158,836***	***0***	***105,802***	***126,884***	***105,802***	***158,836***
Floor to Area Ratio (FAR)	2.8	0	1.6	2.1	1.6	2.8
# Residential Units	111	0	30	50	30	111
# Affordable Housing Units (subset of total # of residential units)	*17*	*0*	*5*	*5*	*5*	*17*
# Live Work Units	12	0	0	10	0	12
# Required Parking (spaces)	346	0	292	306	284	346
Maximum height	55 feet	N/A	CC1: 35 feet R4B: 55 feet	CC1: 45 feet R4B: 55 feet	CC1: 35 feet R4B: 55 feet	65 feet

9) *Expand the economic base of the City, maintain economic vitality, and foster the City's fiscal health by, among other things, providing for commercial and retail activities which generate substantial sales and property tax revenue.*
10) *Promote the efficient use of water and energy through incorporation of water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.1 ALTERNATIVES CONSIDERED BUT REJECTED AS INFEASIBLE

The City considered alternative sites for the project pursuant to *CEQA Guidelines* section 15126.6, which states an agency shall consider a reasonable range of alternatives to the project or to the location of the project. However, alternative sites for the project were considered but determined to be infeasible for several reasons: (a) the project applicant does not own other parcels in the City that could accommodate this project and *CEQA Guidelines* section 15126.6(f)(1) only requires consideration of alternative sites if the project applicant can reasonably acquire or gain access alternative locations; (b) the project is ideal for parcels located in the City's mixed-use overlay; (c) to achieve Objectives # 3, 4, 6, and 7, the project must be located on Santa Monica Boulevard and near existing alternative means of transportation; (d) other sites along Santa Monica Boulevard would not easily accommodate a mixed-use project of this size. Further, given the City's current level of urban development, an alternative site location would not likely avoid or substantially lessen any of the significant impacts of the Project (noise and impacts on one roadway segment).

6.2 NO PROJECT ALTERNATIVE

6.2.1 Alternative Description

This alternative assumes that the proposed project is not implemented and the project site remains in its current condition.

6.2.2 Impact Analysis

The No Project Alternative would involve no changes to the physical environment and thus would have no environmental effects. As such, this alternative would have generally reduced impacts with respect to air quality, aesthetics, greenhouse gas (GHG) emissions, hydrology and geology, traffic, and noise. Construction impacts associated with the proposed project would be avoided because no development would occur on the project site. The existing structures would not be demolished. The No Project Alternative would eliminate the proposed project's significant and unavoidable impact related to construction noise. No mitigation measures would be required for the No Project Alternative. Overall impacts would be lower than those of the proposed project since no change to environmental conditions would occur.

However, the No Project Alternative would not meet any of the objectives of the proposed project. This alternative would not: provide additional housing opportunities (Objective 1), would not provide rental housing including low-income housing (Objective 2), would not

further the goals of the General Plan (Objective 3), would not redevelop an underutilized site (Objective 4), would not create a multi-use development (Objective 5), would not enhance pedestrian activity on Santa Monica Boulevard (Objective 6), would not provide an integrated urban design (Objective 7), would not provide housing near alternative transportation (Objective 8), would not expand the City's economic base (Objective 9), nor promote the efficient use of water or other energy conservation measures consistent with the City's Green Building Ordinance (Objective 10) (City of West Hollywood 2011a, 2009). Further, this alternative would not preclude future redevelopment of the project site.

6.3 ALTERNATIVE 2: BASE ZONING *(No Housing and Affordable Housing or Mixed Use Bonus on CC1 lot)*

6.3.1 Alternative Description

This alternative would involve development consistent with the existing zoning for the project site without the mixed-use bonus. Currently, most of the project site is zoned/designated Commercial, Community 1 (CC1). A 18,933-square foot area in the northern portion of the project site is zoned/designated Residential, Multi-Family High Density (R4B) (see Figures 2-4 and 2-5 in Section 2.0, *Project Description*). Like the proposed project, this alternative would include one structure spanning both the CC1 and R4B portions of the site. Further, like the proposed project and as encouraged by state density bonus law, this alternative would continue to involve the affordable housing bonus on the R4B portion of the site. No residential units would be provided on the CC1 portion of the site under this alternative. Table 6-2 provides a summary comparison of Alternative 2 and the proposed project.

Based on maximum buildout of the existing zoning classifications, Alternative 2 would include approximately 64,500 square feet of commercial space (1.6 FAR) on the CC1 portion of the project site. The commercial uses would include 17,444 square feet of retail, 1,054 square feet of restaurant space, and 46,002 square feet of office uses in a 35-foot high building. On the R4B portion of the project site, Alternative 2 would involve utilizing the available affordable housing bonus and concessions (the same as under the proposed project) to provide 30 two-bedroom units in a 55-foot high building. The commercial and residential components of this alternative would consist of separate developments. This alternative would provide 232 parking spaces for parking requirements for uses in the commercial lots and 60 parking spaces for the residential lots (in accordance with the City's Municipal Code [WHMC] parking requirements). On the commercial component, parking would be provided similarly to the proposed project, with an enclosed subterranean parking garage and parking on the first floor and mezzanine level. This alternative would include water and energy conservation measures in order to achieve the green building incentive bonus for the CC1 portion of the site.

Table 6-2
Alternative 2 Characteristics

	Proposed Project	Alternative 2	
		CC1 Lot	R4B Lot
Building Floor Area	Commercial Restaurant/Café: 3,938 sf Retail: 14,488 sf Office: 6,711 sf Hair Salon: 3,643 sf Live/work space: 15,494 sf *Subtotal: 47,274 sf* Circulation, waste, electrical: 3,994 sf Residential*:* Apartments: 104,066 sf Residential Lobby: 833 sf Residential Recreation Room: 892 sf Residential Storage: 4,777 sf *Subtotal: 110,568 sf* **Total Floor Area: 158,836 sf**	Commercial Restaurant: 1,054 sf Retail: 17,444 sf Office: 46,002 sf Hair Salon: none Live/work space: none *Subtotal: 64,500 sf* Residential None Circulation, waste, electrical: 2,962 sf **Total Floor Area: 67,462 sf**	30 units
Unit Summary	Apartment Units: 111 units Live/Work Units: 12 units	Apartment Units: None Live/Work Units: None	Apartment Units: 30
Affordable Housing	17 units	0 units	5 units
Height	55 feet	35 feet	55 feet
Floor Area Ratio (FAR)	2.8 (CC1 portion only)	1.6 *(1.5 FAR Allowed + 0.1 FAR Green Building Incentive Bonus)*	N/A
Parking	346 spaces	232 spaces	60 spaces

6.3.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing on-site structures and construction of commercial and residential uses. Ozone precursors NO_X and VOC, as well as carbon monoxide (CO), would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. Similar to the proposed project, standard emission control measures required by the SCAQMD and the City of West Hollywood would apply. As shown in Table 6-3, estimated maximum daily VOC and CO emissions during construction would be slightly lower than those of the proposed project. NO_X, SO_x, PM_{10}, and $PM_{2.5}$ emissions would be approximately the same as those of the proposed project and would be below SCAQMD thresholds and LSTs. Thus, impacts would be slightly lower than those of the proposed project and would remain less than significant.

Table 6-3
Alternative 2 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 2 Maximum Daily Construction Emissions	13	33	16	6	3	<1
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded (prior to mitigation)?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 2 Maximum Daily On-Site Construction Emissions	13	17	14	4[3]	2	<1
Localized Significance Thresholds [2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded (prior to mitigation)?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	17	33	19	6	3	<1
Proposed Project Maximum Daily On-Site Construction Emissions for Comparison	17	17	14	4[3]	2	<1

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 2, see Appendix C.
n/a = not applicable
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Architectural coating phase assumed to last 60 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one-acre project in SRA-2 within a distance of 82 feet from the site boundary.
[3] Rounded up from a value of 3.97 pounds per day.

Operational emissions associated with Alternative 2 are shown in Table 6-4. This alternative would have lower operational emissions for all pollutants compared to the proposed project. As with the proposed project, impacts would be less than significant.

Table 6-4
Alternative 2 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	2	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	3	3	23	4	1	<1
Stationary	<1	<1	<1	<1	<1	<1
Subtotal	*6*	*4*	*26*	*4*	*1*	*<1*
Existing Emissions to be Removed[1]	*(5)*	*(3)*	*(21)*	*(3)*	*(1)*	*(<1)*
Net Emissions Increase - Alternative 2	**1**	**1**	**5**	**1**	**<1**	**<1**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Net Operational Emissions for Comparison	3	3	15	1	<1	<1
Alternative 2 Maximum Daily On-Site Operational Emissions (area emissions only)[1]	**2**	**<1**	**3**	**<1**	**<1**	**<1**
Localized Significance Thresholds[2] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***
Proposed Project Maximum Daily On-Site Operational Emissions (area emissions only) for Comparison	*4*	*2*	*11*	*<1*	*<1*	*<1*

Source: Table 2.2, Overall Operational, CalEEMod calculations for Alternative 2, see Appendix C
n/a = not applicable
( ) indicates subtraction, Numbers may not add due to rounding.
[1] See Table 4.2-6 in Section 4.2, Air Quality.
[1] On-site emissions include area emissions consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[2] LSTs are for a one-acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary.

b. Geology and Hydrology. Although this alternative would reduce the overall building size compared to the proposed project, it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as those of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-5 shows GHG emissions associated with Alternative 2. Alternative 2 would result in fewer GHG emissions (2.4 metric tons CO_2e emissions per service population per year [MT CO_2e/SP/year] compared to project emissions of 2.6 MT CO_2e/SP/year) than the proposed project due to the reduced number of vehicle trips, reduced demand for natural gas and electricity, and reduced solid waste generation. Alternative 2 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375, the 2017 State Scoping Plan, and the City of West Hollywood Climate Action Plan, for the same reasons as described in Section 4.3, *Greenhouse Gas Emissions* (e.g., infill development in a walkable area near transit, green building features, etc.). Therefore, impacts would remain less than significant and would be reduced in comparison to those of the proposed project.

Table 6-5
Alternative 2 Annual Greenhouse Gas Emissions

Emission Source	**Annual Emissions (Metric Tons CO_2e)**
Alternative 2 Construction	31
Alternative 2 Operational	
Area	*7*
Energy	230
Mobile	510
Stationary	1
Solid Waste	44
Water	35
Alternative 2 Subtotal	**858**
Existing Conditions[1]	*(481)*
Net Emissions Increase from Alternative 2 (Alternative 2 - Existing)	**377**
Alternative 2 Service Population (SP)[2]	159
Alternative 2 Emissions per Service Population (MT CO_2e/SP/year)	**2.4**
Project-Specific Efficiency Threshold (MT CO_2e/SP/year)	4.3
Exceed Project-Specific Threshold?	**No**
Proposed Project Per Service Population Emissions for Comparison (MT CO_2e/SP/year)	*2.6*

Source: Tables 2.1, 2.2, and 4.2 in CalEEMod annual worksheets for Alternative 2 in Appendix C
( ) denotes subtraction
[1] See Table 4.3-3 in Section 4.3, Greenhouse Gas Emissions
[2] Service population = 40 residents (26 net new units x 1.52 persons per unit) + estimated 119 net new employees (based on estimates in Table 5-1 of this EIR)

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site. Based on maximum build out of the existing zoning classifications, Alternative 2 would include approximately 64,500 sf of commercial space (1.6 FAR) in a 35-foot high building on the CC1 portion of the project site. On the R4B portion of the project site, Alternative 2 would involve utilizing the available affordable housing bonus and concessions (the same as under the proposed project) to provide 30 two-bedroom units in a 55–

foot building. Alternative 2's consistency with the applicable requirements of the Zoning Ordinance and General Plan are shown in Table 6-6. While this alternative would be consistent with the City's Zoning Ordinance with respect to FAR, density and building height, it would not meet several provisions of the City of West Hollywood 2035 General Plan to develop a mixed-use project on the site and to provide housing and affordable housing (this alternative would not involve affordable housing on the CC1 portion of the site). Based on *CEQA Guidelines* Appendix G, a significant impact may occur if a project conflicts with an applicable land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect. The WHMC and General Plan goals and policies to encourage mixed-use development on the site and provide housing and affordable housing relate to the City's vision for the land use pattern of the area and the provision of housing for residents of all socioeconomic statuses and do not specifically avoid or mitigate an environmental effect. This alternative may be inconsistent with some goals of the General Plan related to mixed-use projects and affordable housing. However, like the proposed project, this alternative would not 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. Therefore, land use impacts for this alternative would be the same as the proposed project and would be less than significant (City of West Hollywood 2011a).

Table 6-6
Alternative 2 Consistency with Zoning Ordinance

Requirement	Allowed under Alternative 2	Proposed Project	Alternative 2
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 +Green Building Bonus FAR: 0.1 *Total Allowed = 1.6*	**Consistent** CC1: 2.8	**Consistent** 1.6
Density[2]	R4B 22 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 8 units as 35% bonus for affordable units *Total Allowed = 30 units*	**Consistent** 30 units (R4B only)	**Consistent** 30 units (R4B only)
Building Height	CC1 Allowed Height: 35 ft R4B Allowed Height: 45 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 35 ft R4B: 55 ft	**Consistent** CC1: 35 ft R4B: 55 ft

[1] *FAR used in commercial zoning only*
[2] *Density used in residential zoning only*

e. Noise. Construction-related noise and vibration impacts would be similar to those of the proposed project because construction of this alternative would require the same types of construction equipment. The duration of construction activities would be similar to, but slightly reduced in comparison to that of the proposed project because the scale of development and length of construction would be reduced. Nonetheless, as with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation Measure N-1(a) through N-1(g) would still be required.

Alternative 2 would generate approximately 612 net ADT, or about 27% fewer vehicle trips than would be generated by the proposed project (838 ADT). This decrease in vehicle trips associated

with this alternative would result in incrementally lower noise levels on study area roadways. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 2 would include 30 residential units on the portion of the project site zoned R4B that has frontage to West Knoll Drive (the same number of the units on the R4B lot associated with proposed project). As discussed in Section 4.5, *Noise*, existing noise on West Knoll Drive was measured at 56.2 dBA Leq. Future residences on the project site would not be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. Impacts would be the same as the proposed project and would be less than significant.

Operation of Alternative 2 would result in noise from on-site sources such as stationary equipment (emergency generator), rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with restaurant, office, and retail activities. Noise levels would be similar to those of the proposed project and would be significant but mitigable with incorporation of Mitigation Measure N-4 to provide acoustical shielding.

f. Transportation. Impacts to bicycle facilities, pedestrian facilities, and public transportation would be less than significant, similar to the proposed project. Alternative 2 would also meet the VMT screening criteria (Alternative 2 has a FAR greater than 0.75, provides fewer than the required parking spaces, does not replace affordable units with moderate- or high-income units, and does not have a significant regional draw), and would have a less than significant impact related to VMT.

g. Utilities and Service Systems. As shown in Table 6-7, Alternative 2 would generate an estimated 14,272 gallons of wastewater per day. Compared to the proposed project, this represents a decrease of 11,018 gallons per day, a 44% reduction. Impacts related to wastewater infrastructure and treatment would therefore be reduced under Alternative 2 compared to the proposed project and would remain less than significant.

Table 6-7
Alternative 2 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	30 units	160 gallons/unit	3,200
Auto Parking	94,115 sf [2]	20 gallons/1,000 sf	1,576
Restaurant (Indoor Seating)	40 seats [3]	30 gallons/seat	1,200
Office	46,002 sf	150 gallons/1,000 sf	6,900
Retail	17,444 sf	80 gallons/1,000 sf	1,396
Alternative 2 Wastewater Generation			**14,272**
Proposed Project Wastewater Generation for Comparison			***25,290***

[1] Rates from VCA Engineers, Inc. (2019) based on land use table from the LA County Sanitation District No 4.
[2] Alternative 2 has a 32% decrease in parking (292 compared to 346) compared to proposed project, therefore 19% decrease in parking square footage compared to proposed project (94,115compared to112,004)
[3] Alternative 2 has a 64% reduction in restaurant square footage (3,938 compared to 1,054) compared to proposed project. Therefore, a 63% reduction in restaurant seating assumed (106 seats compared to 40)
Notes: sf = square feet, gpd = gallons per day, bd= bedroom

h. Consistency with Project Objectives and Feasibility. This alternative would meet some of the objectives of the proposed project, but would not meet other objectives or would achieve those objectives to a lesser degree as compared to the proposed project. This alternative would not achieve several of the 2035 General Plan policies to promote the production of housing in the City. The WHMC and 2035 General Plan include a mixed-use bonus to encourage the development of residential uses, and such incentives are needed to enhance the City's housing stock. This alternative would not sufficiently utilize the project site and mixed-use bonus to promote the City's policies to increase market-rate and affordable residential units available in the City. Further, this alternative does not utilize the project site to promote the City's policies related to affordable housing, whereas the project applicant proposes an affordable housing project consistent with the WHMC and 2035 General Plan and consistent with the state's affordable housing requirements and state density law. This alternative also would not fully enhance the area's overall economic character, as it would not expand the City's economic base to the same degree as the proposed project. Further, although the project site is in the mixed-use overlay zone, this alternative does not provide for mixed residential and commercial uses on the commercial parcels. This alternative also would not avoid or substantially reduce the project's significant impact related to construction noise. The following is a discussion of this alternative compared to each objective.

1) *Alternative 2 would not contribute to the residential development of mixed-use areas as residential uses would not be included in the commercial portion of the site. Residential development would be included on the R4B portion of the site.*
2) *Alternative 2 would develop 12 fewer affordable housing units and would provide 81 fewer rental housing opportunities.*
3) *Alternative 2 is consistent with City's zoning for the CC1 portion of the site but would not be consistent with several of the City policies and designations because it would not provide a residential and commercial mixed-use development in the mixed-use incentive overlay zone (the project would involve commercial only on the commercially-zoned portion of the site and*

residential on the residential portion); would not satisfy the policies of the City's housing element, including policies related to affordable housing; and would not achieve the purpose of the transit overlay zone.

4) *Alternative 2 would involve redeveloping an underutilized site and would continue a pattern of commercial development, but would not maximize the redevelopment potential of the site or fully enhance the area's urban character.*
5) *Alternative 2 would not involve a mixed residential and commercial project. It would not provide a combined multi-use development, though it would provide separate residential uses on the R4B portion of the site and commercial uses on the CC1 portion of the site. Overall, it would not provide residential units in the commercial portion of the site and, therefore, would not create a unique, multi-use living experience.*
6) *Alternative 2 would enhance pedestrian activity by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*
7) *Alternative 2 would provide sufficient on-site parking near alternative means of transportation, but would provide substantially fewer residential units as compared to the proposed project.*
8) *Alternative 2 would not provide for an integrated urban design but separate residential and commercial uses.*
9) *Alternative 2 would provide commercial and retail activities.*
10) *Alternative 2 would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.4 ALTERNATIVE 3: REDUCED DENSITY *(No Affordable Housing Bonus on CC1 lot)*

6.4.1 Alternative Description

This alternative would involve development of a mixed-use project on the commercial and R4B residential parcels, but at a reduced residential density as compared to the proposed project as this alternative would not involve density bonuses allowed by the City's affordable housing ordinance and state density bonus law on the CC1 parcels. Alternative 3 would provide commercial and residential uses on the commercial lot to total 2.1 FAR, including 1.6 FAR for commercial uses and 0.5 FAR for residential units. The commercial development would include 2,820 sf of restaurant uses, 14,500 sf of retail uses, 30,000 sf of office uses, 10 Live/Work units, and 20 residential units (two-bedroom units totaling 24,410 sf). Development on the residential R4B parcels would include 30 residential units, with five affordable units, including the density bonus allowed under the City's affordable housing ordinance and state density bonus law on this portion of the site. This alternative would use the mixed-use density bonus and would incorporate the affordable housing density bonus on the R4B portion of the site only. This alternative would include water and energy conservation measures in order to achieve the green building incentive bonus.

This alternative would be 45 feet in height (base height of 35 feet plus the 10 foot mixed-use incentive overlay zone bonus) in the CC1 portion of the site. On the R4B portion of the project site, Alternative 3 would involve utilizing the available affordable housing bonus and

concessions (the same as under the proposed project) to provide 30 two-bedroom units in a 55-foot building. This alternative would provide 246 parking spaces for the commercial uses and 60 parking spaces for the residential uses. On the commercial lot, parking would be provided in an enclosed subterranean parking garage and on levels 1 and 1.5, similar to the proposed project. Table 6-8 compares this alternative to the proposed project.

Table 6-8
Alternative 3 Characteristics

		Alternative 3	
	Proposed Project	**CC1 Lot**	**R4B Lot**
Building Floor Area	Commercial Restaurant/Café: 3,938 sf Retail: 14,488 sf Office: 6,711 sf Hair Salon: 3,643 sf Live/work space: 15,494 sf *Subtotal: 47,274 sf* Circulation, waste, electrical: 3,994 sf Residential: Apartments: 104,066 sf Residential Lobby: 833sf Residential Recreation Room: 892 sf Residential Storage: 4,777 sf *Subtotal: 110,568 sf* **Total Floor Area: 158,836 sf**	Commercial Restaurant/ Café: 2,820 sf Retail: 14,500 sf Office: 30,000 sf Live/work space: 12,912 sf *Subtotal: 60,232 sf* Circulation, Waste, Electrical: 3,902 Residential: Apartments: 24,401 sf **Total Floor Area: 88,544 sf**	30 units
Unit Summary	Apartment Units: 111 units Live/Work Units: 12 units	Apartment Units: 20 units Live/Work Units: 10 units	Apartment Units: 30
Affordable Housing	17 units	0 units	5 units
Height	55 feet	45 feet *(Base height allowed of 35 feet, Mixed-Use Incentive Overlay Zone Bonus of additional 10 feet in height)*	55 feet *(Base height allowed of 45 feet, plus density bonus request of additional 10 feet in height)*
Floor Area Ratio (FAR)	2.8 (CC1 portion only)	2.1 *(1.5 FAR Allowed + 0.5 FAR Mixed Use Bonus + 0.1 FAR Green Building Incentive Bonus)*	N/A
Parking	346 spaces	246 spaces	60 spaces

6.4.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing on-site structures and construction of commercial and residential uses. Ozone precursors NO_X and VOC, as well as CO, would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building

construction. As shown in Table 6-9, estimated maximum emissions under this alternative are about the same, and in some cases slightly lower, than those of the proposed project and would not exceed applicable thresholds. Impacts would be less than significant, similar to the proposed project. Similar to the proposed project, standard emission control measures required by the SCAQMD and City of West Hollywood would apply.

Table 6-9
Alternative 3 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 3 Maximum Daily Construction Emissions	14	33	17	6	3	<1
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 3 Maximum Daily On-Site Construction Emissions	14	17	14	4[3]	2	<1
Localized Significance Thresholds[2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	17	33	19	6	3	<1
Proposed Project Maximum Daily On-Site Construction Emissions for Comparison	17	17	14	4[3]	2	<1

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 3, see Appendix C
n/a = not applicable
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Construction emissions assumed to comply with Mitigation Measures 3.2-1 and 3.2-2 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, which apply to all development in the city (West Hollywood 2010, 2011b). Architectural coating phase assumed to last 60 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one-acre project in SRA-2 within a distance of 82 feet from the site boundary.
[3] Rounded up from a value of 3.97 pounds per day.

Operational emissions associated with Alternative 3 are shown in Table 6-10. This alternative would have slightly lower operational emissions for all pollutants compared to the proposed project. As with the proposed project, emissions of all pollutants would be less than SCAQMD thresholds and impacts would be less than significant.

Table 6-10
Alternative 3 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	3	1	5	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	3	2	20	3	1	<1
Stationary	<1	<1	1	<1	<1	<1
Subtotal	*6*	*4*	*26*	*3*	*1*	*<1*
Existing Emissions to be Removed[1]	*(5)*	*(3)*	*(21)*	*(3)*	*(1)*	*(<1)*
Net Emissions Increase - Alternative 3	**1**	**1**	**5**	**<1**	**<1**	**<1**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Net Operational Emissions for Comparison[1]	3	3	15	1	<1	<1
Alternative 3 Maximum Daily On-Site Operational Emissions (area emissions only)[2]	3	1	5	<1	<1	<1
Localized Significance Threshold [3] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***
Proposed Project Maximum Daily On-Site Operational Emissions (area emissions only) for Comparison	*4*	*2*	*11*	*<1*	*<1*	*<1*

Source: Table 2.2, Overall Operational, Mitigated, CalEEMod calculations for Alternative 3, see Appendix C
( ) indicates subtraction, Numbers may not add due to rounding. n/a = not applicable.
[1] See Table 4.1-6 in Section 4.1, Air Quality
[2] On-site emissions include area emissions (consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[3] LSTs are for a one-acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary.

b. Geology and Hydrology. Although this alternative would reduce the overall building size compared to the proposed project, it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as that of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-11 shows GHG emissions associated with Alternative 3. Alternative 3 would result in fewer per service population GHG emissions (2.2 MT CO_2e/SP/year compared to project emissions of 2.6 MT CO_2e/SP/year) than the proposed project due to the reduced number of vehicle trips, demand for natural gas and electricity, and

solid waste generation. Alternative 3 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375, the 2017 State Scoping Plan, and the City of West Hollywood Climate Action Plan, for the same reasons stated in Section 4.3, *Greenhouse Gas Emissions* (e.g., infill development in a walkable area near transit, green building features, etc.). Impacts would be similar to those of the proposed project and would be less than significant.

Table 6-11
Alternative 3 Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (Metric Tons CO_2E)
Alternative 3	
Alternative 3 Construction	31
Alternative 3 Operational	
Area	14
Energy	261
Mobile	413
Stationary	1
Solid Waste	52
Water	33
Alternative 3 Subtotal	**805**
Existing Conditions[1]	*(481)*
Net Emissions Increase from Alternative 3 (Alternative 3 - Existing)	**324**
Alternative 3 Service Population (SP)[2]	146
Alternative 3 Emissions per Service Population (MT CO_2e/SP/year)	**2.2**
Project-Specific Efficiency Threshold (MT CO_2e/SP/year)	4.3
Exceed Project-Specific Threshold?	**No**
Proposed Project per SP emissions for Comparison (MT CO_2e/SP/year)	*2.6*

Source: Tables 2.1, 2.2 and 4.2 in CalEEMod annual worksheets for Alternative 3, see Appendix C for calculations and for GHG emission factor assumptions.
( ) denotes subtraction
[1] See Table 4.4-3 in Section 4.3, Greenhouse Gas Emissions
[2] Service population = 70 residents (46 net new units x 1.52 persons per unit) + estimated 76 net new employees (based on estimates in Table 5-1 of this EIR)

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site and with the mixed-use incentive overlay zone and green building bonus. However, this alternative would not involve density bonuses allowed by the City's affordable housing ordinance and sate density bonus law on the CC1 portion of the site. Alternative 3's consistency with the City's applicable requirements for FAR, density and building height are shown in Table 6-12. As shown, this alternative would be consistent with the FAR, density and building height requirements of the WHMC, but would not meet some of the provisions of the City of West Hollywood 2035 General Plan to provide affordable housing. However, because this alternative does not involve affordable housing on the CC1 portion of the site, this alternative would involve payment of the Affordable Housing In-Lieu Fee to

support affordable housing development elsewhere in the City. This alternative involves a complicated interpretation of the City's inclusionary housing and density housing requirements. The application for the project was deemed complete at a time when larger projects could pay in affordable housing in lieu fees instead of providing on-site affordable housing units. This is no longer an applicable law in the City. Current City and state policy encourages on-site affordable housing to be built instead of payment of in-lieu fees. Additionally, this alternative would bifurcate the compliance with affordable housing requirements on two different zones portions of the site, which is an unusual and complicated scenario. With fee payment, this alternative would support affordable housing in the City although it would not directly contribute to the City's affordable housing stock and would not provide additional housing in a transit corridor. This alternative would not 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. Impacts would be the same as those of the proposed project and would be less than significant.

Table 6-12
Alternative 3 Consistency with Zoning Ordinance

Requirement	Allowed under Alternative 3	Proposed Project	Alternative 3
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.1*	**Consistent** CC1: 2.8	**Consistent** 2.1
Density[2]	22 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 8 units as 35% bonus for affordable units *Total Allowed = 30 units*	**Consistent** 30 units	**Consistent** 30 units
Building Height	CC1 Allowed Height: 35 ft + Mixed-Use Bonus Height: 10 ft *Total Allowed: 45 ft,* R4B Allowed Height: 45 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 55 ft R4B: 55 ft	**Consistent** CC1: 55 ft R4B: 45 ft

[1] FAR used in commercial zoning only
[2] Density used in residential zoning only

e. Noise. Construction-related noise and vibration impacts would be similar to the proposed project because construction of this alternative would require the same types of construction equipment. The duration of construction activities would be similar to, but slightly reduced as compared to that of the proposed project because the scale of development and length of construction would be reduced. As with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1(a) through N-1(g) would still be required.

Alternative 3 would generate approximately 627 net ADT, or about 26% fewer vehicle trips than would be generated by the proposed project (838 ADT). Therefore, the reduction in vehicle trips associated with this alternative would result in incrementally lower noise levels on study area

roadways. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 3 would include 10 live/work units and 50 apartment units. As discussed in Section 4.5, *Noise*, existing noise on Santa Monica Boulevard was measured at 68.7 dBA Leq. As a result, future residences on the project site may be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. However, with compliance with California Building Code noise insulation requirements, future residents would not be exposed to noise levels above City standards. As with the proposed project, impacts would be less than significant.

Operation of Alternative 3 would result in noise from on-site sources such as stationary equipment (emergency generator), rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with restaurant, office, and retail activities. Noise levels would be similar to those of the proposed project and would be significant but mitigable with incorporation of Mitigation Measure N-4 to provide acoustical shielding.

f. Transportation. Impacts to bicycle facilities, pedestrian facilities, and public transportation would be less than significant, similar to the proposed project. Alternative 3 would also meet the VMT screening criteria (Alternative 3 has a FAR greater than 0.75, provides fewer than the required parking spaces, does not replace affordable units with moderate- or high-income units, and does not have a significant regional draw), and would have a less than significant impact on VMT.

g. Utilities and Service Systems. As shown in Table 6-13, Alternative 3 would generate an estimated 21,623 gallons of wastewater per day. Compared to the proposed project, this represents a decrease of 3,667 gallons per day, a 15% reduction. Impacts related to wastewater infrastructure and treatment would therefore be reduced under Alternative 3 compared to the proposed project and would remain less than significant.

Table 6-13
Estimated Alternative 3 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	50 units	160 gallons/unit	8,000
Residential Live/Work	10 units	120 gallons/unit	1,200
Auto Parking	99,186 sf [2]	20 gallons/1,000 sf	1,983
Restaurant (Indoor Seating)	106 seats	30 gallons/seat	3,180
Office	30,000 sf	150 gallons/1,000 sf	4,500
Retail	14,500 sf	80 gallons/1,000 sf	1,160
Alternative 3 Wastewater Generation			**21,463**
Proposed Project Wastewater Generation for Comparison			***25,290***

[1] Rates from VCA Engineers, Inc. 2017 based on land use table from the LA County Sanitation District No 4.
[2] Alternative 3 has a 11% reduction in parking (306 compared to 346) compared to proposed project, therefore 22% reduction in parking square footage compared to proposed project (99,186 compared to 112,004).
Notes: sf = square feet, gpd = gallons per day, bd= bedroom, cfs = cubic feet per second

h. Consistency with Project Objectives and Feasibility. This alternative would provide 61 fewer apartment units compared to the proposed project, and would meet some of the objectives of the proposed project. However, this alternative would not meet other objectives or would meet certain objectives to a lesser degree as compared to the proposed Project. For example, fewer residential units would not achieve the project objective to provide a unique living experience. This alternative would also not achieve several of the 2035 General Plan policies to promote the production of housing in the City. The City recognizes that the WHMC and 2035 General Plan include mixed-use and affordable housing bonuses to encourage the development of residential uses, and such incentives are needed to enhance the City's housing stock. This alternative would not sufficiently utilize the project site to promote the City's policies to increase market-rate and affordable residential units available in the City, as described above under "Land Use and Planning." The project applicant proposes an affordable housing project consistent with the WHMC and 2035 General Plan and consistent with the state's affordable housing requirements and density bonus law. This alternative would also not fully enhance the area's overall economic character, as it would not expand the City's economic base to the same degree as the proposed project. This alternative would also not avoid or substantially decrease the project's significant impact related to construction noise. The following is a discussion of this alternative compared to each objective.

1) *Alternative 3 would provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing urban core. However, it would not provide as many residential units as the proposed project (50 units compared to 111).*
2) *Alternative 3 would develop 12 fewer affordable housing units and would provide 61 fewer apartment rental housing opportunities.*
3) *The land uses for Alternative 3 are consistent with the City's designations and this alternative provides a mixed-use development in the mixed-use incentive overlay zone. Yet with 61 fewer apartment rental housing opportunities, it would not satisfy the policies of the*

City's housing element, including policies related to affordable housing, would not achieve the purpose of the transit overlay zone, nor would it serve to maximize housing on R4B lots.

4) *Alternative 3 would involve redeveloping an underutilized site and would continue a pattern of commercial development, but would not maximize the redevelopment potential of the site or fully enhance the area's urban character.*
5) *Alternative 3 would create a multi-use development, but would not maximize the redevelopment potential of the site or fully enhance the area's urban character or provide a unique living experience given the fewer residential units.*
6) *Alternative 3 would enhance pedestrian activity by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*
7) *Alternative 3 would provide sufficient on-site parking and would provide housing and retail near alternative means of transportation, but would provide 61 fewer apartment units compared to the proposed project.*
8) *Alternative 3 would provide for an integrated urban design and integrated mobility, but would provide 61 fewer apartment units than the proposed project.*
9) *Alternative 3 would provide commercial and retail activities.*
10) *Alternative 3 would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.5 ALTERNATIVE 4: BOUTIQUE HOTEL

6.5.1 Alternative Description

Alternative 4 would involve separate developments on the CC1 and R4B portions of the project site. This alternative would involve developing a boutique hotel with commercial uses on the ground level on the commercial parcels with a 1.6 FAR on the CC1 portion of the project site. The hotel would provide 78 guest rooms. Ground floor commercial uses would include 14,820 square feet of restaurant/café space and 3,678 square feet of retail space. The hotel/commercial building would be 35 feet in height and would not include a mixed-use bonus or any housing. This alternative would include water and energy conservation measures in order to achieve the green building incentive bonus. On the commercial lot, parking would be provided in an enclosed subterranean parking garage and on levels 1 and 1.5, similar to the proposed project.

On the R4B portion of the project site, Alternative 4 would involve 30 two-bedroom units in a 55-foot tall building with 60 parking spaces. Table 6-14 compares this alternative to the proposed project.

Table 6-14
Alternative 4 Characteristics

	Proposed Project	Alternative 4	
		CC1 Lot	R4B Lots
Building Floor Area	Commercial Restaurant/Café: 3,938 sf Retail: 14,488 sf Office: 6,711 sf Hair Salon: 3,643 sf Live/work space: 15,494 sf *Subtotal: 47,274 sf* Circulation, waste, electrical: 3,994 sf Residential: Apartments: 104,066 sf Residential Lobby: 833 sf Residential Recreation Room: 892 sf Residential Storage: 4,777 sf *Subtotal: 110,568 sf* **Total Floor Area: 158,836 sf**	Commercial Restaurant/Café: 14,820 sf Retail: 3,678 sf Office: none Live/work space: none *Subtotal: 18,498 sf* Hotel: 42,900 sf (78 rooms) Residential: Apartments: none Circulation, Waste, Electrical 6,064 sf **Total Floor Area: 67,462 sf**	30 units
Unit Summary	Apartment Units: 111 units Live/Work Units: 12 units	Apartment Units: 0 units Live/Work Units: 0 units	Apartment Units: 30
Affordable Housing	17 units	0 units	5 units
Height	55 feet	35 feet	55 feet
Floor Area Ratio (FAR)	2.8 (CC1 portion only)	1.6 *(1.5 FAR Allowed + 0.1 FAR Green Building Incentive Bonus)*	N/A
Parking	346 spaces	224 spaces	60 spaces

6.5.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing on-site structures and construction of commercial and residential uses. Ozone precursors NO_X and VOC, as well as CO, would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. As shown in Table 6-15, estimated maximum daily air pollution emissions during construction would be about the same or less than those of the proposed project. Impacts would be less than significant for all air pollutants, similar to the proposed project. Also similar to the proposed project, standard emission control measures required by the SCAQMD and City of West Hollywood would apply.

Table 6-15
Alternative 4 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 4 Maximum Daily Construction Emissions	13	33	17	6	3	<1
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 4 Maximum Daily On-Site Construction Emissions	13	17	14	4[4]	2	<1
Localized Significance Thresholds [2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	*17*	*33*	*19*	*6*	*3*	*<1*
Proposed Project Maximum Daily On-Site Construction Emissions for Comparison	*17*	*17*	*14*	*4[3]*	*2*	*<1*

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 4, see Appendix C
n/a = not applicable
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Construction emissions assumed to comply with Mitigation Measures 3.2-1 and 3.2-2 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, which apply to all development in the city. Architectural coating phase assumed to last 60 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one-acre project in SRA-2 within a distance of 82 feet from the site boundary.
[3] Rounded up from a value of 3.97 pounds per day.

Operational emissions associated with Alternative 4 are shown in Table 6-16. This alternative would generate slighter greater total operational emissions of CO, PM_{10}, and $PM_{2.5}$ due to an increase in the number of vehicle trips and VMT and approximately the same operational emissions of VOC, NO_X, and SO_X as compared to the proposed project. On the other hand, this would generate lower localized emissions of all pollutants as compared to the proposed project due to the lower number of fireplaces in residential units. Emissions of all pollutants would be below SCAQMD regional and localized significance thresholds. As with the proposed project, impacts would be less than significant.

Table 6-16
Alternative 4 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	2	<1	3	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	5	4	33	5	1	<1
Stationary	<1	<1	1	<1	<1	<1
Subtotal	*8*	*6*	*37*	*5*	*2*	*<1*
Existing Emissions to be Removed[1]	*(5)*	*(3)*	*(21)*	*(3)*	*(1)*	*(<1)*
Net Emissions Increase - Alternative 4	**3**	**3**	**16**	**2**	**1**	**<1**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Net Operational Emissions for Comparison[1]	*3*	*3*	*15*	*1*	*<1*	*<1*
Alternative 4 Maximum Daily On-Site Operational Emissions (area emissions only)[2]	**2**	**<1**	**3**	**<1**	**<1**	**<1**
Localized Significance Thresholds[3] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***
Proposed Project Maximum Daily On-Site Operational Emissions (area emissions only) for Comparison	*4*	*2*	*11*	*<1*	*<1*	*<1*

Source: Table 2.2, Overall Operational, Mitigated, CalEEMod calculations for Alternative 4, see Appendix C
( ) indicates subtraction. Numbers may not add due to rounding. n/a = not applicable.
[1] See Table 4.1-6 in Section 4.1, Air Quality
[2] On-site emissions include area emissions consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[3] LSTs are for a one-acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary.

b. Geology and Hydrology. Although this alternative would reduce the overall building size compared to the proposed project, it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as those of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-17 shows GHG emissions associated with Alternative 4. Alternative 4 would result in higher per service population GHG emissions (7.8 MT CO_2e/SP/year compared to 2.6 MT CO_2e/SP/year) than the proposed project. This alternative

results in higher overall GHG emissions than the proposed project and emissions would exceed the locally-appropriate threshold of 4.3 MT CO_2e/SP/year because it also involves a lower service population than the proposed project. Therefore, mitigation would be required to reduce GHG emissions to below the threshold. If mitigation was not feasible or would not sufficiently reduce emissions, impacts would be significant and unavoidable. Nonetheless, because this alternative involves residential and commercial uses on an infill site in a transit area and would incorporate green building features, this alternative would likely still be consistent with some applicable plans and policies adopted for the purpose of reducing GHG emissions, such as SB 375and the City of West Hollywood Climate Action Plan (West Hollywood, 2011b) However, since it would not achieve efficiency targets to reach long-term state goals associated with SB 32 it would not be consistent with the 2017 Scoping Plan. Overall, GHG impacts would increase compared to the proposed project.

Table 6-17
Alternative 4 Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (Metric Tons CO_2E)
Alternative 4	
Alternative 4 Construction	31
Alternative 4 Operational	
Area	7
Energy	467
Mobile	679
Stationary	1
Solid Waste	119
Water	23
Alternative 4 Subtotal	**1,327**
Existing Conditions[1]	*(481)*
Net Emissions Increase from Alternative 4 (Alternative 4 - Existing)	**846**
Alternative 4 Service Population (SP)[2]	108
Alternative 4 Emissions per Service Population (MT CO_2e/SP/year)	**7.8**
Project-Specific Efficiency Threshold (MT CO_2e/SP/year)	**4.3**
Exceed Project-Specific Threshold?	**Yes**
Proposed Project Per Service Population Emissions for Comparison (MT CO_2e/SP/year)	*2.6*

Source: Tables 2.1, 2.2 and 4.2 in CalEEMod annual worksheets for Alternative 4, see Appendix C for calculations and for GHG emission factor assumptions.
( ) denotes subtraction.
[1] See Table 4.4-3 in Section 4.3, Greenhouse Gas Emissions
[2] Service population = 40 residents (26 net new units 1.53 persons per unit) + estimated 68 net new employees (based on estimates in Table 5-1 of this EIR)

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site and with the green building bonus. However, this alternative would not include the mixed-use incentive bonus or density bonuses allowed by the

City's affordable housing ordinance and state density bonus law on the CC1 portion of the site. Alternative 4's consistency with applicable City requirements for FAR, density and building height are shown in Table 6-18. This alternative would be consistent with the FAR, density and building height requirements of the City's Zoning Ordinance, but would not meet some of the provisions of the City of West Hollywood 2035 General Plan to provide affordable housing and a mixed-use project (West Hollywood, 2011a). Based on *CEQA Guidelines* Appendix G, a significant impact may occur if a project conflicts with an applicable land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect. The WHMC and General Plan goals and policies to encourage mixed-use development on the site and provide affordable housing relate to the City's vision for the land use pattern of the area and the provision of housing for residents of all socioeconomic statuses and do not specifically avoid or mitigate an environmental effect. Consequently, although this alternative may be inconsistent with some goals of the General Plan related to mixed-use projects and affordable housing, this alternative would not 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. Therefore, land use impacts for this alternative would be the same as for the proposed project and would be less than significant.

Table 6-18
Alternative 4 Consistency with Zoning Ordinance

Requirement	Allowed under Alternative 4	Proposed Project	Alternative 4
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 +Green Building Bonus FAR: 0.1 *Total Allowed = 1.6*	**Consistent** CC1: 2.8	**Consistent** 1.6
Density[2]	22 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 8 units as 35% bonus for affordable units *Total Allowed = 30 units*	**Consistent** 30 units	**Consistent** 30units
Building Height	CC1 Allowed Height: 35 ft R4B Allowed Height: 45 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 55 ft R4B: 55 ft	**Consistent** CC1: 35 ft R4B: 45 ft

[1] FAR used in commercial zoning only
[2] Density used in residential zoning only

e. Noise. Construction-related noise and vibration impacts would be similar to the proposed project because construction of this alternative would require the same types of construction equipment. The duration of construction activities would be similar to, but slightly reduced as compared to that of the proposed project because the scale of development and length of construction would be reduced. As with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1(a) through N-1(g) would still be required.

Alternative 4 would generate approximately 1,569 net ADT, or about 87% more vehicle trips than would be generated by the proposed project (838 ADT). The increase in vehicle trips associated with this alternative would result in incrementally higher noise levels on study area

roadways. Nonetheless, as stated in Section 4.5, *Noise,* a roughly doubling of traffic volumes results in a 3 dBA increase in traffic noise which would result in a significant traffic noise increase. For the segment with the highest increase in traffic associated with the project (West Knoll Drive between Westmount Drive and Santa Monica Boulevard, see Table 4.5-6) this alternative would add approximately 353 trips (approximately 22.5% of trips based on the trip distribution shown on Figure 4.6-5 in Section 4.6, *Traffic)* which would result in a 23.8% increase in trips under existing plus project conditions and a 20% increase in trips under cumulative plus project conditions. Therefore, this alternative would not double traffic such that a 3 dBA increase would occur. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 4 would include 30 residential units on the portion of the project site zoned R4B that has frontage to West Knoll Drive. As discussed in Section 4.5, *Noise*, existing noise on West Knoll Drive was measured at 56.2 dBA Leq. Future residences on the project site would not be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. As with the proposed project, impacts would be less than significant.

Operation of Alternative 4 would result in noise from on-site sources such as stationary equipment (emergency generator), rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with hotel, restaurant, and retail activities. Noise levels would be similar to those of the proposed project and would be significant but mitigable with incorporation of Mitigation Measure N-4 to provide acoustical shielding.

f. Transportation. Impacts to bicycle facilities, pedestrian facilities, and public transportation would be less than significant, similar to the proposed project. Alternative 4 would also meet the VMT screening criteria (Alternative 4 has a FAR greater than 0.75, provides fewer than the required parking spaces, does not replace affordable units with moderate- or high-income units, and does not have a significant regional draw by requiring a skilled and specialized workforce), and would have a less than significant impact on VMT.

g. Utilities and Service Systems. As shown in Table 6-19, Alternative 4 would generate an estimated 28,146 gallons of wastewater per day. Compared to the proposed project, this represents an increase of 2,856 gallons per day, a 11% increase. Impacts related to wastewater infrastructure and treatment would therefore increase under Alternative 4 compared to the proposed project. However, as infrastructure that serves the project is operating at less than 50% capacity, adequate capacity exists to serve the increase in wastewater under Alternative 4. Impacts would remain less than significant.

Table 6-19
Estimated Alternative 4 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	30 units	160 gallons/unit	4,800
Auto Parking	92,108 sf [2]	20 gallons/1,000 sf	1,842
Restaurant (Indoor Seating)	369 seats [3]	30 gallons/seat	11,070
Retail	3,678 sf	80 gallons/1,000 sf	294
Hotel	78 rooms	130 gallons/room	10,140
Alternative 4 Wastewater Generation			**28,146**
Proposed Project Wastewater Generation for Comparison			***25,290***

[1] Rates from VCA Engineers, Inc. (2017) based on land use table from the LA County Sanitation District No 4.
[2] Alternative 4 has a 18% reduction in parking (284 compared to 346) compared to proposed project, therefore 18% reduction in parking square footage compared to proposed project (92,108compared to 112,004).
Notes: sf = square feet, gpd = gallons per day, bd= bedroom, cfs = cubic feet per second
[3] Alternative 4 has a 276% increase in restaurant square footage (3,938 sf for proposed project compared to 14,820 sf for alternative 4) compared to proposed project. Therefore, a 276% increase in restaurant seating assumed (98 seats compared to 369).

h. Consistency with Project Objectives and Feasibility. This alternative would not promote the City's General Plan policies and goals of promoting residential and commercial mixed-use developments in the mixed-use overlay, which is located on the CC1 portion of the project site. This alternative would not meet several of the project objectives, or would meet the project objectives to a lesser degree as compared to the proposed project. This alternative would also not achieve several of the 2035 General Plan policies to promote the production of housing in the City to the same extent as the project. The City recognizes that the WHMC and 2035 General Plan include mixed-use and affordable housing bonuses to encourage the development of residential uses, and such incentives are needed to enhance the City's housing stock. This alternative would not sufficiently utilize the project site to promote the City's policies to increase market-rate and affordable residential units available in the City andwould not provide affordable residential units pursuant to the City and state's density bonus law. This alternative also would not maximize the development potential of the project site, as it would not integrate the two neighboring residential and commercial parcels to create a more integrated and cohesive project. Further, although the project site is in the mixed-use overlay zone, this alternative does not provide for mixed-use residential and commercial uses on the CC1 parcels. This alternative would also not avoid or substantially decrease the project's significant impact related to construction noise. The following is a discussion of this alternative compared to each objective.

1) *Alternative 4 would provide additional housing opportunities in the City, but would not provide as many residential units as the proposed project (30 units compared to 111). This alternative would not provide any residential units on the commercial parcels.*
2) *Alternative 4 would not contribute to the City's housing stock to the same extent as the proposed project, including affordable housing units, on the CC1 lots, and the project would provide substantially fewer housing units overall (81 fewer housing units and 12 fewer affordable units).*

3) *Alternative 4 is consistent with City's zoning for the CC1 portion of the site but would not be consistent with several of the City policies and designations because it would not provide a mixed-use residential and commercial development in the mixed-use incentive overlay zone (the project would involve commercial only on the commercially-zoned portion of the site and residential on the residential portion); would not satisfy the policies of the City's housing element, including policies related to affordable housing, to the same extent as the proposed project; and would not achieve the purpose of the transit overlay zone. This alternative provides some residential uses near existing modes of transportation but would not be an integrated mixed-use project across both the CC1 and R4B portions of the site.*
4) *Alternative 4 would develop commercial uses along Santa Monica Boulevard, but would underutilize the development potential of the project site.*
5) *Alternative 4 would not involve a mixed-use residential and commercial project but separate developments on the CC1 and R4B portions of the site. Therefore, it would not provide a combined multi-use development, though it would provide residential uses on the R4B portion of the site and commercial uses on the CC1 portion of the site. This alternative would not create a high-quality, multi-use development that offers unique living experiences by because it would eliminate most of the proposed project's residential uses.*
6) *Alternative 4 would enhance pedestrian activity along Santa Monica Boulevard by providing street-facing restaurant and retail uses.*
7) *Alternative 4 would provide some retail and housing uses near alternative means of transportation, but not to the same degree as the proposed project.*
8) *Alternative 4 would not develop the multiple commercial and residential parcels to provide for an integrated urban design with integrated mobility, as the boutique hotel would eliminate the proposed project's integrated mixed-use design for commercial and residential uses.*
9) *Alternative 4 would contribute to the City's economic base.*
10) *Alternative 4 would promote the efficient use of water and energy through incorporation of water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.6 ALTERNATIVE 5: NO SUBTERRANEAN PARKING

6.6.1 Alternative Description

This alternative would involve keeping the mixed-use nature and the size of the project, but would move the entire project above ground. Due to the slope of the project site, the ground floor and mezzanine floor would continue to be partially subterranean. However, the fully subterranean parking level would be removed. In order to accommodate removal of the fully subterranean parking level, the mixed-use structure would be 65 feet in height. Approval of a zoning amendment or variance would be required in order to permit the 65-foot building height. The front of the building facing Santa Monica Boulevard would continue to have ground-floor retail. Table 6-20 compares the characteristics of Alternative 5 to the proposed project.

6.6.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing on-site structures and construction of a mixed-use building that would generate temporary increases in localized air pollutant emissions. Ozone precursors NO_X and VOC, as well as CO, would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. However, because construction would not involve excavation for the subterranean parking level, air quality impacts associated with soil disturbance during excavation and truck trips for the export of earth materials would be reduced. Therefore, Alternative 5 would result in slightly reduced construction-related emissions when compared to the proposed project. Standard emission control measure as required by SCAQMD and the City of West Hollywood would still apply. Impacts would remain less than significant.

Table 6-20
Alternative 5 Characteristics

	Proposed Project	Alternative 5
Building Floor Area	Commercial Restaurant/Café: 3,938 sf Retail: 14,488 sf Office: 6,711 sf Hair Salon: 3,643 sf Live/work space: 15,494 sf *Subtotal: 47,274 sf* Circulation, waste, electrical: 3,994 sf Residential: Apartments: 104,066 sf Residential Lobby: 833sf Residential Recreation Room: 892 sf Residential Storage: 4,777 sf *Subtotal: 110,568 sf* **Total Floor Area: 158,836 sf**	Same
Unit Summary	Apartment Units: 111 units Live/Work Units: 12 units	Same
Affordable Housing	17 units	Same
Height	55 feet	65 ft
Floor Area Ratio (FAR)	2.8 (CC1 portion only)	Same
Parking	346 spaces	Same

b. Geology and Hydrology. This alternative would be the same size as the proposed project and in the same general location; therefore, it would be subject to the same potential geological impacts as the proposed project, although to a slightly lesser degree since the subterranean parking garage would not be constructed. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same under this

alternative as the proposed project. Mitigation Measures GEO-1 and GEO-2 required for the proposed project would also apply to this alternative. This alternative would not require excavation for the subterranean parking garage. Because this alternative would not involve excavation for subterranean parking that could extend into the groundwater table, dewatering during construction would not be required. Therefore, Mitigation Measures GEO-3(a) and GEO-3(b) would not be required and impacts would be reduced compared to the proposed project. Nonetheless, impacts would remain less than significant with mitigation, the same as under the proposed project.

c. Greenhouse Gases. Alternative 5 would result in the same operational GHG emissions as the proposed project because the vehicle trips and energy demand would remain the same. GHG emissions related to construction activities would be incrementally reduced because there would be less excavation and fewer trip trips to export soils materials. Alternative 5 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375, the 2017 State Scoping Plan, and the City of West Hollywood Climate Action Plan for the same reasons as described in Section 4.3, *Greenhouse Gas Emissions* (e.g.: infill development in a walkable area near transit, green building features, etc.). As with the proposed project, impacts would be less than significant.

d. Land Use and Planning. This alternative would involve a 65-foot high structure, which would exceed the allowed height even with the mixed-use height bonus and affordable housing concession (see Table 6-21). Because this alternative exceeds the height limit, a zone amendment or variance would be required and the additional height may increase view blockage and shading/shadowing. Impacts would be greater than those of the proposed project and may be significant and unavoidable**.**

Table 6-21
Alternative 5 Consistency with Zoning Ordinance and General Plan

Requirement	Allowed	Proposed Project	Alternative 5
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.8*	**Consistent** CC1: 2.8	**Consistent** 2.8
Density[2]	22 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 8 units as 35% bonus for affordable units *Total Allowed = 30 units*	**Consistent** 30 units	**Consistent** 30 units
Building Height	CC1 Allowed Height: 35 ft + Mixed-Use Bonus Height: 10 feet + Affordable Housing Concession: 10 ft *Total Allowed: 55 feet* R4B Allowed Height: 45 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 55 ft R4B: 55 ft	**INCONSISTENT** CC1: 65 ft R4B: 65 ft

[1] FAR used in commercial zoning only [2] Density used in residential zoning only

e. Noise. Construction-related noise and vibration impacts during the excavation and grading phase would be reduced compared to the proposed project because Alternative 5 construction would not involve excavation for the subterranean parking garage. Nonetheless, as with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1(a) through N-1(g) would still be required.

The number of vehicle trips under Alternative 5 would remain the same as under the proposed project. Therefore, noise levels on study area roadways would remain the same. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 5 would include the same number of residential and live/work units as the proposed project. As discussed in Section 4.5, *Noise*, existing noise on Santa Monica Boulevard was measured at 68.7 dBA Leq. As a result, future residences on the project site may be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. As such, Mitigation Measure N-3 would still be required to reduce impacts associated with exposure of future residents to roadway noise. As with the proposed project, impacts would be less than significant with mitigation.

Operation of Alternative 5 would result in noise from on-site sources such as stationary equipment (emergency generator), rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with restaurant, office, and retail activities. With this alternative, parking would be placed above ground and noise associated with parking activities may incrementally increase compared to the proposed project. However, noise levels would be similar to those of the proposed project and would be significant but mitigable with mitigation to incorporate acoustical shielding for the emergency generator.

f. Transportation. Impacts to bicycle facilities, pedestrian facilities, and public transportation would be less than significant, similar to the proposed project. Alternative 5 would also meet the VMT screening criteria (Alternative 5 has a FAR greater than 0.75, provides fewer than the required parking spaces, does not replace affordable units with moderate- or high-income units, and does not have a significant regional draw), and would have a less than significant impact on VMT.

g. Utilities and Service Systems. Alternative 5 would involve the same uses as the proposed project. Therefore, wastewater generation would be the same as that of the proposed project and impacts would remain less than significant.

h. Consistency with Project Objectives and Feasibility. This alternative would be identical to the proposed project, except that the parking would not be subterranean and therefore the project would be 65 feet in height. As such, this project would not be consistent with the WHMC and General Plan. Given the required design changes to the project, this project would also be inconsistent or only partially consistent with several of the project objectives. Further, this alternative would not avoid or substantially lessen any of the project significant impacts and could potentially create greater impacts related to aesthetics and consistency with the City's land use policies. The following is a discussion of this alternative compared to each project objective.

1) *Alternative 5 would provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing urban core.*
2) *Alternative 5 would provide affordable residential units and would increase the City's housing stock.*
3) *Alternative 5 would not develop the site in accordance with the City's policies and designations while furthering the goals and objectives of the General Plan because those goals and objectives include promoting development to enhance the pedestrian experience, to promote development consistent with the scale of the neighborhood (General Plan Goal LU-1), and to promote development that will screen parking form public view (General Plan Goal LU-4).*
4) *Alternative 5 would involve redeveloping an underutilized site and would continue a pattern of commercial development.*
5) *Alternative 5 would create a modern, high-quality multi-use development that will enhance the pedestrian experience.*
6) *Alternative 5 would not enhance pedestrian activity along Santa Monica Boulevard to the same degree as the proposed project given the requirement to provide parking as one of the project's above-ground primary uses.*
7) *Alternative 5 would provide housing and retail near alternative means of transportation and would provide sufficient on-site parking.*
8) *Given the extra height and above-ground parking that would not be shielded from public view, Alternative 5 would not develop a mixed-use project that can provide for an integrated urban design.*
9) *Alternative 5 would expand the City's economic base and provide commercial and retail activities.*
10) *Alternative 5 would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-34 compares the physical impacts for each of the alternatives to the physical impacts of the proposed project. The No Project Alternative would be the overall environmentally superior alternative since it would avoid all project impacts. However, the No Project Alternative would not achieve the basic project objectives as stated in Section 2.0, *Project Description.*

Among the development options, Alternative 2 (Existing Zoning – *No Affordable Housing or Mixed-Use Bonus on CC1 lots*) and Alternative 3 (Reduced Density – *No Affordable Housing on CC1 lots*) would be environmentally superior to the proposed project. Alternatives 2 and 3 would meet some of the objectives of the project but not to the same extent as the proposed project.

Alternatives 2 and 3 would involve slightly lower air pollutant and GHG emissions than the proposed project. Furthermore, because Alternatives 2 and 3 would involve residential development at a lower density than the proposed project (without the affordable housing density bonus on the CC1 portion of the site), and wastewater generation would be lower than for the proposed project. Nonetheless, as with the proposed project, these impacts would be less than significant.

Neither Alternative 2 nor Alternative 3 would eliminate the significant and unavoidable construction noise impact. Operational noise impacts would be the same as those of the proposed project and would be less than significant with mitigation for acoustical shielding for the emergency generator.

Alternatives 2 and 3 would contribute to the City's housing stock but would provide 12 fewer affordable housing units and fewer market-rate apartment units (81 fewer units under Alternative 2 and 61 fewer units under Alternative 3) than the proposed project. Neither Alternative 2 nor Alternative 3 would implement General Plan goals related to providing affordable housing to the same extent as the proposed project.

Table 6-22
Summary Comparison of Proposed Project Alternatives

Issue Area	Proposed Project	No Project	Alternative 2: Existing Zoning	Alternative 3: Reduced Density	Alternative 4: Boutique Hotel	Alternative 5: No Subterranean Parking
Air Quality	Class III	- *(Class IV)*	- *(Class II)*	- *(Class III)*	- *(Class III)*	- *(Class III)*
Geology and Hydrology	Class II	- *(Class IV)*	= *(Class II)*	= *(Class II)*	= *(Class II)*	- *(Class II)*
Greenhouse Gas Emissions	Class III	- *(Class IV)*	- *(Class III)*	- *(Class III)*	+ *(Class I)*	- *(Class III)*
Land Use and Planning	Class III	- *(Class IV)*	= *(Class III)*	= *(Class III)*	= *(Class III)*	+ *(Class I)*
Noise	Class I	- *(Class IV)*	- *(Class I)*	- *(Class I)*	- *(Class I)*	- *(Class I)*
Transportation	Class III	- *(Class IV)*	= *(Class III)*	= *(Class III)*	= *(Class III)*	= *(Class III)*
Utilities and Service Systems	Class III	- *(Class IV)*	- *(Class III)*	- *(Class III)*	+ *(Class III)*	= *(Class III)*

Class I = significant and unavoidable impact
Class II = less than significant impact with mitigation incorporated
Class III = less than significant impact
Class IV = no impact
** Impact classifications are shown for the greatest impact in the issue area (i.e., if Class II and III impacts were identified in the issue area, the table indicates the overall impact in that issue area as Class II).*
- impact would be lower (better) than that of the proposed project
+ impact would be greater (worse) than that of the proposed project
= impact would be the same as the proposed project

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