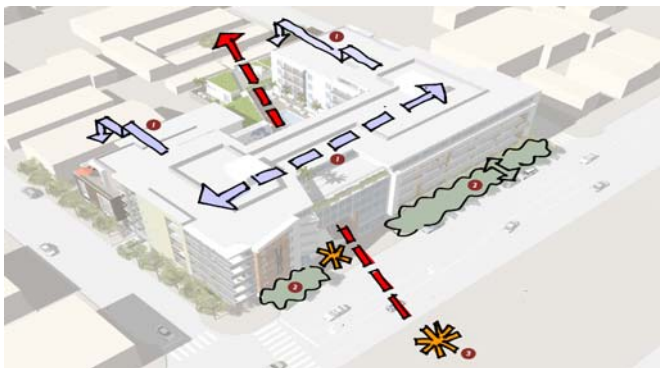


DOMAIN PROJECT

ENVIRONMENTAL IMPACT REPORT

FORMERLY FORMOSA SPECIFIC PLAN PROJECT



Project Location:
7141-7155 Santa Monica Boulevard
& 1107-1117 Detroit Street



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

MAY 2013

Domain Project

7141-7155 Santa Monica Boulevard
and 1107-1117 Detroit Street

Final Environmental Impact Report

State Clearinghouse No. 2007081053

Prepared for:

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

Prepared by:

AECOM Technical Services, Inc.
515 South Flower Street, 9th Floor
Los Angeles, California 90071

May 2013

TABLE OF CONTENTS

CHAPTER	PAGE
EXECUTIVE SUMMARY	ES-1
1.0 INTRODUCTION	1-1
1.1 Background and Project History	1-1
1.2 Summary of the Proposed Project.....	1-2
1.3 The CEQA Environmental Process	1-3
1.4 Organization of the Final EIR.....	1-6
2.0 PROJECT DESCRIPTION	2-1
2.1 Project Location	2-1
2.2 Physical Environmental Setting	2-1
2.3 Project Objectives	2-5
2.4 Proposed Project Characteristics.....	2-5
2.5 Site Cleanup.....	2-12
2.6 Construction Scenario.....	2-14
2.7 Intended Uses of the EIR	2-16
2.8 Project Approvals Required.....	2-16
2.9 Summary of Key Project Changes	2-17
3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION.....	3-1
3.1 Aesthetics.....	3.1-1
3.2 Air Quality	3.2-1
3.3 Cultural Resources	3.3-1
3.4 Geology and Soils.....	3.4-1
3.5 Greenhouse Gas Emissions.....	3.5-1
3.6 Hazards and Hazardous Materials	3.6-1
3.7 Hydrology and Water Quality.....	3.7-1
3.8 Land Use and Planning	3.8-1
3.9 Noise	3.9-1
3.10 Public Services, Utilities and Recreation.....	3.10-1
3.11 Transportation and Traffic	3.11-1
4.0 IMPACT OVERVIEW.....	4-1
4.1 Significant Unavoidable Adverse Impacts.....	4-1
4.2 Effects Not Found to Be Significant.....	4-2
4.2.1 Agricultural and Forestry Resources	4-2
4.2.2 Biological Resources	4-2
4.2.3 Mineral Resources	4-2
4.2.4 Population and Housing.....	4-2
4.3 Cumulative Impacts	4-3
4.4 Significant Irreversible Environmental Changes	4-11
4.5 Growth-Inducing Impacts	4-12

Table of Contents

5.0	ALTERNATIVES TO PROPOSED PROJECT	5-1
5.1	Project Objectives	5-1
5.2	Alternatives Considered But Rejected	5-2
5.2.1	Alternative Sites	5-2
5.2.2	Uniform Building Height	5-2
5.3	Alternatives Carried Forward for Detailed Analysis	5-3
5.3.1	Overview of Alternatives and Impacts	5-3
5.3.2	No Project Alternative	5-4
5.3.3	Reduced Density Alternative	5-5
5.3.4	Mixed-Use with Retail Uses Only Alternative	5-11
5.4	Environmentally Superior Alternative	5-17
6.0	CLARIFICATIONS AND MODIFICATIONS	6-1
7.0	RESPONSE TO COMMENTS.....	7-1
7.1	Responses to Comments on the Recirculated Draft EIR	7-1
7.2	Responses to Comments on the Draft EIR	7-48
8.0	MITIGATION MONITORING AND REPORTING PROGRAM	8-1
9.0	ACRONYMS AND ABBREVIATIONS.....	9-1
10.0	REFERENCES.....	10-1
11.0	LIST OF PREPARERS.....	11-1

TECHNICAL APPENDICES

Appendix A	Initial Study
Appendix B	Air Quality Data
Appendix C	Cultural Resources Report
Appendix D	Geotechnical Report
Appendix E	Hazards Reports
Appendix F	Noise Calculations
Appendix G	Sewer Study
Appendix H	Traffic Impact Analysis

LIST OF TABLES

<u>Table No.</u>	<u>Page</u>
ES-1 Summary of Significant Impacts and Mitigation Measures.....	ES-6
3.2-1 Ambient Air Quality Conditions.....	3.2-6
3.2-2 Criteria Air Pollutants Produced by Faith Plating	3.2-7
3.2-3 Toxic Air Pollutants Produced by Faith Plating	3.2-7
3.2-4 National and California Ambient Air Quality Standards.....	3.2-9
3.2-5 SCAQMD Air Quality Significance Thresholds	3.2-13
3.2-6 Estimated Daily Construction Emissions – Unmitigated.....	3.2-15
3.2-7 Regional Operations Emissions	3.2-16
3.2-8 Carbon Monoxide Concentrations	3.2-17
3.2-9 Estimated Daily Construction Emissions – Mitigated	3.2-20
3.3-1 Cultural Resource Investigations within ½-mile of the Proposed Project Site	3.3-3
3.3-2 Cultural Resources Recorded within ½-mile of the Proposed Project Site.....	3.3-3
3.5-1 West Hollywood Baseline and Projected GHG Emissions and Percent Contributions	3.5-3
3.5-2 West Hollywood Municipal Emissions.....	3.5-3
3.5-3 Greenhouse Gas Emissions.....	3.5-11
3.6-1 Criteria Air Pollutants Produced by Faith Plating (Year 2000).....	3.6-3
3.6-2 Toxic Air Pollutants Produced by Faith Plating (Year 2000).....	3.6-4
3.8-1 West Hollywood General Plan 2035 Policy Consistency Analysis	3.9-8
3.8-2 City Parking Requirements.....	3.9-12
3.8-3 West Hollywood Housing Element Consistency Analysis	3.9-13
3.9-1 Existing Noise Levels	3.9-4
3.9-3 Noise/Land Use Compatibility Matrix.....	3.9-10
3.9-4 Construction Equipment Noise Levels	3.9-11
3.9-5 Typical Outdoor Construction Noise Levels	3.9-12
3.9-6 Construction Noise Levels – Unmitigated.....	3.9-12
3.9-7 Representative Vibration Source Levels for Construction Equipment	3.9-15
3.9-8 Construction Noise Levels – Mitigated	3.9-18
3.11-1 Study Intersections.....	3.11-2
3.11-2 Intersection Level of Service Definitions	3.11-5
3.11-3 Level of Service Summary – Existing Conditions.....	3.11-6
3.11-4 Neighborhood Impact Analysis – Existing Conditions.....	3.11-7
3.11-5 West Hollywood Neighborhood Impact Criteria	3.11-9
3.11-6 Los Angeles Intersection Level of Service Threshold Criteria.....	3.11-10
3.11-7 Project Trip Generation Estimates	3.11-11
3.11-8 Level of Service Summary – Existing With Project Conditions.....	3.11-15
3.11-9 Neighborhood Impact Analysis – Existing With Project Conditions	3.11-17
3.11-10 Cumulative Project List for Traffic.....	3.11-18
3.11-11 Level of Service Summary – Future Without Project Conditions	3.11-21
3.11-12 Level of Service Summary – Future With Project Conditions	3.11-23
3.11-13 Neighborhood Impact Analysis – Future With Project Conditions	3.11-25
4-1 Related Projects	4-4
5-1 Comparison of Impacts for the Proposed Project and the Alternatives	5-18
7-1 List of Comment Letters on the Recirculated Draft EIR	7-2

Table of Contents

<u>Table No.</u>		<u>Page</u>
7-2	List of Comment Letters on Draft EIR	7-48
7-3	Responses to Comments Received During Public Meetings	7-66
8-1	Mitigation Monitoring and Reporting Program	8-2

LIST OF FIGURES

<u>Figure No.</u>		<u>Page</u>
2-1	Regional Location Map.....	2-2
2-2	Project Location Map.....	2-3
2-3	Conceptual Site Plan	2-7
2-4	Santa Monica Boulevard Elevation	2-8
2-5	Detroit Street Elevation.....	2-9
2-6	Formosa Avenue Elevation.....	2-10
2-7	North Elevation	2-11
3.1-1	View north across Santa Monica Boulevard toward the project site	3.1-2
3.1-2	Eastern end of the project site at the corner of Santa Monica Boulevard and Detroit Street.....	3.1-2
3.1-3	Parking area off Formosa Avenue, at rear of the project site.....	3.1-3
3.1-4	Parking area off Detroit Street, at the rear of the project site	3.1-3
3.1-5	View southwest toward the retail complex on the south side of Santa Monica Boulevard	3.1-4
3.1-6	Detail of the setback along the retail complex	3.1-4
3.1-7	View south across Santa Monica Boulevard toward the Formosa Café	3.1-5
3.1-8	View southwest across Santa Monica Boulevard of the Warner Hollywood Studios	3.1-5
3.1-9	View across Santa Monica Boulevard toward the café at the corner of Formosa Avenue	3.1-7
3.1-10	Parking lot and buildings on the corner of Santa Monica Boulevard and Detroit Street	3.1-7
3.1-11	View northeast along Formosa Avenue	3.1-8
3.1-12	Residences along Detroit Street	3.1-8
3.1-13	Analysis of views from the Formosa Café.....	3.1-15
3.1-14	Locations of Key Views.....	3.1-17
3.1-15a	Key View 1: Looking west along Santa Monica Boulevard toward the project site	3.1-18
3.1-15b	Simulation of Key View 1 showing the proposed project	3.1-18
3.1-16a	Key View 2: Looking east along Santa Monica Boulevard toward the project site	3.1-19
3.1-16b	Simulation of Key View 2 showing the proposed project	3.1-19
3.1-17a	Key View 3: Looking south along Formosa Avenue toward the project site	3.1-20
3.1-17b	Simulation of Key View 3 showing the proposed project	3.1-20
3.1-18	Shade/Shadow Analysis for June 21 st	3.1-24
3.1-19	Shade/Shadow Analysis for December 21 st	3.1-25
3.1-20	Shade/Shadow Analysis for September 22 nd	3.1-26
3.1-21	Shade/Shadow Analysis for March 20 th	3.1-27
3.8-1	Land Use Designations	3.8-3
3.9-1	A-Weighted Decibel Scale.....	3.9-2
3.9-2	Noise Measurement Locations.....	3.9-5
3.11-1	Location of Study Intersections	3.11-3
3.11-2	Residential Trip Distribution	3.11-12
3.11-3	Retail Trip Distribution.....	3.11-13

EXECUTIVE SUMMARY

ES.1 INTRODUCTION AND BACKGROUND

This Final Environmental Impact Report (Final EIR) has been prepared by the City of West Hollywood (City) under the California Environmental Quality Act of 1970 (CEQA) Sections 15088, 15089, and 15132, to evaluate potential environmental effects that may result from development of the proposed Domain Project (proposed project). This EIR has been prepared in conformance CEQA statutes (Cal. Pub. Res. Code, §21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, §15000 et. seq.). The City is the Lead Agency under CEQA. This Final EIR includes: Clarifications and Modifications, which describes the changes made to the Draft EIR and Recirculated Draft EIR; Response to Comments, which includes the City's responses to all written comments received by agencies, private organizations, and the public during the 45-day public comment period for the Draft EIR and the Recirculated Draft EIR; and the Mitigation Monitoring and Reporting Program, which lists all the mitigation measures required for implementation of the proposed project, the phase in which the mitigation measures would be implemented, and the enforcement agency responsible for compliance. This Final EIR contains comments and responses to comments received on the Draft EIR, which was circulated for public review from August 15, 2008 until September 29, 2009, and the Recirculated Draft EIR, which was circulated for public review from January 11, 2013 until February 25, 2013. The comments and responses to comments are presented in Chapter 7.0, Response to Comments. Revisions and clarifications to the Final EIR made in response to comments and information received on the Draft EIR and Recirculated Draft EIR are indicated by ~~strikeout~~ and underline text, as illustrated in this paragraph. A complete list of revisions and corrections to the Final EIR is provided in Chapter 6.0, Clarifications and Modifications. Corrections of typographical errors have been made throughout the document and are not indicated by ~~strikeout~~ or underline text.

A Draft Environmental Impact Report (EIR) for the Formosa Specific Plan Project was circulated for public review and comment by the City of West Hollywood (City) on August 15, 2008, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until September 29, 2008. The project site is located on the north side of Santa Monica Boulevard between Detroit Street and Formosa Avenue. The 1.3-acre project site consists of three parcels: 7155 Santa Monica Boulevard, 7141 Santa Monica Boulevard, and 1107 and 1117 Detroit Street. It is developed with a sound editing studio and a metal plating facility. The project evaluated in the Draft EIR was a Specific Plan proposing to demolish the existing site structures and construct up to 130 residential units and approximately 9,000 square feet of commercial uses (i.e., retail/restaurant/banking). To implement the development, the project would have required a specific plan to permit greater height, greater floor area, greater density, reduced parking requirements, and reduced open space requirements than permitted by the City regulations at that time.

A Final EIR was prepared including responses to comments received on the Draft EIR. However, the Final EIR was not circulated for public review and was not brought before the Planning Commission and City Council for approval hearings. The project plans and project site have since been purchased from Formosa Partners, LP, by Domain WH, LLC. The new project applicant intends to move forward with

the proposed mixed-use project with some minor modifications to the site plan and complete the environmental review process pursuant to CEQA.

Pursuant to CEQA Guidelines Section 15088.5, the City of West Hollywood (lead agency) prepared a Recirculated Draft EIR to provide an explanation of the changes to the proposed project and an evaluation of those environmental issue areas where modifications to the environmental setting have occurred and revisions to the previous Draft EIR analysis are warranted. Additionally, since the Draft EIR was made available for public review, the City adopted the West Hollywood General Plan 2035 and made modifications to the West Hollywood Zoning Ordinance. These changes to the City's land use policies and regulations and new General Plan and Zoning designations for the project site have eliminated the need for a Specific Plan. Therefore, the proposed project has been re-named the Domain Project. The Recirculated Draft EIR was circulated for public review and comment on January 11, 2013, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until February 25, 2013.

ES.2 PROJECT OBJECTIVES

The overall goal of the Domain Project, formerly the Formosa Specific Plan Project, is to create a mixed-use development that builds upon, complements, and is a catalyst to additional growth within an existing built environment. The primary objectives of the project include the following:

- Provide the financial resources to clean-up existing environmental contamination, to permit the redevelopment of the site with market rate and affordable housing, thereby converting an incompatible industrial use, which generates air and ground pollutants, into an attractive addition to the adjacent residential and retail uses.
- Establish a principal activity center and entry into the City of West Hollywood by the intensification of commercial uses and urban design improvements.
- Provide for the upgrading, infill, and new development of uses along Santa Monica Boulevard to create a consistent pattern of development and uses that serve adjacent residents and employees and continue the character of specialty uses.
- Enhance pedestrian activity along Santa Monica Boulevard, and provide much needed neighborhood serving retail/restaurant uses along Santa Monica Boulevard that responds to neighborhood needs and market demands.
- Develop a village-like environment by siting and massing buildings around common pedestrian areas and open spaces that are linked to Santa Monica Boulevard.
- Increase housing in West Hollywood and provide affordable housing.

ES.3 PROPOSED PROJECT CHARACTERISTICS

The proposed project includes a mix of retail/commercial and residential uses. Retail and restaurant uses would be restricted to the ground floor level fronting Santa Monica Boulevard and wrapping around to Detroit Street and Formosa Avenue. Residential uses would generally be located on the upper floors. A total of approximately 9,300 square feet of retail and restaurant space would be provided. At this time, no tenants are proposed; thus, the makeup of the commercial uses is not being specified. However, it is anticipated that approximately 2,500 square feet of the commercial space would be occupied by a restaurant and approximately 6,800 square feet would be occupied by retail uses.

Up to 166 apartment units would be developed. The residential units would consist of studios, one-bedrooms, one-bedrooms with den, and two-bedrooms. Ten units would be located on the ground floor fronting the northern property line. No residential units would front Santa Monica Boulevard on the ground floor level. These ground floor units would each have a small patio along the street. The lobby entrance to the residential complex would be located on the ground floor and would be accessible from Santa Monica Boulevard, an elevator from the subterranean parking level, and from the retail parking located on the ground floor. The second floor would consist of residential units, a pool, a lounge, a theater/projection room, a fitness room, and a courtyard. These amenities would be accessible to residents only. A public balcony would be located on the second floor. The third, fourth, fifth, and sixth floors would consist of residential units only. All residential units would be accessed from interior hallways, with the exception of the residential units located on the ground floor. The proposed project would provide approximately 35,000 square feet of open space in the form of private balconies, fitness room, pool, roof deck, lounge, and ~~theater~~ common patio areas. These features would only be available for use by site residents and their guests.

The proposed project would include a maximum of six stories above grade (a maximum of 72 feet in height plus architectural features) along Santa Monica Boulevard. The height would step down from six stories at the southern boundary on Santa Monica Boulevard to three stories (approximately 36 feet) at the northern boundary adjacent to the neighboring apartment buildings. In addition, the proposed project would provide a view portal from Santa Monica Boulevard of the Hollywood Hills to the north of the project site. This view is currently obstructed by onsite buildings. As shown on Figure 2-3, part of the street frontage on Santa Monica Boulevard would be open where the stairs lead from the street level to a plaza on the second floor and the entrance to the residential units. The interior of the site would remain open around the residential courtyard and amenities in the central part of the site. This would allow a direct view from the Santa Monica Boulevard entrance and vantage points on the south side of Santa Monica Boulevard through the site building to the Hollywood Hills and Hollywood sign. The public would be permitted to use the plaza on the second floor of the proposed project to view the Hollywood sign.

The proposed project would include a mix of market rate and affordable apartment units: 133 would be market rate, 17 would be moderate income, and 16 would be low income. The number of studio, one-bedroom, one-bedroom with den, and two-bedroom units would be approved by the City of West

Executive Summary

Hollywood Rent Stabilization and Housing Department prior to occupancy. Additionally, the City establishes maximum rents for affordable units on an annual basis.

The proposed project would be designed, constructed, and operated in accordance with the City's Green Building Ordinance, which specifies energy and water efficiency measures, trip reduction strategies, and other sustainable measures.

The proposed project includes a total of 260 parking spaces (including 15 spaces for guests), of which 46 spaces would be reserved for the retail and restaurant uses and located on the ground floor level. It is anticipated that a fee would be charged for use of the retail and restaurant parking spaces. Employees and patrons would be expected to park in the ground floor parking area. Parking for the retail and restaurant uses would be available for use by guests of the site tenants after normal operating hours of the commercial uses. The remaining 199 parking spaces would be located in one and a half levels of subterranean parking. The primary entry to and exit from the residential garage would be located on Detroit Street at the northern boundary of the project site; residents would also be able to access the subterranean parking garage from the ground-floor level parking garage located off of Formosa Avenue. Access to the residential parking area would be controlled by a gate. The subterranean parking garage would be comprised of single and tandem parking stalls. All residents would be expected to park on site. The proposed project would also provide a total of 45 bicycle parking spaces, with 42 located in the residential garage and 3 located within the ground floor parking area. It is anticipated that all the street parking along Santa Monica Boulevard, Formosa Avenue, and Detroit Street would be retained.

Site landscaping would consist of a single row of street trees along Detroit Street and Formosa Avenue and a double row of street trees along the majority of Santa Monica Boulevard. Street trees would not be planted in front of the view portal so as to maintain a clear line of site to the Hollywood Hills. A 15-foot landscaped buffer would be located along the northern boundary of the project site between the site and the adjacent apartment buildings.

CONSTRUCTION

Environmental cleanup is anticipated to start in the second quarter of 2013 and completed construction is expected to take 26 months, ending in the third quarter of 2015. It is estimated that the project site would be fully occupied and in operation in 2016.

The Faith Plating portion of the project site is listed as a hazardous waste site. The Faith Plating Company conducted onsite chrome, copper, and nickel plating activities at 7141 Santa Monica Boulevard, and 1107 and 1117 Detroit Street ~~since~~ from 1937 through 2012. The Phase I Environmental Assessment of the project site concluded that the inherent nature of the onsite chrome, copper, and nickel plating activities coupled with observed housekeeping practices, the age of the operations, and the violations filed against the site, the presence of the plating facility represents an environmental risk. In addition, due to the age of onsite structures, there is the potential for asbestos-containing material (ACM) and lead-based paint (LBP) in the existing buildings.

Therefore, the applicant entered into a voluntary cleanup agreement (VCA) with California Department of Toxic Substances Control (DTSC). Under the VCA, the applicant would engage in investigation and environmental remediation of the proposed project site under the supervision of DTSC. The environmental remediation would include the implementation of a ~~Remedial~~ Removal Action Work Plan (RAW) to remove onsite contaminated soil contaminants to the satisfaction of DTSC. Prior to the start of construction, the project site would be clearly defined with fencing and staking. Then the project site would be abated for ACM and LBP prior to demolition of existing buildings and site clearing. The next step would be excavation of contaminated soil and other site cleanup activities in accordance with the VCA and under the oversight of DTSC. ~~Under the VCA, the applicant would engage in investigation and environmental remediation of the project site under the supervision of DTSC. The environmental remediation would include the implementation of the RAW to remove contaminants to the satisfaction of DTSC.~~ After excavation of all contaminated soils from the project site has activities have been completed to the satisfaction of DTSC, closure and post-closure activity would involve testing of onsite soils and documentation that the remaining soil would have concentrations of heavy metals less than 10 times their respective Soluble Threshold Limit Concentration (STLC). A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter, per the Condition of Approval of the proposed project, the City would issue a building permit and building construction would begin. In addition, per the Removal Action Objectives in the RAW, groundwater would be monitored for a two-year period following removal of contaminated soils.

ES.4 SUMMARY OF ENVIRONMENTAL IMPACTS

An analysis of environmental impacts caused by the proposed project has been conducted and is contained in this EIR. Table ES-1 provides a summary of the potential significant environmental impacts that would result during construction and operation of the proposed project, mitigation measures that would lessen potential environmental impacts, and the level of significance of the environmental impacts that would remain after implementation of the proposed mitigation.

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
AESTHETICS			
VIS-1: The proposed project would not have a substantial adverse effect on a scenic vista.	Less than significant	No mitigation measures are required.	Less than significant
VIS-2: The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.	Less than significant	No mitigation measures are required.	Less than significant
VIS-3: The proposed project would create a new source of substantial light and glare that would adversely affect day or nighttime views in the area.	Significant	<p>VIS-A All outdoor lighting, other than identification signage, shall be directed from the perimeter of the property toward building entrances and parking areas utilizing cut-off fixtures to prevent nighttime illumination to spill onto adjacent properties, particularly the residential properties located immediately north of the project site.</p> <p>VIS-B The exterior finish of the south-facing walls shall be fabricated with non-reflective glass, non-high gloss paint, and other light-absorbing materials to minimize the glare from the new structure.</p>	Less than significant
VIS-4: The proposed project would not create a new source of substantial shade and shadow that would adversely affect daytime views in the area.	Less than significant	No mitigation measures are required.	Less than significant
AIR QUALITY			
AIR-1: Construction of the proposed project would violate the South Coast Air Quality Management District (SCAQMD) regional significance thresholds for volatile organic compounds (VOC) and nitrogen oxide (NO _x) emissions. During the operational phase, regional pollutant emissions would not violate the SCAQMD significance thresholds.	Significant	<p>AIR-A The construction contractor shall use electricity from power poles rather than temporary diesel or gasoline generators.</p> <p>AIR-B The construction contractor shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.</p> <p>AIR-C The construction contractor shall use alternative-fueled off-road equipment.</p> <p>AIR-D The construction contractor shall configure construction parking to eliminate interference with traffic operations on Santa Monica Boulevard.</p> <p>AIR-E The construction contractor shall provide temporary traffic controls, such as a flag person,</p>	Significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>during all phases of construction to maintain smooth traffic flows.</p> <p>AIR-F The construction contractor shall schedule construction activities that effect traffic flow on the arterial system for off-peak hours.</p> <p>AIR-G All construction equipment and delivery vehicles shall be turned off when not in use or prohibit idling in excess of five minutes.</p> <p>AIR-H The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than 10 grams per liter).</p> <p>AIR-I The construction contractors shall utilize materials that do not require painting.</p> <p>AIR-J The construction contractor shall use pre-painted construction materials.</p> <p>AIR-K <u>The construction contractor shall use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the construction contractor shall use trucks that meet United States Environmental Protection Agency (EPA) 2007 model year NO_x emissions requirements.</u></p> <p>AIR-L <u>All on-site construction equipment shall meet EPA Tier 3 or higher emissions standards according to the following:</u></p> <ul style="list-style-type: none"> <u>Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be</u> 	

Executive Summary

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p><u>achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.</u></p> <ul style="list-style-type: none"> • <u>Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.</u> <p><u>A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.</u></p>	
AIR-2: Construction of the proposed project would expose sensitive receptors to substantial pollutant concentrations of particulate matter emissions. Operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations.	Significant	See mitigation measures AIR-A through AIR-J above.	Significant
AIR-3: Construction of the proposed project would contribute substantially to an existing or projected air quality violation, resulting in a cumulatively considerable impact to NO _x emissions.	Significant	See mitigation measures AIR-A through AIR-G above.	Significant
CULTURAL RESOURCES			
CR-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource.	Less than significant	No mitigation measures are required.	Less than significant
CR-2: The proposed project would not cause a substantial adverse change in the significance of an archaeological resource.	Less than significant	No mitigation measures are required.	Less than significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
CR-3: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less than significant	No mitigation measures are required.	Less than significant
GEOLOGY AND SOILS			
GEO-1: The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking, ground failure, and landslides.	Less than significant	No mitigation measures are required.	Less than significant
GEO-2: The proposed project would not expose people or structures to potential substantial adverse effects involving seismic-related ground failure, including landslides, lateral spreading, subsidence, liquefaction, and collapse.	Less than significant	No mitigation measures are required.	Less than significant
GREENHOUSE GAS EMISSIONS			
GHG-1: The proposed project would be consistent with the City of West Hollywood Climate Action Plan (CAP) and other applicable plans, policies and regulations adopted for the purpose of reducing greenhouse gas (GHG) emissions. In addition, the proposed project would not generate a significant amount of GHG emissions.	Less than significant	No mitigation measures are required.	Less than significant
HAZARDS AND HAZARDOUS MATERIALS			
HAZ-1: The proposed project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65965.5. However, it would not create a significant hazard to the public or the environment.	Less than significant	No mitigation measures are required.	Less than significant
HYDROLOGY AND WATER QUALITY			
HWQ-1: The proposed project would not violate any water quality standards or waste discharge requirements.	Less than significant	No mitigation measures are required.	Less than significant

Executive Summary

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
HWQ-2: The proposed project would not create or contribute runoff that would exceed the capacity of the existing or planned storm water systems or provide substantial additional sources of polluted runoff.	Less than significant	No mitigation measures are required.	Less than significant
LAND USE AND PLANNING			
LU-1: The proposed project would not conflict with an adopted general plan, specific plan, zoning ordinance, or other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Less than significant	No mitigation measures are required.	Less than significant
NOISE			
NOISE-1: Construction activity would not create noise levels in excess of the West Hollywood Municipal Code. However, it would cause a substantial temporary project-related increase in ambient noise levels by more than 10 A-weighted decibels (dBA) at adjacent residential land uses. The proposed project would result in a significant impact related to construction noise.	Significant	<p>NOISE-A The construction contractor shall ensure that equipment is properly maintained per the manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc).</p> <p>NOISE-B The construction contractor shall shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.</p> <p>NOISE-C The construction contractor shall ensure that construction equipment does not idle for extended periods of time.</p> <p>NOISE-D The construction contractor shall locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers).</p> <p>NOISE-E If feasible, the The construction contractor shall install a 12-foot high temporary barrier along the northern property line. The acoustical barrier shall be constructed of material having a minimum surface weight of two pounds per square foot or greater, and a demonstrated Sound Transmission Class rating of 25 or greater as defined by American Society for Testing and Materials Test Method E90. The barrier shall be required during the excavation and site preparation phases of</p>	Significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>construction.</p> <p>NOISE-F The construction contractor shall ensure that music is not audible at offsite locations.</p>	
<p>NOISE-2: The proposed project would expose onsite residents to noise levels in excess of the West Hollywood Municipal Code during project operations. The proposed project would result in a significant impact related to noise and land use compatibility.</p>	Significant	<p>NOISE-G Prior to issuance of a building permit, the applicant shall submit an acoustical study showing that the interior noise level in residential units does not exceed 45 dBA CNEL or L_{dn}. Prior to occupancy, this noise level shall be verified at a representative sample of residences by a qualified acoustical specialist.</p>	Less than significant
<p>NOISE-3: Operation of the proposed project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the project area.</p>	Less than significant	No mitigation measures are required.	Less than significant
<p>NOISE-4: Construction activity would expose nearby sensitive receptors and the nearest filming studio to excessive ground-borne vibration levels. The proposed project would result in a less than significant impact related to operational vibration.</p>	Significant	<p>NOISE-H Prior to commencement of construction activity, a qualified structural engineer shall survey the existing foundation and other structural aspects of residential land uses adjacent and to the north of the project site. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary of Interior’s Standards to such projects.</p> <p>The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions. These baseline conditions shall be forwarded to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building permit for the proposed project.</p> <p>At the conclusion of vibration-causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to adjacent buildings. The letter shall include recommendations for any repair, as may be</p>	Significant

Executive Summary

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken by the applicant prior to issuance of any temporary or permanent certificate of occupancy for the proposed project.	
PUBLIC SERVICES, UTILITIES, AND RECREATION			
PS-1: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.	Less than significant	No mitigation measures are required.	Less than significant
PS-2: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.	Less than significant	No mitigation measures are required.	Less than significant
PS-3: The proposed project may require or result in the construction of new wastewater conveyance. The proposed project would not result in a determination by the wastewater treatment provider that serves or may serve the project that it <u>has lacks</u> adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	Significant	PS-A Prior to the issuance of a Certificate of Occupancy by the City of West Hollywood, the applicant shall obtain a Sewer Capacity Availability Request from the City of Los Angeles Bureau of Engineering in order to prove to the satisfaction of the City of West Hollywood Department of Public Works that there is adequate wastewater capacity to serve the proposed project. If the City of Los Angeles Bureau of Engineering determines by a subsequent Sewer Capacity Availability Request that the wastewater system no longer has capacity to serve the proposed project, the applicant shall be required to design and construct an alternate sewer connection with adequate downstream capacity.	Less than significant
PS-4: The proposed project would not be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	Significant	PS-B Prior to the issuance of a Demolition Permit, the applicant shall submit a building plan to the Environmental Services Coordinator for review and approval. The building plan shall show the location and dimensions of the trash and recyclables storage	Less than significant

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		<p>area. The trash and recyclables storage area shall be designed with adequate space to accommodate the trash and recycling bins and dumpsters.</p> <p>PS-C Prior to the issuance of the Certificate of Occupancy, trash and recycling operations shall be established at the project site as follows:</p> <ul style="list-style-type: none"> • Restaurants shall have a designated dumpster bin to dispose of food waste and other compostables. • Restaurants, residential, and commercial uses shall have a designated dumpster bin to dispose of regular trash. • Restaurants, residential, and commercial uses shall have a designated dumpster bin to dispose of recyclables. 	
<p>PS-5: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or require the construction or expansion.</p>	<p>Less than significant</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p>TRANSPORTATION/TRAFFIC</p>			
<p>TRANS-1: The proposed project would conflict with an applicable plan, ordinance, or policy for establishing measures of effectiveness for the performance of the circulation system established by West Hollywood and Los Angeles.</p>	<p>Significant</p>	<p>TRANS-A South Poinsettia Place at Santa Monica Boulevard: As also identified in the Movietown Specific Plan Final EIR (SCH No. 2008071950) and approved by City Council, prior to issuance of a certificate of occupancy by the City, the applicant shall be responsible for restriping Poinsettia Place to provide two northbound turn lanes (an exclusive left-turn lane and an exclusive right-turn lane) with a length of 260 feet, including storage and taper, by removing on-street parking on both sides of Poinsettia Place. In the event that the Movietown project applicant restripes Poinsettia to provide the two-northbound lanes with a length of 260 feet required for both projects before Domain completes this mitigation measure, the Public</p>	<p>Significant</p>

Executive Summary

Potential Environmental Impacts	Significance Determination	Mitigation Measures	Level of Significance after Mitigation
		Works Director may deem this mitigation measure satisfied for this project as well.	
TRANS-2: The proposed project would not conflict with an applicable congestion management program, including but not limited to level of service standards established by the county congestion management agency for designated roads or highways.	Less than Significant	No mitigation measures are required.	Less than significant
TRANS-3: The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than Significant	No mitigation measures are required.	Less than significant

1.0 INTRODUCTION

This Final Environmental Impact Report (Final EIR) has been prepared by the City of West Hollywood (City) to evaluate potential environmental effects that may result from development of the proposed Domain Project (proposed project). This EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Res. Code §21000 et seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, §15000 et seq.). The City is the Lead Agency under CEQA. This Final EIR contains comments and responses to comments received on the Draft EIR, which was circulated for public review from August 15, 2008 until September 29, 2008, and the Recirculated Draft EIR, which was circulated for public review from January 11, 2013 until February 25, 2013. The comments and responses to comments are presented in Chapter 7.0, Response to Comments. Revisions and clarifications to the Final EIR made in response to comments and information received on the Draft EIR and Recirculated Draft EIR are indicated by ~~strikeout~~ and underline text, as illustrated in this paragraph. A complete list of revisions and corrections to the Final EIR is provided in Chapter 6.0, Clarifications and Modifications. Corrections of typographical errors have been made throughout the document and are not indicated by ~~strikeout~~ or underline text.

1.1 BACKGROUND AND PROJECT HISTORY

A Draft EIR for the Formosa Specific Plan Project was circulated for public review and comment by the City of West Hollywood (City) on August 15, 2008, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until September 29, 2008. The project site is located on the north side of Santa Monica Boulevard between Detroit Street and Formosa Avenue. The 1.3-acre project site consists of three parcels: 7155 Santa Monica Boulevard, 7141 Santa Monica Boulevard, and 1107 and 1117 Detroit Street. It is developed with a sound editing studio and a metal plating facility.

The project evaluated in the Draft EIR was a Specific Plan proposing to demolish the existing site structures and construct up to 130 residential units and approximately 9,000 square feet of commercial uses (i.e., retail/restaurant/banking). The residential units would have consisted of studios, one-bedrooms, one-bedrooms with den, and two-bedrooms. No residential units would have fronted Santa Monica Boulevard on the ground floor level. The project would have included a mix of market rate and affordable units: 113 market rate, 8 moderate income, and 9 low income. The project would have provided approximately 27,000 square feet of open space in the form of private balconies, fitness room, pool, roof deck, lounge, and theater, which would only be available for use by site residents and their guests. A public balcony would have been located on the second floor to provide a public view through the project site to the Hollywood Hills north of the project site. The commercial uses would have been restricted to the ground floor level and would have fronted Santa Monica Boulevard. To implement the development, the project would have required a specific plan to permit greater height, greater floor area, greater density, reduced parking requirements, and reduced open space requirements than permitted by the City regulations at that time.

The Draft EIR and Notice of Completion (NOC) were distributed to the California Office of Planning and Research, State Clearinghouse, and relevant agencies. The public was also given the opportunity to

1.0 Introduction

provide comments on the Draft EIR at two public meetings: one before the Planning Commission on September 4, 2008, and one before the Historic Preservation Commission Meeting on September 22, 2008.

A Final EIR was prepared including responses to comments received on the Draft EIR. However, the Final EIR was not circulated for public review and was not brought before the Planning Commission and City Council for approval hearings. The project plans and project site have since been purchased from Formosa Partners, LP, by Domain WH, LLC. The new project applicant intends to move forward with the proposed mixed-use project with some minor modifications to the site plan and complete the environmental review process pursuant to CEQA. A summary of the proposed project and the key modifications from the previous proposal is provided in Section 1.2 below.

Pursuant to CEQA Guidelines Section 15088.5, the City of West Hollywood (lead agency) prepared a Recirculated Draft EIR to provide an explanation of the changes to the proposed project and an evaluation of those environmental issue areas where modifications to the environmental setting have occurred and revisions to the previous Draft EIR analysis are warranted. Additionally, since the Draft EIR was made available for public review, the City adopted the West Hollywood General Plan 2035 and made modifications to the West Hollywood Zoning Ordinance. These changes to the City's land use policies and regulations and new General Plan and Zoning designations for the project site have eliminated the need for a Specific Plan. Therefore, the proposed project has been re-named the Domain Project.

Following public review of the Recirculated Draft EIR, this Final EIR has been prepared. It includes responses to comments received on the Recirculated Draft EIR and the Draft EIR. The Final EIR is being made available for public review prior to submission to the Planning Commission for approval hearings.

1.2 SUMMARY OF THE PROPOSED PROJECT

The 1.3-acre project site is located on the north side of Santa Monica Boulevard between Detroit Street and Formosa Avenue in the City of West Hollywood, western Los Angeles County. The site consists of three parcels currently owned by the applicant, Domain WH, LLC. The first parcel, 7155 Santa Monica Boulevard, is currently occupied by a sound editing studio, which consists of an approximately 3,500 square-foot, two-story brick and stucco building. The second parcel, 7141 Santa Monica Boulevard, and the third parcel, 1107 and 1117 Detroit Street, are currently occupied by a metal plating facility, which includes five contiguous two-story brick and stucco buildings totaling approximately 36,000 square feet.

The Domain Project involves demolition of the existing site structures, and construction and operation of a single-mixed use building consisting of up to 166 apartment units and approximately 9,300 square feet of retail and restaurant uses. The commercial uses would be restricted to the ground floor level, fronting Santa Monica Boulevard and wrapping around to Detroit Street and Formosa Avenue. The residential units would consist of studios, one-bedrooms, one-bedrooms with den, and two-bedrooms. Ten apartments would be located on the ground floor fronting the northern property line. No residential units would front Santa Monica Boulevard on the ground floor level. The remainder of the residential units would be located on the upper levels. The proposed project would include a mix of market rate and affordable apartment units: 133 would be market rate, 17 would be moderate income, and 16 would be

low income. A total of 46 parking spaces for the commercial uses would be provided at grade and resident parking (199 parking spaces for the residential units and 15 parking spaces for guests) would be provided on up to two levels of subterranean parking for a total of 260 vehicle parking spaces and 45 bicycle parking spaces.

The proposed project would be a single-structure a maximum of six stories above grade (a maximum of 72 feet in height plus architectural features) along Santa Monica Boulevard. The height would step down from six stories at the southern boundary on Santa Monica Boulevard to three stories (approximately 36 feet) at the northern boundary adjacent to the neighboring apartment buildings. In addition, the proposed project would provide a view portal from Santa Monica Boulevard of the Hollywood Hills to the north of the project site.

Since the Draft EIR was made available for public review, the following key modifications to the project design were made:

- The project applicant has changed from Formosa Partners, LP to Domain WH, LLC.
- The proposed project would no longer require a specific plan; subsequently, the project name has changed from the Formosa Specific Plan to the Domain Project.
- The total number of apartments proposed to be constructed increased from 130 to 166 units, and the amount of retail and restaurant space increased from approximately 9,000 square feet to approximately 9,300 square feet. The increase in residential units and commercial square footage was accomplished by reconfiguring the interior building space and increasing the floor-to-area (FAR)¹ ratio from 3.0:1 to 3.18:1.
- The number of affordable units increased from 13 percent to 20 percent of the total units to 33, with an increase in moderate income units from 8 to 17 and an increase in low income units from 9 to 16.
- The proposed building height decreased from 75 feet to 72 feet, but would still consist of 6 stories above grade.
- The amount of open space available to site residents and their guests increased from approximately 27,000 square feet to 35,000 square feet.
- The number of total onsite parking spaces increased from 206 to 260. The number of parking spaces dedicated for use by the commercial patrons decreased by 1 from 47 to a new total of 46 commercial parking spaces. However, the number of parking spaces dedicated for use by the onsite residents increased by 40 from 159 to a new total 199 residential spaces and 15 guest parking spaces. The additional resident parking would be accommodated in an extra half level of subterranean parking compared to the previous project site plan.

¹ Floor area ratio is the ratio of square feet of floor area to site area.

1.0 Introduction

- The start date for project construction moved from March 2009 to the second quarter of 2013; however, the duration of construction remains 26 months.

1.3 THE CEQA ENVIRONMENTAL PROCESS

CEQA requires preparation of an EIR when there is substantial evidence supporting a fair argument that a project may have a significant effect on the environment. The purpose of an EIR is to provide decision makers, public agencies, and the general public with an objective and informational document that fully discloses the environmental effects of the proposed project. The EIR process is intended to facilitate the objective evaluation of potentially significant direct, indirect, and cumulative impacts of the proposed project, and to identify feasible mitigation measures and alternatives that would reduce or avoid the project's significant effects. In addition, CEQA specifically requires that an EIR identify those adverse impacts determined to be significant after mitigation.

Notice of Preparation and Initial Study

In accordance with the CEQA Guidelines, an Initial Study was prepared and a Notice of Preparation (NOP) distributed on August 9, 2007, to public agencies and organizations, as well as private organizations and individuals with a possible interest in the proposed project. The purpose of the NOP was to provide notification that the City planned to prepare an EIR and to solicit input on the scope and contents of the EIR. Over 16 copies of the NOP were distributed; 8 written comment letters were received from various agencies, organizations, and individuals. These letters and the NOP are included in Appendix A.

A public agency scoping meeting was held at Plummer Park Community Center on August 14, 2007. The purpose of this meeting was to seek input from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the proposed project. Approximately 20 people attended the scoping meeting.

Draft EIR

The Draft EIR for the Formosa Avenue Specific Plan Project was circulated for public review and comment on August 15, 2008, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until September 29, 2008. Copies of the Draft EIR are available for review at the City Hall Planning Division counter and West Hollywood Library (715 North San Vicente Boulevard, West Hollywood, CA 90069 [310] 652-5340). The document is also available on the City of West Hollywood website, www.weho.org.

The Draft EIR provided a detailed evaluation of potentially significant impacts for eight environmental issue areas, as follows:

- Aesthetics
- Air Quality
- Cultural Resources

- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services, Utilities and Recreation
- Traffic/Circulation

Cumulative environmental impacts, including Global Climate Change, as well as irreversible environmental changes and growth-inducing impacts, were evaluated in Chapter 4.0, Impact Overview. Chapter 5.0, Alternatives, evaluated the comparative merits of the proposed project against a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and avoid or substantially lessen potentially significant project-related impacts. The alternatives evaluated in the Draft EIR included the No Project Alternative, Reduced Density Alternative, and Mixed-Use with Retail Only Alternative.

The Draft EIR and NOC were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to over 18 interested parties and adjacent property owners and residents located within a 300-foot radius of the project site, which informed them of where they could view the document and how to comment. The purpose of the 45-day review period was to provide interested public agencies, groups, and individuals the opportunity to comment on the contents and accuracy of the document. The document was available to the public at the City Hall Planning Division counter and the West Hollywood Library. A copy of the document was also posted online. The public was given the opportunity to provide comments on the Draft EIR at two public meetings. During the 45-day public review period, a total of five comment letters and emails were received, in addition to the oral testimony from the public meetings.

Recirculated Draft EIR

As stated in Section 15088.5 of the CEQA Guidelines, a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review, but before the Final EIR is certified. In accordance with CEQA Guidelines Section 15088.5, new information includes “changes in the project or environmental setting, as well as additional data or other information.” However, new information “is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment.” The new project applicant intends to move forward with the proposed mixed-use project with some minor modifications to the site plan, as discussed in Section 1.2 above.

The Recirculated Draft EIR was circulated for public review and comment on January 11, 2013, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until February 25, 2013. The Recirculated Draft EIR and NOC were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A NOA was distributed to over 18 interested parties, including individuals who provided written comments on the Draft EIR, which informed them of where they could view the document and how to comment. The

1.0 Introduction

purpose of the 45-day review period was to provide interested public agencies, groups, and individuals the opportunity to comment on the contents and accuracy of the document. The document was available to the public at the City Hall Planning Division counter and the West Hollywood Library. A copy of the document was also posted online. During the public review period for the Recirculated Draft EIR, a total of nine letters and emails were received on the Recirculated Draft EIR.

The Recirculated Draft EIR described the changes to the proposed project and changes to the environmental setting that have occurred since the Draft EIR was made available for public review. It provided new project-specific and cumulative environmental impacts analyses resulting from construction and operation of the new proposed project and updated environmental setting. The following chapters of the Draft EIR were recirculated:

- Air Quality
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services, Utilities and Recreation
- Transportation and Traffic
- Impact Overview
- Alternatives to the Proposed Project

Final EIR

This Final EIR contains comments and responses to comments received on the Draft EIR and the Recirculated Draft EIR. The comments and responses to comments are presented in Chapter 7.0, Response to Comments. Revisions and clarifications made in response to comments and information received on the Draft EIR and the Recirculated Draft EIR are listed in Chapter 6.0, Clarifications and Modifications.

Prior to approval of the proposed project, the City, as the lead agency and decision-making entity, is required to certify that this EIR has been completed in accordance with CEQA, that the proposed project has been reviewed and the information in this EIR has been considered, and that this EIR reflects the independent judgment of the City. CEQA also requires the City to adopt “findings” with respect to each significant environmental effect identified in the EIR (Pub. Res. Code Section 21081; Cal. Code of Regs., Title 14, Section 15091). For each significant effect, CEQA requires the approving agency to make one or more of the following findings:

- The proposed project has been altered to avoid or substantially lessen significant impacts identified in the Final EIR.

- The responsibility to carry out such changes or alterations is under the jurisdiction of another agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the Final EIR.

If the City concludes that the proposed project will result in significant effect, which are identified in this EIR but are not substantially lessened or avoided by feasible mitigation measures and alternatives, the City must adopt a “statement of overriding consideration” prior to approval of the proposed project (Pub. Res. Code Section 21081[b]). Such statements are intended under CEQA to provide a written means by which the lead agency balances in writing the benefits of the proposed project and the significant and unavoidable environmental impacts. Where the lead agency concludes that the economic, legal, social, technological, or other benefits outweigh the unavoidable environmental impacts, the lead agency may find such impacts “acceptable” and approve the proposed project.

In addition, public agencies, when approving a project, must also adopt a Mitigation Monitoring and Reporting Program describing the changes that were incorporated into the proposed project or made a condition of project approval in order to mitigate or avoid significant effects on the environment (Pub. Res. Code Section 21081.6). The Mitigation Monitoring and Reporting Program is adopted at the time of project approval and is designed to ensure compliance during project implementation. Upon approval of the proposed project, the City will be responsible for ensuring compliance with the proposed project’s Mitigation Monitoring and Reporting Program.

1.4 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

The **Executive Summary** provides an overview of the information provided in detail in subsequent chapters. It consists of an introduction; a description of the proposed project and alternatives considered; a discussion of areas of controversy and issues to be resolved; and a table that summarizes the potential environmental impacts in each category, the significance determination for those impacts, mitigation measures, and significance after mitigation.

Chapter 1.0 provides an explanation of the background and history of the proposed project and a brief description of the proposed project. It also includes a brief overview of the CEQA environmental review process and a section describing the organization of the Final EIR.

Chapter 2.0 provides a detailed description of the proposed project. Project objectives are identified, and information on the proposed project characteristics and construction scenario is provided. This section also includes a description of the intended uses of the Final EIR and public agency actions.

Chapter 3.0 describes the potential environmental effects of implementing the proposed project. The discussion in Chapter 3.0 is organized by 11 environmental issue areas, as follows:

1.0 Introduction

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services, Utilities and Recreation
- Transportation and Traffic

For each environmental issue, the analysis and discussion are organized into five subsections as described below:

Environmental Setting – This subsection describes, from a local and regional perspective, the physical environmental conditions in the vicinity of the proposed project at the time of publication of the Notice of Preparation. The environmental setting establishes the baseline conditions by which the City will determine whether specific project-related impacts are significant.

Significance Criteria – This subsection identifies a set of thresholds by which the level of impact is determined.

Environmental Impacts – This subsection provides detailed information on the environmental effects of the proposed project, and whether the impacts of the proposed project would meet or exceed the established significance criteria.

Mitigation Measures – This subsection identifies potentially feasible mitigation measures that would avoid or substantially reduce significant adverse project-related impacts.

Level of Significance after Mitigation – This subsection indicates whether project-related impacts would be reduced to below a level of significance with implementation of the mitigation measures identified in the EIR. This subsection also identifies any residual significant and unavoidable adverse effects of the proposed project that would result even after the mitigation measures have been implemented.

Chapter 4.0 presents the other mandatory CEQA sections, including the following:

Unavoidable Significant Adverse Impacts – This subsection identifies and summarizes the unavoidable significant impacts described in detail in Chapter 3.0.

Effects Not Found to Be Significant – This subsection identifies and summarizes the issue areas that were determined to have no adverse environmental effect or a less than significant environmental effect given the established significance criteria.

Cumulative Impacts – This subsection addresses the potentially significant cumulative impacts that may result from the proposed project when taking into account related or cumulative impacts resulting from other past, present, and reasonably foreseeable future projects.

Irreversible Environmental Changes – This subsection addresses the extent to which the proposed project would result in the commitment of nonrenewable resources.

Growth-Inducing Impacts – This subsection describes the potential of the proposed project to induce economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment.

Chapter 5.0 describes and evaluates the comparative merits of a reasonable range of alternatives to the proposed project that would feasible attain most of the basic objectives of the proposed project and avoid or substantially lessen potentially significant project-related impacts. This chapter also describes the preliminary site constraints analysis and rationale for selecting the range of alternatives discussed in the EIR and identifies the alternatives considered by the City that were rejected from further discussion as infeasible during the scoping process. Additionally, this Chapter includes a discussion of the environmental effects of the No Project Alternative and identifies the environmentally superior alternative.

Chapter 6.0 provides a detailed description of all clarifications and revisions that were made to the text or graphics of the Draft EIR and/or the Recirculated Draft EIR. Clarifications and revisions reflect changes made to the proposed project, analysis, or mitigation as a result of a comment made by an agency or individual during the public review period. This chapter also reflects changes necessary to combine the Draft EIR and Recirculated Draft EIR into this Final EIR.

Chapter 7.0 provides a copy of all comment letters received during the 45-day Draft EIR and Recirculated Draft EIR public comment periods. This chapter also provides written responses to comments on these documents.

Chapter 8.0 includes the Mitigation Monitoring and Reporting Program, which details the mitigation that has been made a condition of the proposed project approval in order to mitigate or avoid significant effects on the environment. It also includes the phase during which the mitigation and the monitoring will be implemented and the agency responsible for enforcing the measure.

Chapter 9.0 provides a list of acronyms and abbreviations used in this Final EIR.

Chapter 10.0 provides a bibliography of reference materials used in preparation of this Final EIR.

Chapter 11.0 identifies those persons responsible for the preparation of this Final EIR.

This page is intentionally left blank.

2.0 PROJECT DESCRIPTION

This chapter provides a description of the proposed project evaluated in Chapter 3.0 of this Final EIR. The project background, objectives, location, and environmental setting are described, followed by a description of project characteristics, and a summary of project approvals that would be required. This information is provided pursuant to the CEQA Guidelines Section 15124.

2.1 PROJECT LOCATION

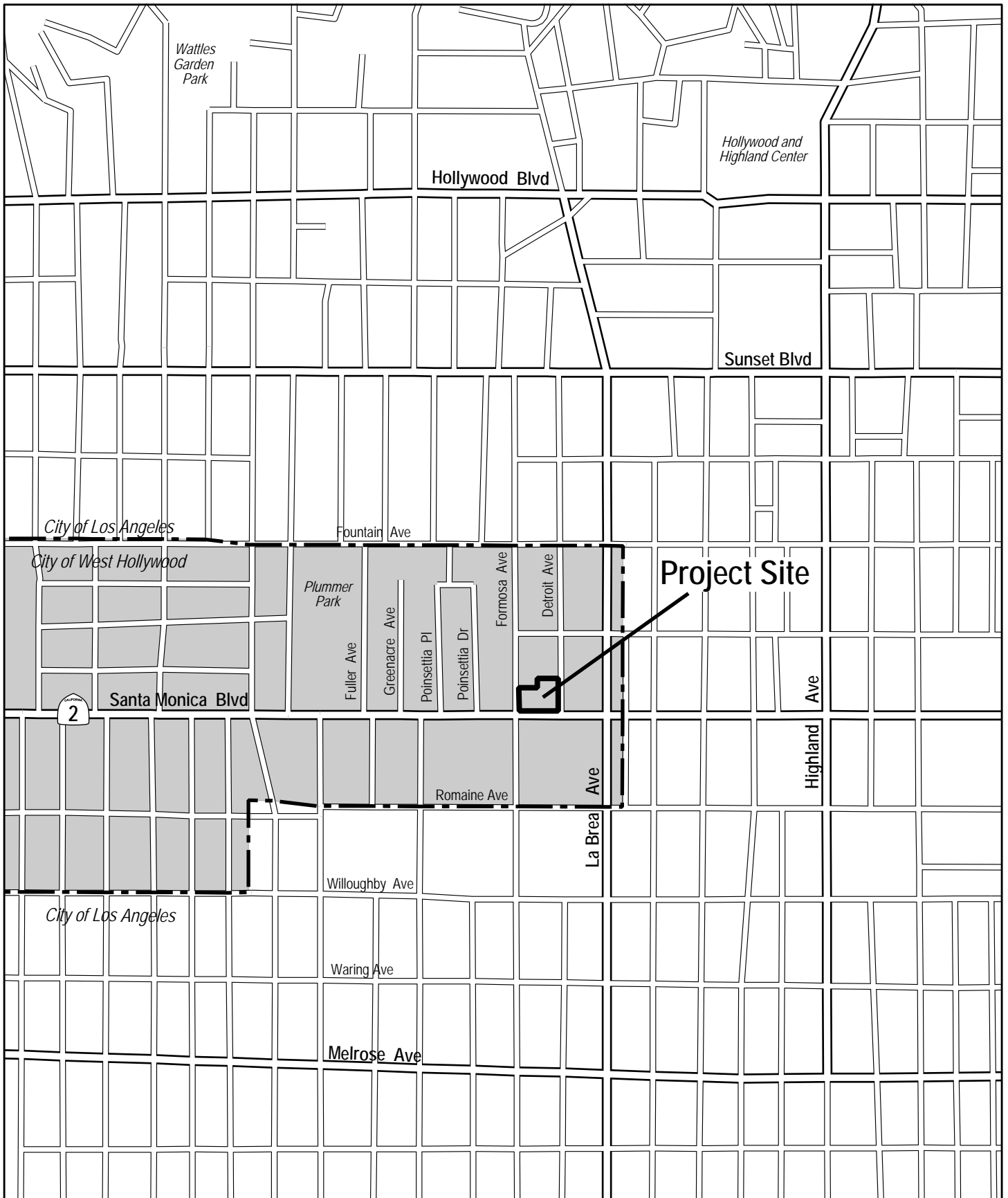
The 1.3-acre project site is bound by Formosa Avenue to the west, Santa Monica Boulevard to the south, Detroit Street to the east, and residential uses to the north. It is located in the City of West Hollywood in western Los Angeles County. The site consists of three parcels. The first parcel is located at 7155 Santa Monica Boulevard. The second parcel is located at 7141 Santa Monica Boulevard. The third parcel is located at 1107 and 1117 Detroit Street. The second and third parcels are developed jointly. Regional access to the site is provided by United States Route 101 (US 101, Hollywood Freeway), which is located approximately 1.4 miles northeast of the project site. The site is located approximately one block west of the City of Los Angeles border. Figure 2-1 shows the regional location map and Figure 2-2 shows the project location map.

2.2 PHYSICAL ENVIRONMENTAL SETTING

2.2.1 EXISTING LAND USES

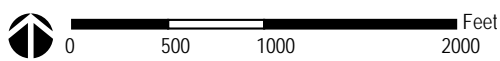
The project site consists of three parcels owned by the applicant, Domain WH, LLC. The first parcel, 7155 Santa Monica Boulevard, is occupied by a sound editing studio and consists of one two-story brick and stucco building totaling approximately 3,500 square feet. This structure was constructed prior to 1928 with renovations occurring in 1980 and 1990. This property includes a surface parking lot with an entrance on Formosa Avenue. The tenants of the sound editing studio vacated the property at the end of September 2012.

The second parcel, 7141 Santa Monica Boulevard, and the third parcel, 1107 and 1117 Detroit Street, are occupied by a metal plating facility and are developed with five contiguous two-story brick and stucco buildings totaling approximately 36,000 square feet. All five structures are wood-framed plaster buildings originally constructed in 1926, 1937, 1951, 1952, and 1958. The office area is located in the western building on the property. The plating operation, polishing, and metal working area are located in the southeastern building. An employee locker room and bumper storage areas are located on the second floor of this building. The first floor of the northeastern building is used for bumper metal work and polishing. A paint spray booth is operated in the northern part of the first floor of this building. The second floor is used for bumper storage. A small paved parking lot is located on the northern portion of this property. This lot is the former location of two underground storage tanks removed in 1988.



Source: ESRI Data & Maps and StreetMap USA, 2012.

Figure 2-2
Project Location Map



2.0 Project Description

Currently, the lot is used for automobile maintenance, bumper storage, and is the location of an onsite wastewater treatment plant and clarifier. The entrance to the parking lot is located on Detroit Street. This portion of the project site is listed as a hazardous waste site. The tenants of the metal plating facility vacated the property in December 2012.

The project site is fully developed with surface parking spaces and structures. There is no vacant or undeveloped soil on the site. The site slopes in a southwesterly direction with the Detroit Street frontage being approximately two feet higher in elevation than the Formosa Avenue frontage. The site landscaping consists of a few scattered trees located on the western site boundary fronting Formosa Avenue. These include an 8-inch palm, a 28-inch ficus, and three 9-inch palms. There is nighttime building and security lighting located on the existing buildings and parking lots.

2.2.2 SURROUNDING LAND USES

The surrounding area is primarily commercial along Santa Monica Boulevard. Jones Café is located west of the site on the northwest corner of Santa Monica Boulevard and Formosa Avenue. A costume shop is located north of Jones Café on the west side of Formosa Avenue facing the project site. Residential uses are located farther north along the west side of Formosa Avenue. A studio is located on the south side of Santa Monica Boulevard opposite Jones Café. The Formosa Café and the West Hollywood Gateway, a multi-tenant commercial facility, are located directly south of the project site on Santa Monica Boulevard. La Brea Avenue is located one block east of the site. There were vacant commercial buildings located on the northeast corner of Santa Monica Boulevard and Detroit Street. These structures have since been demolished and construction of the Monarch West Hollywood – Santa Monica & La Brea Project is now underway. The project will consist of 184 residential units and 13,350 square feet of ground floor retail when construction is complete in late 2013. A beverage service company and the parking lot and drive-thru for a fast food restaurant are located north of the Monarch on Detroit Street. Residential uses abut the project site to the north. A two-story apartment building is located north of the site fronting Formosa Avenue. An apartment complex consisting of four one-story apartment buildings is located north of the site along Detroit Street. The area north of the project site contains a mix of single- and multi-family residential uses.

Metered parking is located on this block of Santa Monica Boulevard in front of the existing buildings. City preferential permit street parking is located on Formosa Avenue and Detroit Street. The sidewalk along this block of Santa Monica Boulevard features bulb-outs at Formosa Avenue and Detroit Street to facilitate pedestrian crossing and wheelchair access. Street trees and tree wells are located in the sidewalks surrounding the project site.

2.2.3 GENERAL PLAN DESIGNATION AND ZONING

The project site is designated and zoned CA (Commercial, Arterial) in the City of West Hollywood General Plan (City of West Hollywood 2010). The CA zone is for parcels that support regional retail uses due the presence of a high volume of vehicle traffic. This designation allows for mixed-use development

with multi-family residential, retail, and commercial uses. The project site is also located within a Mixed-Use Incentive Overlay Zone and the Santa Monica/La Brea Transit District. The Mixed-Use Incentive Overlay Zone identifies certain locations where a mix of residential and commercial uses is encouraged. New development with a mix of residential and commercial uses in this zone may receive an additional 0.5 (FAR)¹ and 10 feet in height. The Transit Overlay Zone is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips (City of West Hollywood 2011).

2.3 PROJECT OBJECTIVES

The overall goal of the Domain Project, formerly the Formosa Specific Plan Project, is to create a mixed-use development that builds upon, complements, and is a catalyst to additional growth within an existing built environment. The primary objectives of the project include the following:

- Provide the financial resources to clean-up existing environmental contamination, to permit the redevelopment of the site with market rate and affordable housing, thereby converting an incompatible industrial use, which generates air and ground pollutants, into an attractive addition to the adjacent residential and retail uses.
- Establish a principal activity center and entry into the City of West Hollywood by the intensification of commercial uses and urban design improvements.
- Provide for the upgrading, infill, and new development of uses along Santa Monica Boulevard to create a consistent pattern of development and uses that serve adjacent residents and employees and continue the character of specialty uses.
- Enhance pedestrian activity along Santa Monica Boulevard, and provide much needed neighborhood serving retail/restaurant uses along Santa Monica Boulevard that responds to neighborhood needs and market demands.
- Develop a village-like environment by siting and massing buildings around common pedestrian areas and open spaces that are linked to Santa Monica Boulevard.
- Increase housing in West Hollywood and provide affordable housing.

2.4 PROPOSED PROJECT CHARACTERISTICS

The proposed project includes a mix of retail/commercial and residential uses. Figure 2-3 shows the conceptual ground floor site plan. Retail and restaurant uses would be restricted to the ground floor level fronting Santa Monica Boulevard and wrapping around to Detroit Street and Formosa Avenue. Residential uses would generally be located on the upper floors. A total of approximately 9,300 square

¹ Floor area ratio is the ratio of square feet of floor area to site area.

2.0 Project Description

feet of retail and restaurant space would be provided. At this time, no tenants are proposed; thus, the makeup of the commercial uses is not being specified. However, it is anticipated that approximately 2,500 square feet of the commercial space would be occupied by a restaurant and approximately 6,800 square feet would be occupied by retail uses.

Up to 166 apartment units would be developed. The residential units would consist of studios, one-bedrooms, one-bedrooms with den, and two-bedrooms. Ten units would be located on the ground floor fronting the northern property line. No residential units would front Santa Monica Boulevard on the ground floor level. These ground floor units would each have a small patio along the street. The lobby entrance to the residential complex would be located on the ground floor and would be accessible from Santa Monica Boulevard, an elevator from the subterranean parking level, and from the retail parking located on the ground floor. The second floor would consist of residential units, a pool, a lounge, a theater/projection room, a fitness room, and a courtyard. These amenities would be accessible to residents only. A public balcony would be located on the second floor. The third, fourth, fifth, and sixth floors would consist of residential units only. All residential units would be accessed from interior hallways, with the exception of the residential units located on the ground floor. The proposed project would provide approximately 35,000 square feet of open space in the form of private balconies, fitness room, pool, roof deck, lounge, and ~~theater~~ common patio areas. These features would only be available for use by site residents and their guests.

The proposed project would include a maximum of six stories above grade (a maximum of 72 feet in height plus architectural features) along Santa Monica Boulevard. The height would step down from six stories at the southern boundary on Santa Monica Boulevard to three stories (approximately 36 feet) at the northern boundary adjacent to the neighboring apartment buildings (see Figures 2-4 through 2-7). In addition, the proposed project would provide a view portal from Santa Monica Boulevard of the Hollywood Hills to the north of the project site. This view is currently obstructed by onsite buildings. As shown on Figure 2-3, part of the street frontage on Santa Monica Boulevard would be open where the stairs lead from the street level to a plaza on the second floor and the entrance to the residential units. The interior of the site would remain open around the residential courtyard and amenities in the central part of the site. This would allow a direct view from the Santa Monica Boulevard entrance and vantage points on the south side of Santa Monica Boulevard through the site building to the Hollywood Hills and Hollywood sign. The public would be permitted to use the plaza on the second floor of the proposed project to view the Hollywood sign.

All developers in the City of West Hollywood are required to make a percentage of newly constructed housing units available to moderate and low income households. The affordable units are expected to be distributed throughout the development (West Hollywood Municipal Code Section 19.10.010). The proposed project would include a mix of market rate and affordable apartment units: 133 would be market rate, 17 would be moderate income, and 16 would be low income. The number of studio, one-bedroom, one-bedroom with den, and two-bedroom units would be approved by the City of West Hollywood Rent Stabilization and Housing Department prior to occupancy. Additionally, the City establishes maximum rents for affordable units on an annual basis.



Figure 2-4
Santa Monica Boulevard Elevation



Figure 2-5
Detroit Street Elevation



Figure 2-6
Formosa Avenue Elevation



Figure 2-7
North Elevation

2.0 Project Description

The proposed project would be designed, constructed, and operated in accordance with the City's Green Building Ordinance (No. 07-762 adopted October 1, 2007), which specifies energy and water efficiency measures, trip reduction strategies, and other sustainable measures.

The proposed project includes a total of 260 parking spaces (with 15 spaces for guests), of which 46 spaces would be reserved for the retail and restaurant uses and located on the ground floor level. It is anticipated that a fee would be charged for use of the retail and restaurant parking spaces. Employees and patrons would be expected to park in the ground floor parking area. Parking for the retail and restaurant uses would be available for use by guests of the site tenants after normal operating hours of the commercial uses. The remaining 199 parking spaces would be located in one and a half levels of subterranean parking. The primary entry to and exit from the residential garage would be located on Detroit Street at the northern boundary of the project site; residents would also be able to access the subterranean parking garage from the ground-floor level parking garage located off of Formosa Avenue. Access to the residential parking area would be controlled by a gate. The subterranean parking garage would be comprised of single and tandem parking stalls. All residents would be expected to park on site. The proposed project would also provide a total of 45 bicycle parking spaces, with 42 located in the residential garage and 3 located within the ground floor parking area. It is anticipated that all the street parking along Santa Monica Boulevard, Formosa Avenue, and Detroit Street would be retained.

Site landscaping would consist of a single row of street trees along Detroit Street and Formosa Avenue and a double row of street trees along the majority of Santa Monica Boulevard. Street trees would not be planted in front of the view portal so as to maintain a clear line of site to the Hollywood Hills. A 15-foot landscaped buffer would be located along the northern boundary of the project site between the site and the adjacent apartment buildings.

2.5 SITE CLEANUP

The Faith Plating portion of the project site is listed as a hazardous waste site. The Faith Plating Company conducted onsite chrome, copper, and nickel plating activities at 7141 Santa Monica Boulevard, and 1107 and 1117 Detroit Street ~~since from~~ 1937 through 2012. Concentrations of regulated metals (lead, chromium, cadmium, and nickel) and volatile organic compounds (VOCs) in onsite subsurface soils have been measured above both the U.S. Environmental Protection Agency (EPA) IX Preliminary Remediation Goals (PRGs) and the California Human Health Screening Levels (CHHSLs) for residential soils. In addition, due to the age of onsite structures, there is the potential for asbestos-containing material (ACM) and lead-based paint (LBP) in the existing buildings. A preconstruction survey would be required to determine the presence of ACM and LBP.

The applicant entered into a voluntary cleanup agreement (VCA) with the California Department of Toxic Substances Control (DTSC). Under the VCA, the applicant would engage in investigation and environmental remediation of the proposed project site under the supervision of DTSC. The environmental remediation would include the implementation of a Removal Remedial Action Work Plan (RAW) to remove onsite contaminated soils ~~contaminants~~ to the satisfaction of DTSC.

2.0 Project Description

The RAW, which has been approved by DTSC, requires specific removal action objectives (RAO) based on site-specific media of concern chemicals of concern (COCs), exposure routes and receptors, and acceptable contaminant concentrations or range of contaminant concentrations for each exposure route. The media of concern for the project site are soil, subsurface gas, and ground water. The COCs for the site are heavy metals (primarily chromium, nickel, copper, and lead), VOCs (perchloroethylene [PCE], trichloroethylene [TCE], benzene and naphthalene), and petroleum hydrocarbons. ~~While these RAOs have not received final approval from DTSC, they do serve as a useful guide for the types of remediation that is contemplated for the project site.~~ The RAOs for the project site are:

- Remove onsite sources to contamination to soil and groundwater;
- Minimize construction worker and adjacent residents' exposure to COCs during the construction program;
- Comply with all required permits including the South Coast Air Quality Management District (SCAQMD) 1166 Permit which includes daily monitoring for VOCs until the onsite soil excavation has been completed and the excavation area is sealed;
- Compliant demolition, removal and disposal of building materials from the site;
- Remove soils impacted with heavy metals until concentrations are below the California's Total Threshold Limit (CTTL) concentration and 10 times the Soluble Threshold Limit Concentration (STLC) or below hazardous concentrations within the property boundary and to a maximum depth of 20 feet below ground surface (bgs);
- Remove soils impacted with VOCs, or petroleum hydrocarbons to a depth of 15 feet bgs across the entire project boundary. Additional soil removal may occur beneath the plating operation floor to a maximum depth of 20 feet bgs if heavy metal concentrations exceed 10 times the STLC;
- Minimize the volume of soil designated as non-hazardous being transported and disposed of as hazardous through segregation based on existing data and supplemental data obtained during the excavation processes;
- Verify remaining conditions following excavation for documentation through verification sampling and testing;
- Assess post-remedial risks of subsurface vapors to determine if further mitigation is necessary;
- Monitor groundwater for a defined period of decreasing trends in the minor concentration of COCs. No groundwater remediation is anticipated to achieve unrestricted regulatory site closure for this site;
- Obtain unrestricted regulatory site closure for the site; and
- Provide a site ready for the unrestricted construction of a beneficial retail and residential complex that will enhance the community.

2.0 Project Description

All ACM and LBP would be removed prior to the start of demolition in accordance with DTSC requirements for LBP and SCAQMD requirements for ACM. Per state law, the applicant must obtain proof of satisfaction of state and regional requirements prior to the start of demolition.

2.6 CONSTRUCTION SCENARIO

Environmental cleanup is anticipated to start in the second quarter of 2013 and completed construction is expected to take 26 months, ending in the third quarter of 2015. It is estimated that the project site would be fully occupied and in operation in 2016.

Prior to the start of construction, the project site would be clearly defined with fencing and staking. Then the project site would be abated for ACM and LBP prior to demolition of existing buildings and site clearing. The next step would be excavation and site cleanup in accordance with the VCA, as described in Section 2.5 above. Under the VCA, the applicant would engage in investigation and environmental remediation of the project site under the supervision of DTSC. The environmental remediation would include the implementation of the RAW to remove onsite contaminated soils ~~contaminants~~ to the satisfaction of DTSC. After excavation of all contaminated soils from the project site ~~has activities have~~ been completed to the satisfaction of DTSC, closure and post-closure activity would involve testing of onsite soils and documentation that the remaining soil would have concentrations of heavy metals less than 10 times their respective STLC. A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter, per the Condition of Approval of the proposed project, the City would issue a building permit and building construction would begin.

Construction staging would take place within the construction boundaries. Construction workers would park at an offsite lot and not use street parking on the nearby residential streets. Approximately 30 construction workers would be working onsite per day. They are expected to travel approximately 20 miles each way to and from the project site. The entire project site would be graded. It is anticipated that approximately 33,200 cubic yards of soil would be removed. Of this amount, approximately 10,200 cubic yards of soil is expected to be contaminated. Soils classified as hazardous waste would be transported off-site to a Class I landfill, such as Kettleman Hills Landfill in Kettleman City, California. Soils containing VOCs would be transported to a landfill such as Antelope Valley Landfill in Palmdale, California. Soils classified as non-hazardous would be transported to Rose Hills Landfill in Los Angeles. Construction would require no more than 60 truck trips per day with an average of 35 haul trucks entering and leaving the site on a typical day during hauling operations. Typical construction equipment would include bobcats, skip loaders, backhoes, hydraulic hammers, roll-off bins, excavators, gradalls, bottom dumps, cranes, pick-up trucks, concrete ready-mix trucks, delivery vehicles, paving machines, and assorted power operated hand tools.

Hours of construction would be limited to between 8:00 a.m. and 7:00 p.m. on weekdays and Saturdays. Construction activities would not be conducted outside the hours allowed by the Noise Ordinance unless an extended hours permit is obtained from the City.

2.0 Project Description

All development projects in West Hollywood are required to prepare a construction mitigation plan that addresses issues such as truck routing, dust control, construction worker parking, hours of operation, and materials storage. Further, the applicant would be required to obtain an encroachment permit for the public right-of-way along the site frontage for the duration of the construction period. The most effective and appropriate combination of resource avoidance and monitoring would be employed during all phases of project construction, including implementation of the following additional Best Management Practices:

- The proposed project would implement Rule 403 dust control measures required by the SCAQMD, which would include the following:
 - 1) Water shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.
 - 2) The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public road:
 - a. Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;
 - b. Pave the surface extending at least 100 feet and at least 20 feet wide;
 - c. Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or
 - d. Install a wheel washing system to remove bulk material from tires and vehicle undercarriages.
 - 3) All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
 - 4) Construction activity on exposed or unpaved dirt surfaces shall be suspended when wind speed exceeds 25 miles per hour (such as instantaneous gusts).
 - 5) Ground cover in disturbed areas shall be replaced in a timely fashion when work is completed in the area.
 - 6) A community liaison shall be identified concerning on-site construction activity including resolution of issues related to particulate matter less than 10 microns in diameter (PM₁₀) generation.
 - 7) Non-toxic soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
 - 8) Traffic speeds on all unpaved roads shall be limited to 15 mph or less.
 - 9) Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads. If feasible, water sweepers with reclaimed water shall be used.
- Project would implement all required measures approved by DTSC as part of the RAW.
- Construction equipment staging areas would be located as far as possible from the adjacent residential uses.
- Project would develop and implement an erosion control plan and a Storm Water Pollution Prevention Plan for construction activities. Erosion control and grading plans would include:

2.0 Project Description

- (1) minimizing the extent of the disturbed area and duration of exposure;
 - (2) stabilizing and protecting the disturbed area as soon as possible;
 - (3) keeping runoff velocities low;
 - (4) protecting disturbed areas from contact with runoff;
 - (5) retaining sediment within the construction area; and
 - (6) due to the size of the site (greater than one acre) a Notice of Intent and the Storm Water Pollution Prevention Plan will be submitted to the California Regional Water Quality Control Board.
- Project would comply with the National Pollution Discharge Elimination System Phase II Rule.
 - Water pressure for firefighting purposes would be provided in accordance with requirements.
 - All mobile construction equipment would be equipped with properly operating mufflers or other noise reduction devices.
 - Businesses and residences immediately adjacent to the construction site would be notified prior to the start of construction (e.g., via flyers). The notices would include a telephone number for noise complaints.
 - Construction debris would be recycled in accordance with the California waste reduction requirements.

2.7 INTENDED USES OF THE EIR

An EIR is a public document used by a public agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid environmental damage (CEQA Guidelines, Section 15121). As an informational document, an EIR does not recommend for or against approving a project. The main purpose of an EIR is to inform governmental decision makers and the public about potential environmental impacts of the project.

This Final EIR will be used by the City of West Hollywood, as the lead agency under CEQA, in making decisions with regard to the adoption of the proposed project and the subsequent construction and development of the mixed-use project described above.

2.8 PROJECT APPROVALS REQUIRED

The City is the lead agency pursuant to CEQA Guidelines Section 15367. This Final EIR will be used by the City as a decision-making tool for approval of the Domain Project. Various City permits and approvals would be required in order to approve and implement the proposed project. These include, but are not limited to, the following:

- City of West Hollywood Design Review Subcommittee (compliance with design guidelines),

- City of West Hollywood Historic Preservation Commission (review of cultural resources), and
- City of West Hollywood Planning Commission (Conditional Use Permit [CUP], Modification Permit, and EIR).

Other regulatory agencies and local jurisdictions that also require permits or approvals in order to construct and operate the proposed project include:

- California Department of Toxic Substances Control (approval of RAW and related documents, permits, and actions)
- Occupational Safety and Health Administration, Department of Industrial Relations (Notification of Excavation Activity)
- Los Angeles Regional Water Quality Control Board, Region 4 (National Pollutant Discharge Elimination System permit)
- City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division (sewer capacity availability review)

2.9 SUMMARY OF KEY PROJECT CHANGES

Since the Draft EIR was made available for public review, the following key modifications to the project design were made:

- The project applicant has changed from Formosa Partners, LP to Domain WH, LLC.
- The proposed project would no longer require a specific plan; subsequently, the project name has changed from the Formosa Specific Plan to the Domain Project.
- The total number of apartments proposed to be constructed increased from 130 to 166 units, and the amount of retail and restaurant space increased from approximately 9,000 square feet to approximately 9,300 square feet. The increase in residential units and commercial square footage was accomplished by reconfiguring the interior building space and increasing the FAR ratio from 3.0:1 to 3:18.
- The number of affordable units increased from 13 percent to 20 percent of the total units from 17 to 33, with an increase in moderate income units from 8 to 17 and an increase in low income units from 9 to 16.
- The proposed building height decreased from 75 feet to 72 feet, but would still consist of 6 stories above grade.
- The amount of open space available to site residents and their guests increased from approximately 27,000 square feet to 35,000 square feet.

2.0 Project Description

- The total number of onsite parking spaces increased from 206 to 260. The number of parking spaces dedicated for use by the commercial patrons decreased by 1 from 47 to a new total of 46 commercial parking spaces. However, the number of parking spaces dedicated for use by the onsite residents increased by 40 from 159 to a new total of 199 residential parking spaces and 15 guest parking spaces. The additional resident parking would be accommodated in an extra half level of subterranean parking compared to the previous project site plan.
- The start date for project construction moved from March 2009 to the second quarter of 2013; however, the duration of construction remains 26 months.

3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION

The environmental issue areas analyzed in this section are as follows:

- Aesthetics (Chapter 3.1)
- Air Quality (Chapter 3.2)
- Cultural Resources (Chapter 3.3)
- Geology and Soils (Chapter 3.4)
- Greenhouse Gas Emissions (Chapter 3.5)
- Hazards and Hazardous Materials (Chapter 3.6)
- Hydrology and Water Quality (Chapter 3.7)
- Land Use and Planning (Chapter 3.8)
- Noise (Chapter 3.9)
- Public Services, Utilities and Recreation (Chapter 3.10)
- Transportation and Traffic (Chapter 3.11)

The following sections include an analysis, by issue area, of the proposed project's potential effects on the environment. Each environmental issue area includes the following subsections:

- Environmental Setting
- Regulatory Setting
- Environmental Impacts
- Mitigation Measures
- Significance after Mitigation

This page is intentionally left blank.

3.1 AESTHETICS

The purpose of this section is to identify and evaluate key visual and aesthetic resources in the project area and to determine the degree of visual and aesthetic impacts that would be attributable to the proposed project. The analysis describes the potential aesthetic effects of the proposed project on the existing landscape and built environment, focusing on the compatibility of the proposed project with existing conditions and its potential effects on visual resources. As shown in Section 3.1.3, visual simulations were prepared, and a shade and shadow analysis was conducted for the proposed project.

3.1.1 ENVIRONMENTAL SETTING

Urban design character can be defined as the overall physical image of the urban environment. Several factors contribute to this image, including: (1) nature and quality of building architecture; (2) cohesion of the area's collective architecture; (3) compatibility between uses and activities with the built environment; (4) quality of the streetscape, including roadways, sidewalks, plazas, parks, and street furniture; and (5) quality and nature of private property landscaping that is visible to the general public.

PROJECT SITE

The project site is located in a highly urbanized area. It is comprised of several one- and two-story buildings of various surface colors and textures, including beige brick, unpainted concrete, stucco, and surfaces painted in beige and pale blue (see Figures 3.1-1 and 3.1-2). All five structures are wood-framed plaster buildings with zero-lot setbacks. There is little visual or design connection between the structures. A fenced surface parking lot is located at the rear of the buildings on Formosa Avenue (see Figure 3.1-3) and a driveway to another, larger surface parking area on the project site is provided from Detroit Street (see Figure 3.1-4). Other than in the parking lot off Formosa Avenue, there is no on-site landscaping.

SURROUNDING SETTING

A two- to three-story retail complex is located opposite the project site along the southern side of Santa Monica Boulevard (see Figures 3.1-5 and 3.1-6). This complex is characterized by a glass and painted concrete exterior with façades of varying geometries, heights, and undulating setbacks, resulting in a high degree of unity. A wide, tree-lined sidewalk provides pedestrians with a buffer from Santa Monica Boulevard and La Brea Avenue. The Formosa Café is located to the west of the retail complex. It is a one- and two-story painted concrete structure characterized by striped awnings over the windows and entrances (see Figure 3.1-7). The Warner Hollywood Studios is located west of the Formosa Café on Santa Monica Boulevard (see Figure 3.1-8). For security, a cream stucco wall approximately 6 feet in height surrounds the studios, with occasional two-story structures visible along the perimeter. The common paint coloring along the wall lends the structure a high degree of unity, although the structures are not particularly visually memorable.



Figure 3.1-1
View north across Santa Monica Boulevard toward the project site



Figure 3.1-2
Eastern end of the project site at the corner of Santa Monica Boulevard and Detroit Street



Figure 3.1-3
Parking area off Formosa Avenue, at rear of the project site



Figure 3.1-4
The parking area off Detroit Street, at the rear of the project site



Figure 3.1-5
View southwest toward the Retail Complex on the south side of Santa Monica Boulevard



Figure 3.1-6
Detail of the setback along the Retail Complex



Figure 3.1-7
View south across Santa Monica Boulevard toward the Formosa Cafe



Figure 3.1-8
View southwest across Santa Monica Boulevard of the Warner Hollywood Studios

3.1 Aesthetics

On the northern side of Santa Monica Boulevard, immediately west of the project site, is a single-story brown-brick café (see Figure 3.1-9). A commercial property ~~is~~ was located along the eastern side of Detroit Street adjacent to Santa Monica Boulevard (see Figure 3.1-10), which has since been demolished and construction of the Monarch West Hollywood – Santa Monica & La Brea Project is now underway. This ~~commercial~~ property ~~used to feature~~ features an approximately 6-foot tall red/brown metal fence. ~~One~~ with one and two-story structures ~~are~~ visible behind the fence. The project will consist of 184 residential units and 13,350 square feet of ground floor retail when construction is complete in late 2013. Neither of these sites is unexpected in an urban setting and consequently, neither is likely to be especially memorable.

North of the project site, on both Detroit Street and Formosa Avenue, lies a number of residences in configurations of varying densities – single family dwellings and multi-story condominiums. These residences vary in height, type, and construction style (see Figures 3.1-11 and 3.1-12). This view, while displaying a high degree of intactness, is anticipated in an urban setting, and as such, is not considered to be especially vivid or memorable.

Given this mix of commercial, residential, and light industrial uses, the differing appearances of the buildings, and the variations in setbacks, colors, and textures, the north side of Santa Monica Boulevard currently lacks a single cohesive, unifying visual theme. Consequently, the views from the project site, with the exception of the retail complex located at the intersection of Santa Monica Boulevard and La Brea Avenue, including those of the project site itself, are not considered visually memorable.

The Hollywood sign and the Hollywood Hills are located north of the project site. Views of the Hollywood Hills are available in the project vicinity when viewers look north on La Brea and other parallel streets. The Hollywood sign can be seen from vantage points along La Brea Avenue. There are currently no direct views of the Hollywood sign from the project site or directly across from the project site. It is blocked by existing structures.

3.1.2 REGULATORY SETTING

CITY OF WEST HOLLYWOOD GENERAL PLAN

~~There are no elements in the City of West Hollywood General Plan that specifically refer to aesthetics or visual quality; however, the Land Use and Urban Design Element contains several policies related to the appearance of new structures, stating that “in general, new development in the City’s commercial corridors shall be consistent in scale and character with existing uses” and “new development shall be required to contribute to the overall quality and character of the City. All uses will be required to provide extensive landscaping on-site and along street frontages” (City of West Hollywood 1988).~~



Figure 3.1-9
View across Santa Monica Boulevard toward the cafe at the corner of Formosa Avenue



Figure 3.1-10
Parking lot and buildings on the corner of Santa Monica Boulevard and Detroit Avenue



Figure 3.1-11
View northeast along Formosa Avenue



Figure 3.1-12
Residences along Detroit Street

~~This Element also notes that there are differing opinions about the optimal height for new buildings: “[O]ne suggests that all new construction be limited to low rise structures while the other suggests that taller buildings be permitted to promote variability and visual interest.” However, the Element notes that discussion of visual quality should include “the impacts on viewsheds of the mountains and Los Angeles basin; shadow and bulk effects of tall buildings; and potential visual monotony of continuous low rise ‘bulky’ buildings” (City of West Hollywood 1988).~~

~~The Land Use and Urban Design Element encourages the development of pedestrian friendly design. “In all commercial areas of the city, it is a basic land use principle that the uses and design of development induce and enhance high levels of pedestrian activity. This would be achieved through limiting the ground elevation of structures for the majority of every block to ‘pedestrian friendly’ uses (i.e., high turnover, customer active uses, such as retail sales establishments and restaurants). Additionally, pedestrian activity will be enhanced by requirements for the architectural design and siting of the structures” (City of West Hollywood 1988).~~

~~The following are policies from the Land Use and Urban Design Element with which the project would be required to comply.~~

~~Policy 1.13.31 — Encourage that new development be designed to create a “village like” environment, by the siting and massing of buildings around common pedestrian areas and open spaces which are linked to Santa Monica Boulevard, inclusion of pedestrian oriented uses at the ground elevation, and use of vertical setbacks of buildings in excess of 30 feet above grade.~~

~~Policy 1.35.32 — c. — Dedicate the courtyard as a semi-public space which is easily accessed from the street, with a grand processional entry, grand stairs if appropriate, and so on. The courtyard is best if located at street level or a few feet above.~~

~~e. — Design the courtyard space with a distinctive character created through special landscape elements such as fountains, lush landscaping, reflective pools, towers, decorative tile, and special entry stairs to second level units.~~

~~h. — Emphasize the importance of relationship of the housing project to the context of the street.~~

~~Policy 1.29.30 — Require that new residential development be compatible with and complement existing structures, including the:~~

3.1 Aesthetics

- a. ~~maintenance of the predominant or average existing front yard setbacks, except for balconies or building extensions to achieve additional common courtyard area;~~
- b. ~~inclusion of a vertical setback of one foot for every two feet in height above the second story along 50 percent of the building front;~~
- c. ~~use of compatible building materials, colors, and forms, while allowing flexibility for distinguished architectural design solutions;~~
- d. ~~use of site landscape to complement the architectural design of the structure;~~
- e. ~~limitation of front yard paving for driveways with a maximum width of 24 feet, or 40 percent of the property frontage, whichever is less;~~
- f. ~~covering of all required on-site parking;~~
- g. ~~use of a minimum of 50 percent of the street facing facade of the building at the graded elevation of the site for occupiable space and entries, unless inappropriate, where the intent shall be preserved by the use of architectural design elements which shall visually convey the sense of occupiable space;~~
- h. ~~incorporation of a minimum of 60 percent of the required common open space at grade or the level of the first habitable floor;~~
- i. ~~design of common space so that it is easily accessible and of sufficient size to be usable by residents; and~~
- j. ~~inclusion of entries which convey a sense of individual identity for each residential unit at the lowest habitable level facing a public street or courtyard.~~

~~Policy 1.29.31 Encourage that multi-unit residential structures incorporate architectural design details and elements which provide visual character and interest, avoiding flat planar walls and "box-like" appearances, and reflect the heritage of significant structures in the City (e.g., use of courtyards, balconies, offset planes and levels, deeply recessed or projecting windows, sloping roofs, and extensively landscaped yards).~~

~~Policy 1.49.1 Encourage that new structures be designed in architectural styles which reflect the City's diversity and creativity; yet are compatible in scale and character with the City's existing buildings within residential neighborhoods and commercial districts.~~

There are no elements in the City of West Hollywood General Plan that specifically refer to aesthetics or visual quality; however, the Land Use and Urban Form Element contains several policies related to the appearance of new structures and the integration of new uses within the existing urban context. It also designates the project area the Santa Monica/La Brea Transit District, the intent of which is to “create a high-intensity, lively and vibrant transit node with an active sidewalk scene and an identifiable sense of place, marking a major eastern entry to the City” (City of West Hollywood 2011).

The following are policies from the Land Use and Urban Form Element with which the proposed project would be required to comply.

LU 1.2 Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.

LU 2.5 Allow increases to permitted density/intensity and height for projects that provide affordable housing.

LU 4.2 Continue to improve the pedestrian environment through a coordinated approach to street tree planting, sidewalk maintenance and enhancement, pedestrian amenities, and a focus on human-scale frontage design for buildings renovations and new development projects.

LU 4.4 Require development projects along commercial corridors to employ architectural transitions to adjoining residential properties to ensure compatibility of scale and a sense of privacy for the existing residences.

LU 4.5 Require development projects to incorporate landscaping in order to extend and enhance the green space network in the City.

LU 5.1 Continue to encourage diverse architectural styles that reflect the City’s diversity and creativity.

LU 5.4 Encourage the use of high quality, permanent building materials that do not require excessive maintenance and utilize the design review process to evaluate such materials.

LU 6.1 Where appropriate, development projects should incorporate open spaces that are accessible to the public.

LU 7.3 Require development projects to install street trees consistent with the City’s street tree specifications along public sidewalks adjacent to the project site, as sidewalk width permits, where such trees do not currently exist or where replacement is needed.

LU 14.6 Encourage the design of buildings to emphasize this area as a unique point along the Santa Monica Boulevard corridor and within the City.

LU 14.8 Enhance pedestrian activity along Santa Monica Boulevard through the following building and public realm activities.

3.1 Aesthetics

- a. Improve the streetscape with tree plantings, landscaping, and public amenities such as benches.
- b. Locate building at or near the sidewalk edge to create an attractive pedestrian environment.
- c. Encourage projects to incorporate landscape elements into the design of buildings to enhance green space in the City.
- d. Support pedestrian activity and the experience along the streetscape through active and transparent ground floor frontages.

3.1.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not substantially damage scenic resources within a state scenic highway. Accordingly, this issue is not further analyzed in the EIR.

Pursuant to the CEQA Guidelines, the proposed project would have a significant effect on aesthetic resources if it would:

- Have a substantial adverse effect on a scenic vista;
- Substantially degrade the existing visual character or quality of the site and its surroundings;
- Create a new source of substantial light and glare that would adversely affect day or nighttime views in the area; or
- Create a new source of substantial shade or shadow that would adversely affect daytime views in the area.

METHODOLOGY FOR ASSESSING VISUAL IMPACT

The extent of the potential impact from a particular visual change is subjective and depends upon the degree of alteration, the scenic quality of the area disturbed, and the sensitivity of the viewers. The degree of alteration refers to the extent of change, including changes to the structure height, landscaping, and setback. Scenic quality is often indicated by special zoning and planning overlay zones, but can also be assessed based on the vividness or memorability of the view, and intactness and unity of the elements within the view. These terms are defined as follows.

Vividness the memorability of the visual impression received from contrasting landscape elements as they combine to form a striking distinctive visual pattern.

Intactness the integrity of visual order in the natural and man-built landscape, and the extent to which the landscape is free from visual encroachment.

Unity the degree to which the visual resources of the landscape join together to form a coherent, harmonious visual pattern. Unity refers to the compositional harmony or inter-compatibility between landscape elements (U.S. Department of Transportation 1988).

Because of the nature of the project site, the proposed project would be visible to several different groups of people. To assess their potential response to the proposed project, it is important to identify and categorize different types of viewers depending on their sensitivity to change in the landscape. Viewer groups who currently experience the project site include local residents, employees of the businesses at the project site, shoppers and employees of the shops opposite the project site along Santa Monica Boulevard, and motorists passing the project site. Viewer sensitivity varies depending on the location of the viewer at the time the view is experienced, the duration of that view, the typical activities being undertaken while the view is experienced, and the number of viewers in the sensitive viewer group. A description of each viewer group follows, in order from the most to least sensitive viewer groups.

- Residents adjacent to and in the vicinity of the project site regularly experience views of long duration and have the greatest personal knowledge of the site's appearance. Thus, they are most likely to notice and experience any changes at the site and are considered to be the most sensitive group viewing the project site.
- Employees at the project site experience views of the project site as they approach and leave work, but are considered to have less personal investment in the visual appearance of the site and its vicinity. The appearance of the inside of existing or future buildings is not considered in this analysis, which instead, focuses on public views (i.e., external features).
- Shoppers and employees of the shops opposite the project site along Santa Monica Boulevard are considered less sensitive viewers than residents because the retail complex is oriented for a pedestrian experience. In addition, these viewers have less personal investment in the visual appearance of the surrounding buildings. For these reasons, shoppers and employees at this location would be moderately sensitive to changes at the project site.
- Motorists pass the project site along Santa Monica Boulevard, Detroit Street, and Formosa Avenue. Motorists are generally considered to be the least sensitive of the viewers identified here as views are fleeting and temporary as they pass the project site. Due to the traffic signals at Formosa Avenue and La Brea Avenue, motorists would experience longer duration views, but the activity of commuting would distract motorists from critically examining the project site, and thus, motorists are considered the least sensitive of the viewer groups analyzed here.

It is possible to acknowledge a visual change as potentially adverse, but not significant, because either viewers are not sensitive or the scenic quality of the surrounding area is not high.

3.1 Aesthetics

IMPACT ANALYSIS

VIS-1 *The proposed project would not have a substantial adverse effect on a scenic vista.*

Typically, public views form the focus of analysis when considering the effect of a project on a scenic vista. The proposed project would replace existing one- and two-story structures with a six-story structure, which would alter the views currently experienced by sensitive viewers. Views of the Hollywood Hills to the north and the Los Angeles basin to the south are considered scenic resources in the City of West Hollywood (City of West Hollywood 1988).

Given that the project site is located west of a large retail complex, and the Hollywood sign lies to the east, direct views of the Hollywood sign would not be affected because these views are not currently experienced at the project site or directly across from the project site. Views of the Hollywood Hills from the retail complex at the intersection of Santa Monica Boulevard and La Brea Avenue would be partially obstructed (along the western portion of this property) by the six-story building, but would not be completely blocked. At street-level, there is currently little opportunity to view the Hollywood Hills from this portion of the retail complex; consequently, the effect on this view as experienced by shoppers, employees, and motorists would be minimal and would not be significant.

While the proposed structure would be up to 72 feet in height, views to the north of the Hollywood Hills as seen from the Formosa Café would be enhanced by the inclusion of a view corridor. This view corridor would open up a currently obstructed view of the Hollywood sign and would create a new scenic vista from Santa Monica Boulevard (see Figure 3.1-13). As such, the proposed project would have a beneficial impact on scenic vistas, and the impact would be less than significant.

VIS-2 *The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.*

The construction phase would involve both the demolition of existing structures and removal of existing improvements on the proposed project site. During these periods of activity, the view of the project site would change substantially from existing conditions. Construction areas would be busier than at present, with truck movements carrying materials on- and off-site, and work crews and construction equipment moving around the site. Demolition and construction activities would be visible from nearby roadways and surrounding properties. This short-term condition would create a temporary visual distraction typically associated with construction activities. The construction would be temporary in nature and would last approximately 26 months with a large portion of construction involving interior finishing that would be less distracting to surrounding uses. Further, the project site would be fenced and screened on all sides to reduce the visual intrusion on the surrounding uses.

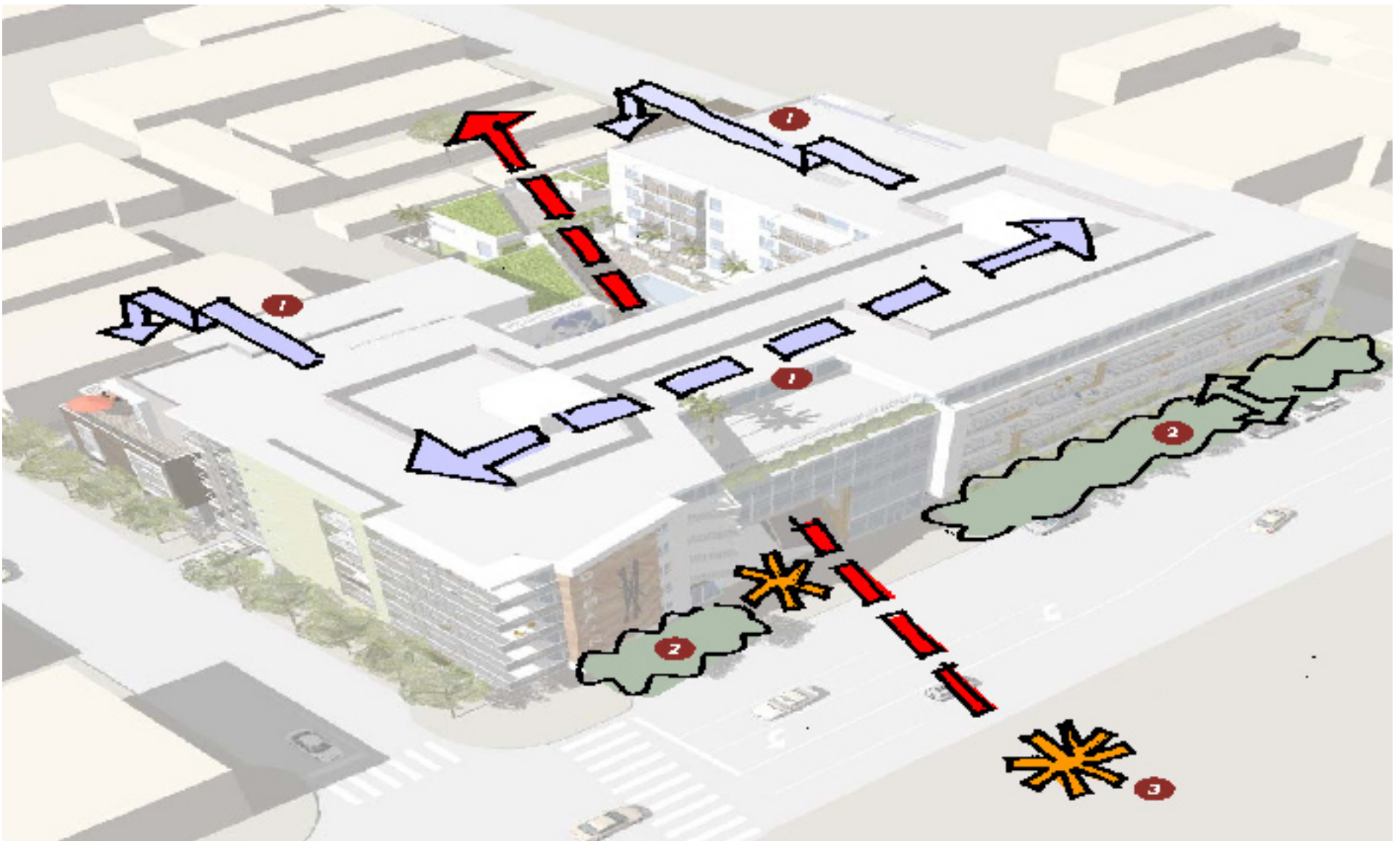


Figure 3.1-13
Analysis of views from the Formosa Cafe

3.1 Aesthetics

Although the construction process would represent a change in the visual environment, the site would appear similar to other construction sites throughout the City and in nearby urban areas. During construction, the project site would not stand out as a memorable or remarkable feature in the landscape. It would not substantially degrade the existing visual character or quality of the site and its surroundings. The construction impact would be short-term and less than significant.

In order to assess the potential visual changes that would result from operation of the proposed project, three Key Views, representative of those experienced by sensitive viewers, were selected for analysis. Simulations from these key views were completed to provide a comparison of the visual effect that would result under the proposed project. A guide to the location from which the key views can be seen in Figure 3.1-14, while the key views and simulations are shown in Figures 3.1-15, 3.1-16, and 3.1-17.

The proposed project would replace the existing two-story stucco commercial structures and surface parking lots with a single six-story structure, as viewed from Santa Monica Boulevard, containing retail/restaurant and residential uses. As such, the existing visual character of the project site would be expected to change. Further, the proposed project would result in construction of a structure that is two to four stories taller than the existing buildings and the surrounding uses. This is demonstrated through the use of key views, which are representative views of the project site, and simulations from the same locations to show how these views would change as a result of the proposed project.

~~As indicated in the Formosa Specific Plan, the~~ The design of the proposed project is intended to avoid monotony and repetition in building elevations by varying building heights, massing, rooflines, color, texture, materials, and placement. It does not allow long, uninterrupted building planes by varying massing and/or facade treatments. ~~Per the Specific Plan, the~~ The design articulates each building elevation, providing visual interest with window patterns, size, and placement. It integrates overhangs and other external elements into the overall building design. The varying heights, rooflines, color and textures of the proposed structure would provide the visual variety to soften the bulk and mass of the proposed structure.

Key View 1 shows the project site from the retail complex on the south side of Santa Monica Boulevard (see Figure 3.1-15a). This is a view that would typically be seen by shoppers and employees of the retail complex, as well as motorists traveling west on Santa Monica Boulevard. Presently, the project site is visible in the middle ground as a series of separate buildings that are not remarkable in style, color, or bulk. Because of the middle ground placement, the project site does not stand out as a memorable or remarkable feature in the landscape.



Figure 3.1-14
Locations of Key Views



Figure 3.1-15a
Key View 1: Looking west along Santa Monca Boulevard toward the project site



Figure 3.1-15b
Simulation of Key View 1 showing the proposed project



Figure 3.1-16a
Key View 2: Looking east along Santa Monca Boulevard toward the project site



Figure 3.1-16b
Simulation of Key View 2 showing the proposed project



Figure 3.1-17a
Key View 3: Looking south along Formosa Avenue toward the project site



Figure 3.1-17b
Simulation of Key View 3 showing the proposed project

Under the proposed project, the project site would become a more prominent element in Key View 1 because of the greater bulk and massing of the six-story Santa Monica Boulevard frontage (see Figure 3.1-15b). The proposed project would provide a contemporary balance in architectural styles with the retail complex located on the south side of Santa Monica Boulevard, providing clean lines and colors that operate as a focal point for the view. Consequently, while the proposed project would result in changes to the view from Key View 1, these changes would be considered positive and consistent with newer development in the area and would not degrade the existing visual character or quality of the site and its surroundings.

Key View 2 shows the project site from the Warner Hollywood Studios on Santa Monica Boulevard (see Figure 3.1-16a). The project site is in the foreground and represents an indistinctive, unmemorable scene in which there is a low degree of visual unity between the existing structures on the project site and surroundings. Furthermore, the age and somewhat run-down state is more evident from Key View 2 as the structures are in the foreground.

The simulation from Key View 2 shows the effect that the proposed six-story structure would have on foreground views along Santa Monica Boulevard (see Figure 3.1-16b). Placing the bulk of the structure toward Santa Monica Boulevard would make the proposed building appear most massive from this view. Because the proposed project would replace several older structures, it would bring about a greater degree of visual unity when seen from Key View 2; however, its newer construction and design, combined with its substantially greater bulk and height along Santa Monica Boulevard mean it would be a more obvious element in the landscape than the existing structures, and would not fit in as easily with adjacent, older structures. Consequently, the proposed project would result in a lower degree of visual unity than is presently seen. However, the proposed project would also be a more memorable and striking structure, and represents a greater degree of visual intactness within the project site. From Key View 2, the proposed project would be a substantial, but not adverse change on the landscape.

Key View 3 shows the project site in the middle ground when looking southeast down Formosa Avenue (see Figure 3.1-17a). The surface parking lot is visible, as is an obstructed view of the buildings at the corner of Formosa Avenue and Santa Monica Boulevard. The view is typical of that in a transitional zone between residential and light commercial areas. It is not particularly memorable or distinctive.

Under the proposed project, Key View 3 would include a middle ground view of the proposed project, representing a substantial change in scale and massing (see Figure 3.1-17b). The stepping down of the proposed structure, decreasing in height with distance from Santa Monica Boulevard, is obvious in this simulation and indicates the transition from a six-story structure on the Santa Monica Boulevard frontage to a size that is more appropriate for a residential neighborhood on the north end of the project site. The proposed structure would result in a more memorable visual setting, and one displaying a high degree of unity in transitioning from the higher densities at the Santa Monica Boulevard frontage to the residential scale found at the rear. Although the proposed structure would be approximately one to two stories taller than the closest multi-family residential structure, it is consistent with the height of newer multi-family residential structures within this neighborhood.

3.1 Aesthetics

Due to its size, design, bulk, color, and construction materials, the proposed project would represent a substantial change to the visual setting and quality of views experienced from this neighborhood. A larger, more obvious and memorable structure would be present as a result of the proposed project. As it would be a new structure in an area which is characterized by older, established buildings, the proposed project would result in a lower degree of unity with surrounding components than the current structures, but this would be outweighed by a greater degree of intactness as a single structure. Furthermore, the proposed project would be more visually representative of the types of structures proposed for this vicinity, as indicated by the newer retail complex on the south side of Santa Monica Boulevard and new multi-family residential structures to the north along Formosa Avenue. Consequently, operation of the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. The impact would be less than significant.

VIS-3 *The proposed project would create a new source of substantial light and glare that would adversely affect day or nighttime views in the area.*

The existing site uses have nighttime building lighting and security lighting. The proposed project would also use nighttime building lighting and security lighting; however, the increased intensity of use of the site would create additional sources of light and glare than currently exist. ~~The Formosa Specific Plan requires~~ However, all outdoor lighting and other means of illumination for signs, structures, landscaping, parking, loading, unloading, and similar areas ~~to~~ would be focused, directed, and arranged to prevent glare and illumination on streets or adjoining properties. ~~It~~ The proposed project would also ~~requires~~ the use of low intensity, energy conserving night lighting. A detailed lighting plan has not been finalized for this project; however, ~~meeting the requirements of the Specific Plan,~~ project design, in conjunction with mitigation measure VIS-A7, would reduce potential lighting impacts to a less than significant level.

The construction materials intended for the proposed project are not yet finalized; however, ~~the Specific Plan states~~ it is anticipated that there would be variation of compatible building materials for large expanses of wall surface (tile, cement plaster, glass, metal panels, etc). Tile, glass, and aluminum have potential to reflect sunlight and direct glare toward the commercial properties south of the project site. The increased bulk of the structure at the project site, compared to the current structures, would likely increase the glare emanating from the project site. Furthermore, glare from the proposed project may affect shoppers, employees, pedestrians and motorists along Santa Monica Boulevard by momentarily impeding visibility, which could be a potentially significant impact. Mitigation measure VIS-B requires the use of non-reflective building materials in project construction. As such, with implementation of mitigation, the impact of light and glare would be reduced to a less than significant level.

VIS-4 *The proposed project would not create a new source of substantial shade and shadow that would adversely affect daytime views in the area.*

A shade and shadow analysis was conducted for the proposed project. For the purpose of the shadow analysis, shadows cast by the proposed building were simulated for the summer solstice (June 21), fall equinox (September 22), winter solstice (December 21), and spring equinox (March 20) at 9:00 a.m., 12:00 p.m., and 3:00 p.m.

Generally, shadow lengths are the longest during the winter season when the period of daylight is shortest. In particular, the shortest day of the year occurs on the winter solstice, which falls on or around December 21. Conversely, shadow lengths are the shortest during the summer when the period of daylight extends more than 12 hours. The longest day of the year occurs on the summer solstice, which falls on or around June 21.

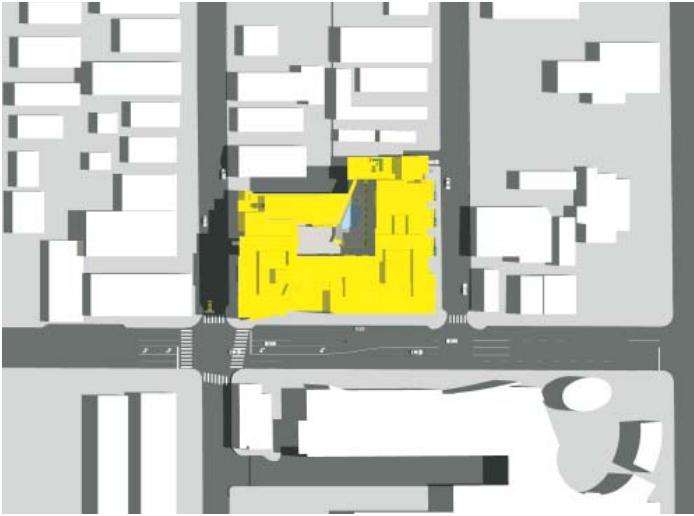
The direction of the shadows cast move with the sun throughout the day, resulting in different variations in the length of shadow projections at different times of the day and seasons of the year. Shadows are projected in a westerly direction during the morning hours when the sun rises from the east; shadows move northerly during the late morning and early afternoon hours. Finally, shadows are cast in an easterly direction during the late afternoon to early evening hours when the sun sets in the west.

Figures 3.1-18 through 3.1-21 present shadow projections from the proposed project during summer, winter, fall, and spring. Few shadows would be cast by the proposed project on adjacent properties on June 21 when shadows are shortest. As shown on Figure 3.1-18, the shadows would be much shorter than those in winter and would fall only on the project site and the adjacent roads. None of the adjacent structures would be shaded. Consequently, summer shadows would be less than significant.

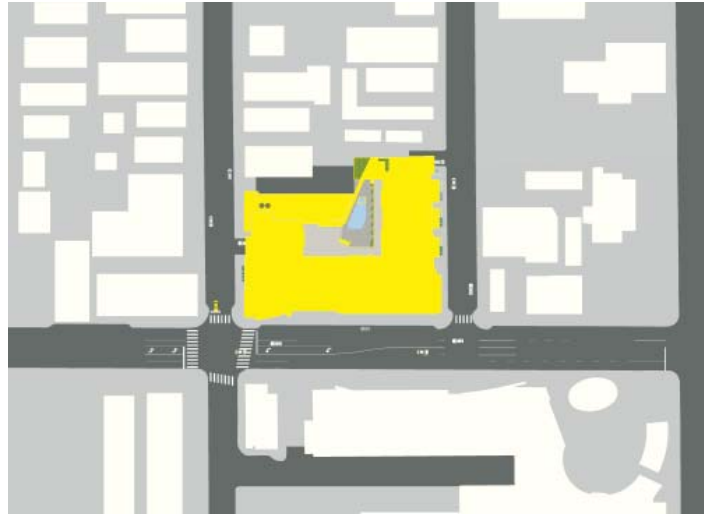
Shadows cast on December 21 would be the longest shadows and represent the worst-case scenario. On December 21, shadows would be directed primarily toward the residences north of the project site (Figure 3.1-19). The proposed project would be four stories taller than the existing site buildings when viewed from Santa Monica Boulevard and approximately one to five stories taller than surrounding uses. As such, the proposed project could cast shade and shadows on nearby sensitive viewers (residential uses directly abutting the northern project boundary). By reducing the building bulk toward the north through a stepped design, the proposed project would minimize overshadowing effects, and most shadows would fall on the project site itself. In the morning, shadows from the project site would cover the southern half of the building directly north of the site on Formosa Avenue, all of the building north of the interior of the site, and the western half of the building directly north of the site fronting Detroit Street. By noon, all of the adjacent building fronting Detroit Street would be shaded. The building north of the site interior would not be shaded at noon. By afternoon, the shadows would have shifted to cover the southern portion of residential buildings directly north of the site on Detroit Street and the southeastern portion of the adjacent building fronting Formosa Avenue. None of the adjacent structures would be shaded for the entire day when the shadows are the longest. The structures north of the project site would be affected for two to four hours during the days with the longest shadows. Thus, these shadow impacts are not considered significant.

Figures 3.1-20 and 3.1-21 show the shadows that would be cast by the proposed project in fall and spring, respectively. These shadows represent the middle range of overshadowing that would result from the proposed project. Shading of adjacent structures would be minimal, though some yard and open space areas may be shaded for a couple of hours during the morning and evening. Consequently, impacts related to shadows would be less than significant.

SUMMER SOLSTICE - JUNE 21ST



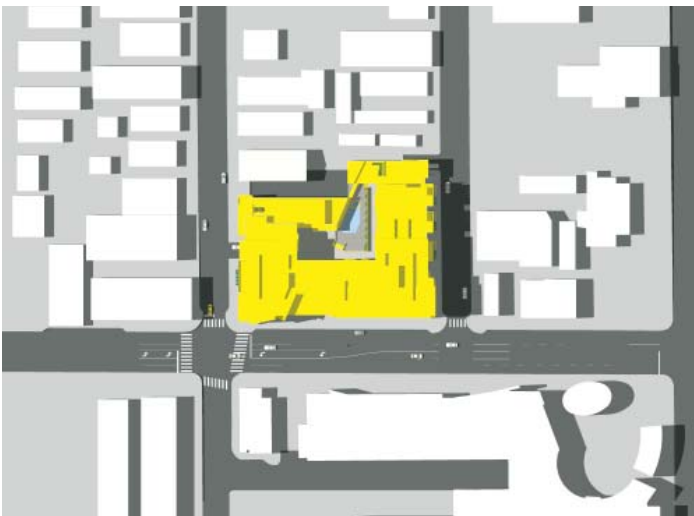
9:00AM SHADOW STUDY



PLAN IMAGE WITH OUT SHADOWS



12:00PM SHADOW STUDY



3:00PM SHADOW STUDY

SHADE/SHADOW ANALYSIS WEST HOLLYWOOD

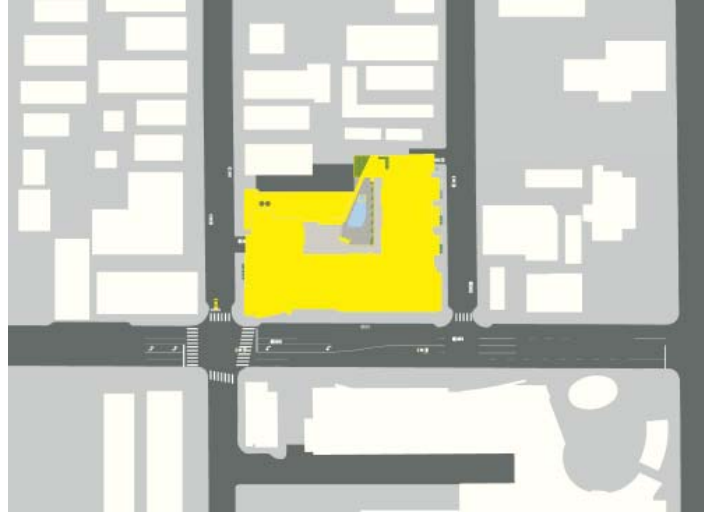


PROPOSED BUILDINGS

FALL EQUINOX-SEPTEMBER 22ND



9:00AM SHADOW STUDY



PLAN IMAGE WITH OUT SHADOWS



12:00PM SHADOW STUDY



3:00PM SHADOW STUDY

SHADE/SHADOW ANALYSIS
WEST HOLLYWOOD

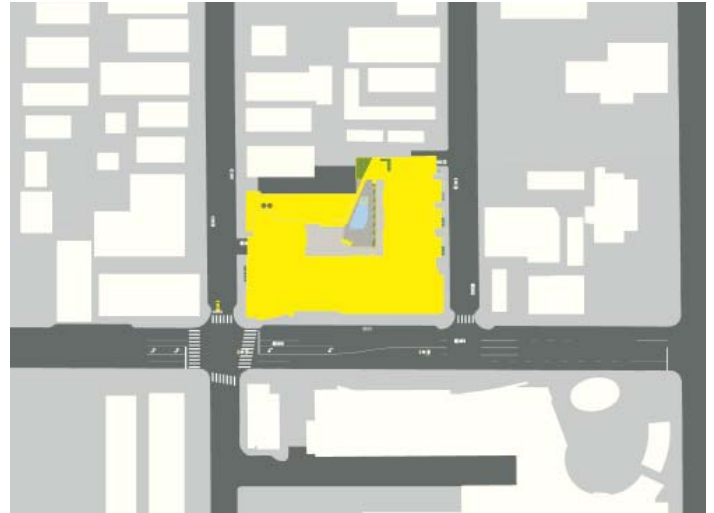


PROPOSED BUILDINGS

WINTER SOLSTICE-DECEMBER 21ST



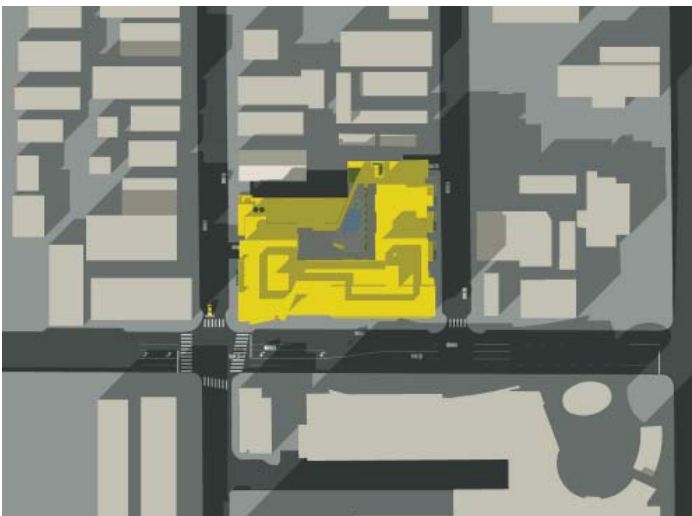
9:00AM SHADOW STUDY



PLAN IMAGE WITH OUT SHADOWS



12:00PM SHADOW STUDY



3:00PM SHADOW STUDY

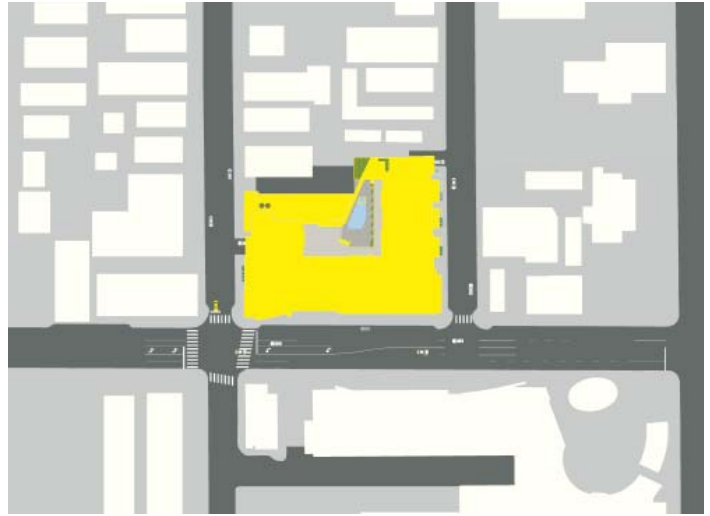
SHADE/SHADOW ANALYSIS WEST HOLLYWOOD



SPRING EQUINOX-MARCH 20TH



9:00AM SHADOW STUDY



PLAN IMAGE WITH OUT SHADOWS



12:00PM SHADOW STUDY



3:00PM SHADOW STUDY

SHADE/SHADOW ANALYSIS
WEST HOLLYWOOD



3.1 Aesthetics

As a result of the proposed project, some structures adjacent to the project site would be in shadow during the winter, particularly around the equinox. However these structures are neither part of, nor experience views of, particular scenic quality that would be affected by the occasional overshadowing. Consequently, the proposed project would not create a new source of substantial shade and shadow that would adversely affect daytime views in the area. The impact would be less than significant.

3.1.4 MITIGATION MEASURES

VIS-A All outdoor lighting, other than identification signage, shall be directed from the perimeter of the property toward building entrances and parking areas utilizing cut-off fixtures to prevent nighttime illumination to spill onto adjacent properties, particularly the residential properties located immediately north of the project site.

VIS-B The exterior finish of the south-facing walls shall be fabricated with non-reflective glass, non-high gloss paint, and other light-absorbing materials to minimize the glare from the new structure.

3.1.5 SIGNIFICANCE AFTER MITIGATION

Although the proposed project would introduce a new source of light and glare, implementation of mitigation measures VIS-A and VIS-B would reduce light and glare impacts associated with the proposed project to a less than significant level. Impacts related to scenic vistas, visual quality and character, and shade and shadow from the proposed project would be less than significant.

3.2 AIR QUALITY

This section examines the degree to which the proposed project may significantly impact air quality. Both short-term construction emissions and long-term effects related to the ongoing operations are discussed in this section. Supporting data and calculations are included in Appendix B. This analysis focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the quantity of pollutants released into the air, measured in pounds per day (ppd). “Concentrations” refer to the amount of pollutant material per volumetric unit of air, measured in parts per million (ppm) or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). Air pollutants of concern include ozone (O_3), carbon monoxide (CO), inhalable particulate matter (PM_{10}), fine particulate matter ($\text{PM}_{2.5}$), and the two major contributors to the formation of O_3 : reactive organic compounds (ROC), and nitrogen oxides (NO_x).

3.2.1 ENVIRONMENTAL SETTING

A discussion of regional and local air quality conditions, existing monitored data, existing onsite emissions, and nearby land uses that are sensitive to air pollution is provided below.

REGIONAL CLIMATE

The project site is located within the Los Angeles County portion of the South Coast Air Basin. The 6,745-square-mile South Coast Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County are among the highest in the four counties comprising the South Coast Air Basin.

The South Coast Air Basin is in an area of high air pollution potential due to its climate and topography. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The South Coast Air Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The South Coast Air Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The South Coast Air Basin experiences frequent temperature inversions. Temperature typically decreases with height. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and nitrogen dioxide (NO_2) react under strong sunlight, creating smog.

3.2 Air Quality

Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO₂ emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO emissions are produced almost entirely from automobiles, the highest CO concentrations in the South Coast Air Basin are associated with heavy traffic. NO₂ concentrations are also generally higher during fall and winter days.

LOCAL CLIMATE

The mountains and hills within the South Coast Air Basin contribute to the variation of rainfall, temperature, and winds throughout the region. Winds in the project vicinity, as measured at the West Hollywood Wind Monitoring Station, are calm approximately 19 percent of the time and predominately blow from the southwest. The annual average temperature in the vicinity of the project site is 77 degrees Fahrenheit (°F) with an average winter temperature of approximately 68°F and an average summer temperature of approximately 74°F. Total precipitation in the project area averages approximately 17 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately 10 inches during the winter, approximately 4 inches during the spring, approximately 2 inches during the fall, and less than 1 inch during the summer.

EXISTING AIR QUALITY

Air pollutants monitored in the South Coast Air Basin include O₃, CO, particulate matter, NO₂, sulfur dioxide (SO₂), and toxic air contaminants (TACs).

O₃ is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG), which includes volatile organic compounds (VOC) and NO_x react in the presence of ultraviolet sunlight. O₃ is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x, components of O₃, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O₃ formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O₃ at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue and some immunological changes.

CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas such as the project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, such that ambient CO concentrations generally follow spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature

inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excessive CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Particulate matter consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids and metals. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., motor vehicles, power generation and industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2 , NO_x , and VOC. Inhalable particulate matter, or PM_{10} , is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. They can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

NO_2 , like O_3 , is not directly emitted into the atmosphere, but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_x and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10} . High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere and reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 ppm.

3.2 Air Quality

SO₂ is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. The main sources of SO₂ are coal and oil used in power plants and industries. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel.

TACs are generally defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Other factors, such as the amount of the chemical, its toxicity and how it is released into the air, weather, and terrain, all influence whether the emission could be hazardous to human health. TACs are emitted by a variety of industrial processes, such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust, and may exist as PM₁₀ and PM_{2.5}, or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources.

The emission of toxic substances into the air can be damaging to human health and to the environment. Human exposure to these pollutants at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental, and respiratory problems. Pollutants deposited onto soil or into lakes and streams affect ecological systems and eventually human health through the consumption of contaminated food. The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.

The public's exposure to TACs is a public health issue in California. The Air Toxics "Hotspots" Information and Assessment Act is a state law requiring facilities to report emissions of TACs to air districts. The program is designed to quantify the amounts of potentially hazardous air pollutants released, the location of the release, the concentrations to which the public is exposed, and the resulting health risks.

To date, the most comprehensive study on air toxics in the South Coast Air Basin is the *Multiple Air Toxics Exposure Study in the South Coast Basin*, conducted by the South Coast Air Quality Management District (SCAQMD) (SCAQMD 2000). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. The *Multiple Air Toxics Exposure Study* found that the average cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million.

MONITORED AIR QUALITY

SCAQMD maintains a network of air quality monitoring stations located throughout the South Coast Air Basin and has divided it into air monitoring areas. The SCAQMD monitors air quality conditions at 38 locations throughout the South Coast Air Basin. The project site is located in SCAQMD's Central Los Angeles County Air Monitoring Subregion, which is served by the Los Angeles – North Main Street Monitoring Station, located approximately eight miles southeast of the project site. Historical data from the Los Angeles – North Main Street Monitoring Station was used to characterize existing conditions in the vicinity of the project site. Criteria air pollutants monitored at the Los Angeles – North Main Street Monitoring Station include O₃, CO, NO₂, SO₂, PM_{2.5}, and PM₁₀. Lead and sulfate concentrations are also monitored in the South Coast Air Basin, although they are not considered pollutants of concern and are not further assessed in this analysis.

Table 3.2-1 shows pollutant levels, the state and federal standards, and the number of exceedances recorded at the Los Angeles –North Main Street Monitoring Stations for the years 2009 through 2011. Criteria air pollutants CO, NO₂, and SO₂ did not exceed the state and federal standards from 2009 to 2011. However, the one-hour state standard for O₃ was exceeded one to three times during this period. The eight-hour state standard for O₃ was exceeded zero to five times, while the eight-hour federal standard for O₃ was exceeded zero to two times. The 24-hour state standard for PM₁₀ was exceeded zero to four times, while the 24-hour federal standard for PM₁₀ was not exceeded during this period. The 24-hour federal standard for PM_{2.5} was exceeded five to eight times and the 24-hour state standard for PM_{2.5} was also exceeded each year from 2009 to 2011.

3.2 Air Quality

TABLE 3.2-1 AMBIENT AIR QUALITY CONDITIONS

Pollutant	Pollutant Concentration & Standards	2009	2010	2011
Ozone (O ₃)	Maximum 1-hr Concentration (ppm)	0.14	0.10	0.13
	Days > 0.09 ppm (State 1-hr standard)	3	1	1
	Maximum 8-hr Concentration (ppm)	0.10	0.08	0.07
	Days > 0.07 ppm (State 8-hr standard)	5	1	0
	Days > 0.075 ppm (National 8-hr standard)	2	1	0
Carbon Monoxide (CO)	Maximum 1-hr concentration (ppm)	3	3	n/a
	Days > 20 ppm (State 1-hr standard)	0	0	n/a
	Days > 35 ppm (National 1-hr standard)	0	0	n/a
	Maximum 8-hr concentration (ppm)	2.2	2.3	2.4
	Days > 9.0 ppm (State 8-hr standard)	0	0	0
	Days > 9 ppm (National 8-hr standard)	0	0	0
Nitrogen Dioxide (NO ₂)	Maximum 1-hr Concentration (ppm)	0.12	0.09	0.11
	Days > 0.18 ppm (State 1-hr standard)	0	0	0
Respirable Particulate Matter (PM ₁₀)	Maximum 24-hr concentration (µg/m ³)	70	41	53
	Days > 50 µg/m ³ (State 24-hr standard)	4	0	1
	Days > 150 µg/m ³ (National 24-hr standard)	0	0	0
Fine Particulate Matter (PM _{2.5})	Maximum 24-hr concentration (µg/m ³)	64	39	49
	Exceed State Standard (12 µg/m ³)	Yes	Yes	Yes
	Days > 35 µg/m ³ (National 24-hr standard)	7	5	8
Sulfur Dioxide (SO ₂)	Maximum 24-hr Concentration (ppm)	0.002	0.002	0.002
	Days > 0.04 ppm (State 24-hr standard)	0	0	0
	Days > 0.14 ppm (National 24-hr standard)	0	0	0

Note:

n/a = not applicable

Source: CARB, *Air Quality Data*, 2008, website <http://www.arb.ca.gov/adam/cgi-bin/db2www/adamtop4b.d2w/start>, accessed October 1, 2012; SCAQMD, *Historical Data by Year*, website <http://www.aqmd.gov/smog/historicaldata.htm>, accessed October 1, 2012.

TOXIC AIR POLLUTANTS GENERATED BY EXISTING SITE OPERATIONS

A portion of the project site includes a metal plating facility. The facility has a number of air permits administered by the SCAQMD and is identified by the SCAQMD as Facility 20162. The facility has active permits for the chrome plating process line, a mist eliminator, abrasive blasting, and a spray booth. The most recent publicly available emissions data is from 2000. Table 3.2-2 shows the existing criteria pollutant emissions and Table 3.2-3 shows the existing TAC emissions for the project site.

TABLE 3.2-2 CRITERIA AIR POLLUTANTS PRODUCED BY FAITH PLATING

Pollutant	Annual Emissions (tons per year)
Carbon Monoxide	0.149
Nitrogen Oxide	0.182
Reactive Organic Gases	0.174
Sulfur Oxide	0.001
Total Suspended Particulates	0.095

Source: SCAQMD, Facility Information Database, Facility ID 20162.

TABLE 3.2-3 TOXIC AIR POLLUTANTS PRODUCED BY FAITH PLATING

Pollutant ID	Annual Emissions (pounds per year)
Acetaldehyde	0.015
Acrolein	0.009
Benzene	0.028
Chromium (VI)	0.006
Ethyl Benzene	0.034
Formaldehyde	0.061
Hexane	0.022
Nickel	1.128
polycyclic aromatic hydrocarbons (PAHs) (total with components not reported)	0.001
Toluene	0.132
Xylenes	0.098

Source: SCAQMD, Facility Information Database, Facility ID 20162.

SENSITIVE AIR QUALITY RECEPTORS

Some population groups are considered more sensitive to air pollution than others due to the types of users or activities involved. The California Air Resources Board (CARB) has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The closest sensitive receptors to the project site include:

- Single- and multi-family residences, located adjacent and to the north
- Single- and multi-family residences, located 145 feet to the northwest
- Single- and multi-family residences, located 220 feet to the northeast
- Samy Hotel, located 285 feet to the north
- Poinsettia Recreation Center, located 1,090 feet to the south

3.2 Air Quality

The above sensitive receptors represent the nearest air quality sensitive land uses with the potential to be impacted by the proposed project. Additional sensitive receptors are located farther from the project site in the surrounding community and would be less likely to be impacted by air emissions than the above-listed sensitive receptors.

3.2.2 REGULATORY SETTING

FEDERAL

The federal Clean Air Act governs air quality in the United States. The Clean Air Act (42 U.S.C. §§ 7401-7671q) was first enacted in 1955 and has been amended numerous times, most recently in 1990. The U.S. Environmental Protection Agency (EPA) is responsible for enforcing the Clean Air Act. The EPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The EPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB.

As required by the Clean Air Act, National Ambient Air Quality Standards have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and lead (Pb). The Clean Air Act requires EPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the National Ambient Air Quality Standards have been achieved. The federal standards are summarized in Table 3.2-4. The EPA has classified the South Coast Air Basin as attainment for SO₂ and Pb, maintenance for CO, and nonattainment for O₃, PM_{2.5}, and PM₁₀. The EPA has not classified NO₂ as attainment, nonattainment, or maintenance. An area is designated as unclassified for a pollutant if available information does not support a designation of attainment or nonattainment.

STATE

In addition to being subject to the requirements of Clean Air Act, air quality in California is also governed by more stringent regulations under the California Clean Air Act. The California Clean Air Act is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB is responsible for meeting the state requirements of the Clean Air Act, administering the California Clean Air Act, and establishing the California Ambient Air Quality Standards. The California Ambient Air Quality Standards are generally more stringent than the corresponding federal National Ambient Air Quality Standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The state standards are also summarized in Table 3.2-4.

TABLE 3.2-4 NATIONAL AND CALIFORNIA AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	n/a	0.075 ppm (147 µg/m ³)	Nonattainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Nonattainment	150 µg/m ³	Nonattainment
	Annual Arithmetic Mean	20 µg/m ³	Nonattainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Nonattainment
	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	15.0 µg/m ³	Nonattainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance
	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	n/a
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Unclassified/ Attainment
Sulfur Dioxide (SO ₂)	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	0.14 ppm (365 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Attainment

Note:

n/a = not applicable

Source: CARB, *Area Designation Maps/State and National*, February 2011, website <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed September 11, 2012

The California Clean Air Act requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the California Ambient Air Quality Standards have been achieved. Under the California Clean Air Act, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the California Clean Air Act, the Los Angeles County portion of the South Coast Air Basin is designated as a nonattainment area for O₃, PM_{2.5}, and PM₁₀.

3.2 Air Quality

LOCAL

The 1977 Lewis Air Quality Management Act created the SCAQMD to coordinate air quality planning efforts throughout southern California. This Act merged four county air pollution control agencies into one regional district to better address the issue of improving air quality in southern California. Under the Act, renamed the Lewis-Presley Air Quality Management Act in 1988, the SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, the SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

All areas designated as nonattainment under the California Clean Air Act are required to prepare plans showing how the area would meet the state air quality standards by its attainment dates. The Air Quality Management Plan (AQMP) is the SCAQMD plan for improving regional air quality. It addresses Clean Air Act and California Clean Air Act requirements and demonstrates attainment with state and federal ambient air quality standards. The AQMP is prepared by SCAQMD and the Southern California Association of Governments (SCAG). The AQMP provides policies and control measures that reduce emissions to attain both state and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the South Coast Air Basin must demonstrate that daily construction and operational emissions thresholds, as established by the SCAQMD, would not be exceeded. The environmental review must also demonstrate that individual projects would not increase the number or severity of existing air quality violations.

The SCAQMD is currently developing the 2012 AQMP to continue the progression toward clean air and compliance with state and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. The Draft 2012 AQMP proposes attainment demonstration of the federal 24-hour PM_{2.5} standard by 2014 in the South Coast Air Basin through adoption of all feasible measures while incorporating current scientific information and meteorological air quality models. It also updates the EPA approved eight-hour O₃ control plan with new commitments for short-term NO_x and VOC reductions. The Draft 2012 AQMP addresses several state and federal planning requirements. The Draft 2012 AQMP builds upon the approach taken in the 2007 AQMP, adopted on June 1, 2007, for the attainment of federal PM and O₃ standards, and highlights substantial reductions needed and the urgent need to engage in interagency coordinated planning to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria air pollutant standards within the timeframes allowed under the Clean Air Act (SCAQMD 2012).

3.2.3 ENVIRONMENTAL IMPACTS

METHODOLOGY

This air quality analysis is consistent with the methods described in the SCAQMD *CEQA Air Quality Handbook* (1993 edition), as well as the updates to the *CEQA Air Quality Handbook*, as provided on the SCAQMD website.

Regional and localized construction emissions were analyzed for the proposed project. The majority of construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria air pollutant emissions for a variety of land use projects. The emissions factors and calculation methodologies contained in the CalEEMod program have been approved for use by SCAQMD. The model contains data that are specific for the SCAQMD and Los Angeles County. Inputs include each land use type and size, in terms of building area, number of dwelling units, etc., and the vehicle trip generation for each land use. Appendix B contains the worksheets documenting the input and output for this analysis.

Construction. Project-specific construction details were incorporated in CalEEMod for the estimate of emissions generated from construction activities. Construction is anticipated to begin in the second quarter of 2013 and finish in the third quarter of 2015 (approximately 26 months). Approximately 30 construction workers would be present at the project site each day. The construction workers are expected to travel approximately 20 miles each way to and from the project site for a total of 40 miles round-trip. Peak daily construction emissions were calculated for the individual construction activities (e.g., demolition, site preparation, grading, and building construction). It is assumed that the first eight months of the construction process would consist of demolition, site preparation, and grading. During the grading stage, the entire 1.3-acre project site would be graded. Typical construction equipment would include bobcats, skip loaders, backhoes, hydraulic hammers, roll-off bins, excavators, gradalls, bottom dumps, cranes, pick-up trucks, concrete ready-mix trucks, delivery vehicles, paving machines, and assorted power operated hand tools.

It is anticipated that approximately 32,000 cubic yards of earth would be transported to three different off-site disposal facilities. Of this amount, approximately 10,200 cubic yards of soil is expected to be contaminated. Soils classified as hazardous waste would be transported offsite to a Class I landfill, such as Kettleman Hills Landfill in Kettleman City, California. Soils containing VOCs would be transported to a landfill such as to Antelope Valley Landfill in Palmdale. Soils classified as non-hazardous would be transported to Rose Hills Landfill in Los Angeles. Construction would require no more than 60 truck trips per day with an average of 35 haul trucks entering and leaving the site on a typical day during hauling operations. In order to present maximum daily emissions, it was assumed that 60 truck trips per day would travel 58 miles each way to the northern edge of the SCAQMD's jurisdiction along Interstate 5. Haul truck emissions were estimated using emission rates obtained from EMFAC2011 and the vehicle miles traveled discussed above.

Regional emissions were compared to the SCAQMD regional thresholds to determine project impact significance. Emissions for the localized construction air quality analysis of PM_{2.5}, PM₁₀, CO, and NO₂

3.2 Air Quality

were compiled using Localized Significance Threshold (LST) methodology promulgated by the SCAQMD in *Sample Construction Scenarios for Projects Less than Five Acres in Size*. Localized onsite emissions were calculated using similar methodology to the regional emission calculations. LSTs were developed based upon the size or total area of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor. LSTs for CO and NO₂ were derived by using an air quality dispersion model to back-calculate the emissions per day that would cause or contribute to a violation of any ambient air quality standard for a particular source receptor area. Construction PM_{2.5} and PM₁₀ LSTs were derived using a dispersion model to back-calculate the emissions necessary to exceed a concentration equivalent to 50 µg/m³ over five hours, which is the SCAQMD Rule 403 control requirement.

Operations. CalEEMod was also used to calculate operational (i.e., mobile and area) emissions. This air quality analysis is consistent with the methods described in the SCAQMD *CEQA Air Quality Handbook*, as well as the updates to the *CEQA Air Quality Handbook*, as provided on the SCAQMD website. The majority of operational emissions come from passenger vehicles. Mobile source emissions were based on 1,453 net new daily trips. Existing land uses generate 177 trips per day and the proposed project would generate 1,630 net new trips per day. The proposed project includes sustainability features such as exceeding Title 24 requirements by 20 percent, using interior paints with low VOC content (less than 50 grams per liter), and solar panels to generate electricity. These features were applied to the CalEEMOD analysis.

Localized CO emissions may potentially occur offsite at congested intersections with high traffic volumes. The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when volume-to-capacity (V/C) ratios are increased by two percent at intersections with a level of service (LOS) – traffic performance at intersections or along roadway segments – of D or worse. The SCAQMD also recommends a CO hotspot evaluation when an intersection decreases in LOS by one level beginning when LOS changes from C to D. Localized CO concentrations were evaluated using a combination of a microscale dispersion model (i.e., CAL3QHC) and EMFAC2011 emission factors. The analysis is based on the background concentration of CO and an estimate of project-related CO as a function of peak hour trip generation.

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not conflict with or obstruct implementation of the applicable air quality management plan or create objectionable odors. Accordingly, these issues are not further analyzed in the EIR.

The State CEQA Guidelines establish that the proposed project would have a significant impact related to air quality if it would:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation; and/or
- Expose sensitive receptors to substantial pollutant concentrations.

Because of the SCAQMD's regulatory role in the South Coast Air Basin, the significance thresholds and

analysis methodologies in the SCAQMD's *Air Quality Guidance Handbook* are used in evaluating project impacts. Specifically, the proposed project would result in a significant impact if:

- Construction and operational emissions would exceed the regional and localized thresholds set forth in Table 3.2-5;
- Project-related traffic causes CO concentrations at study intersections to violate the California Ambient Air Quality Standards for either the one- or eight-hour period, which are 20 ppm and 9.0 ppm, respectively; and/or
- TAC emissions would exceed a risk of 10 persons in one million.

TABLE 3.2-5 SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds ^a			
Pollutant	Regional Construction	Localized Construction ^b	Operation
NO _x	100 lbs/day	103 lbs/day	55 lbs/day
VOC	75 lbs/day	--	55 lbs/day
PM ₁₀	150 lbs/day	4 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	3 lbs/day	55 lbs/day
SO _x	150 lbs/day	--	150 lbs/day
CO	550 lbs/day	562 lbs/day	550 lbs/day
Pb	3 lbs/day	--	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds			
TACs (including carcinogens and noncarcinogens)		Maximum Incremental Cancer Risk \geq 10 in 1 million Hazard Index \geq 1.0 (project increment)	
Odor		Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants ^c			
NO ₂ 1-hour average annual average		SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.25 ppm (state) 0.053 ppm (federal)	
PM ₁₀ 24-hour average annual geometric average annual arithmetic mean		10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$ 20 $\mu\text{g}/\text{m}^3$	
PM _{2.5} 24-hour average		10.4 $\mu\text{g}/\text{m}^3$ (construction) ^c & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
Sulfate 24-hour average		25 $\mu\text{g}/\text{m}^3$	
CO 1-hour average 8-hour average		SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) 9.0 ppm (state/federal)	

Notes:

^a Source: SCAQMD, *SCAQMD Air Quality Analysis Guidance Handbook and Air Quality Significance Thresholds*, 2007, website <http://www.aqmd.gov/ceqa/hdbk.html>.

^b Based on a 1-acre project site and a 25-meter (82-foot) receptor distance.

^c Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

^d Ambient air quality threshold based on SCAQMD Rule 403.

3.2 Air Quality

IMPACT ANALYSIS

AIR-1: *Construction of the proposed project would violate the SCAQMD regional significance thresholds for VOC and NO_x emissions. During the operational phase, regional pollutant emissions would not violate the SCAQMD significance thresholds.*

REGIONAL POLLUTANT EMISSIONS

Construction. Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions would primarily result from demolition and site preparation activities. NO_x emissions would primarily result from the use of construction equipment. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

It is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust, as listed in Section 2.5. Compliance with Rule 403 has been included in the calculation of estimated maximum regional emissions. Per the SCAQMD, it would reduce PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.

Table 3.2-6 presents the estimated maximum regional emissions associated with each phase of construction. Construction-related daily maximum regional emissions would not exceed the SCAQMD regional thresholds for SO_x, PM₁₀, and PM_{2.5}. However, maximum regional emissions would exceed the SCAQMD regional significance thresholds for VOC related to architectural coating activity and NO_x related to offsite haul truck activity. Therefore, the proposed project would result in a significant impact related to regional construction emissions. Implementation of mitigation measures AIR-A through ~~AIR-J~~ AIR-L would be required to reduce ~~the impact to a less than significant level~~ regional construction emissions.

TABLE 3.2-6 ESTIMATED DAILY CONSTRUCTION EMISSIONS – UNMITIGATED

Construction	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
DEMOLITION						
Onsite Emissions	5	38	24	<1	2	3
Offsite Emissions	1	3	8	<1	<1	6
Total Emissions	6	41	32	<1	2	9
SITE PREPARATION						
Onsite Emissions	4	32	19	<1	5	7
Offsite Emissions	1	1	7	<1	<1	2
Total Emissions	5	33	26	<1	5	9
GRADING						
Onsite Emissions	3	26	15	<1	4	6
Offsite Emissions ^a	6	177	30	1	4	4
Total Emissions	9	203	45	1	8	10
CONSTRUCTION BUILDING						
Onsite Emissions	5	23	16	<1	2	2
Offsite Emissions	1	7	11	<1	<1	2
Total Emissions	6	30	27	<1	2	4
ARCHITECTURAL COATING						
Onsite Emissions	387	3	2	0	<1	<1
Offsite Emissions	1	1	6	0	<1	2
Total Emissions	388	4	8	0	<1	2
Maximum Regional Total	388	203	45	<1	8	10
Regional Significance Threshold	75	100	550	150	55	150
Exceed threshold?	Yes	Yes	No	No	No	No
Maximum OnSite Total	388	38	24	<1	5	7
Localized Significance Threshold^b	—	103	562	—	3	4
Exceed threshold?	—	No	No	—	Yes	Yes

^a Haul truck emissions were estimated using EMFAC2011 and added to CALeMOD emissions.

^b Assumed a 1-acre project site and a 25-meter (82-foot) receptor distance.

Source: Terry A. Hayes Associates Inc. 2012.

Operations. Operational emissions of criteria pollutants would come from area sources and mobile sources. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products such as household cleaners, and architectural coatings for routine maintenance. Mobile sources include vehicle trips that would be made by residents, visitors and service personnel and by patrons, employees, and vendors associated with the retail and restaurant uses. The proposed project would generate 1,453 net new weekday vehicle trips. Table 3.2-7 compares regional operational emissions under existing conditions to existing with project conditions, and emissions under future without project conditions to future with project conditions. Daily maximum regional operational emissions would not exceed the SCAQMD regional thresholds for all the analyzed criteria pollutants. Therefore, the impact to regional operational emissions would be less than significant.

3.2 Air Quality

TABLE 3.2-7 REGIONAL OPERATIONAL EMISSIONS

Operations	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
EXISTING CONDITIONS (2013)						
Area Source	1	0	0	0	0	0
Mobile Source	1	3	11	<1	<1	2
Total Emissions	2	3	11	<1	<1	2
EXISTING WITH PROJECT CONDITIONS (2013)						
Area Source	7	<1	14	<1	<1	<1
Mobile Source	10	25	105	<1	2	19
Total Emissions	17	25	119	<1	2	19
Net Emissions	15	22	108	<1	2	17
Regional Significance Threshold	55	55	550	150	55	150
Exceed Threshold?	No	No	No	No	No	No
FUTURE WITHOUT PROJECT CONDITIONS (2016)						
Area Source	1	0	0	0	0	0
Mobile Source	1	2	9	<1	<1	2
Total Emissions	2	2	9	<1	<1	2
FUTURE WITH PROJECT CONDITIONS (2016)						
Area Source	7	<1	14	0	<1	<1
Mobile Source	8	19	76	<1	1	17
Total Emissions	15	19	90	<1	1	17
Net Emissions	13	17	81	<1	1	15
Regional Significance Threshold	55	55	550	150	55	150
Exceed threshold?	No	No	No	No	No	No

Source: Terry A. Hayes Associates Inc. 2012.

AIR-2: *Construction of the proposed project would expose sensitive receptors to substantial pollutant concentrations of particulate matter emissions. Operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations.*

LOCAL EXPOSURE TO CRITERIA POLLUTANTS

Construction. Localized impacts from onsite daily emissions associated with construction activities were evaluated for sensitive receptors located near the project site. Table 3.2-6 shows the calculated onsite construction emissions data and threshold values for each pollutant based on the SCAQMD screening tables. PM_{2.5} and PM₁₀ concentrations would exceed the SCAQMD's LST thresholds during the site preparation phase of construction. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards. Where localized construction emissions exceed the screening-level look-up table values, the lead agency may estimate the concentrations at sensitive receptors using the EPA's preferred regulatory air dispersion model (i.e., AERMOD), which is consistent with SCAQMD's *Localized Significance Threshold Methodology for CEQA Evaluation* guidance document (2007). The concentrations obtained from the air dispersion model are then compared to the California Ambient Air Quality Standards to determine the level of significance.

The LST evaluation for construction was conducted using AERMOD. The model indicates that maximum concentrations would occur at the multi-family residences located at the northern boundary of the project

site. Maximum daily PM_{2.5} and PM₁₀ concentrations would be approximately 54 µg/m³ and 79 µg/m³, respectively. These concentrations would exceed the PM_{2.5} and PM₁₀ significance threshold of 10.4 µg/m³. Therefore, the proposed project would result in a significant impact related to localized construction emissions.

Operations. There would be negligible onsite emissions of NO_x, CO, PM₁₀, and PM_{2.5} during the occupancy of the apartment units and the operation of the retail and restaurant uses. Therefore, no impacts related to regional localized operational emissions would occur.

Localized air quality impacts could occur as a result of CO hotspots. The state one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes. An exceedance of the state CO standards at an intersection is referred to as a CO hotspot. The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when V/C ratios would be increased by two percent at intersections with a LOS of D or worse, or when an intersection decreases in LOS to E or F.

Table 3.2-8 shows intersection CO concentrations for Existing With Project and Future With Project conditions. The EPA CAL3QHC micro-scale dispersion model was used to calculate the CO concentrations. CO concentrations would be less than the state one- and eight-hour standards of 20 and 9.0 ppm, respectively. Therefore, the impact to localized CO concentrations would be less than significant.

TABLE 3.2-8 CARBON MONOXIDE CONCENTRATIONS

Intersection	One-Hour		Eight-Hour	
	Existing With Project	Future With Project	Existing With Project	Future With Project
Detroit Street and Fountain Avenue	3	3	2.5	2.5
Formosa Avenue and Santa Monica Boulevard	--	3	--	2.5
La Brea Avenue and Santa Monica Boulevard	3	3	2.7	25
State Standard	20		9.0	

Note:

-- The study intersection does not have an LOS of D or worse

Source: Terry A. Hayes Associates Inc. 2012.

TOXIC AIR CONTAMINANTS

Construction. The principal TACs of concern are those that may be generated by demolition of the existing buildings and excavation of contaminated soils. These TACs and provisions for avoidance of impacts are discussed in Section 2.5 of this Recirculated Draft EIR. An additional TAC that would be generated during project construction is diesel particulate matter (diesel PM). Diesel PM would be generated in the exhaust of diesel engine construction equipment. During construction, there would be persons at the residential and commercial uses adjacent to the project site. The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to 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

3.2 Air Quality

individual. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to TAC 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, because the use of diesel engine construction equipment onsite would be limited to 26 months, exposure would occur approximately 3 percent of the 70-year exposure period. Therefore, the proposed project would result in a less than significant impact related to construction TAC emissions.

Operations. The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel PM (e.g., truck stops and warehouse distribution facilities), and has provided guidance for analyzing mobile source diesel emissions. The proposed mix of retail/restaurant and residential uses is not anticipated to generate a substantial number of daily truck trips. The primary source of potential TACs associated with project operations is diesel PM from delivery trucks (e.g., truck traffic on local streets and onsite truck idling). Less than five heavy-duty trucks (e.g., delivery trucks) would access the project site on a daily basis, and the trucks that would visit the site would not idle onsite for extended periods of time. Based on the limited activity of these TAC sources, the proposed project would not warrant the need for a health risk assessment associated with onsite activities, and potential TAC impacts are expected to be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The proposed project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). It is anticipated that the proposed project would not release substantial amounts of TACs, and no significant impact on human health would occur.

As shown in Table 3.2-3 above, Faith Plating ~~currently~~ recently emitted approximately 0.60 tons per year of criteria air pollutants and 1.5 pounds per year of TACs. Implementation of the proposed project would be beneficial for nearby sensitive receptors since the existing metal plating facility would be removed and a mixed-use development constructed in its place. As such, there would be a substantial reduction in VOCs and TACs. Any additional VOCs or TACs that are generated during operation of the proposed project from area and mobile sources would be substantially outweighed by the reduction in emissions from the closing of Faith Plating and the elimination of metal plating activities at the project site. Therefore, the proposed project would result in a less than significant impact related to operational TAC emissions.

AIR-3 *Construction of the proposed project would contribute substantially to an existing or projected air quality violation, resulting in a cumulatively considerable impact NO_x emissions.*

The South Coast Air Basin is a federal or state nonattainment area for O₃, PM₁₀, and PM_{2.5}. It is assumed that a project that conforms to the applicable air quality plan(s) and does not exceed the local agency thresholds for a direct significant impact would not result in a cumulatively considerable increase in pollutant concentrations.

The related projects (see Table 3.9-10 on page 3.9-18 of this Recirculated Draft EIR) include the development of hundreds of thousands of square feet of commercial and residential uses, a number that is many times greater than the proposed project. As the proposed project results in a regionally significant impact during construction relative to NO_x, it is anticipated that related project development would also result in significant regional impacts. While mitigation measures would reduce air quality impacts, it is forecasted that the construction of the related projects, in addition to the proposed project, would result in a regionally significant NO_x impact.

The SCAQMD's approach for assessing cumulative operational impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean Air Acts. The SCAQMD has set forth regional significance thresholds designed to assist in the attainment of ambient air quality standards. The proposed project would not result in a significant VOC, PM_{2.5}, PM₁₀, NO_x or CO impact during operations. Therefore, the proposed project would result in a less than significant regional cumulative operations impact.

3.2.4 MITIGATION MEASURES

- AIR-A** The construction contractor shall use electricity from power poles rather than temporary diesel or gasoline generators.
- AIR-B** The construction contractor shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.
- AIR-C** The construction contractor shall use alternative-fueled off-road equipment.
- AIR-D** The construction contractor shall configure construction parking to eliminate interference with traffic operations on Santa Monica Boulevard.
- AIR-E** The construction contractor shall provide temporary traffic controls, such as a flag person, during all phases of construction to maintain smooth traffic flows.
- AIR-F** The construction contractor shall schedule construction activities that effect traffic flow on the arterial system for off-peak hours.
- AIR-G** All construction equipment and delivery vehicles shall be turned off when not in use or prohibit idling in excess of five minutes.
- AIR-H** The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than 10 grams per liter).
- AIR-I** The construction contractors shall utilize materials that do not require painting.
- AIR-J** The construction contractors shall use pre-painted construction materials.

3.2 Air Quality

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

AIR-L All on-site construction equipment shall meet EPA Tier 3 or higher emissions standards according to the following:

- Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

3.2.5 SIGNIFICANCE AFTER MITIGATION

Regional construction impacts were identified for NO_x emissions during the grading phase and VOC emissions were identified during the architectural coating phase. Localized construction impacts related to PM_{2.5} and PM₁₀ emissions were identified during the demolition, site preparation, and grading phases of construction.

Mitigation measures AIR-A through ~~AIR-G~~ AIR-L would reduce regional NO_x emissions by at least five percent. However, the majority of emissions (87 percent) would be generated by haul trucks and there are no feasible measures to reduce on-road haul truck emissions. As shown in Table 3.2-9, implementation of the mitigation measures would not reduce regional NO_x emissions generated during grading activity to below the SCAQMD significance threshold. Therefore, the proposed project would result in a short-term significant and unavoidable impact related to regional NO_x emissions during construction.

Mitigation measures AIR-H through AIR-J would reduce project-related architectural coating emissions by 96 percent. As shown in Table 3.2-9, implementation of the mitigation measures would reduce regional

VOC emissions generated during architectural coating to below the SCAQMD significance threshold. Therefore, after mitigation the proposed project would result in a less than significant impact related to regional VOC construction emissions.

TABLE 3.2-9 ESTIMATED DAILY CONSTRUCTION EMISSIONS – MITIGATED

Construction Phase	Pounds Per Day	
	VOC	NO _x
GRADING		
Unmitigated Emissions	9	203
Mitigated Emissions	N/A	193
Regional Significance Threshold	75	100
Exceed threshold?	No	Yes
ARCHITECTURAL COATING		
Unmitigated Emissions	388	4
Mitigated Emissions	19	N/A
Regional Significance Threshold	75	100
Exceed threshold?	No	No

Source: Terry A. Hayes Associates Inc. 2012.

The majority of localized impacts from PM_{2.5} and PM₁₀ emissions during the demolition, site preparation, and grading phases would be related to fugitive dust emissions (up to 86 percent). The proposed project would be required to implement SCAQMD Rule 403 to control fugitive dust emissions. Rule 403 requires intensive dust prevention control measures and represents the greatest degree that fugitive dust can be controlled at a construction site. Implementation of Rule 403 would not reduce PM_{2.5} and PM₁₀ emissions to below the SCAQMD significance thresholds. Therefore, the proposed project would result in a short-term significant and unavoidable impact related to localized PM_{2.5} and PM₁₀ emissions during construction.

Operational air quality emissions would be less than significant without mitigation.

This page is intentionally left blank.

3.3 CULTURAL RESOURCES

A Cultural Resources Assessment was prepared for the proposed project in November 2007. This section summarizes the results and conclusions presented in the survey. A complete copy of this report is included in Appendix C.

3.3.1 ENVIRONMENTAL SETTING

HISTORY OF THE PROJECT AREA

The project area and vicinity was very likely host to Native American hunting and gathering prior to the 18th century. The indigenous population, now known as the Gabrielino, would have exploited locally available resources such as acorns, sage, yucca, deer, small rodents, cactus fruit, and other plants, animals, and birds associated with freshwater marshes (McCawley 1996). The area, which later became known as Rancho La Brea, was granted to Senor Moreno in 1775 and was most likely used by Spanish settlers for cattle and sheep grazing (CPPOA 2007). During the latter half of the 19th century, the area was primarily used for farming. The land was subdivided into large lots, allowing residents to grow crops such as peas, beans, chilies, fruits, and vegetables for the growing Los Angeles market (City of West Hollywood 2007b).

The project area falls within the 4,439-acre La Brea rancho, granted to Antonio Jose Rocha and Nemisio Dominquez on January 6, 1828. The former area of Rancho La Brea would currently be bounded (roughly) by Wilshire Boulevard in the south, Cynthia Street to the west, Sunset Boulevard to the north, and Gower Street to the east (Kielbasa 1997).

In 1894, Moses Sherman purchased land at the corner of San Vicente Boulevard and Santa Monica Boulevard, located 1.2 miles southwest of the project area. The site was the location of the Los Angeles Railway Company powerhouse and maintenance shop buildings. (The site now houses Pacific Design Center.) Many workers and their families moved to the area and by 1912, the town of Sherman was a burgeoning community (City of West Hollywood 2007a and 2007b; West Hollywood Marketing and Visitors Bureau 2007). As the town of Sherman grew, it spread north into present-day east West Hollywood. The name “West Hollywood,” however, was not used until 1925 (City of West Hollywood 2007a) and the City of West Hollywood remained an unincorporated part of Los Angeles County. Since the area was not part of the City of Los Angeles, and therefore not subject to Los Angeles city laws, the area became a haven for bootleggers and gamblers in the 1920s. Many nightclubs and casinos flourished along the Sunset Strip at this time (Wikipedia 2007).

In the 1910s, the movie industry moved into the area, and several silent-era movie studios set up shop in Sherman. One of Hollywood’s first movie studios opened on a lot on the southwest corner of Santa Monica Boulevard and Formosa Avenue, across the street and slightly west of the project area. By 1922 the studio was owned by Mary Pickford and Douglas Fairbanks. The studio later became known as Samuel Goldwyn Studio and is currently called the Lot Studios (Terry A. Hayes Associates 2006).

3.3 Cultural Resources

On the southeast corner of Santa Monica Boulevard and Formosa Avenue, directly across the street from the project area, lies the Formosa Café. Built in 1934, the Formosa Café has played a key supportive role in the development of the film industry. The café has served innumerable Hollywood stars, including Clark Gable, Lana Turner, Frank Sinatra, and Marilyn Monroe. The café is still a popular place for movie stars working at the adjacent studio lot to dine (Formosa Cafe Website 2007).

Historically, the rest of the surrounding area has been a mix of residential, commercial, and light industrial buildings. Up to 1919, the area consisted of a few, scattered residences, but much of the area remained undeveloped. By the 1950s, the area had been subdivided and heavily developed as the movie industry flourished in this part of the City and entertainment workers moved into nearby housing. West Hollywood also served as a center of production associated with the continuous use of the Lot as a movie studio and the City as a whole often served as a backdrop for location filming. The eastern portion of the City became a regional population center for Jews from the Former Soviet Union beginning in the last decades of the twentieth century and into the twenty-first century (City of West Hollywood 2008). The City of West Hollywood was incorporated in 1984 and is currently one of the most densely populated and developed areas in the Los Angeles area.

The project area, part of which houses a metal plating facility (Faith Plating), has served primarily the same function for over 80 years. A 1919 map of the area reveals that the area along Santa Monica Boulevard, between Formosa Avenue and Detroit, was undeveloped. By the mid to late 1920s, the area housed a bank and a metal plating facility. The bank was converted to a sound studio in 1976. At some point in the past, domestic structures located behind (north of) the metal plating facilities were annexed and put to industrial use.

EXISTING CONDITIONS

Archival records research of the project area was conducted on November 14, 2007 at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search revealed that a total of seven cultural resource investigations were previously conducted within a 1/2-mile radius of the project. Of the seven previous investigations, three are cultural resource assessments for cellular phone towers, one is a cultural resource assessment for a mass transit system, two consisted of an evaluation of historic properties and separate archaeological survey for an air treatment facility, and one is a Phase I cultural resource survey. None of the previous investigations appear to have involved archaeological excavation. Although one previous investigation (LA3354) did touch on the boundaries of the project area, none of the project area has been previously surveyed. The previously surveyed areas within 1/2-mile of the proposed project site are described in Table 3.3-1.

**TABLE 3.3-1 CULTURAL RESOURCE INVESTIGATIONS WITHIN 1/2-MILE
OF THE PROPOSED PROJECT SITE**

Author	Report No.	Description	Date
Duke, Curt	LA6406	Cultural Resource Assessment AT&T Wireless Services Facility	2002
Duke, Curt and Marvin, Judith	LA7772	Cultural Resource Assessment Cingular Wireless Facility West Hollywood	2003
Hirsch, Jennifer	LA7345	Historical Evaluation Report for the Sierra Bonita Air Treatment Facility	2005
Kyle, Carolyn E.	LA7345	Cultural Resource Assessment for Cingular Wireless Facility	2002
Maki, Mary	LA8269	Negative Archaeological Survey Report of Approximately 0.3 Acre for the Sierra Bonita Construction Project	2007
Maki, Mary K.	LA3354	Phase 1 Cultural Resource Survey of Detroit Street in West Hollywood	1995
Singer, Clay A.	LA447	Preliminary Evaluation of Cultural Resources Along Proposed Urban Mass Transit System Alignment Alternatives in City of Los Angeles	n.d.

As shown in Table 3.3-2, one cultural resource has been recorded within 1/2-mile of the proposed project site. The resource consists of a two-story commercial brick building and is located approximately 1/4-mile west of the project area on Santa Monica Boulevard. No prehistoric or historic archaeological resources have been recorded within 1/2 mile of the project area or within the project area.

**TABLE 3.3-2 CULTURAL RESOURCES RECORDED WITHIN 1/2-MILE
OF THE PROPOSED PROJECT SITE**

Permanent Trinomial (CA-LAN-)	P No. (P-19-)	Other No.	Description	Date Recorded
-	187439	-	Vanetta Building – two story brick commercial building	7/2002

There are three project-adjacent properties listed on the California Historic Resources Inventory, including the building located at 7155 Santa Monica Boulevard, one of the buildings present within the project area. The building at 7155 Santa Monica Boulevard is listed as “7R,” indicating it was identified during a cultural resources survey but was not evaluated for either the National Register or the California Register. The second property, 1134 North Formosa Avenue is listed as “7N” (Needs to be Reevaluated), but the property is no longer standing. The location is immediately north of 7155 Santa Monica Boulevard. The third property is the Lot Studios, formerly Pickford/Fairbanks and then Samuel Goldwyn Studios, located at 1041 Formosa Avenue. The studio is on the southwest corner of Santa Monica Boulevard and Formosa Avenue, diagonally across from the project area. This property status is listed as “3S” (appears eligible for listing on the National Register as a separate property). The Formosa Café, located at 7156 Santa Monica Boulevard, is directly south of the project area. It is listed as City of West Hollywood Historical Landmark.

3.3 Cultural Resources

CULTURAL RESOURCES SURVEY

A cultural resources field survey was conducted on November 16, 2007. The survey addressed all cultural resources which may be present within the project area, including historic buildings and structures, and prehistoric and/or historic archaeological resources. Given that the project area consists of a built environment and all undeveloped ground surface is obscured by pavement, no prehistoric and/or historic archaeological resources were identified during the survey.

7155 Santa Monica Boulevard: The rectangular-shaped building, constructed ca. 1928, features a flat roof, banded cornice, and closed eaves. The exterior is a combination of brick and stucco siding. Inset, full-story, square architectural accents are present on the southern façade. A personnel door and plate glass window are also located on this façade. The northern façade displays rectangular sliding windows on the second story. One-over-one sash windows and glass block accents are featured on the bottom story. An inset entry, supported by round metal posts, is also located on this façade. Brick seating and a double-wide entry are located within the covered entryway. This building sits upon a concrete slab foundation, and totals approximately 3,500 square feet.

7141 Santa Monica Boulevard and 1107 and 1117 Detroit Street: This building is composed of five contiguous brick and stucco buildings constructed during the years 1926, 1927, 1951, 1952, and 1958. The principal building (Building 1) features a flat roof and a brick and stucco exterior. Double-wide entry doors are located on the southern and western facades. A large square galvanized metal element is attached to the western elevation. Building 2 is brick, with a single-story extension located on the western façade. Aluminum-sliding windows on the eastern façade are framed between the brick cornice above, and small decorative metal squares below. A portion of the east façade has been filled in with concrete block. Both single and double-wide entryways are located on the front (south) façade. A gable-roofed metal covering with square metal posts is attached to the northwest façade. Architect Frank O. Gehry designed a two-story addition to the building in 1963. This space added 3,600 square feet and functions as offices. Building 3 is a large, rectangular, stucco-covered building with a flat roof and no eave overhang. Regularly-spaced aluminum sliding windows are present on the eastern façade. A single entry door and double-wide opening with a corrugated metal covered sliding door is also located on this façade. Building 3 encompasses two other buildings (what would be Buildings 4 and 5). These are wood and brick buildings under the shared roof of Building 3.

PALEONTOLOGICAL RESOURCES SURVEY

A paleontological resources assessment was conducted by the Natural History Museum of Los Angeles County on November 16, 2007. While no fossil vertebrate localities have been recorded within the boundaries of the proposed project site, there are known fossil resources nearby. The closest resource is south-southwest of the project area near the intersection of Sierra Bonita and Oakwood Avenue, approximately one mile from the project area. At this location, a fossil bison (*Bison antiquus*) was recovered from a depth of only 12 feet. Several other fossils have been recovered from areas within 1.5 miles of the project area. Mastodon and mammoth fossils were recovered from a site near the intersection of Kilkea Drive and Beverly Boulevard, 1.5 miles southwest of the project area. Two known fossil

localities are present at The Grove near the intersection of Fairfax and First Street. Fossils recovered from the Grove include pocket gopher (*Thomomys*), pond turtle (*Clemmys*), garter snake (*Thamnophis*), mammoth (*Mammuthus columbi*), cottontail rabbit (*Sylvilagus*), kangaroo rat (*Dipodomys*), meadow mouse (*Microtus*), horse (*Equus occidentali*), bison (*Bison antiquus*), and camel (*Camelops hesternus*). Some of these finds were recovered from a depth of only 10 feet. There are many other known fossil localities south and west of the project area, including in Park La Brea and Hancock Park.

3.3.2 REGULATORY SETTING

CALIFORNIA REGISTER OF HISTORIC RESOURCES (CRHR)

A cultural resource is considered “historically significant” under CEQA if the resource meets one or more of the criteria for listing on the California Register. The California Register was designed to be used by state and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the California Register (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852). A resource is considered significant if it:

1. is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. is associated with the lives of persons important in our past;
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
or
4. has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

CITY OF WEST HOLLYWOOD

The City of West Hollywood has specific guidelines for cultural resources of local significance, under West Hollywood Municipal Code Section 19.58.050 Criteria for Designation of Cultural Resources. These guidelines are as follows:

The Historic Preservation Commission may approve a nomination application for and recommend designation of, and the Council may designate a cultural resource, or any portion thereof (both interior and exterior) or historic district in compliance with Sections 19.58.60

3.3 Cultural Resources

(Designation of Historic Districts) and 19.58.070 (Review and Approval of Designations) below if it finds that the cultural resource meets one or more of the following criteria:

- A. Exemplifies Special Elements of the City. It exemplifies or reflects special elements of the City's aesthetic, architectural, cultural, economic, engineering, political, natural, or social history and possesses an integrity of design, location, materials, setting, workmanship feeling, and association in the following manner:
 - 1. It embodies distinctive characteristics of a period, method, style, or type of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
 - 2. It contributes to the significance of a historic area by being:
 - a. A geographically definable area possessing a concentration of historic or scenic properties; or
 - b. A thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or
 - 3. It reflects significant geographical patterns, including those associated with different eras of growth and settlement, particular transportation modes, or distinctive examples of community or park planning; or
 - 4. It embodies elements of architectural design, craftsmanship, detail, or materials that represent a significant structural or architectural achievement or innovation; or
 - 5. It has a unique location or singular physical characteristic or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city; or
- B. Example of Distinguishing Characteristics. It is one of the few remaining examples in the City, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen; or
- C. Identified with Persons or Events. It is identified with persons or events significant in local, state, or national history; or
- D. Notable Work. It is representative of the work of a notable architect, builder, or designer (Ord. 03-663 § 4 (part), 2003: Ord. 02-643 § 48, 2003: Ord. 01-594 § 2 (Exh. A (part)), 2001).

The City of West Hollywood Municipal Code Section 19.58.020(b) states that one of the purposes of the Historic Preservation Ordinance is “developing and maintaining an appropriate setting and environment for cultural resources, cultural resource sites, and historic districts.” In accordance with Section 19.58.040(h), the Historic Preservation Commission has the authority of “Reviewing all applications for permits, environmental assessments, environmental impact reports, environmental impact statements, and other similar documents pertaining to designated and potential cultural resources, or related neighboring property within public view. ‘Neighboring properties within public view’ shall mean any property that can be seen from a public right-of-way and which is within the same street block (on either side of the street) as a cultural resource.” Because the proposed project is located directly across the street from the Formosa Café, which is a locally-designated historic resource, this EIR was subject to the review of the Historic Preservation Commission.

3.3.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not directly or indirectly destroy human remains interred outside of a formal cemetery. Accordingly, this issue is not further analyzed in the EIR.

Pursuant to the CEQA Guidelines, the proposed project would have a significant effect on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource (Cal. Code Regs., Title 14, § 15064.5);
- Cause a substantial adverse change in the significance of an archaeological resource (Cal. Code Regs., Title 14, § 15064.5); or
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

IMPACT ANALYSIS

CR-1: *The proposed project would not cause a substantial adverse change in the significance of a historical resource.*

The buildings located at 7155 Santa Monica Boulevard and 7141 Santa Monica Boulevard/1107 and 1117 Detroit Street do not appear eligible for listing on the CRHR. Each of the buildings has lost a significant degree of historic integrity due to ad-hoc modifications and additions undertaken throughout the years. The building located at 7155 Santa Monica Boulevard was constructed ca. 1928. This building functioned as a bank beginning at an unknown date, up until 1976, at which time it was converted for use as a sound studio. The property has undergone several alterations over the years including the addition of

3.3 Cultural Resources

650 square feet (1959), new entrance doors and the installation of a suspended ceiling (1965), and the addition of offices on the east side of the building (1991) (Los Angeles County Building Permits).

The building located at 7141 Santa Monica Boulevard/1107 and 1117 Detroit Street currently functions as a metal plating facility (Faith Plating). The main part of the building was originally constructed in 1926-27. The building was later modified several times. An addition, completed by contractor Jerome White in 1952, added a 2,400-square-foot open shed, and converted an existing space to function as a warehouse. Building 2 once functioned as apartments which were later converted to industrial use. In 1958, a 15,800-square-foot addition was completed for manufacturing and storage space. Architect Frank O. Gehry designed a two-story addition to the building in 1963. This space added 3,600 square feet and functions as offices. Other miscellaneous alterations were undertaken on the building in the 1980s, such as fire damage repair, new and reconfigured doors, and the addition of a small storage room (Los Angeles County Building Permits).

Research did not reveal these properties to have significant associations with important themes in local or state history (CRHR Criterion 1). Likewise, the buildings do not appear to be significantly associated with persons considered important in history (CRHR Criterion 2). The addition designed by noted architect Frank O. Gehry to the building located at 7141 Santa Monica Boulevard/1107 and 1117 Detroit Street occurred in the 1960s to an existing structure. This addition was later modified during alterations completed in the 1980s. The later modification, combined with the addition being less than 50 years old (age criteria for historic buildings), renders significance under Criterion 2 unjustifiable. The buildings do not embody distinguishing architectural characteristics, nor do they appear to be the work of a master (CRHR Criterion 3). These buildings, in their current conditions and configurations, are the result of numerous alterations undertaken by various individuals over time, and do not retain integrity to their original construction dates. These types of buildings are well represented throughout the Los Angeles area and do not appear likely to yield important primary information on historic construction techniques or technologies (CRHR Criterion 4). The existing site buildings are not eligible or potentially eligible for inclusion on the CRHR. These buildings do not meet the eligibility criteria for designation as a cultural resource by the City of West Hollywood. Therefore, the demolition of the existing site structures would not result in a substantial adverse change in the significance of a state or locally designated historical resource. The impact would be less than significant, and no mitigation measures are required.

The site buildings do not appear eligible for CRHR listing due to a significant loss of historic integrity. The immediate locale of the project area in general, is a mix of both pre- and post-1957 buildings. Although there are several historic-era buildings in the vicinity of the project area (e.g., Formosa Café), the historic setting of this area has been compromised due to the presence of several contemporary in-fill buildings. Because the integrity of the historic setting has been impacted, the area no longer retains a sense of place and time to the era of original construction (1920s). Therefore, construction of the proposed project would not have an adverse indirect impact (i.e., visual) on surrounding properties of historical significance. No mitigation measures are required.

CR-2: *The proposed project would not cause a substantial adverse change in the significance of an archaeological resource.*

No prehistoric or historic archaeological resources have been previously recorded ~~within the limits of the record search~~ during ground disturbing activities in the project vicinity. Additionally, ~~The pedestrian site survey conducted in connection with this project failed to reveal any surface evidence of archaeological resources within the project site.~~ Lastly, ground disturbing activities within the project site boundaries have not previously encountered historic or prehistoric archaeological resources. Therefore, archaeological resources are not expected to be encountered during construction, and the impact would be less than significant. ~~No mitigation measures are required. However, the lack of surface evidence of archaeological materials does not preclude the possibility that subsurface archaeological materials may exist.~~ In the event any archaeological materials are encountered during earthmoving activities, the construction contractor would be required cease activity in the affected area until the discovery can be evaluated by a qualified cultural resources specialist (archaeologist) in accordance with the provisions of CEQA Guidelines Section 15064.5. ~~Compliance with existing regulations would ensure a less than significant impact, and no mitigation measures are required.~~

CR-3: *The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

A paleontological resources assessment was conducted by Dr. Samuel McLeod, Vertebrate Paleontology Division of the Natural History Museum of Los Angeles County on November 16, 2007. While no fossil vertebrate localities have been recorded within the boundaries of the project site, there are known fossil resources nearby. Ground disturbing activities within the project site boundaries have not previously encountered fossil resources. Therefore, paleontological resources are not expected to be encountered during construction, and the impact would be less than significant. ~~No mitigation measures are required.~~ In the event any paleontological resources are encountered during earthmoving activities, the construction contractor shall cease activity in the affected area until the discovery can be evaluated by a qualified paleontological resource specialist in accordance with the provisions of CEQA Guidelines Section 15064.5. ~~Compliance with existing regulations would ensure a less than significant impact, and no mitigation measures are required.~~

3.3.4 MITIGATION MEASURES

No significant impacts related to cultural resources would occur as a result of the proposed project, and no mitigation would be required.

3.3.5 SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

This page is intentionally left blank.

3.4 GEOLOGY AND SOILS

This section describes the geologic and soils conditions underlying the project site and provides an analysis of potential impacts associated with geological hazards related to seismic impacts and subsurface conditions. The analysis in this section is based on the *Updated Geotechnical Investigation Report* prepared by Geocon West, Inc. (2012), which is included as Appendix D.

3.4.1 ENVIRONMENTAL SETTING

PHYSICAL SETTING

The project site is located along the northern margin of the Los Angeles Basin. The Los Angeles Basin, also referred to as the Coastal Plain of Los Angeles, is situated between the Santa Monica Mountains on the north, the Puente Hills and Whittier fault to the east, the Palos Verdes Peninsula and Pacific Ocean on the west, and the Santa Ana Mountains and San Joaquin Hills on the south.

Locally, the project site is situated on an alluvial apron at the base of the Hollywood Hills known as the La Brea Plain. Topography in the area slopes to the south. Regionally, the Los Angeles Basin, including the site, is located in the northern portion of the Peninsular Ranges geomorphic province. The boundary between the Peninsular Ranges and Transverse Ranges geomorphic provinces is a system of faults that include the active Malibu Coast, Santa Monica, Hollywood, Raymond, and Sierra Madre fault zones.

The project site slopes gently from the south to southeast. Site elevations range from 289 above mean sea level (MSL) at the northeast corner to 284 MSL at the southwest corner, for a difference of 5 vertical feet across the existing pad. Soils on the project site consist of artificial fill and alluvium. The artificial fill has a depth of up to 3 feet and may be deeper in some areas. It is likely the result of past grading and construction activities on the project site. The artificial fill is underlain by alluvial deposits. Younger alluvial soils are less than 7 feet thick and consist of clayey sand and sand with minor gravel. Older alluvial deposits are composed of fine grained soils consisting of clay, silt, and fine grained clayey sand, silty sand, and sand. Groundwater onsite was encountered at a depth of 21 feet below ground surface (bgs), or at 264.5 feet MSL on the southwest corner and at 268 feet MSL at the northeast corner. Historic high groundwater levels in the project vicinity are 17 feet bgs, which corresponds to an elevation of 267 feet MSL at the southwest corner and 272 feet MSL at the northeast corner of the project site. However, groundwater levels typically vary seasonally and perched groundwater conditions can develop when impermeable fine grained soils are subjected to irrigation or precipitation.

SEISMIC HAZARDS

Faults are fractures or zones of fracture along which displacement of one side occurs relative to another side. This displacement can take a number of forms, including vertical, horizontal, or a combination of displacement directions. Horizontal movement of adjacent land masses, such as occurs along the San Andreas Fault, are known as strike-slip faults. In the case of the San Andreas Fault, the Pacific Plate is moving in a north-westerly direction, relative to the North American plate. Faults may also cause vertical movement, in which a section of land is elevated above another section. This occurs at dip-slip faults,

3.4 Geology and Soils

and may result in a previously buried mass of land being exposed as a fault scarp. There are several types of dip-slip faults, including normal, reverse and thrust faults. Oblique faults, such as the Santa Monica, Hollywood, Raymond and Cucamonga Faults, cause both vertical and horizontal displacement.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate surface faulting hazards associated with structures intended for human occupancy. The Act addresses only surface rupture hazards, rather than other earthquake hazards, the former being the most easily avoided of seismic hazards. The Alquist-Priolo Earthquake Fault Zone Maps delineate active and potentially active faults considered by the state to be “sufficiently active” and “well-defined” to be of concern to new construction. The project site is not located within an Alquist-Priolo Fault Zone or within a Fault Rupture Study area, as mapped by the City of West Hollywood and the California Geological Survey. Further, no active or potentially active faults with the potential for surface rupture are known to occur or pass directly beneath the project site.

The closest surface fault to the project site is the Hollywood Fault, which trends approximately east-west along the base of the Santa Monica Mountains from the West Beverly Hills Lineament in the West Hollywood-Beverly Hills area to the Los Feliz area of Los Angeles. It is located approximately 0.6 miles north of the project site. Other nearby faults include the Santa Monica, Raymond, Newport-Inglewood, Malibu Coast, San Fernando-Sierra Madre, Verdugo, and San Andreas. Therefore, although the potential for surface rupture due to faulting occurring beneath the project site is low, the project site is located within a seismically active region of southern California.

LIQUEFACTION

Liquefaction typically occurs when loose sand and silt that is saturated with water can behave like a liquid when shaken by an earthquake. Earthquake waves cause water pressures to increase in the sediment and the sand grains to lose contact with each other, leading the sediment to lose strength and behave like a liquid. The soil can lose its ability to support structures, flow down even very gentle slopes, and erupt to the ground surface to form sand boils. Many of these phenomena are accompanied by settlement of the ground surface — usually in uneven patterns that damage buildings, roads and pipelines. The project site is not located within an area identified as having potential for liquefaction. Additionally, the geotechnical investigation determined that the alluvial soils underlying the project site would not be prone to liquefaction during a seismic event.

LANDSLIDES

Landslides occur when masses of rock, earth, or debris move down a slope. Landslides are caused by disturbances in the natural stability of a slope. They can accompany heavy rains or follow droughts, earthquakes, or volcanic eruptions. The project site is not located within an area designated as susceptible to slope instability or landslides, including seismically induced slope instability or landslides. Additionally, no landslides have been identified on the project site or in close proximity. Therefore, the potential for slope stability hazards such as landslides is considered low.

SUBSIDENCE

Land subsidence is the loss of surface elevation due to the removal of subsurface support. Land subsidence is caused by activities that contribute to the loss of support materials within the underlying soils, such as agricultural practices or the overdraft of an aquifer. The existing uses do not include the types of activities that would contribute to the loss of subsurface support. Subsidence is not known to occur onsite or in the immediate project area. However, due to the presence of shallow groundwater underlying the project site, temporary construction dewatering would be required during excavation and foundation preparation. Dewatering can result in subsidence.

EXPANSION

Expansive soils generally result from specific clay minerals that expand when saturated and shrink in volume when dry. Generally, expansive soils contain a high percentage of clay particles. Expansive soils can occur in any climate; however, arid and semi-arid regions are subject to more extreme cycles of expansion and contraction than more consistently moist areas. The hazard associated with expansive soils lie in the structural damage that may occur when buildings are placed on these soils. The site-specific geotechnical report prepared for the project site determined that the soils underlying the project site are primarily comprised of silty sands, which would not be considered expansive, but layers of silty clay, sandy clay, and clayey sand are also present that have low potential for expansion.

SEISMICALLY-INDUCED FLOODING

Seismically-induced flooding is inundation of flood waters caused by the failure of dams or levees due to earthquakes. The project site is located in an area identified as having a potential for inundation as a result of a failure or breach of Mulholland Dam. However, the Mulholland Dam was constructed and is maintained to withstand a failure during a magnitude 8.3 earthquake on the San Andreas Fault and a magnitude 7.0 earthquake on the Newport-Inglewood Fault. Therefore, the likelihood of inundation due to earthquake-induced dam failure is considered low.

3.4.2 REGULATORY SETTING

FEDERAL AND STATE AGENCIES AND REGULATIONS

Alquist-Priolo Special Study Zones. The Alquist-Priolo Earthquake Fault Zoning Act of 1972 requires that special geologic studies be conducted to locate and assess any active fault traces in and around known active fault areas prior to development of structures for human occupancy (California Geological Survey 1972). This state law was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. The Alquist-Priolo Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults and only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The law requires the State Geologist to establish regulatory zones (Earthquake Fault Zones) around the surface traces of active faults and to issue

3.4 Geology and Soils

appropriate maps. The Alquist-Priolo Maps are distributed to all affected cities, counties and state agencies for their use in planning and controlling new or renewed construction. Local cities and counties must regulate certain development projects within the zones, which includes withholding permits until geologic investigations demonstrate that development sites are not threatened by future surface displacement. Projects include all land divisions and most structures for human occupancy.

Seismic Hazards Mapping Act. The Seismic Hazards Mapping Act of 1990 addresses non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides, and its purpose is to protect public safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and other hazards caused by earthquakes (California Geological Survey 1990). This law requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects with these zones. Before a development permit is granted for a site within a seismic hazard zone, a geotechnical investigation of the site has to be conducted and appropriate mitigation measures incorporated into the project design. Seismic Hazard maps have been completed for much of the southern California region.

Uniform Building Code. The Uniform Building Code covers the construction, alteration, repair, demolition, equipment, use, and maintenance of all buildings or structures. Published by the International Conference of Building Officials, the Uniform Building Code is a widely adopted model building code in the United States.

California Building Code. The California Building Code is certified in the California Code of Regulations Title 24, Part 2, which is a portion of the California Building Standards Code. Title 24 is assigned to the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. The California Building Code incorporates by reference the Uniform Building Code with necessary California amendments. About one-third of the text within the California Building Code has been tailored for California earthquake conditions.

LOCAL AGENCIES AND REGULATIONS

City of West Hollywood General Plan 2035 Safety and Noise Element. City and county governments typically develop as part of their General Plans, safety and seismic elements that identify goals, objectives, and implementing actions to minimize the loss of life, property damage and disruption of goods and services from man-made and natural disasters including floods, fires, non-seismic geologic hazards and earthquakes. Local governments may provide policies and develop ordinances to ensure acceptable protection of people and structures from risks associated with these hazards. Ordinances may include those addressing unreinforced masonry construction, erosion or grading.

The Safety and Noise Element of the City of West Hollywood General Plan 2035 aims at reducing death, injuries, damages to property, and economic and social dislocation resulting from earthquakes and other geologic hazards. This element identifies several policies pertaining to ground motion, fault rupture, liquefaction, and emergency response (City of West Hollywood 2011).

3.4.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would result in a less than significant impact associated with soil erosion or the loss of topsoil, and have no impact related to having 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. Accordingly, these issues are not further analyzed in the EIR.

The CEQA Guidelines establish that the proposed project would have a significant impact related to geology and soils if it would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42);
 - Strong seismic ground shaking;
 - Seismic-related ground failure, including liquefaction; and
 - Landslides.
- 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.
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

IMPACT ANALYSIS

GEO-1 *The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking, ground failure, liquefaction, and landslides.*

The City of West Hollywood, like most of southern California, is subject to strong seismic ground shaking in the event of a major earthquake. As discussed above, the project site is not located within an Alquist-Priolo Fault Zone or within a Fault Rupture Study area, as mapped by the City of West Hollywood and the California Geological Survey. Further, no active or potentially active faults with the potential for surface rupture are known to occur or pass directly beneath the project site. Seismic activity

3.4 Geology and Soils

at area faults may result in ground shaking at the project site; however, seismic hazards from ground shaking are typical for many areas of southern California and the potential for seismic activity would not be greater than for much of the Los Angeles area.

Compliance with the California Building Code, Section 1613 earthquake load requirements would ensure that proposed structures can withstand the expected worst-case seismic ground shaking. The City's plan check and building inspection procedures would ensure that the proposed project is constructed according to these standards. Additionally, the proposed project would be designed and constructed in compliance with the design guidelines established for the project site by the geotechnical investigation and set forth in the report (see Appendix D). Compliance with existing state and local regulations and implementation of the recommended geotechnical design standards would reduce the impact from seismic ground shaking to a less than significant level. No mitigation measures are required.

As discussed in Section 3.4.1 above, the project site is not located within an area mapped as susceptible to landslides or liquefaction. Therefore, the potential for seismic-related ground failure would be low, and the impact would be less than significant. No mitigation measures are required.

GEO-2 *The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including landslides, lateral spreading, subsidence, liquefaction, and collapse.*

Significant areas of West Hollywood have young alluvial deposits and high groundwater conditions that may be susceptible to collapse or subsidence. The project site is underlain by artificial fill and alluvial soils. Geotechnical testing encountered artificial fill in the first 3 feet bgs of soil. However, deeper pockets of artificial fill may be present in other parts of the project site. In the event that artificial fill is encountered at depths greater than 3 feet bgs, the geotechnical investigation (see Appendix D) recommends deepening building foundations as necessary to penetrate the artificial fill or compacting site soils. Further, layers of silty clay, sandy clay, and clayey sand that are present within the project site have low potential expansion. Therefore, the geotechnical report provides recommendations for exterior slabs founded on such soils. Additionally, due to the depth of excavation for the subterranean parking structure, the geotechnical investigation recommends sloping and shoring to provide stability during excavation. The shoring system should be designed to minimize deflection and prevent damage to existing structures and adjacent improvements. The shoring design would be required to meet the deflection limits as set forth in Section 8.20.15 of the project geotechnical investigation (see Appendix D).

As discussed above, the project site is not located within an area mapped as susceptible to landslides or liquefaction. The proposed project would not include the types of activities that would contribute to subsidence. However, the project site is located within a portion of the City with historic high groundwater levels (see also Section 3.7, Hydrology and Water Quality). Due to the presence of shallow groundwater underlying the project site, temporary construction dewatering would be required during excavation and foundation preparation. To prevent subsidence during construction activities, the

dewatering system would be implemented and monitored by a qualified dewatering contractor. The dewatering contractor would determine the size, spacing, and depths of the dewatering wells.

The proposed project would be constructed in compliance with the latest version of the West Hollywood Municipal Code, the California Building Code, and all other applicable federal, state, and local codes. Additionally, the proposed project would be designed and constructed in compliance with the design guidelines established for the site by the geotechnical investigation and set forth in the report (see Appendix D), which include: temporary dewatering during construction; permanent dewatering during project operation; soldier pile system; the use of compacted layers of approved soils for fill; and waterproofing methods applied to below-grade walls. Therefore, the potential for collapse would be less than significant. No mitigation measures are required.

GEO-3 *The proposed project would not be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial risks to life or property.*

As discussed above, the majority of the soils underlying the project site are primarily comprised of silty sand, which would not be considered expansive. Additionally, up to 25 feet of artificial fill and alluvium beneath the site would be excavated and removed during construction of the subterranean parking garage. Remaining soils and any engineered fill required for the proposed project would be properly compacted and backfilled under the instruction of a geotechnical engineer. Additionally, compliance with existing state and local regulations and implementation of the recommended geotechnical design standards would reduce the impact of unsuitable soils to a less than significant level. No mitigation measures are required.

3.4.4 MITIGATION MEASURES

No mitigation measures are required beyond implementation of the recommended geotechnical design standards.

3.4.5 SIGNIFICANCE AFTER MITIGATION

Impacts to geology and soils would be less than significant without implementation of mitigation.

This page is intentionally left blank.

3.5 GREENHOUSE GAS EMISSIONS

This section provides an overview of existing greenhouse gas (GHG) conditions and evaluates the climate change impacts associated with the proposed project. The environmental setting discussion and the impact analysis are based on the City of West Hollywood Climate Action Plan (CAP), which was adopted on September 6, 2011. Supporting data and calculations are included in Appendix B.

3.5.1 ENVIRONMENTAL SETTING

The greenhouse effect refers to warming that results when the atmosphere traps heat radiating from Earth toward space. Certain gases in the atmosphere act like the glass in a greenhouse – allowing sunlight to pass into the greenhouse, but blocking the heat from escaping into space. The gases that contribute to the greenhouse effect include water vapor, carbon dioxide (CO₂), methane (CH₄), nitrogen dioxide (N₂O), and chlorofluorocarbons. While the greenhouse effect is essential to life on earth, emissions from burning fossil fuels, deforestation, and other causes have increased the concentration of GHGs to dangerous levels.

In addition to CO₂, CH₄, and N₂O, GHGs include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and water vapor. Of all the GHGs, CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion. CO₂ comprised 83.3 percent of the total GHG emissions in California in 2002. The other GHGs are less abundant but have higher global warming potential than CO₂. Among the other GHGs and with the exception of water vapor, CH₄ is the most abundant but has the least global warming potential. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. The CO₂e of CH₄ and N₂O represented 6.4 and 6.8 percent, respectively, of the 2002 California GHG emissions. Other high global warming potential gases represented 3.5 percent of these emissions. In addition, there are a number of manmade pollutants, such as CO, NO_x, non-methane VOCs, and SO₂, which have indirect effects on terrestrial or solar radiation absorption by influencing the formation or destruction of other climate change emissions.

Observations from around the world show that global average air and ocean temperatures have steadily increased over the past 100 years. Between 1995 and 2006, all but one of the years ranked as the warmest year on record. In addition to increased temperatures, other evidence indicates that our planet's climate is warming. Rapid levels of glacial melt, decreases in the extent of Northern Hemisphere sea ice, shorter freezing seasons, and decreasing snowpacks are a few of the changes. Increasing temperatures in particular threaten the world's ecological, social, and economic systems. Notable examples of potential effects include:

- More frequent and intense extreme weather events (i.e., hurricanes)
- Increased stress on water resources
- Coastal areas at greater risk from sea-level rise and storm surges
- Reduced food security
- Increased threats to human health (i.e., mosquito-borne diseases)

3.5 Greenhouse Gas Emissions

- Ecosystem loss or degradation
- Economic and geopolitical disruption

GLOBAL GREENHOUSE GAS EMISSIONS

Data describing atmospheric GHG concentrations over the past 800,000 years show that concentrations of CO₂ have increased since pre-industrial times, from approximately 280 ppm to approximately 353 ppm in 1990 and approximately 379 ppm in 2005 (City of West Hollywood 2011). In 2000, the United Nations International Panel on Climate Change described potential global emission scenarios for the coming century. The scenarios vary from a best-case characterized by low population growth, clean technologies, and low GHG emissions, to a worst-case where high population growth and fossil-fuel dependence result in extreme levels of GHG emissions. While some degree of climate change is inevitable, most climate scientists agree that to avoid dangerous climate change, atmospheric GHG concentrations need to be stabilized at 350 to 400 ppm.

CALIFORNIA GREENHOUSE GAS EMISSIONS

Between 1990 and 2004, California's annual GHG emissions increased 11 percent from 427 million metric tons (MMT) to 474 MMT (City of West Hollywood 2011). If emissions continue to increase at business-as-usual rates, statewide emissions are expected to increase to approximately 600 MMT by 2020, a 40 percent increase above 1990 levels. In order for California to participate effectively in global efforts to avoid dangerous climate change, statewide GHG emissions need to be reduced to at least 1990 levels by 2020 and 80 percent below 1990 levels by 2050.

WEST HOLLYWOOD GREENHOUSE GAS EMISSIONS

The City of West Hollywood CAP includes a GHG baseline inventory that identifies sources and levels of GHG emissions produced by residents and businesses within the community and municipal operations. The 2008 inventory addresses the following emission sectors: residential and nonresidential energy use (i.e., commercial and industrial), transportation, solid waste, water use, and wastewater treatment. Government-related GHG emissions, which include energy use in government buildings, vehicle fleets, solid waste, streetlights, and other government-owned/operated facilities, are a subset of the community-wide emissions inventory.

Communitywide GHG emissions were also projected for the years 2020 and 2035 under a business-as-usual scenario. The business-as-usual scenario assumes that historical data and trends are representative of future year consumption rates for energy, water, and waste. A summary of West Hollywood's 2008, 2020, and 2035 business-as-usual emissions is provided in Table 3.5-1. Assuming that the same type of current emissions-generating practices continue to occur within the City, GHG emissions are anticipated to increase by 11 percent in 2020 over 2008 levels, and by 22 percent in 2035 over 2008 levels.

TABLE 3.5-1 WEST HOLLYWOOD BASELINE AND PROJECTED GHG EMISSIONS AND PERCENT CONTRIBUTIONS

Emissions Sector	Baseline MT CO ₂ e (percent of total emissions)		
	2008	2020	2035
Transportation	361,350 (62%)	412,450 (64%)	456,600 (64%)
Commercial/Industrial Energy Use	116,197 (20%)	116,028 (18%)	127,653 (18%)
Residential Energy Use	70,378 (12%)	77,519 (12%)	84,081 (12%)
Wastewater Treatment	20,981 (4%)	22,768 (4%)	24,974 (4%)
Solid Waste	8,543 (1%)	9,267 (1%)	10,172 (1%)
Water Consumption	5,764 (1%)	8,200 (1%)	8,971 (1%)
Total	583,213 (100%)	646,232 (100%)	8,971 (100%)
GHG Emissions per Service Population^a	9.7	9.9	9.8

^a Service population includes population and jobs in the City of West Hollywood.
 Source: City of West Hollywood, *Climate Action Plan*, September 6, 2011.

Transportation emissions are the largest portion of GHG emissions. The magnitude of GHG emissions increases from 2008 to 2020 and 2035 is due primarily to anticipated future population growth (and related consumption) in West Hollywood. Although the trends for each projection show an increase in GHG emissions, emission reductions are anticipated due to programs and regulations applied at the federal and state levels, such as vehicle fuel efficiency standards, low carbon fuel standards, and renewable energy portfolio requirements. These actions at the federal and state levels are not considered in the 2020 and 2035 projections.

Table 3.5-2 summarizes municipal baseline emissions from sectors for which data are available. Emissions from the municipal vehicle fleet, solid waste, and water/wastewater are not reported, as data for these sectors were not available at the time of the analysis.

TABLE 3.5-2 WEST HOLLYWOOD MUNICIPAL EMISSIONS

Emissions Sector	2008 Baseline MT CO ₂ e
Buildings and Facilities Electricity Use	670
Buildings and Facilities Natural Gas Use	52
Street Lights	2,211
Traffic Control	69

Source: City of West Hollywood, *Climate Action Plan*, September 6, 2011.

3.5.2 REGULATORY SETTING

STATE

California has adopted a wide variety of regulations aimed at reducing California’s GHG emissions. While state actions alone will not stop global warming, adopting and implementing this legislation

3.5 Greenhouse Gas Emissions

demonstrates California's leadership in addressing this critical challenge. Key legislation pertaining to California's reduction targets is described below.

Assembly Bill 32 (2006). Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, requires California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 directs CARB to adopt a quantified cap on GHG emissions that represents 1990 emissions levels, institute a schedule to meet the emissions cap, and develop tracking, reporting, and enforcement tools to assist California to achieve the required GHG emission reductions.

Climate Change Scoping Plan (2008 and 2011). The Climate Change Scoping Plan was approved by CARB in December 2008 and outlines the state's plan to achieve the GHG reductions required in AB 32. The Scoping Plan contains the primary strategies California will implement to achieve a reduction of 169 MMT of CO₂e, or approximately 28 percent from the state's projected 2020 emissions level.

Executive Order S-3-05 (2005). Executive Order S-3-05 recognizes California's vulnerability to reduced snowpack in the Sierra Nevada Mountains, exacerbation of air quality problems, and potential sea level rise due to a changing climate. To address these concerns, the executive order established targets to reduce GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

Assembly Bill 1493 (2002). AB 1493 requires CARB to develop and adopt regulations to reduce GHG emissions from passenger vehicles, light-duty trucks, and other non-commercial vehicles for personal transportation. In 2004, CARB approved amendments to the California Code of Regulations adding GHG emissions standards to California's existing standards for motor vehicle emissions.

Assembly Bill 811 (2008). AB 811 helps finance the upfront costs of solar and other energy efficiency improvements that are permanent fixtures to a property. AB 811 authorizes cities and counties to establish assessment districts in order to provide loans to property owners with long-term repayments added to their annual property tax bills.

Executive Order S-1-07 (2007). Executive Order S-1-07 establishes a low-carbon fuel standard to reduce the carbon intensity of transportation fuels sold in California by a minimum of 10 percent by 2020.

Senate Bill 7 (2009). Senate Bill (SB) 7 requires the state to achieve a 20 percent reduction in urban per capita water use by December 31, 2020. The state is required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. SB 7 requires each urban retail water supplier to develop both long-term urban water use targets and an interim urban water use target. SB 7 also creates a framework for future planning and actions for urban and agricultural users to reduce per capita water consumption 20 percent by 2020.

Senate Bill 375 (2008). SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations are required to adopt a Sustainable Communities Strategy, which allocates land uses in the Metropolitan Planning Organizations' Regional Transportation Plan. Qualified projects consistent with an approved Sustainable Communities

Strategy or Alternative Planning Strategy and categorized as “transit priority projects” receive incentives under new provisions of CEQA.

Senate Bill 1078 (2002), Senate Bill 107 (2006), and Executive Order S-14-08. SB 1078 requires retail sellers of electricity to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 changed the target date of SB 1078 to 2010. EO-S-14-08 expands California's Renewable Energy Standard to 33 percent renewable power by 2020.

Senate Bill 97 (2007). SB 97 acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. The California Resources Agency is required to certify and adopt guidelines for mitigating GHG emissions or the effects of GHG emissions, as required by CEQA.

California Air Pollution Control Officers Association. The California Air Pollution Control Officers Association prepared a white paper related to evaluating and addressing GHG emissions under CEQA to provide a common platform of information and tools to support local governments (2008). According to the California Air Pollution Control Officers Association, the paper is intended as a resource, not a guidance document. It is not intended, and should not be interpreted, to dictate the manner in which an air district or lead agency chooses to address GHG emissions in the context of its review of projects under CEQA. The California Air Pollution Control Officers Association conducted an analysis of various approaches and significance thresholds, ranging from a zero threshold (all projects are cumulatively considerable) to a high of 50,000 metric tons CO₂e per year. Other methods include a 900-metric ton threshold for capturing 90 percent of new development and a 10,000-metric ton threshold for capturing 50 percent of new development.

LOCAL

Environmental Task Force. The City formed a task force of community members and City staff to examine how the community could reduce its ecological footprint. The recommendations of the task force were outlined in the Environmental Task Force Report released on September 12, 2008.

Green Building Ordinance. On October 1, 2007, the City adopted one of the nation's first mandatory green building ordinances. A key component of the West Hollywood Green Building Program is the Green Building Point System for new construction, which offers incentives for projects that achieve exemplary status across a range of sustainable measures. A manual for the City's Green Building Ordinance explaining the requirements and acceptable methods to achieve them is available on the City's website or at the Green Building Resource Center.

Recycling. In addition to standard household (blue and green cart) recycling for all residents, the City also has a Commercial Recycling Program. The City sends all commercial refuse to a Materials Recovery Facility (MRF) for separation and processing. The City also has a restaurant food waste recycling program, sponsors drop-off sites, and events (e.g., batteries, cell phones, paper, cardboard and electronic waste).

3.5 Greenhouse Gas Emissions

Polystyrene Ban. The City adopted a polystyrene ban in 1990. The ban prohibits use of polystyrene containers by restaurants, vendors, non-profits, and food packagers, and prohibits the sale of polystyrene containers within the City for home use.

Plastic Bag Ban. The City adopted a plastic bag ban on August 20, 2012. The purpose of the ban is to:

- Encourage sustainability by substituting plastic bags with durable and long-lasting reusable bags and paper bags made from recycled materials;
- Reduce costs to businesses, consumers, taxpayers, and the environment;
- Eliminate waste, litter, and marine debris; and
- Create local green jobs.

Climate Action Plan. The City has developed a CAP designed to address climate change and reduce GHG emissions at the local level. Although climate change is a global problem, the City recognizes that many strategies to adapt to a changing climate and combat its progression are best enacted at the local level. This plan recommends a series of actions West Hollywood can take to reduce its contributions to global climate change by reducing GHG emissions. The CAP includes actions in which every part of the community can participate – residents, property owners, businesses, and City government.

The CAP outlines a course of action to reduce municipal and communitywide GHG emissions that contribute to climate change. The CAP seeks to:

- Provide clear guidance to City staff and decision-makers regarding when and how to implement key actions to reduce GHG emissions;
- Place the City on a path to reduce annual communitywide GHG emissions by 20 to 25 percent below 2008 business-as-usual emission levels by 2035;
- Inspire residents, property owners, and businesses to participate in community efforts to reduce GHG emissions; and
- Demonstrate West Hollywood’s ability to respond to and comply with California GHG reduction legislation and guidelines.

The CAP includes strategies and performance indicators to reduce GHG emissions from both municipal and communitywide activities within West Hollywood. These strategies address seven major GHG sources and recommend actions to achieve GHG reductions through:

- Community leadership and engagement
- Land use and community design
- Transportation and mobility
- Energy use and efficiency
- Water use and efficiency
- Waste reduction and recycling
- Green space

The CAP implements Policy IRC-6.3 of the West Hollywood General Plan Infrastructure, Resources, and Conservation Element. The General Plan includes specific goals and policies that guide the City's approach to climate change, including emissions reduction targets, guidelines for preparing inventories or plans, and general reduction strategies in order to comply with AB 32.

CEQA Guidelines Section 15183.5 allows jurisdictions to analyze and mitigate the significant effects of GHGs at a programmatic level, by adopting a plan for the reduction of GHG emissions. Later, as individual projects are proposed, project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review in their cumulative impacts analysis. Project-specific environmental documents prepared for projects consistent with the General Plan and CAP may rely on the programmatic analysis of GHGs contained in the EIR certified for the West Hollywood General Plan update and CAP. A project-specific environmental document that relies on the CAP for its cumulative impacts analysis must identify the specific CAP measures applicable to the project and how the project incorporates the measures.

3.5.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

The CEQA Guidelines establish that the proposed project would have a significant impact related to greenhouse gas emissions if it would:

- 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.

CARB and the SCAQMD have not adopted a significance threshold for analyzing GHG emissions associated with land use development projects such as the proposed project. The methodology used in this EIR to analyze the project's contribution to global climate change includes a quantification of GHG emissions. The purpose of calculating the project's GHG emissions is for informational and comparative purposes, as neither CARB nor SCAQMD has adopted a quantifiable threshold for evaluating whether project-generated GHGs would be considered a significant impact. The determination of significance is focused on project consistency with the City of West Hollywood CAP, which is the blueprint for managing GHG emissions within the City.

3.5 Greenhouse Gas Emissions

IMPACT ANALYSIS

GHG-1: *The proposed project would be consistent with the City of West Hollywood CAP and other applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions. In addition, the proposed project would not generate a significant amount of GHG emissions.*

The City adopted a CAP that includes measures intended to reduce GHG emissions within City operations and the community at large. The CAP defines community strategies and GHG reduction measures through text and maps and recommends implementation actions for each quantified GHG reduction measure. As a whole, the measures were designed and benchmarked to specific standards to enable the City to achieve its GHG reduction target of 20 to 25 percent below 2008 levels by 2035, as required by AB 32. As proposed, the CAP exceeds the AB 32 target, with a projected 25.5 percent reduction.

The project site is designated and zoned CA (Commercial, Arterial) in the City of West Hollywood General Plan. This designation allows for mixed-use development with multi-family residential, retail, and restaurant uses. The proposed project is consistent with the General Plan and, thus, is consistent with growth assumptions used to develop the CAP. Therefore, the proposed project would comply with the following applicable CAP policies and goals, as described below:

LU-1.1: Facilitate the establishment of mixed-use, pedestrian- and transit-oriented development along the commercial corridors and in Transit Overlay Zones.

The project site is designated and zoned CA (Commercial, Arterial) in the City of West Hollywood General Plan. The CA zone is for parcels that support regional retail uses due to the presence of a high volume of vehicle traffic. This designation allows for mixed-use development with multi-family residential, retail, and commercial uses. The project site is also located within a Mixed-Use Incentive Overlay Zone and the Santa Monica/La Brea Transit District. The Mixed-Use Incentive Overlay Zone identifies certain locations where a mix of residential and commercial uses is encouraged. The Transit Overlay Zone is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for automobile trips. The proposed mixed-use project would be located along the Santa Monica Boulevard commercial corridor and near multiple transit options.

T-1.1: Increase the pedestrian mode share in West Hollywood with convenient and attractive pedestrian infrastructure and facilities.

The design of the building and proposed landscape amenities would enhance the pedestrian experience along this stretch of Santa Monica Boulevard. The design includes unique styling to add to the diversity of the area and make the frontage pedestrian-friendly and visually interesting. Additionally, it would provide new street level retail and restaurant uses to encourage pedestrian movement along Santa Monica Boulevard.

- E-1.5: Develop an energy efficient appliance upgrade program for residents and business owners to promote upgrades from inefficient appliances to new Energy Star appliances.

Refrigerators, washing machines, and dishwashers installed as part of the proposed project would be Energy Star products. In addition, the proposed project would exceed the requirements in the Title 24 Energy Code by 20 percent.

- E-2.2: Require all new construction to achieve California Building Code Tier II Energy Efficiency Standards (Section 503.1.2).

The proposed project would be required to achieve California Building Code Tier II Energy Efficiency Standards, which states that new construction must exceed 2007 California Energy Code requirements (by 30 percent over 2007 Title 24 requirements).

- 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.

The proposed project would be submetered for water, gas, and electric for each unit to encourage conservation.

- E-3.2: Require the use of recycled materials for 20 percent of construction materials in all new construction.

The proposed project would incorporate materials with recycled content such that the sum of post-consumer recycled content plus one-half of the post-industrial content constitutes at least 20 percent of the total value of the materials used at the project site.

- W-1.1: Reduce per capita water consumption by 30 percent by 2035.

Water saving features associated with the proposed project would include low-flow showerheads, kitchen faucets, and shower faucets (less than two gallons per minute). The proposed project would also have dual-flush water-efficient toilets.

- W-1.2: Encourage all automated irrigation systems installed in the City to include a weather-based control system.

The proposed project landscaping features would include low-water native landscaping and use an automated weather-based irrigation control system.

Additionally, the proposed project would be required to implement mitigation measure 3.15-1 in the EIR for the General Plan. This measure states that:

“To further reduce construction-generated GHG emissions, the project applicant(s) of all project phases shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction.

3.5 Greenhouse Gas Emissions

Prior to releasing each request for bid to contractors for the construction of each development phase, the project applicant(s) shall obtain the most current list of GHG reduction measures that are recommended by the City and stipulate that these measures be implemented in the respective request for bid as well as the subsequent construction contract with the selected primary contractor.

The project applicant(s) for any particular development phase may submit to the City a report that substantiates why specific measures are considered infeasible for construction of that particular development phase and/or at that point in time. The report, including the substantiation for not implementing particular GHG reduction measures, shall be approved by the City prior to the release of a request for bid by the project applicant(s) for seeking a primary contractor to manage the construction of each development phase. By requiring that the list of feasible measures be established prior to the selection of a primary contractor, this measure requires that the ability of a contractor to effectively implement the selected GHG reduction measures be inherent to the selection process.

The City's recommended measures for reducing construction-related GHG emissions at the time of writing this EIR are listed below. The list will be updated as new technologies or methods become available. The project applicant(s) shall, at a minimum, be required to implement the following:

- Improve fuel efficiency of construction equipment:
 - reduce unnecessary idling (modify work practices, install auxiliary power for driver comfort);
 - perform equipment maintenance (inspections, detect failures early, corrections);
 - train equipment operators in proper use of equipment;
 - use the proper size of equipment for the job; and
 - use equipment with new technologies (repowered engines, electric drive trains).
- Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power.
- Use an Air Resources Board-approved low-carbon fuel, such as biodiesel or renewable diesel for construction equipment. (Emissions of oxides of nitrogen from the use of low carbon fuel must be reviewed and increases mitigated.) Additional information about low-carbon fuels is available from Air Resources Board's Low Carbon Fuel Standard Program.
- Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking for construction worker commutes.
- Reduce electricity use in the construction office by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones.
- Recycle or salvage nonhazardous construction and demolition debris (goal of at least 75 percent by weight).
- Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials).
- Minimize the amount of concrete used for paved surfaces or use a low carbon concrete option.

3.5 Greenhouse Gas Emissions

- Produce concrete onsite if determined to be less emissive than transporting ready mix.
- Use EPA-certified SmartWay trucks for deliveries and equipment transport. Additional information about the SmartWay Transport Partnership Program is available from Air Resources Board’s Heavy-Duty Vehicle Greenhouse Gas Measure.
- Develop a plan to efficiently use water for adequate dust control. This may consist of the use of non-potable water from a local source.”

Lastly, the proposed project would be designed and constructed in accordance with the City’s Green Building Ordinance, which would include implementing energy efficient systems and appliances, installing energy efficient lighting, and using water-efficient landscaping, irrigation systems and water conserving plumbing and fixtures. As designed, the proposed project would exceed Title 24 energy requirements by 20 percent, would use low-VOC interior paints (approximately 50 grams per liter), and would include solar panels.

Based on compliance with the CAP, the City’s Green Building Ordinance, and implementation of mitigation measure 3.15-1 in the EIR for the General Plan, GHG emissions were quantified for the proposed project. The emission calculations take into account on-road mobile vehicle operations, general electricity consumption, electricity consumption associated with the use and transport of water, natural gas consumption, and solid waste decomposition during construction and operations. Similar to the emissions presented in the air quality analysis, GHG emissions were estimated using CalEEMOD. Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span, as shown in Table 3.5-3.

TABLE 3.5-3 GREENHOUSE GAS EMISSIONS

Source	CO ₂ e Emissions (metric tons/year)
Construction Activity	36
Operational Activity	
Area Sources	4
Mobile Sources	1,651
Electricity Consumption	600
Solid Waste Decomposition	47
Water Consumption	146
Total Emissions	2,484
GHG Efficiency Metrics	
Residential Population	267
Employment Population	18
Service Population	285
Annual CO₂e/Service Population	8.7

Source: Terry A. Hayes Associates Inc. 2012.

3.5 Greenhouse Gas Emissions

As shown in Table 3.5-3, the proposed project would generate 2,484 metric tons per year of CO₂e, or 8.7 metric tons of CO₂e per year per service population. By implementing the project features and GHG reducing measures described above, the proposed project would result in a GHG emission profile that is better (lower) than business-as-usual. Project-generated GHG emissions would be less than the 9.7 metric tons of CO₂e per year per service population 2008 baseline identified in the EIR for the City of West Hollywood General Plan and CAP for the entire City (2010). In addition, the estimated emissions of 2,484 metric tons per year would be less than the California Air Pollution Control Officers Association 10,000-metric ton emissions standard for capturing 50 percent of new development. Approximately 66 percent of project emissions would be related to mobile sources. Although difficult to quantify, it is anticipated that mobile source emissions would be reduced in the future as regional transit expands (e.g., Regional Connector and Westside Subway Extension) and project-related single-occupancy vehicle trips are reduced.

The proposed project would comply with the plans and policies in the City's CAP; comply with mitigation measure 3.15-1 in the General Plan EIR for the purpose of reducing GHG emissions; and comply with the City's Green Building Ordinance. Based on this analysis, project-related GHG emissions would be less than the City's business-as-usual baseline of 9.7 metric tons of CO₂e per year per service population as defined in the CAP and would not conflict with the City of West Hollywood's General Plan and CAP, which is intended to exceed the AB 32 emission reduction targets. The CAP features, General Plan mitigation measure, and project design features would meaningfully reduce project-generated GHG emissions. Therefore, the proposed project would result in a less than significant impact, and no mitigation measures are required.

3.5.4 MITIGATION MEASURES

Impacts related to GHG emissions would be less than significant. No mitigation measures are required.

3.5.5 SIGNIFICANCE AFTER MITIGATION

Impacts to GHG emissions would be less than significant without implementation of mitigation.

3.6 HAZARDS AND HAZARDOUS MATERIALS

Hazardous substances are defined by state and federal regulations as substances that must be regulated in order to protect the public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be hazardous. The California Code of Regulations Title 22, Chapter 11, Article 2, Section 66261 provides the following definition:

A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of or otherwise managed.

According to California Code of Regulations Title 22 (Chapter 11, Article 3), substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered hazardous. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, contaminated, or which is being stored prior to disposal.

Toxic substances may cause short-term or long-term health effects, ranging from temporary effects to permanent disability or death. Examples of toxic substances include most heavy metals, pesticides, benzene, gasoline, hexane, natural gas, sulfuric acid, lye, explosives, pressurized canisters, and radioactive and biohazardous materials. Soils may also be toxic because of accidental spilling of toxic substances.

This section discusses the potential for the proposed project to expose people to hazards and hazardous materials. The past, present, and future uses of the site and the surrounding area are discussed. For the purposes of this analysis, the following reports prepared for the project site were reviewed (see Appendix E):

- PIC Environmental Services. *Groundwater Monitoring Report*. April 12, 2012.
- PIC Environmental Services. *Phase I Environmental Site Assessment Report*. April 16, 2012.
- Professional Services Industry, Inc. *Phase I Environmental Site Assessment for the Faith Plating and SSI Studios, 7141 and 7155 Santa Monica Boulevard, West Hollywood, Los Angeles County, California 90046*. December 29, 2005.
- Professional Services Industry, Inc. *Phase II and Limited Phase III Environmental Site Assessment for the property at 7141 and 7155 Santa Monica Boulevard, West Hollywood, Los Angeles County, California*. April 18, 2006.

3.6 Hazards and Hazardous Materials

- Professional Services Industry, Inc. *Site Characterization Report for the property at 7141 and 7155 Santa Monica Boulevard and 1107-1117 Detroit Street, West Hollywood, Los Angeles County, California.* September 24, 2007.
- Professional Services Industry, Inc. ~~*Remedial Removal Action Work Plan for the property at 7141 and 7155 Santa Monica Boulevard and 1107-1117 Detroit Street, West Hollywood, Los Angeles County, California.* September 24, 2007~~ *August 9, 2008.*
- Professional Services Industry, Inc. *Human Health Risk Assessment for the property at 7141 and 7155 Santa Monica Boulevard, West Hollywood, Los Angeles County, California 90046.* ~~September 24, 2007~~ July 7, 2008.

3.6.1 ENVIRONMENTAL SETTING

PROJECT SITE CONDITIONS

The 7155 Santa Monica Boulevard property is currently developed with a two-story, 3,500-square-foot, wood-framed, plaster structure constructed prior to 1928 and renovated in 1980 and again in 1990. The remainder of the property consists of a paved parking area and landscaping. The site has been occupied by SSI Sound Studios since 1973, and prior to that, by Bank of America.

The 7141 Santa Monica Boulevard and 1107 and 1117 Detroit Street parcels have been occupied by Faith Plating Company ~~since from~~ from 1937 through 2012, and contain five contiguous structures totaling approximately 36,000 square feet. The structures are interconnected, two-story, wood-framed plaster buildings constructed between 1926 and 1958. ~~Faith Plating conducts metal fabrication and plating operations in the south central portion of the property. Discharge of treated industrial waste is located in the north central portion of the property. Underground fuel storage tanks were formerly located in the northern portion of the property.~~ The plating operation, polishing, and metal working area are located in the first floor of the largest building, located in the southeastern portion of the property. The southeastern main building and the adjacent building in the southwestern portion of the property house degreasing operations. An employee locker room and a bumper storage area are located on the second floor of the main building. The northeastern building contains bumper metal work and polishing areas on the first floor, and bumper storage on the second floor, which appears to have previously been used as apartments. In the northern portion of the property, a small, unpaved parking lot is now used for automobile maintenance and bumper storage and contains an onsite wastewater treatment plant, clarifier, hydraulic lift, and a monitoring well.

~~Professional Services Industries, Inc., on behalf of Faith Plating and Hanover West (former project applicant), conducted surface and subsurface investigations of the Faith Plating property in 2005 through 2008. During these investigations, elevated concentrations of metals (particularly chromium, nickel and copper) were measured in soil within and adjacent to the plating room in excess of federal standards. All surface and subsurface investigations were performed under a Voluntary Oversight Agreement with the California Department of Toxic Substances Control (DTSC) (site ID number 60000429). Professional~~

Services Industries, Inc. submitted a Removal Action Work Plan (RAW) to DTSC on behalf of Hanover West to remediate contaminated soil at the project site. The RAW was formally approved by DTSC on March 13, 2009 (see Appendix C of this Recirculated Draft EIR).

WASTEWATER DISCHARGE PERMIT

As part of the existing conditions, Faith Plating recently operated pursuant to an industrial wastewater discharge permit No. 000J122557 and Los Angeles County Health Department permit No. 105700. These permits specify the quality of wastewater that Faith Plating may discharge into the wastewater collection and treatment system, the amount of pre-treatment required, as well as the quality of storm water runoff from the facility that may be discharged into local storm drains and ultimately into the Pacific Ocean. The wastewater produced from the project site resulted from rinses of plating, anodizing, and stripping. The wastewater contained, among other things, chromium, copper, and nickel. Pre-treatment consisted of chrome reduction, neutralization, metals precipitation, and filter press.

Numerous Notices of Non-Compliance or Notices of Violation (NOV) were issued against Faith Plating from 1992 to 2007. The majority of the NOV's were due to insufficient pre-treatment of nickel prior to discharge and violations of the EPA monthly average efficiency discharge limit.

AIR QUALITY PERMITS

As part of the existing conditions, Faith Plating recently operated pursuant to permits issued by the SCAQMD, permit No.s F43973, F56683, F56684, and F7933. These permits regulate the emissions of VOCs and various TACs (including hexavalent chromium). Based on a 2000 annual emissions report, Faith Plating produced the criteria air pollutants shown in Table 3.6-1.

TABLE 3.6-1 CRITERIA AIR POLLUTANTS PRODUCED BY FAITH PLATING (YEAR 2000)

<u>Pollutant</u>	<u>Description</u>	<u>Annual Emission (tons per year)</u>
<u>CO</u>	<u>Carbon Monoxide</u>	<u>0.149</u>
<u>NO_x</u>	<u>Nitrogen Oxide</u>	<u>0.182</u>
<u>ROG</u>	<u>Reactive Organic Gases</u>	<u>0.174</u>
<u>SO_x</u>	<u>Sulfur Oxide</u>	<u>0.001</u>
<u>TSP</u>	<u>Total Suspended Particulates</u>	<u>0.095</u>

Based on a 2000 annual emissions report, Faith Plating produced the toxic air pollutants shown in Table 3.6-2.

3.6 Hazards and Hazardous Materials

TABLE 3.6-2 TOXIC AIR POLLUTANTS PRODUCED BY FAITH PLATING (YEAR 2000)

<u>Pollutant ID</u>	<u>Description</u>	<u>Annual Emission (pounds per year)</u>
75070	Acetaldehyde	0.015
107028	Acrolein	0.009
71432	Benzene	0.028
18540299	Chromium (VI)	0.006
100414	Ethyl Benzene	0.034
50000	Formaldehyde	0.061
110543	Hexane	0.022
7440020	Nickel	1.128
1151	polycyclic aromatic hydrocarbons (PAHs) (total with components not reported)	0.001
108883	Toluene	0.132
1330207	Xylenes	0.098

This data from the 2000 annual emissions report represents the latest information available regarding Faith Plating's criteria pollutants and toxic pollutant air emissions. It is likely that Faith Plating's 2012 air emissions are similar to this year 2000 data.

HAZARDOUS WASTE AND SOLID WASTE

In 2007, Faith Plating generated 14.2520 tons of hazardous waste that is transported under a hazardous waste manifest to various authorized hazardous waste treatment, storage, and disposal (TSD) facilities in southern California. The 14.2520 tons are comprised of 3.2109 tons of aqueous solution with metals, 0.2294 tons of unspecified aqueous solution, 8.6225 of other inorganic solid waste, and 2.1893 tons of California Code 726 (liquids with nickel greater than or equal to 134 million gallons).

PHASE I ENVIRONMENTAL SITE ASSESSMENT

In November 2005, a Phase I Environmental Site Assessment was conducted for the project site. As part of the site assessment, an environmental database records (EDR) report was prepared for the project site. According to the EDR report, the 7155 Santa Monica Boulevard property is not listed on any hazardous materials databases or lists; however, the 7141 Santa Monica Boulevard / 1107-1117 Detroit Street property is listed on seven databases: Hazardous Waste Information System (HAZNET); Resource Conservation and Recovery Act – Large Quantity Generator (RCRA-LQG); Historic Underground Storage Tank (HIST UST); Leaking Underground Storage Tank (LUST); Cortese; Statewide Environmental Evaluation and Planning System (SWEEPS) UST; and Los Angeles County Hazardous Materials System (HMS).

The 7141 Santa Monica Boulevard / 1107-1117 Detroit Street property is listed on HIST UST and SWEEPS UST for records of five USTs installed on the property: a 3,000-gallon gasoline tank installed in 1971 and removed in 1988; a 5,000-gallon product tank installed in 1971 and removed in 1988; a 500-gallon tank installed in 1982; a 30-gallon tank installed in 1984; and a 300-gallon tank with an unknown

3.6 Hazards and Hazardous Materials

installation date. No further information is available for the 500-, 300-, or 30-gallon tanks. The property is listed on the HAZNET and RCRA-LOG databases for the plating operations that occur on the site and the generation of hazardous materials associated with the plating processes. The inclusion of sites on these databases do not necessarily indicate an environmental concern; however, the records for the property also indicate that the plating facility was issued two chromium discharge violations (dated September 25, 2002 and November 1, 2004), one nickel discharge violation (dated November 12, 2002), and one failure to respond to a notice of violation (dated July 23, 2003).

The property is also listed on the Cortese and LUST databases for a reported release of gasoline into the soil and groundwater from the 3,000-gallon tank. The release was discovered in 1988 during the removal of the 3,000- and 5,000-gallon USTs. Contaminated soils beneath the USTs were overexcavated and hydrogen peroxide was injected into the soil and groundwater as a treatment method. The site was given a case closed status in 1996; however, two monitoring wells remain onsite.

In addition to the 7141 Santa Monica Boulevard / 1107-1117 Detroit Street property records, two adjoining and two nearby properties were included on the hazardous materials databases. The former UNOCAL site (7144 Santa Monica Boulevard), located approximately 60 feet south of the project site is listed on the RWQCB's Spills, Leaks, and Investigation Cleanup (SLIC) and LUST databases for a release of gasoline into the soil in 1991. The site is currently undergoing pollution characterization. The BA Studios site (7144 Santa Monica Boulevard), also located approximately 60 feet south of the project site, is listed on the SLIC database for a release of volatile organic compounds (VOCs) in the form of perchloroethylene at the facility. The site is currently undergoing site assessment. The Warner Hollywood Studios site (1041 Formosa Avenue), located approximately 150 feet southwest of the project site, is listed on the RCRA – Small Quantity Generator (RCRA-SQG), HAZNET, LUST, and SWEEPS UST databases. Although the facility has no reported violation associated with their RCRA-SQG status, one release of gasoline into the onsite soils occurred in 1995. The release was granted a case closed status by the RWQCB in 1997. The final site, the Quality Care Cleaners site (1110 La Brea Avenue), located approximately 350 feet east of the project site, is listed on the HAZNET and Cleaners databases. No violations or releases are reported for the facility, and it is currently an operating dry cleaners.

The Phase I concluded that the inherent nature of the onsite chrome, copper, and nickel plating activities coupled with observed housekeeping practices, the age of the operations, and the violations discussed above, the presence of the plating facility represents an environmental risk to the project site. Additionally, the unknown status of the three remaining underground storage tanks (USTs), the conditions of the adjoining and nearby properties, and the remaining groundwater monitoring wells represent additional environmental risks to the site. The report recommended further investigation to address the three USTs and possible soil and groundwater contamination from the plating operations.

PHASE II AND LIMITED PHASE III ENVIRONMENTAL SITE ASSESSMENTS

In accordance with the recommendations of the Phase I, a Phase II and Limited Phase III Environmental Site Assessments were conducted for the project site in January 2006. The site assessment included concrete, soil gas, soil, and groundwater sampling. Preliminary soil gas samples were collected from 30

3.6 Hazards and Hazardous Materials

locations throughout the site and were analyzed for VOCs. Four of the samples contained detectable amounts of VOCs and based on these results, 37 soil borings were collected: 31 within the interior of the facility and 6 around the perimeter of the property. Eighty soil samples and 25 groundwater samples were collected from the borings and were analyzed for VOCs and metal concentrations. Additionally, seven concrete samples were collected from throughout the interior of the plating facility and were analyzed for VOCs and metals.

Analysis results for VOCs were compared to applicable California Preliminary Remediation Goals (PRGs). Analysis results for metals in soils and concrete were compared to California Code of Regulations Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC), and the federal RCRA Total Concentration Leaching Potential (TCLP) to determine disposal requirements. Metal concentrations below the STLC are considered to be non-hazardous while those higher than the TTLC are considered to be hazardous under California disposal requirements. Concentrations between the lower STLC and higher TCLP values are further evaluated by a California Waste Extraction Test (WET) and values are again compared to the STLC. A test similar to the WET is conducted to compare values to the TCLP to determine if the sediment is considered a federal hazardous waste for disposal purposes. Analysis results for metals in soils were further compared to the California Residential Human Health Screening Levels (CHHSLs) and PRGs to assess the volume of soil requiring remediation. The CHHSLs and PRGs were developed by the California Environmental Protection Agency and Region IX of the US EPA, respectively, and are guidance levels based on human cancer risks.

Soil analytical results determined that VOCs exceed PRGs in the upper five feet of soil in the area of the oil storage area and at a depth of 25 feet in the area of the former dispenser island. Concentrations of cadmium, chromium, lead, and nickel exceed both CHHSLs and PRGs in six samples of shallow soils in the vicinity of the plating operation. Subsequent analysis of chromium indicated that it was predominantly in the trivalent form. As a result, chromium concentrations were below the CHHSLs and PRGs for trivalent chromium. Concentrations of metals exceeded STLCs in every soil sample analyzed; however, only cadmium and nickel in one sample adjacent to the southwest corner of the plating room exceeded California TTLCs. No samples contained metals in excess of federal RCRA TCLP levels. Results of the concrete analysis indicated that no samples contained VOCs in excess of applicable thresholds. Concentrations of metals in the concrete exceeded STLCs in every sample; however, only chromium, copper, and nickel levels in three samples in the vicinity of the hazardous storage area and adjacent to the plating area exceeded California TTLCs. One sample in the motorcycle room adjacent to the plating operations contained chromium in excess of the federal TCLP thresholds.

Groundwater analytical results indicated that 11 samples contained VOCs in excess of California Drinking Water Standards, with benzene representing the most frequently detected VOC, occurring in 8 samples. Samples containing VOCs in excess of Drinking Water Standards were collected from locations beneath the plating facility and south of the facility along Santa Monica Boulevard. Metals were detected above California Drinking Water Standards in eight samples collected west of the onsite wastewater treatment plant, east of the former fuel dispensing island, and surrounding the plating operation. Based

on the relatively low concentrations of metals detected throughout and surrounding the property, it does not appear that metal contamination in the groundwater has migrated offsite.

The Phase II and Limited Phase III Environmental Assessment concluded that the sources of metals and VOCs appear to be limited to the southeastern portion of the project site in the area of the plating baths operated by Faith Plating. Additionally, the extent of impact from metals is greatest near the surface and generally extends to a depth of approximately 10 feet bgs. In addition to the analytical results, the assessment determined that the information indicating that three USTs remained onsite was unsubstantiated. The Regional Water Quality Control Board, State Water Resources Control Board, Los Angeles County Department of Public Works, and West Hollywood Building Department have no records of the tanks. Additionally, a geophysical study conducted on accessible portions of the property did not locate the tanks. The assessment concluded that the records most likely refer to onsite water treatment and plating tanks. The assessment also determined that one of the two remaining groundwater monitoring wells observed during the Phase I have been properly abandoned under a permit from the Los Angeles County Department of Public Works. The monitoring well located in the sidewalk on the southeastern portion of the property has not been abandoned and the assessment recommends that it be secured or abandoned if no longer in use.

VOLUNTARY CLEANUP AGREEMENT (VCA)

On September 13, 2006, the prior applicant, Hanover West, entered into a VCA with DTSC, pursuant to the voluntary cleanup program administered by DTSC and authorized under California Health and Safety Code Section 25355.5(a)(1)(C). Under the VCA, the applicant first engages in a comprehensive investigation of the environmental condition of the project site; once that is approved by DTSC, the applicant then proposes and completes an environmental remediation of the project site, which occurs under the oversight of DTSC. DTSC has approved the site characterization of the property and the Removal Action Work Plan (RAW) to remove contaminated soils at the site to the satisfaction of DTSC. Under the VCA, the applicant reimburses DTSC for its costs and expenses incurred in supervising the environmental remediation of the project site. As discussed in Chapter 2.0, Project Description, the current applicant, Domain WH, LLC, has since entered into the VCA with DTSC.

HUMAN HEALTH RISK ASSESSMENT

Following the completion of the site assessments, a Human Health Risk Assessment (HHRA) was prepared for the project site to determine potential risks to human health, including cancer, from the site specific contaminants and conditions. During the site assessments, cadmium, nickel, and lead were found at concentrations in excess of applicable hazardous materials thresholds as detailed above. Accordingly, they were identified as the COCs for the site. VOCs identified as COCs included benzene, toluene, ethylbenzene, xylenes, naphthalene, perchloroethylene, trichloroethylene, and vinyl chloride.

The assessment of health risks is based on ways in which receptors are exposed to COCs, or exposure pathways. Based on the current and proposed future land use at the site, the HHRA determined that potential human exposure pathways exist for the following receptors and exposure routes:

3.6 Hazards and Hazardous Materials

- Excavation and construction workers: Potential exposure of excavation and construction workers to metals and VOCs in soil in the upper 20 feet bgs by incidental ingestion, dermal contact, and inhalation of dust.
- Neighboring residents: Potential exposure of neighboring residents to metals and VOCs in soil in the upper 20 feet bgs by incidental inhalation of dust.
- Future residents and occupational workers: Potential inhalation exposure to VOCs migrating into structures from subsurface soil gas by future occupational workers and residents.

Exposure to groundwater was not considered a complete exposure pathway for this site based on the following:

- Shallow groundwater beneath the site has low concentrations of VOCs and metals below or slightly above Maximum Contaminant Levels (MCL).
- Natural attenuation and biodegradation of the reported concentrations should occur within the limits of the property or at some limited distance down-gradient, but at considerable distance from any municipal wells or discharge locations.
- The low concentrations of metals found in filtered water samples suggest that further attenuation on soils shall occur.
- VOC concentrations in groundwater should also naturally biodegrade and attenuate.
- Shallow groundwater beneath the site is not used for beneficial purposes.

The HHRA also evaluated the risks associated with the human exposure to contaminants on the site during construction and after construction is complete. In short, with implementation of the remediation in the RAW (discussed below), there would be no unacceptable human health risks associated with either construction or future occupation at the site.

Following construction of the project's subterranean parking structure, which would occupy the entire footprint of the property, no direct exposure to soils surrounding or beneath the site are anticipated. After completion of the development, pathways of exposure to metals would be eliminated and risks of vapor intrusion would be minimized for the following reasons:

- Soil across the entire property would be excavated and removed from the project site to at least 14 feet bgs;
- The residual soils in the unsaturated zone would have considerably lower concentrations of metals than the removed material resulting in an expected lower exposure point concentration;
- The proposed structure would occupy the entire footprint of the subject property with the foundation of the structure providing the effective mitigating barrier for contact with subsurface soils on the property; and
- Shallow groundwater would not be pumped or used onsite or down gradient from the property.

Construction

According to the HHRA, exposure to VOCs during construction would be limited. Low concentrations of VOCs may volatilize during the excavation process, but concentrations are expected to be low. The duration of exposure would be less than 6 months for excavation workers and neighboring residents with frequencies not exceeding 8 hours.

The carcinogenic risks associated with nickel and cadmium, for construction workers for all three exposure pathways (ingestion, dermal, and inhalation) would be greater than the recognized acceptable level of 1×10^{-6} . The largest calculated risk would be the risk associated with the inhalation of nickel (1.7×10^{-2}). Based on these assessments, the applicant has proposed that during the construction phase of the project appropriate worker protection measures such as dust suppression and monitoring, an appropriate level of personal protective equipment (PPE), and sufficient safe work procedures (washing and containment of soiled clothes) should be employed at the subject property to protect the health of both onsite construction workers and off-site residents. These standard worker protection measures are a part of the RAW and thus are specifically designed by an independent responsible agency (i.e., DTSC) to provide sufficient protection to workers in these types of environments. Deployment of these RAW worker protection measures would reduce carcinogenic risks associated with nickel and cadmium for construction workers for all three exposure pathways (ingestion, dermal, and inhalation). Additionally, the results indicate the calculated cancer risk associated with the inhalation of nickel and cadmium in fugitive dust for off-site residents (1.68×10^{-7} to 1.27×10^{-8}) would be significantly lower than the generally acceptable risk level of 1 in 1 million (1.0×10^{-6}). The maximum detected concentration of lead in the soils at the site is 810 milligrams per kilogram (mg/kg), which is below the acceptable level of human health risk of 1,039 mg/kg. Therefore, lead would not represent a significant health risk to either construction workers or off-site residents. Accordingly, through implementation of the RAW, construction workers and off-site residents would not be exposed to significant health risks.

Operation

Following construction of the proposed project, cadmium, nickel, and lead impacted soil would be excavated to a depth of 14 feet bgs and removed from the project site. Additionally, the proposed structure would occupy the entire footprint of the property and no existing topsoil would be exposed. Accordingly, no direct exposure to soils surrounding or beneath the site would occur.

The summed total carcinogenic risk associated with vapor intrusion of VOCs at the project site was calculated to be 1.7×10^{-6} , slightly above the acceptable value of 1.0×10^{-6} . While this value is slightly above the acceptable value of 1.0×10^{-6} , this risk value is less than one order of magnitude above the accepted level. Additionally, according to the California Office of Environmental Health Hazard Assessment web page, these calculated risk values are also below the Proposition 65 acceptable risk level of 1 in 100,000. It should be noted that the calculation did not include the benefits of the presence of the underground parking and the implementation of a standard vapor barrier, both of which are included in the proposed project. The standard vapor barrier is designed to prevent vapor invasion into the building. Additionally, the subterranean parking garage would have a separate air handling system from the

3.6 Hazards and Hazardous Materials

remainder of the building. The air exchange rate for parking garages would be very high in order to prevent the buildup of CO. Thus, the combined effect of the garage and the vapor barrier would reduce the total carcinogenic risk associated with vapor intrusion of VOCs at the project site to below the acceptable value. The summed total hazard index for non-carcinogenic risk (0.043) is well below the threshold of 1 in 100,000, and therefore, no additional action would be warranted to mitigate this risk. In summary, upon the completion of the work in accordance with the RAW discussed above, there would be no excess risks to future occupants of the project site.

2012 PHASE I ENVIRONMENTAL SITE ASSESSMENT

In April 2012, a Phase I Environmental Site Assessment Report was prepared for the project site to determine whether conditions at the site had changed since the previous Phase I, Phase II and Limited Phase III Environmental Site Assessments were prepared in 2005 and 2006, respectively ~~Draft EIR~~ (see Appendix E C of this Recirculated Draft EIR). The 2012 Phase I Environmental Site Assessment indicates that the project site is listed on the following 10 regulatory lists:

- Voluntary Cleanup Program (VCP): This state list includes sites at which DTSC provides regulatory oversight to investigate and remediate identified subsurface contamination problems. The project site is included on the VCP list in response to an effort to remediate the property from 2005 to 2008.
- DTSC's ENVIROSTOR Database: This state electronic database includes sites with known subsurface environmental contamination problems. The project site is included on the ENVIROSTOR database in response to submission of numerous environmental investigation reports completed in 2005 to 2008.
- Resource Conservation and Recovery Act (RCRA): This federal list includes sites that have obtained permits to legally use, store, and/or dispose of hazardous waste (e.g., hexavalent chromium). Faith Plating appears on this list; however, inclusion on the list does not indicate the presence of a subsurface contamination problem.
- Leaking Underground Storage Tank (LUST): This state list includes sites that have sustained historic soil or groundwater contamination due to leakage from USTs. Faith Plating appears on the LUST list due to discovery of gasoline soil contamination under fuel dispensers in 1988. Subsequent remediation successfully mitigated soil contamination. Accordingly, the Regional Water Quality Control Board awarded regulatory closure on December 31, 1996.
- Facility Index Registry System (FINDS): This federal list includes sites which appear on one or more other federal lists. Faith Plating appears on the FINDS list in response to inclusion on the RCRA and Integrated Compliance Information System (ICIS) permit lists. Appearance on the federal FINDS list does not indicate the presence of a subsurface contamination problem.
- Underground Storage Tank Lists (UST): These state lists identify sites that currently or historically have used, operated, and/or permitted USTs. Faith Plating appears on these lists;

however, regulatory closure has occurred for all historic onsite USTs. Appearance on the state UST permit lists does not indicate the presence of a subsurface contamination problem.

- Emissions Inventory Data (EMI): This state list includes sites permitted to operate equipment that may release regulated amounts of air pollutants. Faith Plating appears on the EMI list in response to SCAQMD permits to operate plating tanks and a paint booth. Appearance on the state EMI list does not indicate the presence of a subsurface contamination problem.
- Integrated Compliance Information System (ICIS): This federal list includes site subject to compliance obligations relevant to potential surface discharges of pollutants. Faith Plating appears on the federal ICIS list. Appearance on this list does not indicate the presence of a subsurface contamination problem.
- HAZNET: This state list, like the federal RCRA list, includes sites that have historically obtained permits to legally dispose of hazardous waste (e.g., hexavalent chromium). Faith Plating is included on the HAZNET list. Appearance on this list does not indicate the presence of a subsurface contamination problem.
- Los Angeles County Hazardous Materials Sites: This county list includes sites that have been inspected or obtained industrial waste discharge/underground storage tank operating permits from the Los Angeles County Department of Public Works. All available records were reviewed at the county offices. One industrial waste clarifier remains in use at Faith Plating. All historic USTs have been removed under permit requirements of the Los Angeles County Department of Public Works and received regulatory closure with “No Further Action” status.

Additionally, several sites are listed within a one-mile radius of the project site.

GROUNDWATER MONITORING

A Groundwater Monitoring Report was prepared for the project site in April 2012. Groundwater samples were taken from five wells on March 26, 2012. The highest concentrations of most metal contaminants were measured in March 2008, when groundwater was at its shallowest level in all wells, while the lowest concentrations were measured in March 2012, when groundwater was at its deepest level. This most recent groundwater testing found that hexavalent chromium was nondetectable in all five wells. Additionally, significant levels of VOCs were not measured in the groundwater under the project site.

REMEDIAL REMOVAL ACTION WORK PLAN (RAW)

On ~~September 24, 2007~~ August 9, 2008, a proposed RAW was prepared for the project site by Hanover West in coordination with and under the regulatory oversight of DTSC. The RAW was approved by DTSC on March 13, 2009. The applicant, in coordination with DTSC, has agreed to implement the RAW as part of the proposed project. The purpose of the RAW is to provide a plan to ~~remediate~~ remove the COCs identified in the Site Characterization Report in conjunction with the proposed project. The

3.6 Hazards and Hazardous Materials

primary objective of the RAW is to ensure the protection of human health and the environment, and to prepare the property for residential uses.

The RAW requires specific removal action objectives (RAO), based on site-specific media of concern, COCs, exposure routes and receptors, and acceptable contaminant concentrations or range of contaminant concentrations for each exposure route. These RAOs indicate the types of remediation that is contemplated for the project site. The RAOs for the project site are as follows:

- Remove onsite sources to contamination to soil and groundwater;
- Minimize construction worker and adjacent residents' exposure to COCs during the construction program;
- Comply with all required permits including the SCAQMD 1166 Permit which includes daily monitoring for VOCs until the onsite soil excavation has been completed and the excavation area is sealed;
- Compliant demolition, removal and disposal of building materials from the site;
- Remove soils impacted with heavy metals until concentrations are below the CTTL concentration and 10 times the STLC or below hazardous concentrations within the property boundary and to a maximum depth of 20 feet bgs;
- Remove soils impacted with VOCs, or petroleum hydrocarbons to a depth of 15 feet bgs across the entire project boundary. Additional soil removal may occur beneath the plating operation floor to a maximum depth of 20 feet bgs if heavy metal concentrations exceed 10 times the STLC;
- Minimize the volume of soil designated as non-hazardous being transported and disposed of as hazardous through segregation based on existing data and supplemental data obtained during the excavation processes;
- Verify remaining conditions following excavation for documentation through verification sampling and testing;
- Assess post-remedial risks of subsurface vapors to determine if further mitigation is necessary;
- Monitor groundwater for a defined period of decreasing trends in the minor concentration of COCs. No groundwater remediation is anticipated to achieve unrestricted regulatory site closure for this site;
- Obtain unrestricted regulatory site closure for the site; and
- Provide a site ready for the unrestricted construction of a beneficial retail and residential complex that will enhance the community.

3.6.2 REGULATORY SETTING

FEDERAL

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA, commonly known as Superfund, provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste at these sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified.

Resource Conservation and Recovery Act (RCRA). RCRA provides the EPA the authority to control hazardous waste from the “cradle-to-grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous wastes.

STATE

Title 22 of the California Code of Regulations. Title 22 of the California Code of Regulations includes state hazardous waste regulations enforced by DTSC and local Certified Unified Program Agencies (CUPAs). Authority from the state was delegated to local CUPAs to establish a unified hazardous waste and hazardous materials management program for hazardous waste generators, treatment of hazardous waste subject to tiered permitting, facilities with USTs and above ground storage tanks (ASTs), risk management and prevention plans, and hazardous materials management plans and inventory statements required by the Uniform Fire Code.

California Health and Safety Code. State hazardous waste control laws enforced by the DTSC are included in the California Health and Safety Code. These regulations identify standards for the classification, management, and disposal of hazardous waste in California.

Occupational Safety and Health Act. Federal and state occupational safety and health regulations also contain provisions on hazardous materials management as it relates to worker safety, worker training, and worker right-to-know. The applicable federal law is the Occupational Safety and Health Act (OSHA). Under OSHA, authority to administer the Act is delegated to states that have developed a plan with provisions that are at least as stringent as those provided by OSHA. California is a delegated state for federal OSHA purposes. The California Occupational Safety and Health Act and regulations and programs authorized are commonly referred to as Cal/OSHA.

3.6 Hazards and Hazardous Materials

3.6.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment; emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; pose a safety hazard for people residing or working within two miles of a public airport or private airstrip; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or expose people or structures to significant risk of loss, injury or death involving wildland fires. Accordingly, these issues are not further analyzed in the EIR.

The CEQA Guidelines establish that a proposed project would have a significant effect on hazards and hazardous materials if it would:

- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

IMPACT ANALYSIS

HAZ-1: *The proposed project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65965.5. However, it would not create a significant hazard to the public or the environment.*

Faith Plating generates polluted wastewater containing, chromium, copper, and nickel, among other things. Additionally, Faith Plating has occasionally been discharging beyond the permitted levels. The proposed project would result in elimination of these discharges (permitted discharges and discharges beyond permit levels), which would produce a positive or beneficial impact. Moreover, the proposed project would eliminate the 14.252 tons per year of hazardous waste. Accordingly, implementation of the proposed project would result in beneficial impacts with respect to hazardous materials at the project site.

As discussed above, the project site contains elevated concentrations of VOCs and metals in the soil beneath the project site in concentrations that exceed state and federal standards. Additionally, elevated levels of metals also occur within the concrete of the plating facility. Due to the elevated levels of COCs detected at the project site, Hanover West entered into a VCA with DTSC and a RAW was prepared under DTSC supervision and approved on March 13, 2009. The applicant, in coordination with DTSC, has agreed to implement the RAW as part of the proposed project. Pursuant to the RAW, the proposed project would involve environmental remedial actions that would, among other things, remove onsite sources of contamination to the soil; obtain unrestricted regulatory site closure for the site; and provide a site ready for the unrestricted construction of residential uses. Thus, the implementation of the RAW

would ensure that any existing contamination is remediated and that the project site would be adequate for residential occupancy.

Construction

As discussed above, during construction of the proposed project, potential exposure pathways consist of inhalation, ingestion, and dermal contact of cadmium, nickel, lead, and VOCs by construction workers and inhalation of cadmium, nickel, lead, and VOCs by neighboring residents. Potential pathways during operation of the proposed project consist of inhalation of VOCs by residents and occupational workers.

According to the HHRA calculations detailed above, during construction, exposure of construction workers to VOCs and lead and exposure of neighboring residents to cadmium, nickel, lead, and VOCs would be below the acceptable risk levels and impacts would be less than significant. However, the calculated risk of exposure of construction workers to cadmium and nickel exceed the acceptable risk levels and impacts to the health of construction workers would potentially occur. Therefore, as detailed in the project description and the environmental setting section above, a RAW has been approved for the proposed project detailing the required remedial actions for the contaminated soil beneath the properties.

The RAW includes site and project specific excavation control measures, sampling and analysis, transportation, health and safety plans, and case closure procedures. Included in the measures, plans, and procedures are details of the amount of soil and from what locations throughout the project site to which the various state or federal requirements pertain. These include the following site cleanup activities:

Prior to excavation, the area identified as containing soils designated as hazardous waste would be identified and designated as an exclusion zone. A transition zone would be established immediately outside of the exclusion zone where equipment and personnel would be decontaminated. The transition zone would also be used for truck loading and unloading. Excavation for remediation of hazardous materials would be conducted in conjunction with the development of the proposed project site. Excavation would remove the target depth required by construction, which is 25 feet bgs. Excavation would generally begin along the southern boundary of the project site where Faith Plating is currently located to remove contaminated soils first. Equipment would be decontaminated prior to moving into areas outside of the exclusion zone or alternative equipment would be utilized.

The area of soil contamination requiring disposal as a California hazardous material is estimated at approximately 5,400 square feet centered beneath the plating baths and vertical extending approximately 10 feet bgs. Soil sampling would be conducted during excavation to ensure that all contaminated soils to a maximum depth of 25 feet bgs would be excavated. Excavated soil may be loaded by the excavator directly into trucks or temporarily stockpiled in designated areas for loading onto trucks by either the excavator or a loader for removal and designated off-site disposal. Soil designated as hazardous waste stockpiled outside of the exclusion zone would be laid on plastic sheets and would be removed daily from the project site. Truck routes from the work area would be cleaned daily using wet sweeping.

3.6 Hazards and Hazardous Materials

Ambient air samples would be collected upwind and downwind of excavation activities within the project site. Periodic ambient air sampling for VOCs would be conducted. A record of daily air monitoring would be maintained onsite. During excavation, soil samples would be periodically collected and analyzed from the COCs to assess the remaining conditions in the unexcavated portion of the project site and to characterize the removed soils for disposal disposition.

After excavation activities have been completed, closure and post-closure activity would document that the remaining soil would have concentrations of heavy metals less than 10 times their respective STLC. A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter of No Further Action (NFA), building construction would begin. Building construction would not be permitted until the NFA is received.

Following the implementation of the RAW and removal of the impacted soil in accordance with state and federal standards for residential occupancy, construction impacts related to hazardous conditions at the site would be less than significant. Because compliance with the RAW is required by state law, no mitigation measures are required.

Operation

As discussed above, the calculated risk for VOC intrusion into the proposed structure exceeds the acceptable risk level. According to the California Office of Environmental Health Hazard Assessment web page, the calculated risk values are below the Proposition 65 acceptable risk level of 1 in 100,000. Additionally, the risk calculation was based on conservative assumptions that did not account for the subterranean parking garage and the implementation of a standard vapor barrier, both of which are included in the proposed project. The standard vapor barrier is designed to prevent vapor invasion into the building. Additionally, the subterranean parking garage would have a separate air handling system from the remainder of the building. The air exchange rate for parking garages is typically very high in order to prevent the buildup of carbon monoxide. Thus, the combined effect of the garage and the vapor barrier would mitigate the total carcinogenic risk associated with vapor intrusion of VOCs at the subject property to a less than significant level. No additional mitigation measures are required.

Following implementation of the RAW, the potential existing source(s) of VOCs in soil gas are expected to be minimized with the removal of soils to a depth of 25 feet bgs and construction of the subterranean parking garage. Potential remaining sources may include residual concentrations in the remaining soil and groundwater. However, as required by DTSC, groundwater monitoring would occur for a two-year period to evaluate if contaminant concentrations are exhibiting an increasing trend. If no increasing trend is exhibited, no further action would be recommended. At the close of the two-year monitoring period, a letter would be issued from DTSC that groundwater monitoring has been completed and the project site would be considered remediated. Accordingly, compliance with existing state and federal regulations, including compliance with the RAW, would be expected to provide substantial environmental benefits to

the project site and ensure a less than significant impact related to exposure of residents and occupational workers to VOCs during operation. No additional mitigation measures are required.

3.6.4 MITIGATION MEASURES

Because implementation of the RAW's RAOs would effectively remediate any existing contamination and provide a site safe for residential construction, no significant impacts related to hazards and hazardous materials would occur as a result of the proposed project, and no additional mitigation would be required.

3.6.5 SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

3.6 Hazards and Hazardous Materials

This page is intentionally left blank.

3.7 HYDROLOGY AND WATER QUALITY

3.7.1 ENVIRONMENTAL SETTING

PHYSICAL SETTING

The project site is entirely developed with urban uses, including a metal plating facility and a sound editing studio. It slopes gently from the south to southeast and contains only impervious surfaces. Surface runoff is primarily sheet flow in the direction of the site slope to storm drains located in Detroit Street and Formosa Avenue.

Site elevations range from 289 feet MSL at the northeast corner to 284 feet MSL at the southwest corner for a difference of 5 vertical feet across the existing pad. Groundwater onsite was encountered at a depth of 21 feet bgs, or at 264.5 feet MSL on the southwest corner and at 268 feet MSL at the northeast corner. Historic high groundwater levels in the project vicinity are approximately 17 feet bgs, which corresponds to an elevation of 267 feet MSL at the southwest corner and 272 feet MSL at the northeast corner of the project site. However, groundwater levels typically vary seasonally and perched groundwater conditions can develop when impermeable fine grained soils are subjected to irrigation or precipitation (Geocon West, Inc. 2012).

The project site is not mapped as being located within a 100-year flood zone. However, it is located in an area identified as having a potential for inundation as a result of a failure or breach of Mulholland Dam (City of West Hollywood 2011). As discussed in Section 3.2, the Mulholland Dam was constructed and is maintained to withstand a failure during a magnitude 8.3 earthquake on the San Andreas Fault and a magnitude 7.0 earthquake on the Newport-Inglewood Fault. Therefore, the likelihood of inundation due to earthquake-induced dam failure is considered low. Similarly, the project site is not located within a coastal area or adjacent to an enclosed water body. Therefore, flooding from seismically-induced tsunamis or seiches is considered unlikely.

3.7.2 REGULATORY SETTING

CLEAN WATER ACT

The EPA is the lead federal agency responsible for managing water quality. The Clean Water Act of 1972 is the primary federal law that governs and authorizes EPA and the states to implement activities to control water quality. Under federal law, EPA has published water quality regulations under Volume 40 of the Code of Federal Regulations. Section 303 of the Clean Water Act requires states to adopt water quality standards for all surface waters of the United States. As defined by the Clean Water Act, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question, and (2) criteria that protect the designated uses. Section 304(a) requires EPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use.

3.7 Hydrology and Water Quality

The National Pollutant Discharge Elimination System (NPDES) permit program was established in the Clean Water Act to regulate municipal and industrial discharges to surface waters of the United States. A discharge from any point source is unlawful unless the discharge is in compliance with an NPDES permit. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self monitoring, and other activities.

PORTER-COLOGNE WATER QUALITY CONTROL ACT

The Porter-Cologne Act is California's statutory authority for the protection of water quality. Under the Act, the state must adopt water quality policies, plans, and objectives that protect the state's waters for the use and enjoyment of the people. The Act sets forth the obligations of the State Water Resources Control Board and Regional Water Quality Control Boards to adopt and periodically update Basin Plans. Basin Plans are the regional water quality control plans required by both the Clean Water Act and Porter-Cologne Act in which beneficial uses, water quality objectives, and implementation programs are established for each of the nine regions in California. The Act also requires waste dischargers to notify the Regional Water Quality Control Boards of their activities through the filing of reports of waste discharge and authorizes the State Water Resources Control Board and Regional Water Quality Control Boards to issue and enforce waste discharge requirements, permits, Section 401 water quality certifications, or other approvals. The Regional Water Quality Control Boards also have authority to issue waivers to reports of waste discharge and/or waste discharge requirements for broad categories of "low threat" discharge activities that have minimal potential for adverse water quality effects when implemented according to prescribed terms and conditions.

The Los Angeles Regional Water Quality Control Board (LARWQCB) is responsible for the preparation and implementation of the Water Quality Control Plan for the Los Angeles Region (Los Angeles RWQCB 1994). The Basin Plan defines the beneficial uses, water quality objectives, implementation programs, and surveillance and monitoring programs for waters in the Los Angeles region, including the Los Angeles River, the San Gabriel River, and Ballona Creek. The Basin Plan contains specific numeric water quality objectives that are applicable to certain water bodies or portions of water bodies. Objectives have been established for bacteria, dissolved oxygen, pH, pesticides, electrical conductivity, total dissolved solids, temperature, turbidity, and trace elements. Numerous narrative water quality objectives have also been established.

The State Water Resources Control Board and LARWQCB have adopted specific NPDES permits for a variety of activities that have potential to discharge wastes to waters of the state, including construction activities. All of the NPDES permits involve similar processes, including submittal to the LARWQCB of notices of intent to discharge, and implementation of Storm Water Pollution Prevention Plans (SWPPP) that include Best Management Practices (BMPs) to minimize those discharges.

Construction activities subject to the general construction activity permit include clearing, grading, stockpiling, dewatering, and excavation. Dischargers are required to eliminate or reduce non-storm water discharges to storm drain systems and other waters. The permit also requires dischargers to consider the use of permanent post-construction BMPs that would remain in service to protect water quality throughout the life of the project. All NPDES permits also have inspection, monitoring, and reporting requirements. Where pollutants are known or should be known to be present and have the potential to contact runoff, sampling and analysis are required. NPDES permits require the implementation of design and operational BMPs to reduce the level of contaminant runoff. Types of BMPs include source controls, treatment controls, and site planning measures.

CITY OF WEST HOLLYWOOD MUNICIPAL CODE

Chapter 15.56, Storm Water Runoff Pollution Control, in the City of West Hollywood's Municipal Code sets forth standards to protect water quality in the City. These standards include the requirements of the City's Municipal NPDES Permit and the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP). Chapter 15.52, Water Conservation Plan, regulates irrigation water practices in the City to reduce potable water consumption. Chapter 19.26.090, Plant Materials, discusses and regulates the City's drought tolerance requirements for plant materials. Chapter 19.26.070, Irrigation and Water Conservation, contains standards for landscape irrigation and conservation and irrigation equipment standards.

CITY OF WEST HOLLYWOOD MUNICIPAL NPDES PERMIT

The City of West Hollywood is a co-permittee under the Municipal Storm Water and Urban Runoff Discharges in the County of Los Angeles, and the incorporated cities, except the City of Long Beach (Order No. 01-182, NPDES Permit No. CAS00401). The Los Angeles County Storm Water Quality Management Program is the local enforcement mechanism of the NPDES, which controls water pollution by regulating point sources that discharge pollutants to receiving waters. This permit specifies that all new development and redevelopment projects that fall under specific priority project categories must comply with the Los Angeles County SUSMP. The SUSMP includes BMP requirements for site design, source control, and treatment control.

3.7.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would result in a less than significant impact associated with depleting groundwater supplies, altering site drainage patterns, otherwise substantially degrading water quality, placing housing or other structures within a 100-year flood hazard area, or exposing people or structures to risk of loss associated with flooding, inundation, tsunami, or seiche. Accordingly, these issues are not further analyzed in the EIR.

3.7 Hydrology and Water Quality

The CEQA Guidelines establish that the proposed project would have a significant impact related to hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements.
- Create or contribute runoff that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

IMPACT ANALYSIS

HWQ-1 *The proposed project would not violate any water quality standards or waste discharge requirements.*

The proposed project site is currently entirely developed with urban uses. The majority of the project site contains flat impervious surfaces. Development of the proposed project would not substantially change the amount of impervious surfaces onsite. The proposed project does not include any uses that might discharge unusual pollutants, such as industrial or manufacturing uses. Further, it would eliminate hazardous waste water discharges currently generated by Faith Plating (see Section 3.6 Hazards and Hazardous Materials).

In the short term, water used to control dust during grading and construction, as well as storm water, could carry construction debris, spilled fluids (including petroleum products from construction vehicles), and disturbed soils into local and regional waterways. The LARWQCB requires all discretionary projects, such as the proposed project, to incorporate features to filter or retain the first 3/4-inch of storm water onsite. Since most pollutants are carried away in the first 3/4-inch of rainfall, this requirement would address the primary source of pollution onsite. Control of pollutants within the storm water runoff during construction is anticipated to be accomplished through BMPs including but not limited to sandbag barriers, temporary desilting basins near inlets, gravel driveways, dust controls, employee training, mulching, street sweeping, tracking control BMPs such as entrance and outlet tire wash, and general good housekeeping practices implemented during construction. The proposed project would follow guidelines for BMPs per a SWPPP, which would include erosion and sediment control BMPs. Implementation of these requirements, including preparation of a SWPPP, would ensure that impacts to water quality during construction would be less than significant.

Based on the geotechnical report (see Appendix D), due to high groundwater levels in the project vicinity, pre-construction dewatering measures would be needed to achieve the required excavation depths. Dewatering would need to continue until the subterranean construction is completed and the parking structure is waterproofed and backfilled. There is a potential for groundwater dewatering to affect groundwater levels and soil characteristics at the project site, as well as in the project vicinity. A design-level geotechnical investigation and groundwater analysis would be performed by the applicant to establish procedures for dewatering implementation consistent with state and City geotechnical standards so that useable aquifers and surrounding soils and building foundations are not adversely impacted by groundwater withdrawal. Additionally, a qualified dewatering consultant would be employed to determine the most effective means and methods of dewatering the project site. It is anticipated that the

dewatering system would consist of the installation of wellpoints around the perimeter of the project site. Pumping of the wells would begin in advance of construction to allow drawdown of the water level to at least 2 feet below the excavation levels. The extent and nature of the dewatering program that would be required, as well as the anticipated pumping volumes, would be determined by the dewatering consultant after the installation and pumping of the test wells at the project site. A groundwater dewatering permit would be required from the Regional Water Quality Control Board. Although groundwater beneath the project site is not contaminated (see Section 3.6, Hazards and Hazardous Materials for a detailed discussion), as a condition of site cleanup, monitoring wells previously established on the project site would continue to be monitored for potential contamination. All groundwater removed from the project site during construction would be disposed of in accordance with DTSC procedures, as per the requirements of the RAW. Compliance with existing regulations would ensure that there would be no adverse impact to water quality associated with onsite groundwater disposal.

During operation, the proposed project would provide covered parking for the residential and retail/restaurant uses, thereby minimizing the amount of automobile-related pollutants that could be directly exposed to rain and become surface runoff. Further, the proposed project would be required to submit a site drainage plan for review and approval by the City prior to the issuance of a building permit. This submittal must include BMPs to limit discharge of sediment and pollutants during long-term operation in accordance with the Los Angeles County NPDES permit requirements. Additionally, the building foundation would be designed to prevent groundwater from intruding into the structure and be coated with a waterproof membrane. Therefore, a permanent dewatering program would not be required during long-term project operation.

Compliance with the state and local regulations and implementation of site specific consultant geotechnical design guidelines would ensure that impacts to water quality, both during construction and operation, are less than significant. In addition, the proposed project would have the beneficial effect of removing hazardous waste water discharges currently generated by Faith Plating. No mitigation measures are required.

HWQ-2 *The proposed project would not create or contribute runoff that would exceed the capacity of the existing or planned storm water systems or provide substantial additional sources of polluted runoff.*

As discussed above, the project site is currently entirely developed with impervious surfaces. Implementation of the proposed project would not substantially modify the amount of impervious surfaces onsite or substantially increase the amount of storm water runoff produced at the project site. Standard City requirements to submit a site drainage plan prior to issuance of a building permit would ensure that construction and operational impacts are minimized. In addition, the proposed project would be required to implement BMPs identified in the SWPPP during construction and operation and comply with the SUSMP. Compliance with existing state and local regulations would ensure a less than significant impact, and no mitigation measures are required.

3.7 Hydrology and Water Quality

3.7.4 MITIGATION MEASURES

No mitigation measures are required.

3.7.5 SIGNIFICANCE AFTER MITIGATION

Impacts to hydrology and water quality would be less than significant without implementation of mitigation.

3.8 LAND USE AND PLANNING

3.8.1 ENVIRONMENTAL SETTING

EXISTING LAND USES

The project site consists of three parcels owned by the project applicant. The first parcel, 7155 Santa Monica Boulevard, is currently occupied by a sound editing studio, which consists of one two-story brick and stucco building totaling approximately 3,500 square feet. The second and third parcels, 7141 Santa Monica Boulevard, and 1107 and 1117 Detroit Street, are currently occupied by a metal plating facility, which is developed with five contiguous two-story brick and stucco buildings totaling approximately 36,000 square feet. This portion of the project site is listed as a hazardous waste site. The project site is fully developed with surface parking spaces and structures. There is no vacant land or undeveloped soil on the site. There are no residential uses currently located on the project site. The project site is located in the Santa Monica/La Brea Transit District commercial sub-area of the City's General Plan.

SURROUNDING LAND USES

The surrounding area is primarily commercial along Santa Monica Boulevard. Jones Café is located west of the project site on the northwest corner of Santa Monica Boulevard and Formosa Avenue. A costume shop is located north of Jones Café on the west side of Formosa Avenue facing the project site. Residential uses are located farther north along the west side of Formosa Avenue. A studio is located on the south side of Santa Monica Boulevard opposite Jones Café. The Formosa Café and the West Hollywood Gateway, a multi-tenant commercial facility, are located directly south of the project site on Santa Monica Boulevard. La Brea Avenue is located one block east of the site. There were vacant commercial buildings located on the northeast corner of Santa Monica Boulevard and Detroit Street. These structures have since been demolished and construction of the Monarch West Hollywood – Santa Monica & La Brea Project is now underway. The Monarch project will consist of 184 residential units and 13,350 square feet of ground floor retail when construction is complete in late 2013. A beverage service and a parking lot and drive-thru for a fast food restaurant are located north of the Monarch on Detroit Street. Residential uses abut the project site to the north. A two-story apartment building is located north of the site fronting Formosa Avenue. An apartment complex consisting of four one-story apartment buildings is located north of the site along Detroit Street. The area north of the project site contains a mix of single- and multi-family residential uses.

3.8.2 REGULATORY SETTING

WEST HOLLYWOOD GENERAL PLAN 2035 LAND USE ELEMENT AND ZONING ORDINANCE

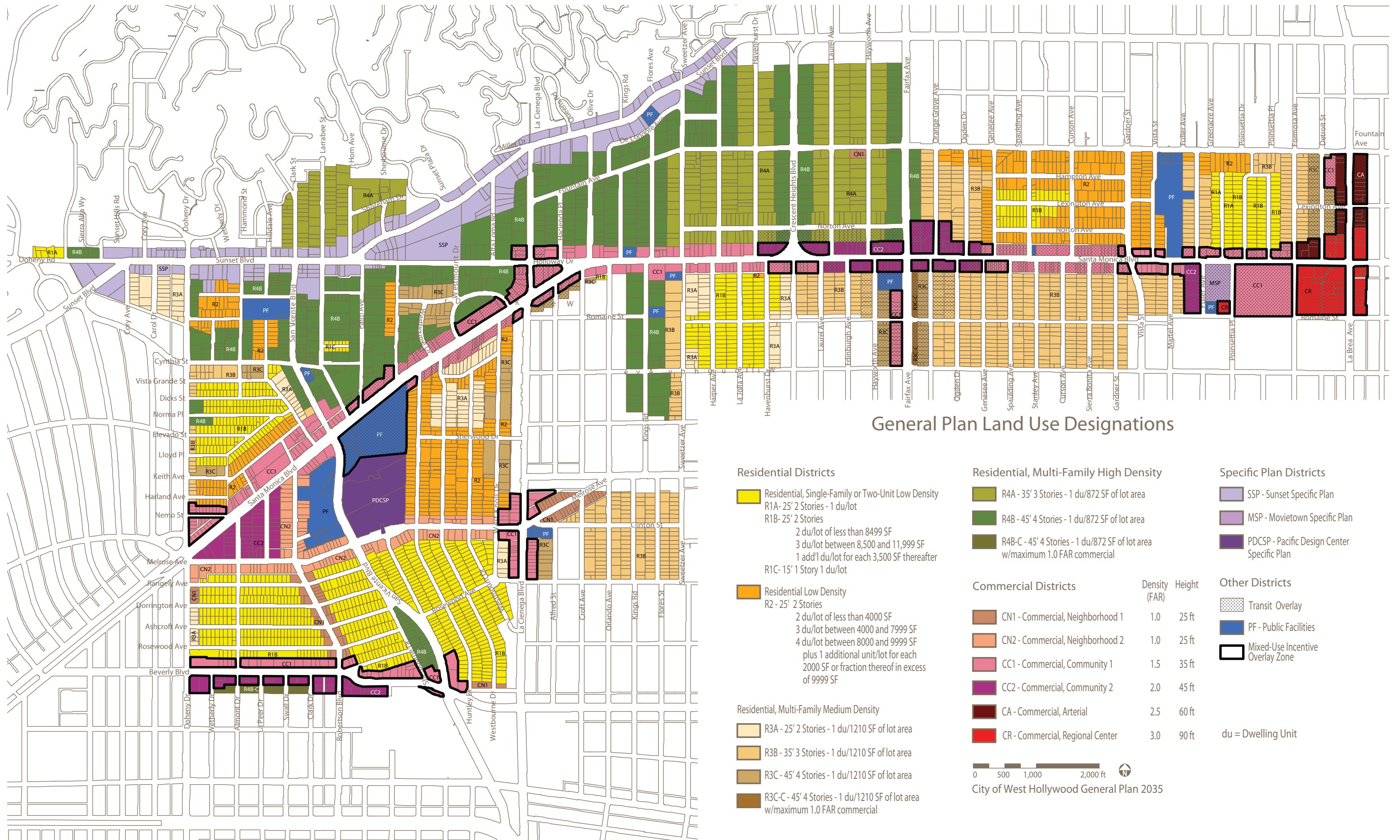
The City's General Plan and the Zoning Ordinance (Article 19 of the West Hollywood Municipal Code) serve as the principal instruments of land use regulation for all properties and proposed development within the City. The West Hollywood General Plan 2035, adopted in September 2011, includes a Land Use and Urban Form Element. This element establishes goals and policies for the manner in which new

3.8 Land Use and Planning

development should occur and how existing uses should be preserved within the City. The Land Use and Urban Form Element includes policies addressing permitted uses, density, design standards, height, and other guidelines. The policies of this element would apply to the proposed project and a more detailed description of applicable policies is included in Section 3.8.3 below.

The project site is designated as CA (Commercial, Arterial) in the City of West Hollywood General Plan (2011). The project site is also zoned CA. The CA designation and zone is intended for parcels that support regional retail uses in areas of high volume vehicular traffic. The CA designation allows for mixed-use development with multi-family residential, retail, and commercial uses with a density of 2.5 FAR and up to 60 feet in height (City of West Hollywood 2011). The project site is also located within a Mixed-Use Incentive Overlay Zone and the Santa Monica/La Brea Transit District. The Mixed-Use Incentive Overlay Zone identifies certain locations where a mix of residential and commercial uses is encouraged. Within the Mixed-Use Incentive Overlay Zone, commercial projects that incorporate residential units may be granted a bonus of up to 0.5 FAR to be added to the base FAR. Additionally, a height bonus of up to 10 feet and one story may accompany a FAR bonus of up to 0.5 FAR for residential uses provided that: a) if the proposed project is adjacent to a residential zoning district, the 25 feet of the structure located closest to the residential zoning district is limited in height to 35 feet; and b) all of the additional area allowed by the height bonus is developed exclusively with residential uses (City of West Hollywood 2011). The Santa Monica/La Brea Transit District commercial sub-area is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips. It allows for modifications to parking requirements, or other development standards may be considered, when individual projects provide specified supplemental Transportation Demand Management programs (City of West Hollywood 2011).

The property located northwest of the project site is zoned R3B (Residential, Multi-Family Medium Density), which allows one dwelling unit for every 1,210 square feet of lot area up to 3 stories and 35 feet in height. The property located northeast of the project site is zoned R3C (Residential, Multi-Family Medium Density), which allows one dwelling unit for every 1,210 square feet of lot area up to 4 stories and 45 feet in height. The properties located immediately to the west and south of the project site are zoned CR (Commercial, Regional Center), which allows a density of 3.0 FAR in up to 8 stories and 90 feet in height. The property immediately west is zoned CC1 (Commercial, Community 1), which allows a density of 1.5 FAR up to 3 stories and 35 feet in height. In general, the properties immediately fronting Santa Monica Boulevard are zoned commercial, with residential uses located behind the commercial uses. Figure 3.8-1 illustrates the land use designations in the area surrounding the project site.



Source: City of West Hollywood 2010

Figure 3.8-1
Land Use Designations

This page is intentionally left blank.

HOUSING ELEMENT

The Housing Element of the City’s General Plan provides a profile of the West Hollywood resident population and housing stock. The element provides a comprehensive profile of West Hollywood households including composition, size, income, and special housing needs. It also analyzes the City’s housing stock in terms of tenure, affordability, maintenance, costs, and vacancy rates. The element projects future population in the City and analyzes the ability of existing housing to meet future needs. The Housing Element has six goals, each of which is associated with policies to facilitate achievement of these goals. The six goals include:

- Goal H-1 Provide affordable rental housing.
- Goal H-2 Maintain and enhance the quality of the housing stock and residential neighborhoods.
- Goal H-3 Encourage a diverse housing stock to address the needs of all socioeconomic segments of the community.
- Goal H-4 Provide for adequate opportunities for new construction of housing.
- Goal H-5 Provide for a government environment that facilitates housing development and preservation.
- Goal H-6 Promote equal access to housing for all.

According to the City’s most recent Housing Element (2011), the City’s housing stock consists of 24,560 housing units, including 22,097 (90 percent) multi-family units and 2,463 (10 percent) single-family homes. Because the City is built-out, the housing stock has changed very little over the past 20 years. Existing parcels are generally recycled with new housing units. Because of the high residential rents and housing prices in West Hollywood, lower income (below 81 percent of the County median) households would only be able to afford rents at government-assisted development. Some rental units fall within the affordable rent range for moderate income (81 to 120 percent of the County median) households, although they are limited in availability (City of West Hollywood 2011).

The Southern California Association of Governments (SCAG) Regional Council adopted the fifth cycle Regional Housing Need Allocation (RHNA) Plan, which covers the planning period from October 2013 to October 2021, on October 4, 2012 (SCAG 2012). The City’s most recent RHNA is 77 total units. The affordability levels of these units are as follows:

- Very low income 19 units (24.7 percent)
- Low income 12 units (15.5 percent)
- Moderate income 13 units (16.9 percent)
- Above Moderate income 33 units (42.9 percent)

The City is required to demonstrate the availability of adequate sites to accommodate the projected housing growth needs by income category. To fulfill this requirement, the City prepared an updated

3.8 Land Use and Planning

Housing Element, which was adopted on September 6, 2011, and has initiated the next Housing Element cycle.

3.8.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not physically divide an established community or conflict with any applicable habitat conservation plan or natural community conservation plan. Accordingly, these issues are not further analyzed in the EIR.

The CEQA Guidelines establish that the proposed project would have a significant effect on land use and planning if it would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

IMPACT ANALYSIS

LU-1: *The proposed project would not conflict with an adopted general plan, specific plan, zoning ordinance, or other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.*

WEST HOLLYWOOD GENERAL PLAN 2035 LAND USE ELEMENT AND ZONING ORDINANCE

As discussed above, the City's General Plan and Zoning Map designate the project site as CA (Commercial, Arterial). The CA designation allows a density of 2.5 FAR in up to five stories and 60 feet in height with an additional 0.5 FAR and 10 feet in height bonuses granted within the Mixed-Use Incentive Overlay Zone, for a total allowable height of 70 feet in up to six stories and allowable density of 3.0 FAR. The CA zoning district identifies areas appropriate for a variety of commercial uses including retail, professional offices, business support and personal services, entertainment uses, restaurants, specialty shops, overnight accommodations, cultural uses, and small-scale manufacturing uses related to design furnishings, galleries, motion pictures, television, music or design-related uses. Mixed-use developments with residential and office uses above businesses are encouraged.

The proposed project would develop up to 166 residential apartment units, comprised of both affordable and market rate housing, and approximately 9,300 square feet of new retail and restaurant space. In addition, it would provide approximately 246 parking spaces and approximately 16,000 square feet of common open space and 14,800 square feet of private open space for a total of approximately 30,800 square feet of open space (made up of a combination of features including private balconies, fitness room, pool, roof deck, lounge, and theater, which would be available for use by residents and their guests). The proposed project would require a Conditional Use Permit (CUP) to allow the sale of alcohol in the restaurant uses. Additionally, while all residential units are proposed as rental apartment units, the market could change in the future and the units could become for-sale condominium units. Therefore, a Vesting Tentative Tract Map is proposed in the event that the residential units become for-sale units.

Of the 166 proposed residential units, 16 would be low income units and 17 would be moderate income units. Section 19.22.050 of the West Hollywood Municipal Code (Municipal Code) provides density bonuses for projects that include affordable housing units onsite. Pursuant to Municipal Code Section 19.22.050(D)(1), the proposed project would be eligible for a 20 percent density bonus for the provision of low income units and a 5 percent density bonus for the provision of moderate income units for a total bonus of 25 percent over the base FAR, or an additional FAR of 0.75.¹ With the addition of the affordable housing density bonus, the maximum allowable density for the proposed project would be 3.75 FAR. The proposed project density is 3.18 FAR, which is within the maximum density allowable at the project site with the inclusion of the affordable housing density bonus.

Per Section 19.36.280(A)(1) of the Municipal Code, mixed-use developments containing residential uses 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 (for projects containing 31 or more residential units). As the proposed project would include approximately 166 residential units, a minimum of 19,920 square feet of private open space and 2,000 square feet of common open space would be required. Thus, the proposed project would provide approximately 5,000 square feet less private open space than is required by the Municipal Code, and would provide a surplus of approximately 14,000 square feet of common open space than is required by the Municipal Code. Due to the inclusion of affordable housing units, the applicant is eligible for two concessions pursuant to Section 19.22.050(E) of the Municipal Code. As stated above, the applicant would use the affordable housing density bonus. Additionally, the applicant would use Section 19.22.050(E) to modify the open space requirements for the proposed project as a concession for providing onsite affordable housing.

The CA designation allows for development of up to five stories and 60 feet in height with an additional 10 feet in height bonuses granted within the Mixed-Use Incentive Overlay Zone, for a total allowable height of 70 feet in up to six stories. The proposed project would construct up to six stories in height, but would be up to 72 feet in height not including architectural features. Therefore, a Modification Permit is required to permit greater height than is allowed by right and with bonuses.

Construction of the proposed project would be subject to the policies set forth in the West Hollywood General Plan 2035 and the Municipal Code. Table 3.8-1 outlines the applicable policies identified in the Land Use and Urban Form Element of the City's General Plan and the proposed project's consistency with each of these policies. A more thorough discussion of specific elements of the General Plan and Zoning Ordinance is included in Chapter 3.1, Aesthetics, ~~Chapter 3.1-3.2~~, Air Quality, Chapter 3.3, Cultural Resources, ~~Chapter 3.2~~ 3.5, Greenhouse Gas Emissions, and ~~Chapter 3.7~~ 3.9, Noise, ~~of this Recirculated Draft EIR, and Chapter 3.1, Aesthetics, and Chapter 3.3, Cultural Resources, of the previous Draft EIR.~~

¹ The existing zoning for the project site allows for a density of up to 3.0 FAR. The 3.0 base FAR x 25 percent affordable housing bonus = 0.75 additional FAR.

3.8 Land Use and Planning

TABLE 3.8-1 WEST HOLLYWOOD GENERAL PLAN 2035 POLICY CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<p><i>LU-1.1 – Maintain a balanced land use pattern and buildings to support a broad range of housing choices, retail businesses, employment opportunities, cultural institutions, entertainment venues, educational institutions, and other supportive urban uses within the City.</i></p>	<p>Consistent. The proposed project would develop 166 apartment units in a mixed-use development containing approximately 9,300 square feet of neighborhood-serving retail and restaurant uses on the ground floor. Of the 166 apartment units proposed, 16 would be designated as low income units and 17 would be designated as moderate income units; the remainder of the units would be provided at market rate. The residential units would consist of studios, one-bedrooms, one-bedrooms with den, and two-bedrooms. Therefore, the proposed project would provide housing choices, retail businesses, and employment opportunities within the City.</p>
<p><i>LU-1.2 – Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.</i></p>	<p>Consistent. As described in Section 2.4, the proposed project would be developed to a maximum of six stories above grade along Santa Monica Boulevard. The height would step down from six stories at the southern boundary on Santa Monica Boulevard to three stories at the northern boundary adjacent to the neighboring apartment buildings. The height of the proposed project from north to south across the site is designed to avoid abrupt changes in scale and massing from the adjacent residential neighborhood to the north.</p>
<p><i>LU-1.3 – Encourage new development to enhance the pedestrian experience.</i></p>	<p>Consistent. The proposed project would include site landscaping to enhance the pedestrian experience including a single row of street trees along Detroit Street and Formosa Avenue, and a double row of street trees along the majority of Santa Monica Boulevard. Additionally, the proposed project would provide a view portal for pedestrians from Santa Monica Boulevard of the Hollywood Hills to the north of the project site and a plaza on the second floor.</p>
<p><i>LU-1.4 – Continue to maintain regulations that encourage preservation of existing housing and development of new housing that accommodates households that are diverse in size, type, and income.</i></p>	<p>Consistent. The proposed project would provide approximately 166 apartment units, including 133 market rate units, 16 low income units and 17 moderate income units. The residential units would consist of studios, one-bedrooms, one-bedrooms with den, and two-bedrooms. Thus, the proposed project would provide new housing to accommodate households of varying size, type, and income.</p>
<p><i>LU-1.8 – Promote the establishment, retention, and expansion of businesses that provide employment for West Hollywood’s residents and the surrounding region.</i></p>	<p>Consistent. The proposed project would develop approximately 9,300 square feet of neighborhood-serving retail and restaurant uses, which would provide employment opportunities for residents of the City and the surrounding region.</p>
<p><i>LU-1.13 – Seek to reduce the demand for motorized transportation by supporting land use patterns that prioritize pedestrian, bicycle, and transit mobility options, and mixed use development.</i></p>	<p>Consistent. The proposed project would develop a mixed-use structure on a site well-served by existing transit lines. Additionally, the proposed project would provide approximately 45 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, including the West Hollywood Gateway commercial facility directly south of the project site. Further, the proposed project would include site landscaping to enhance the pedestrian experience including a single row of street trees along Detroit Street and Formosa Avenue, and a double row of street trees along the majority of Santa Monica Boulevard. 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.</p>

TABLE 3.8-1 WEST HOLLYWOOD GENERAL PLAN 2035 POLICY CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<p><i>LU-2.1 – Direct the majority of new development to the City’s commercial corridors served by high levels of existing or future public transit, with an emphasis on developing transit-supportive land use mixes and intensities near high frequency transit stops such as Santa Monica Boulevard near Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard.</i></p>	<p>Consistent. The project site is located within the Santa Monica/La Brea Transit District commercial sub-area, a portion of the City that is well-served by high levels of existing public transit. The proposed project would develop a mixed-use structure containing approximately 166 apartment units and 9,300 square feet of retail and restaurant uses. The proposed commercial uses would front Santa Monica Boulevard, within the portion of the project site nearest to high-frequency transit stops.</p>
<p><i>LU-2.2 – Consider the scale and character of existing neighborhoods and whether new development improves and enhances the neighborhood when approving new infill development.</i></p>	<p>Consistent. The proposed project would be developed to a maximum of six stories above grade along Santa Monica Boulevard. The height would step down from six stories at the southern boundary on Santa Monica Boulevard to three stories at the northern boundary adjacent to the neighboring apartment buildings. The height of the proposed project from north to south across the site is designed to be sensitive to the character of the adjacent residential neighborhood to the north.</p>
<p><i>LU-2.3 – Allow residential mixed-use development in commercial corridors.</i></p>	<p>Consistent. The proposed project would include development of a mixed-use structure to include residential, retail, and restaurant uses within a Mixed-Use Incentive Overlay Zone located along Santa Monica Boulevard.</p>
<p><i>LU-2.5 – Allow increases to permitted density/intensity and height for projects that provide affordable housing.</i></p>	<p>Consistent. The proposed project would provide approximately 166 residential units, including 16 low income units and 17 moderate income units. Pursuant to Municipal Code Section 19.22.050(D)(1), the proposed project would be eligible for a 20 percent density bonus for the provision of low income units and a 5 percent density bonus for the provision of moderate income units for a total bonus of 25 percent over the base FAR, or an additional FAR of 0.75. With the addition of the affordable housing density bonus, the maximum allowable density for the proposed project would be 3.75 FAR. The proposed project would utilize the affordable housing density bonus and proposes a density of 3.18 FAR, which is within the maximum density allowable at the project site with the inclusion of the affordable housing density bonus. The proposed project would incorporate the additional 0.5 FAR and 10 foot height increase incentives provided by the Mixed-Use Incentive Overlay Zone.</p>
<p><i>LU-2.6 – Implement a Mixed-Use Incentive Overlay Zone that focuses and incentivizes residential mixed-use projects to locate in certain key areas of the City. Projects with a mix of residential and commercial uses located in the indentified Mixed-Use Incentive Overlay Zone will be allowed up to an additional 0.5 FAR and ten (10) feet in height. The Mixed-Use Incentive Overlay Zone should be applied to certain areas of the City that have the following characteristics:</i></p> <ul style="list-style-type: none"> • <i>Key transit nodes along commercial corridors</i> • <i>Areas that are encouraged to redevelop over the time horizon of the General Plan</i> • <i>Areas where new or expanded mixed-use districts can be created. For example, areas where multiple residential mixed-use projects are or could be expected to occur in the future.</i> 	<p>Consistent. The proposed project would develop a mixed-use structure containing residential, retail, and restaurant uses on a site located within a Mixed-Use Incentive Overlay Zone. The proposed project would incorporate the additional 0.5 FAR and 10 foot height increase incentives provided by the Mixed-Use Incentive Overlay Zone.</p>

3.8 Land Use and Planning

TABLE 3.8-1 WEST HOLLYWOOD GENERAL PLAN 2035 POLICY CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<p><i>LU-2.8 – Consider increases in the General Plan’s permitted FAR and height for projects in all commercial designations that provide one or more of the following:</i></p> <ul style="list-style-type: none"> <i>a. Expand existing facilities or introduce new uses which are considered to be of significant importance (public benefits, historical use, socially-valued use, etc.).</i> <i>b. Provide significant benefits to the City.</i> <i>c. Offer architectural design that is of unusual merit and will enhance the City.</i> <i>d. Affordable Housing.</i> 	<p>Consistent. The proposed project would provide approximately 166 residential units, including 16 low income units and 17 moderate income units. Pursuant to Municipal Code Section 19.22.050(D)(1), the proposed project would be eligible for a 20 percent density bonus for the provision of low income units and a 5 percent density bonus for the provision of moderate income units for a total bonus of 25 percent over the base FAR, or an additional FAR of 0.75. With the addition of the affordable housing density bonus, the maximum allowable density for the proposed project would be 3.75 FAR. The proposed project would utilize the affordable housing density bonus and proposes a density of 3.18 FAR, which is within the maximum density allowable at the project site with the inclusion of the affordable housing density bonus. The proposed project would incorporate the additional 0.5 FAR and 10 foot height increase incentives provided by the Mixed-Use Incentive Overlay Zone.</p>
<p><i>LU-4.1 – Implement land use patterns that locate a wide range of destinations within a short walk of every West Hollywood resident in order to encourage walking as a desirable mode of transportation.</i></p>	<p>Consistent. The proposed project would provide restaurant and retail uses and the entrance to the plaza would front Santa Monica Boulevard. The plaza, located on the second floor of the structure, would provide views of the Hollywood Hills and the Hollywood sign. The proposed project would be located within walking distance of multiple commercial opportunities, including the West Hollywood Gateway commercial facility directly south of the project site. The proposed project would also be located in proximity to several residential uses. By providing ground floor level neighborhood-serving retail and restaurant uses, the proposed project would provide a new local-serving pedestrian amenity on the north side of Santa Monica Boulevard.</p>
<p><i>LU-4.2 – Continue to improve the pedestrian environment through a coordinated approach to street tree planting, sidewalk maintenance and enhancement, pedestrian amenities, and a focus on human-scale frontage design for building renovations and new development projects.</i></p>	<p>Consistent. The proposed project would include site landscaping to enhance the pedestrian experience including a single row of street trees along Detroit Street and Formosa Avenue, and a double row of street trees along the majority of Santa Monica Boulevard. Additionally, the proposed project would provide a view portal for pedestrians from Santa Monica Boulevard of the Hollywood Hills to the north of the project site. Further, the proposed project would develop ground floor level neighborhood-serving retail and restaurant uses with pedestrian scale design fronting Santa Monica Boulevard.</p>
<p><i>LU-4.3 – Continue to implement parking strategies and standards that ensure parking areas do not dominate street frontages and are screened from public views whenever possible.</i></p>	<p>Consistent. The proposed project would provide a total of 246 parking spaces in one ground floor level and one and half subterranean levels. The ground floor parking spaces would be reserved for the retail and restaurant uses, and would be accessed via a driveway on Formosa Avenue behind the retail and restaurant uses. Entry to and exit from the residential garage would be located on Detroit Street at the northern boundary of the project site. All parking areas would be located to the middle and rear of the site with entry to the parking levels located on the sides of the structure, not at the building frontage, and would be screened from public view.</p>
<p><i>LU-4.4 – Require development project along commercial corridors to employ architectural transitions to adjoining residential properties to ensure compatibility of scale and a sense of privacy for the existing residences.</i></p>	<p>Consistent. The proposed project would be developed to a maximum of six stories above grade along Santa Monica Boulevard. The height would step down from six stories at the southern boundary on Santa Monica Boulevard to three stories at the northern boundary adjacent to the neighboring apartment buildings. The proposed project would employ architectural transitions from north to south across the site and is designed to be sensitive to the character and scale of the adjacent residential neighborhood to the north.</p>

TABLE 3.8-1 WEST HOLLYWOOD GENERAL PLAN 2035 POLICY CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<p><i>LU-4.5 – Require development projects to incorporate landscaping in order to extend and enhance the green space network of the City.</i></p>	<p>Consistent. The proposed project would include landscaping throughout the site including a single row of street trees along Detroit Street and Formosa Avenue, and a double row of street trees along the majority of Santa Monica Boulevard. The proposed project would also install a 16-foot landscape buffer between the proposed mixed-use building and the adjacent residential uses along the northern boundary of the project site.</p>
<p><i>LU-4.6 – Require commercial development projects to provide for enhanced pedestrian activity in commercial areas through the following techniques:</i></p> <ul style="list-style-type: none"> <i>a. Minimizing vehicle intrusions across the sidewalk.</i> <i>b. Locating the majority of a building’s frontages in close proximity to the sidewalk edge.</i> <i>c. Requiring that the first level of a building occupy a majority of the lot’s frontage, with exceptions for vehicle access.</i> <i>d. Allowing for the development of outdoor plazas and dining areas.</i> <i>e. Requiring that the majority of the linear ground floor frontage be visually and physically “penetrable,” incorporating windows and other design treatments to create an attractive street frontage.</i> <i>f. Requiring that ground floor uses be primarily pedestrian-oriented.</i> <i>g. Discouraging new surface parking lots.</i> 	<p>Consistent. The proposed project would be designed to enhance pedestrian activity. Vehicular access to the site would be provided via one driveway on Formosa Avenue and one driveway on Detroit Street, thereby minimizing vehicle intrusions across the sidewalk on Santa Monica Boulevard. The building’s frontages would abut the sidewalk edge, with the first level of the building occupying the lot’s frontage. A view portal would allow pedestrians along Santa Monica Boulevard access to views of the Hollywood Hills. The restaurant and retail uses and the entrance to the plaza would front Santa Monica Boulevard. The plaza, located on the second floor of the structure, would provide views of the Hollywood Hills and the Hollywood sign. Parking would be provided in one ground floor level and one and half subterranean levels. All parking areas would be contained on the interior of the project site.</p>
<p><i>LU-6.1 – Where appropriate, development projects should incorporate open spaces that are accessible to the public.</i></p>	<p>Consistent. The proposed project would provide a view portal for pedestrians from Santa Monica Boulevard of the Hollywood Hills to the north of the project site. Additionally, the public would be permitted access to a plaza located on the second floor of the structure to view the Hollywood Hills and the Hollywood sign.</p>
<p><i>LU-7.3 – Require development projects to install street trees consistent with the City’s street tree specifications along public sidewalks adjacent to the project site, as sidewalk width permits, where such street trees do not currently exist or where replacement is needed.</i></p>	<p>Consistent. The proposed project would include landscaping throughout the site including a single row of street trees along Detroit Street and Formosa Avenue, and a double row of street trees along the majority of Santa Monica Boulevard. All street trees installed would be consistent with City’s street tree specifications.</p>
<p><i>LU-14.3 – Encourage ground-floor commercial and restaurant uses in all new development facing Santa Monica Boulevard and La Brea Avenue to capitalize on and serve the high volumes of pedestrian traffic and public transit and to activate public spaces. The following additional guidance applies:</i></p> <ul style="list-style-type: none"> <i>a. Retail uses that activate the street should be encouraged.</i> <i>b. Primarily neighborhood-serving uses are encouraged on the north side of Santa Monica Boulevard.</i> <i>c. Primarily regional-serving retail should be encouraged along La Brea Avenue and on the south side of Santa Monica Boulevard.</i> 	<p>Consistent. The proposed project would develop approximately 9,300 square feet of ground floor level neighborhood-serving retail and restaurant uses to serve the needs of site residents and adjacent residents in a pedestrian-friendly manner and in close proximity to public transportation.</p>
<p><i>LU-14.4 – Encourage an increase in the amount and diversity of multi-family residential uses in [the Santa Monica/La Brea Transit District] area.</i></p>	<p>Consistent. The proposed project would increase the amount and diversity of multi-family residential uses within the Santa Monica/La Brea Transit District commercial sub-area of the City by providing a mix of market rate and affordable apartment units consisting of approximately 133 market rate units, 17 moderate income units, and 16 low income units.</p>

3.8 Land Use and Planning

TABLE 3.8-1 WEST HOLLYWOOD GENERAL PLAN 2035 POLICY CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<p><i>LU-14.8 – Enhance pedestrian activity along Santa Monica Boulevard through the following building and public realm activities:</i></p> <ul style="list-style-type: none"> <i>a. Improve the streetscape with tree plantings, landscaping and public amenities such as benches.</i> <i>b. Locate buildings at or near the sidewalk edge to create an attractive pedestrian environment.</i> <i>c. Encourage projects to incorporate landscape elements into the design of buildings to enhance green space in the City.</i> <i>d. Support pedestrian activity and the experience along the streetscape through active and transparent ground floor frontages.</i> 	<p>Consistent. The proposed project would include site landscaping to enhance the pedestrian experience including a single row of street trees along Detroit Street and Formosa Avenue, and a double row of street trees along the majority of Santa Monica Boulevard. Additionally, the proposed project would provide a view portal for pedestrians from Santa Monica Boulevard of the Hollywood Hills to the north of the project site. Pedestrians would also be permitted access to a plaza located on the second floor of the structure to view the Hollywood Hills and the Hollywood sign. The building frontage would be built out to the sidewalk on Santa Monica Boulevard, bringing the retail and restaurant uses to the pedestrian.</p>
<p><i>LU-14.10 – Encourage new mixed-use development in [the Santa Monica/La Brea Transit District].</i></p>	<p>Consistent. The proposed project would develop a mixed-use structure consisting of approximately 166 residential apartment units and 9,300 square feet of ground floor level, neighborhood-serving retail and restaurant uses within the Santa Monica/La Brea Transit District commercial sub-area of the City.</p>

As discussed in Table 3.8-1 above, implementation of the proposed project would be consistent with all applicable policies identified in the Land Use and Urban Form Element of the City’s General Plan. A more thorough discussion of specific elements of the General Plan and Zoning Ordinance is included in Chapter 3.1, Aesthetics, ~~Chapter 3.1-3.2~~, Air Quality, Chapter 3.3, Cultural Resources, ~~Chapter 3.2 3.5~~, Greenhouse Gas Emissions, and ~~Chapter 3.7 3.9~~, Noise, ~~of this Recirculated Draft EIR, and Chapter 3.1, Aesthetics, and Chapter 3.3, Cultural Resources, of the previous Draft EIR.~~

The proposed project takes advantage of inclusionary housing parking incentives, which specifies parking space requirements for development providing onsite affordable housing, and waives the requirement for guest parking. Per Article 19-3, Chapter 19.28 and Article 19-3, Article 19.22 of the City of West Hollywood Municipal Code, the proposed project would be required to provide a total of 245 parking spaces, as shown in Table 3.8-2.

TABLE 3.8-2 CITY PARKING REQUIREMENTS

Land Use	Units/ Adj. Gross Area (du/ksf)	Parking Code Requirements	Parking Requirements
<i>Residential</i>			
Studios	51	1 spaces per dwelling unit	51
One Bedrooms	67	1 spaces per dwelling unit	67
One Bedroom Plus Den	15	1 spaces per dwelling unit	15
Two-Bedroom	33	2 spaces per dwelling unit	66
<i>Retail and Restaurant</i>	9.3	5 spaces/1,000 sf adj. gross area	46
Total Parking Requirement			245

Notes:

du is dwelling unit

ksf is 1,000 square feet

The proposed project would provide 46 parking spaces for the retail and restaurant uses in the ground floor parking garage. It would provide 214 parking spaces for the residential uses in the subterranean parking garage. The proposed project would provide a total of 260 parking spaces, or more parking than is required for the project by the West Hollywood Municipal Code with the inclusionary housing parking incentive.

The proposed project would adhere to Title 24 of the California Code of Regulations, which governs the design and construction of buildings and associated facilities and equipment throughout California. In addition, the proposed project would be barrier-free and would provide Americans with Disabilities Act (ADA) access where applicable. In accordance with the City’s Green Building Ordinance, the proposed project would be constructed to meet LEED certification requirements. Additionally, the proposed project would be required to implement the water and energy efficiency features mandated as part of Title 24. As such, no conflicts with the Green Building Ordinance would occur.

Further, with the granting of the affordable housing density bonus and open space concession, and approval of the modification permit to allow two additional feet in height than permitted, the CUP for the sale of alcohol at the restaurants uses, and the Vesting Tentative Tract Map for the potential future conversion from rental to condominium units, the proposed project would be consistent with the City’s General Plan and Zoning Ordinance. The granting and approval of the requested bonuses, permits, and Vesting Tentative Tract Map would have no environmental effects beyond the physical impacts associated with the proposed project already addressed throughout the EIR. Therefore, the proposed project is consistent with the City’s General Plan and Zoning Ordinance, and no impact would occur.

HOUSING ELEMENT

Construction and operation of the proposed project would be subject to the policies set forth in the City of West Hollywood Housing Element (2011b). Table 3.8-3 outlines the policies in the Housing Element of the City’s General Plan that are relevant to the proposed project and the proposed project’s consistency with each of these policies.

TABLE 3.8-3 WEST HOLLYWOOD HOUSING ELEMENT CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<i>H-1.2 – Retain and maintain existing affordable rental housing.</i>	Not Applicable. The proposed project involves the removal of industrial and commercial uses. No existing housing units are located on-site. However, project implementation would result in the creation of 17 moderate income and 16 low income affordable inclusionary rental units.
<i>H-1.4 – Encourage the replacement of multi-family housing that is demolished with housing that is affordable to a wide spectrum of households.</i>	Not Applicable. The proposed project would not demolish existing multi-family housing. However, project implementation would result in the creation of housing that is affordable to a wide spectrum of households, including 17 moderate income households, 16 low income households, and 133 market rate households.

3.8 Land Use and Planning

TABLE 3.8-3 WEST HOLLYWOOD HOUSING ELEMENT CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<i>H-2.3 – Promote strong, on-site management of apartment complexes to ensure the maintenance of housing and neighborhood quality.</i>	Consistent. The proposed project is intended to provide a high-quality mixed-use retail and residential development. It is intended to be an example of development for the City’s eastern gateway. It will be continuously maintained to ensure the value of the site. The proposed project would have onsite property management.
<i>H-2.4 – Establish and maintain development standards that support housing and mixed-use developments while protecting and enhancing the quality of life goals.</i>	Consistent. The proposed project involves construction of a mixed-use development consisting of approximately 166 apartment units, including 133 market rate units, 17 moderate income units and 16 low income units, and 9,300 square feet of ground floor level, neighborhood-serving retail and restaurant uses. The proposed project would serve the needs of site residents and adjacent residents in a pedestrian-friendly manner and in close proximity to public transportation. The proposed project would include site landscaping to enhance the pedestrian experience including a single row of street trees along Detroit Street and Formosa Avenue, and a double row of street trees along the majority of Santa Monica Boulevard. Further, in accordance with the City’s Green Building Ordinance, the proposed project would be constructed to meet LEED certification requirements.
<i>H-2.5 – Continue to support healthy neighborhoods by addressing public health and safety issues in cooperation with other public agencies and perform ongoing property inspections.</i>	Consistent. The project site consists of three parcels that are currently used as a metal plating facility and sound recording studio. The parcels occupied by the metal plating facility are a known hazardous waste site. On September 13, 2006, the applicant entered into a VCA with the DTSC. Additionally, a RAW was prepared for the project site on September 24, 2007 in coordination with and under the regulatory oversight of DTSC. Approval of the proposed project would remove these industrial and commercial uses and replace them with a residential and retail complex. Hazardous materials on-site would be cleaned up as part of project construction.
<i>H-3.1 – Facilitate the development of a diverse range of housing options including, but not limited to, single-family homes, second/accessory units, multi-family rental housing, condominiums and townhomes, live/work units, and housing in mixed use developments.</i>	Consistent. The proposed project involves construction of a mixed-use development consisting of approximately 166 apartment units, including 133 market rate units, 17 moderate income units and 16 low income units. The residential units would consist of studios, one-bedrooms, one-bedrooms with den, and two-bedrooms. Thus, the proposed project would provide a range of new housing options.
<i>H-3.3 – Continue to implement the Inclusionary Housing Ordinance to ensure that new housing developments expand affordable housing opportunities for lower and moderate income households.</i>	Consistent. The proposed project would provide 166 residential apartment units, of which 20 percent (or 33 units) would be designated as affordable housing units, consistent with the adopted Inclusionary Housing Ordinance. Of the 33 affordable housing units provided, 17 would be moderate income units and 16 would be low income units.
<i>H-4.1 – Encourage and provide incentives for the development of housing in mixed use and transit-oriented developments.</i>	Consistent. The proposed project would develop a mixed-use structure containing residential, retail, and restaurant uses. The project site is located within a Mixed-Use Incentive Overlay Zone, which provides incentives of an additional 0.5 FAR and 10 foot height increase for development projects consisting of a mix of residential and commercial uses. The proposed project would utilize the density and height bonuses provided by the Mixed-Use Incentive Overlay Zone, as well as affordable housing density bonuses provided by the Inclusionary Housing Ordinance. In addition, the proposed project would be located in the Santa Monica/LA Brea Transit District commercial sub-area.

TABLE 3.8-3 WEST HOLLYWOOD HOUSING ELEMENT CONSISTENCY ANALYSIS

Policy	Consistency Analysis/Comment
<p><i>H-4.2 – Provide adequate sites to meet the City’s share of regional housing needs and the housing needs of special groups, including seniors, persons with disabilities or other medical conditions, the homeless, single parents, and large households.</i></p>	<p>Consistent. As discussed in Section 3.4.2 above, the City’s share of regional housing needs is a total of 584 units, of which 99 units should be moderate income and 91 units should be low income. The proposed project would develop a mixed-use structure that would add 166 net new residential rental units to the City’s housing stock, including 133 market rate units, 17 moderate income units, and 16 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.</p>
<p><i>H-5.1 – Provide incentives where feasible to offset or reduce the costs of affordable housing development, including density bonuses and flexibility in site development standards.</i></p>	<p>Consistent. The proposed project would provide approximately 166 residential units, including 16 low income units and 17 moderate income units. Pursuant to Municipal Code Section 19.22.050(D)(1), the proposed project would be eligible for a 20 percent density bonus for the provision of low income units and a 5 percent density bonus for the provision of moderate income units for a total bonus of 25 percent over the base FAR, or an additional FAR of 0.75. With the addition of the affordable housing density bonus, the maximum allowable density for the proposed project would be 3.75 FAR. The proposed project would utilize the affordable housing density bonus and proposes a density of 3.18 FAR, which is within the maximum density allowable at the project site with the inclusion of the affordable housing density bonus. The proposed project would be eligible for two concessions.</p>

The City is required to demonstrate the availability of 77 new units across all income categories. The City requires the availability of 33 above moderate income units. As such, the proposed project would provide 133 market rate units to address this need. Additionally, the City requires the availability of 13 moderate income units and 12 low income units. As such, the proposed project would provide 17 moderate income and 16 low income units. The proposed project would provide 100 percent of the City’s current RHNA allocation.

As discussed in Table 3.8-2 above, implementation of the proposed project would be consistent with all applicable policies identified in the Housing Element of the City’s General Plan. The proposed project is consistent with the Housing Element, and no impact would occur.

3.8.4 MITIGATION MEASURES

No mitigation measures are required.

3.8.5 SIGNIFICANCE AFTER MITIGATION

The impact would be less than significant.

This page is intentionally left blank.

3.9 NOISE

This section provides an overview of noise and vibration levels and evaluates the construction and operational impacts resulting from implementation of the proposed project. Topics addressed include short- and long-term increases in ambient noise levels associated with construction and operational activities; potential exposure of sensitive receptors to excessive noise and vibration levels above standards established in the City's General Plan or Noise Ordinance; and mitigation measures to reduce noise and vibration impacts, where feasible.

NOISE CHARACTERISTICS AND EFFECTS

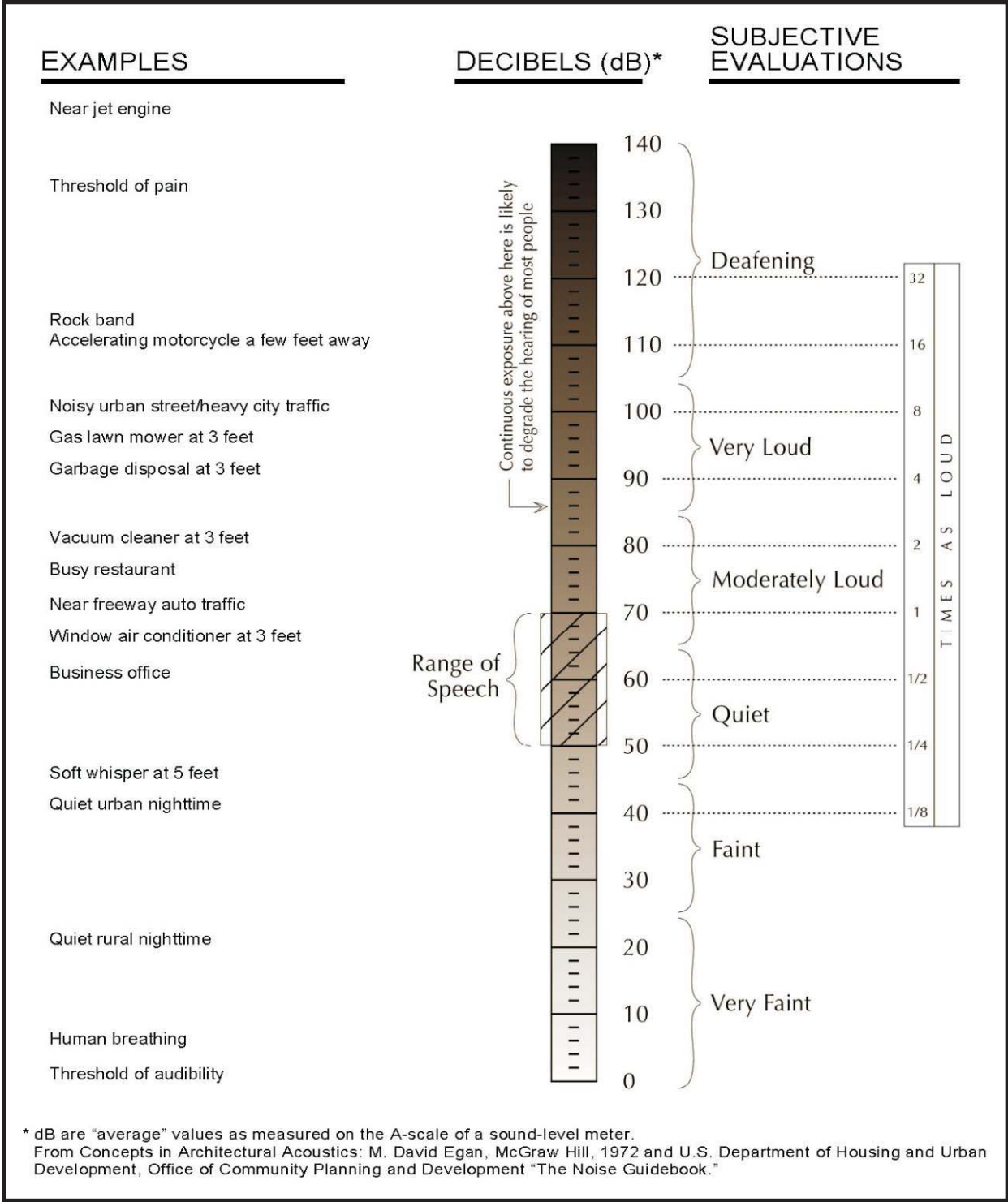
Sound is technically described in terms of the loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Figure 3.9-1 provides examples of A-weighted noise levels from common sounds.

Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment ranges from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise; the amount of background noise present before the intruding noise; and the nature of work or human activity that is exposed to the noise source.

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness and would cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.8 dBA over soft surfaces for each doubling of the distance.

Generally, noise is most audible when traveling by direct line-of-sight. Line-of-sight is an unobstructed visual path between the noise source and the noise receptor. Barriers, such as walls, berms, or buildings that break the line-of-sight between the source and the receiver greatly reduce noise levels from the source since sound can only reach the receiver by bending over the top of the barrier. Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.



* dB are "average" values as measured on the A-scale of a sound-level meter.
 From Concepts in Architectural Acoustics: M. David Egan, McGraw Hill, 1972 and U.S. Department of Housing and Urban Development, Office of Community Planning and Development "The Noise Guidebook."

SOURCE: City of West Hollywood, Program Environmental Impact Report, City of West Hollywood General Plan and Climate Action Plan, 2011.

**Figure 3.9-1
A-Weighted Decibel Scale**

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL), Equivalent Noise Level (L_{eq}), and Day-Night Noise Level (L_{dn}).

CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background sound levels. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

L_{dn} is a 24-hour L_{eq} with an adjustment to reflect the greater sensitivity of most people to nighttime noise. The adjustment is a 10-dBA penalty for all sound that occurs in the nighttime hours of 10:00 p.m. to 7:00 a.m. The effect of the penalty is that in the calculation of L_{dn} , any event that occurs during the nighttime hours is equivalent to 10 of the same event during the daytime hours.

VIBRATION CHARACTERISTICS AND EFFECTS

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square amplitude is most frequently used to describe the effect of vibration on the human body and is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure root mean square. The decibel notation acts to compress the range of numbers required to describe vibration.

High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of vibration can damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes).

3.9 Noise

In contrast to noise, vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 root mean square or lower, well below the threshold of perception for humans, which is around 65 root mean square. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

3.9.1 ENVIRONMENTAL SETTING

NOISE

The existing noise environment is characterized by vehicular traffic along Santa Monica Boulevard. Additional ambient noise includes industrial metal work at Faith Plating and occasional aircraft overflights. Ambient noise measurements were taken using SoundPro DL Sound Level Meter between 11:30 a.m. to 1:45 p.m. on October 4, 2012. These readings were used to establish existing ambient noise conditions and to provide a baseline for evaluating construction and operational noise impacts. Noise measurement locations are shown in Figure 3.9-2. As shown in Table 3.9-1, existing ambient sound levels range between 57.4 and 70.6 dBA L_{eq} . Typically, the L_{eq} is within two dBA of the CNEL (Caltrans 2009). It is estimated that the existing CNEL along Santa Monica Boulevard is between 68.6 and 72.6 dBA.

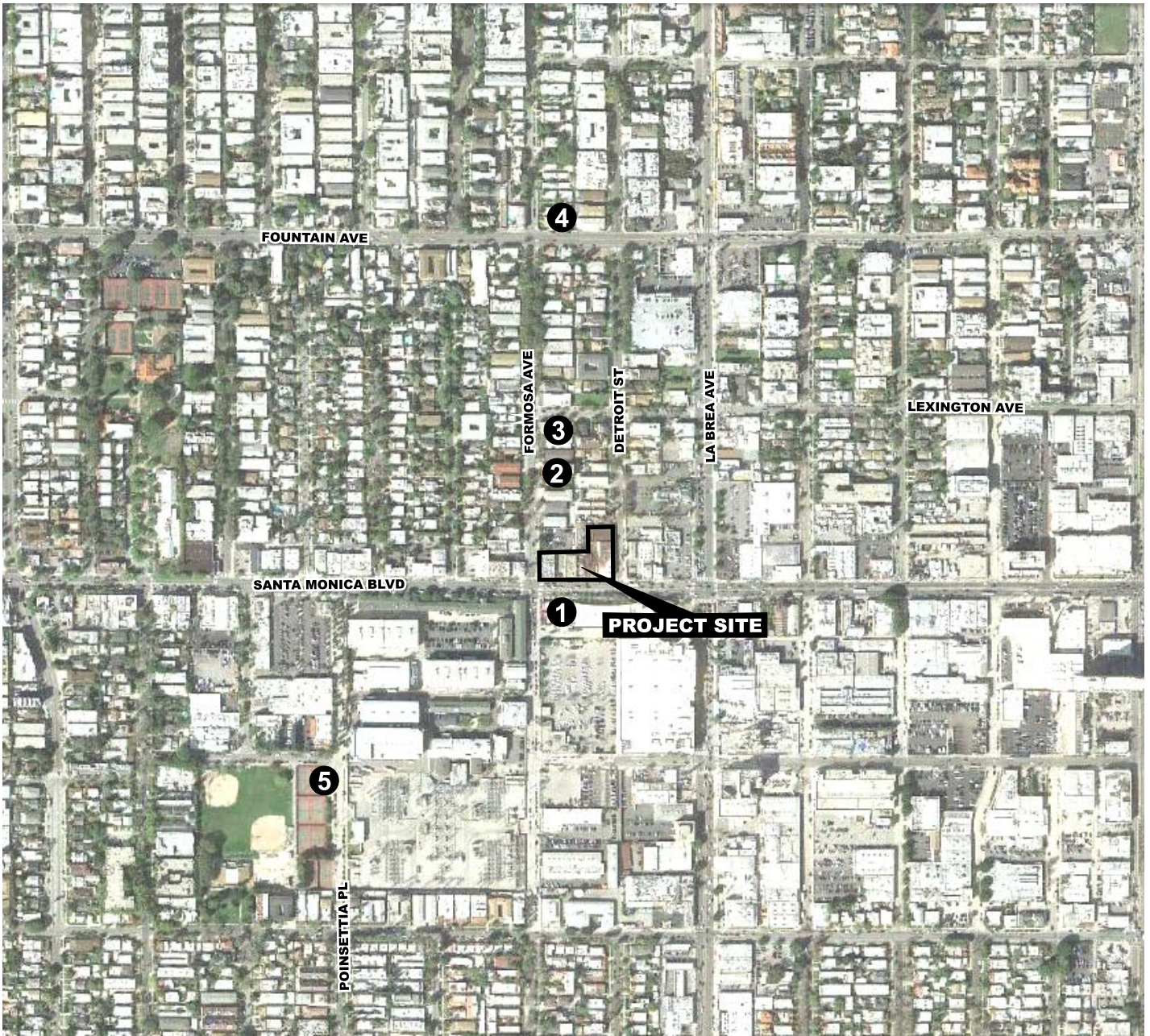
TABLE 3.9-1 EXISTING NOISE LEVELS

No.	Noise Monitoring Location	Sound Level (dBA, L_{eq})
1	7155 Santa Monica Boulevard	70.6
2	1132 Formosa Avenue	57.4
3	7168 Lexington Avenue	66.1
4	7181 Fountain Avenue	68.5
5	Poinsettia Recreation Center	59.2

Source: Terry A. Hayes Associates Inc. 2012.

VIBRATION

There are no stationary sources of vibration located near the project site. Heavy-duty trucks can generate groundborne vibrations that vary depending on vehicle type and weight, and pavement conditions. However, vibration levels from adjacent roadways are not typically perceptible at the project site.



SOURCE: Terry A. Hayes Associates, Inc. and Google Earth, 2012.

LEGEND:

 Project Site

 Noise Monitoring Locations

- 1. 7155 Santa Monica Boulevard
- 2. 1132 Formosa Avenue
- 3. 7168 Lexington Avenue
- 4. 7181 Fountain Avenue
- 5. Poinsettia Recreation Center

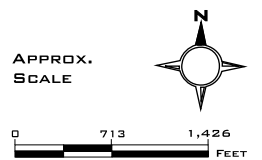


Figure 3.9-2
Noise Measurement Locations

SENSITIVE NOISE RECEPTORS

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors near the project site include the following:

- Single- and multi-family residences, located adjacent and to the north
- Single- and multi-family residences, located 145 feet to the northwest
- Single- and multi-family residences, located 220 feet to the northeast
- Samy Hotel, located 285 feet to the north
- The Lot studio, located 360 feet to the southwest (nearest studio building to the project site)
- Poinsettia Recreation Center, located 1,090 feet to the south

The above sensitive receptors represent the nearest residential and recreational land uses with the potential to be impacted by the proposed project. Additional sensitive receptors are located farther from the project site in the surrounding community and would be less impacted by noise and vibration levels than the above-listed sensitive receptors. In addition to the off-site receptors listed above, the residential units to be constructed as part of the proposed project are considered sensitive receptors.

3.9.2 REGULATORY SETTING

FEDERAL NOISE CONTROL ACT OF 1972

The Federal Noise Control Act of 1972 established programs and guidelines to identify and address the effects of noise on public health, welfare, and the environment. In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at more local levels of government, thereby allowing more individualized control for specific issues by designated federal, state, and local government agencies. Consequently, in 1982, responsibilities for regulating noise control policies were transferred to specific federal agencies, and state and local governments. However, noise control guidelines and regulations contained in EPA rulings in prior years remain in place. No federal noise regulations are directly applicable to the proposed project.

STATE OF CALIFORNIA TITLE 24

The State of California has adopted noise standards in areas of regulation not preempted by the federal government. State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. State regulations governing noise levels generated by individual motor vehicles and occupational noise control are not applicable to planning efforts, nor are these areas typically subject to CEQA analysis. State noise regulations and policies applicable to the proposed project include Title 24 requirements and noise exposure limits for various land use categories.

In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for residential buildings (California Code of Regulations Title 24, Part 2, Chapter 12, Section 1207.11.2). Title 24 establishes standards for interior room noise attributable to outside noise sources. Title 24 also specifies that acoustical studies should be prepared whenever a residential building or structure is proposed to be located in areas with exterior noise levels 60 dB L_{dn} or greater. The acoustical analysis must show that the building has been designed to limit intruding noise to an interior level not exceeding 45 dB L_{dn} for any habitable room.

WEST HOLLYWOOD GENERAL PLAN NOISE ELEMENT AND MUNICIPAL CODE

The West Hollywood General Plan Safety and Noise Element contains goals and policies to protect citizens from exposure to excessive noise. The Safety and Noise Element identifies significant noise issues in the City that include the following:

- Residential neighborhoods are located adjacent to heavily traveled arterials, some of which are exposed to high ambient noise levels;
- Traffic congestion occurs during the evening hours in and around areas containing concentrations of entertainment uses. The associated parking and noise spillover causes disturbances to residential areas;
- Noise generated by customers and operations of night clubs, restaurants, bars, and other similar uses during evening hours often impacts adjacent residences;
- The nighttime use of surface parking lots and unenclosed garages often causes noise impacts on adjacent residences;
- Increases in traffic volumes increase noise levels throughout the City;
- Commercial and residential uses are located in proximity to one another, creating potential noise conflicts between these uses; and
- Mixed-use buildings, which integrate residences above ground floor commercial uses, present potential noise conflicts from traffic noise generated from the commercial frontage street and noise generated from ground floor commercial activity.

The West Hollywood Noise Control Ordinance, found in Title 9 Public Peace, Morals and Safety, Chapter 9.08 of the Municipal Code, contains guidance for the purpose of striking a balance between normal, everyday noises that are unavoidable in an urban environment and those noises that are so excessive and annoying to persons of ordinary sensitivity that they must be curtailed to protect the comfort and tranquility of all persons who live and work in the City.

Section 9.08.050(f) of the Municipal Code prohibits construction activities between the hours of 7:00 p.m. and 8:00 a.m. on weekdays, and at any time on Saturdays, Sundays, and City holidays, except that interior construction may occur on Saturdays between 8:00 a.m. and 7:00 p.m. However, Section 9.08.060 allows the City Manager to exempt projects from these limits if necessary to protect or promote public safety or welfare.

3.9 Noise

Chapter 19.20 of the Municipal Code contains General Property Development and Use Standards. Section 19.20.090 includes the following requirements:

- **Maximum Noise Level.** Proposed development and land uses shall comply with the requirements of the City's Noise Control Ordinance in Chapter 9.08 of the Municipal Code.
- **Residential Project Mitigation.** Developers of residential projects adjacent to existing commercial uses shall incorporate noise mitigating construction techniques to ensure that noise from existing commercial uses is abated to acceptable levels in compliance with Chapter 9.08 of the Municipal Code.
- **Commercial Project Mitigation.** Developers of commercial projects adjacent to residential zoning districts or existing residential uses shall incorporate noise mitigating construction techniques to ensure that noise from the proposed commercial activities is abated to acceptable levels in compliance with Chapter 9.08 of the Municipal Code.
- **Mechanical Equipment.** Equipment located on the rooftop of a structure shall be enclosed or incorporate other elements to prevent adverse noise that might be heard by persons on adjacent properties.

VIBRATION

CEQA states that the potential for any excessive vibration levels must be analyzed, but it does not define the term “excessive” vibration. Numerous public and private organizations and governing bodies have provided guidelines to assist in the analysis of vibration; however, the federal, state, and local governments have yet to establish specific vibration requirements. Additionally, there are no federal, state, or local vibration regulations or guidelines directly applicable to the proposed project.

Publications of the Federal Transit Administration (FTA) and the California Department of Transportation (Caltrans) are two of the seminal works for the analysis of vibration relating to transportation and construction-induced vibration. The proposed project is not subject to FTA or Caltrans regulations; however, these guidelines serve as a useful tool to evaluate vibration impacts. Caltrans guidelines recommend that a standard of 0.2 inches per second PPV not be exceeded for the protection of normal residential buildings, and that 0.08 inches per second PPV not be exceeded for the protection of older or historically significant structures. With respect to human response within residential uses (i.e., annoyance, sleep disruption), FTA recommends a maximum acceptable vibration standard of 80 VdB. In addition, the FTA has indicated that vibration levels of 65 VdB would impact filming studios.

3.9.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not expose persons to excessive noise from public or private airports. Accordingly, these issues are not further analyzed in the EIR.

The CEQA Guidelines establish that the proposed project would result in a significant impact related to noise and vibration if it would:

- Create levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, or result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- Create a substantial permanent increase in ambient noise levels in the vicinity of the project above levels without the project;
- Create a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project, in excess of noise levels existing without the project; and/or
- Expose people to or generate excessive ground-borne vibration or ground-borne noise levels.

In addition, the City of West Hollywood has identified more specific CEQA thresholds in the City of West Hollywood General Plan Final EIR and the Safety and Noise Element of the General Plan. The proposed project would result in a significant impact related to noise if it would:

- Cause, or if residential in nature, be exposed to, a non-transportation noise level that exceeds 55 dBA L_{eq} from 8:00 a.m. to 10:00 p.m. or 50 dBA L_{eq} from 10:00 p.m. to 8:00 a.m.;
- Expose persons to noise levels inconsistent with the City's Noise/Land Use Compatibility Matrix (see Table 3.9-3);
- Cause a permanent increase in ambient noise levels of 5 dB L_{dn} or greater where the existing ambient noise level is less than 60 dB;
- Cause a project-related permanent increase in ambient noise levels of 3 dB L_{dn} or greater where the existing ambient noise level is greater than 60 dB; and/or
- Cause a project-related temporary increase in ambient noise levels of 10 dBA L_{eq} or greater.

The proposed project would result in a significant impact related to vibration if it would:

- Expose non-engineered timber and masonry buildings to vibration damage levels that exceed 0.2 inches per second PPV;
- Expose historic structures to vibration damage levels that exceed 0.08 inches per second PPV;
- Expose persons to vibration levels that exceed 80 VdB: and/or
- Expose filming studios to vibration levels that exceed 65 VdB.

3.9 Noise

TABLE 3.9-3 NOISE/LAND USE COMPATIBILITY MATRIX

Land Use	Community Noise Exposure (dBA, CNEL)						
	50	55	60	65	70	75	80
Residential							
Transient Lodging – Motel, Hotel							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Parks							
Golf Course, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial, and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Zone A - Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved meet conventional Title 24 construction standards. No special noise insulation requirements.

Zone B - Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise reduction measures are identified and included in the project design.

Zone C - Normally Unacceptable - New construction or development is discouraged. If new construction is proposed, a detailed analysis is required, noise reduction measures must be identified, and noise insulation features included in the design.

Zone D - Clearly Unacceptable - New construction or development should not be undertaken.

Source: City of West Hollywood, *West Hollywood General Plan 2035, Safety and Noise Element*, 2011.

IMPACT ANALYSIS

NOISE-1 *Construction activity would not create noise levels in excess of the West Hollywood Municipal Code. However, it would cause a substantial temporary project-related increase in ambient noise levels by more than 10 dBA at adjacent residential land uses. The proposed project would result in a significant impact related to construction noise.*

Construction activity would impact noise-sensitive land uses in the project vicinity. Table 3.9-4 illustrates typical noise levels associated with the operation of construction equipment at a distance of 50 feet. As shown, construction equipment generates high levels of intermittent noise ranging from 55 to 95 dBA and

would result in a significant impact where noise-sensitive land uses adjoin construction sites. Although construction activities would result in a substantial noise increase in such locations, this impact would be short-term and would cease upon completion of construction.

TABLE 3.9-4 CONSTRUCTION EQUIPMENT NOISE LEVELS

Equipment Item	Typical Maximum Noise Level (dBA) at 50 Feet
Earthmoving	
Backhoes	80
Bulldozers	85
Front Loaders	80
Graders	85
Paver	85
Roller	85
Tractors	84
Dump Truck	84
Pickup Truck	55
Materials Handling	
Concrete Mixer Truck	85
Concrete Pump Truck	82
Crane	85
Man Lift	85
Stationary Equipment	
Compressors	80
Generator	82
Pumps	77
Impact Equipment	
Compactor	80
Jack Hammers	85
Impact Pile Drivers (Peak Level)	95
Pneumatic Tools	85
Other Equipment	
Concrete Saws	90
Vibrating Hopper	85
Welding Machine/Torch	73

Source: City of West Hollywood, *Final Program Environmental Impact Report for City of West Hollywood General Plan 2035 and CAP*, October 2010.

The noise levels shown in Table 3.9-5 take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for each phase of construction. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. No pile driving would be conducted as part of project construction. A typical piece of noisy equipment is assumed to be active for 40 percent of the eight-hour workday (consistent with the EPA studies of construction noise), generating a noise level of 89 dBA L_{eq} at a reference distance of 50 feet.

3.9 Noise

TABLE 3.9-5 TYPICAL OUTDOOR CONSTRUCTION NOISE LEVELS

Construction Phase	Noise Level (dBA) at 50 Feet
Ground Clearing	84
Grading/Excavation	89
Foundations	78
Structural	85
Finishing	89

Source: EPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971

The West Hollywood Municipal Code exempts construction-generated noise that occurs between the hours of 8:00 a.m. to 7:00 p.m. Monday through Friday, but does not contain quantified noise level limits for construction activities. The regulatory exemption without noise levels limit reflects the City's acknowledgement that construction noise is a necessary part of new development and does not create an unacceptable public nuisance when conducted during the least noise-sensitive hours of the day. Thus the proposed project would not violate existing ordinances or standards established in the West Hollywood Municipal Code.

Construction noise levels drop off at a rate of about 6 dBA per doubling of distance between the noise source and receptor. However, intervening structures would also result in lower noise levels. Sound levels may be attenuated 3.0 to 5.0 dBA by a first row of houses/buildings and 1.5 dBA for each additional row of houses in built-up environments (FTA 1978). These factors generally limit the distance construction noise travels and ensure noise impacts from construction are localized. Construction noise levels for the proposed project are shown in Table 3.9-6 below.

TABLE 3.9-6 CONSTRUCTION NOISE LEVELS - UNMITIGATED

Sensitive Receptor	Distance (feet) ^a	Maximum Construction Noise Level (dBA) ^b	Existing Ambient Noise Level (dBA, L _{eq}) ^c	New Ambient Noise Level (dBA, L _{eq}) ^d	Increase ^e
Single- and Multi-Family Residences Adjacent and to the north	Adjacent	89.0	57.4	89.0	31.6
Single- and Multi-Family Residences to the northwest	145	79.8	57.4	79.8	22.4
Single- and Multi-Family Residences to the northeast	220	76.1	66.1	76.5	10.4
Samy Hotel	285	70.9	57.4	71.1	13.7
The Lot	360	68.9	57.4	69.2	11.8
Poinsettia Recreation Center	1,090	56.2	59.2	61.0	1.8

^a Distance of noise source from receptor.

^b Construction noise source's sound level at receptor location, with distance and building adjustment.

^c Pre-construction activity ambient sound level at receptor location.

^d New sound level at receptor location during the construction period, including noise from construction activity.

^e An incremental noise level increase of 10 dBA or more would result in a significant impact.

Source: Terry A. Hayes Associates Inc. 2012.

As shown in Table 3.9-6, typical construction activity using multiple pieces of equipment would increase the ambient noise levels at nearby single- and multi-family residences between 76.5 and 89.0 dBA L_{eq} , respectively. Construction noise levels would exceed the 10-dBA incremental increase thresholds at nearby single- and multi-family residences, the Samy Hotel, and The Lot studio. Therefore, the proposed project would result in a significant impact related to short-term substantial increases in ambient noise levels in the project vicinity during construction. Implementation of mitigation measures NOISE-A through NOISE-F are required.

NOISE-2 *The proposed project would expose onsite residents to noise levels in excess of the West Hollywood Municipal Code during project operations. The proposed project would result in a significant impact related to noise and land use compatibility.*

The City of West Hollywood has developed a Noise Element for the General Plan to manage noise exposure within the City. The General Plan Noise Element includes goals for locating new land uses in acceptable noise environments. To help meet this goal, the General Plan presents a noise contour map and identifies locations where multi-family residences must demonstrate compliance with the Title 24 goal of 45 dBA CNEL or L_{dn} interior noise level. The CNEL along Santa Monica Boulevard is approximately 70 dBA, which would not be compatible with the exterior noise level shown in Table 3.9-3 for residential land uses when the proposed project is occupied and operational. The variability in construction methods and materials makes it difficult to accurately assess post-construction interior noise levels. It is anticipated that interior noise levels in project residences would exceed the 45 dBA CNEL standard along high volume roadways such as Santa Monica Boulevard. Therefore, the proposed project would result in a significant impact related to onsite interior noise levels in excess of the West Hollywood Municipal Code during long-term operation. Implementation of mitigation measure NOISE-G is required.

NOISE-3 *Operation of the proposed project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the project area.*

During operation, the proposed project would generate 1,453 net new daily trips. Mitigation measure 3.9-3 in the City of West Hollywood General Plan Final EIR states that mobile source noise assessments are required for all discretionary, non-residential projects that will cause future traffic volumes to increase by 25 percent or more on any roadway in front of or near blocks where the majority land uses are residential or institutional (e.g., schools).

Noise sensitive land uses in the project vicinity are located along Formosa Avenue, Detroit Street, and Lexington Avenue. It is anticipated that the future without project average daily traffic volumes for Formosa Avenue, Detroit Street, and Lexington Avenue would be 7,195, 4,149, and 3,273 net new daily trips, respectively. It is anticipated that the future with project traffic volumes for Formosa Avenue, Detroit Street, and Lexington Avenue would be 7,307, 4,831, and 3,656 net new daily trips, respectively. Therefore, implementation of the proposed project would cause future traffic volumes to increase by 2 percent along Formosa Avenue, 16 percent along Detroit Street, and 12 percent along Lexington Avenue.

3.9 Noise

As directed in the City of West Hollywood General Plan Final EIR, mobile source noise assessments are not required for the proposed project since future traffic volumes would not increase by 25 percent along any roadway segments.

The proposed project would require building mechanical equipment (e.g., air handlers, exhaust fans, and pool equipment). A utility room would be located on the western portion of the project site and two fan rooms would be located on the eastern portion. Equipment contained within these rooms would not generate audible noise beyond the property line. Utility boxes would be located on the northwest and northeast edges of the project site. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 60 dBA L_{eq} at 50 feet. This noise level is reduced by at least 10 dBA when the equipment is enclosed within a structure. Mechanical equipment noise would not exceed 55 dBA L_{eq} between 8:00 a.m. and 10:00 p.m. or 50 dBA L_{eq} between 10:00 p.m. and 8:00 a.m. beyond the property line. In addition, the enclosed equipment would not increase the permanent L_{dn} by more than 1.0 dBA at any adjacent land use. Therefore, the proposed project would result in a less than significant impact to operational noise related to mechanical equipment, and no mitigation is required.

A loading zone would be provided for retail and restaurant service and residential use on Formosa Avenue just north of Santa Monica Boulevard and south of the commercial parking garage entrance. Noise levels from medium-duty trucks accessing the project site would range from 71 to 79 dBA L_{eq} at 50 feet (Caltrans 2009). The proposed project would typically generate less than five truck trips per day. These truck trips would generate short-term and intermittent noise. Truck activity would occur during daytime hours and the intermittent noise would not increase the permanent L_{dn} by more than 1.0 dBA at any adjacent land use. In addition, noise levels would be further attenuated based on the distance of the sensitive residential uses (more than 25 feet) from the loading docks. Therefore, the proposed project would result in a less than significant impact related to truck loading noise during operations, and no mitigation is required.

The proposed project includes 246 enclosed parking spaces on the ground level and within one and a half floors of subterranean parking. Since all parking on the project site would be enclosed within the building, parking noise would be inaudible at nearby sensitive receptors. Parking activity would not increase ambient noise levels beyond the property line. Therefore, the proposed project would result in a less than significant ambient noise impact during operations, and no mitigation is required.

The proposed project would include a pool and courtyard area. These areas would be enclosed on all sides and would not be in the direct line-of-sight of any sensitive receptors. In addition, the pool area would not include amplified noise. Recreational and courtyard noise would not exceed 55 dBA L_{eq} between 8:00 a.m. and 10:00 p.m. or 50 dBA L_{eq} between 10:00 p.m. and 8:00 a.m. beyond the property line. In addition, recreational noise would not increase the permanent L_{dn} by more than 1.0 dBA at any adjacent land use. Therefore, the proposed project would result in a less than significant impact related to pool and courtyard activity, and no mitigation is required.

NOISE-4 *Construction activity would expose nearby sensitive receptors and the nearest filming studio to excessive ground-borne vibration levels. The proposed project would result in a less than significant impact related to operational vibration.*

CONSTRUCTION

Construction activity could generate vibration that would either damage nearby buildings or annoy people in the project vicinity. Construction activities can generate varying degrees of ground-borne vibration, depending on the construction procedures and the type of construction equipment operated. Construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effects on buildings (i.e., building damage) are dependent on the location of the buildings to the source and the characteristic of the building structure. Typical equipment vibration levels are shown in Table 3.9-7.

TABLE 3.9-7 REPRESENTATIVE VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 feet (Inches/Second)	VdB at 25 feet
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Heavy-Duty Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

The majority of construction activities would occur central to the project site and away from the adjacent land uses to the north. Heavy-duty equipment vibration levels outside of 15 feet would be less than the 0.2 PPV building damage threshold. However, heavy-duty construction equipment would periodically operate within 15 feet of the existing residences to the north. During these occasions, equipment vibration levels would exceed the 0.2 PPV building damage threshold. Therefore, the proposed project would result in a significant impact related to building damage at adjacent residential land uses, and implementation of mitigation measure NOISE-H is required.

The Formosa Cafe is a historical resource located approximately 90 feet south of the project site on Santa Monica Boulevard. It is anticipated that heavy-duty equipment would generate a vibration level of 0.01 PPV at the Formosa Cafe. Vibration levels would not exceed the 0.2 PPV building damage threshold for historic structures. Therefore, the proposed project would result in a less than significant vibration impact to the Formosa Café, and no mitigation is required.

The closest filming studio building on The Lot is located approximately 360 feet to the southwest of the project site. It is anticipated that heavy-duty construction equipment would generate a vibration level of 0.002 PPV at The Lot, and would not exceed the 0.2 PPV building damage threshold. The anticipated annoyance due to heavy-equipment operation would 52.2 VdB, and would not exceed the 65 VdB significance threshold for filming studios. Therefore, the proposed project would result in a less than significant vibration impact to The Lot during construction, and no mitigation is required.

3.9 Noise

The nearest sensitive receptor that has the potential to result in human annoyance due to construction activity would also be the multi-family residences adjacent and to the north of the project site. Heavy-duty equipment (e.g., a large bulldozer) generates vibration levels of 87 VdB at 25 feet. Based on this reference level, vibration levels would exceed the 80 VdB significance threshold when equipment would be within 43 feet of adjacent land uses. There is no feasible mitigation to reduce vibration levels resulting from use of heavy-duty equipment; however construction impacts are temporary in nature. Nonetheless, construction vibration levels would expose nearby uses to excessive ground-borne vibration. Therefore, the proposed project would result in a significant vibration annoyance impact.

OPERATIONS

The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on local roadways. However, similar to existing conditions, project-related traffic vibration levels would be less than 80 VdB and would not be perceptible by sensitive receptors. Therefore, the proposed project would result in a less than significant impact to operational vibration levels, and no mitigation is required.

3.9.4 MITIGATION MEASURES

- NOISE-A** The construction contractor shall ensure that equipment is properly maintained per the manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc).
- NOISE-B** The construction contractor shall shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.
- NOISE-C** The construction contractor shall ensure that construction equipment does not idle for extended periods of time.
- NOISE-D** The construction contractor shall locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers).
- NOISE-E** ~~If feasible, the~~ The construction contractor shall install a 12-foot high temporary barrier along the northern property line. The acoustical barrier shall be constructed of material having a minimum surface weight of two pounds per square foot or greater, and a demonstrated Sound Transmission Class rating of 25 or greater as defined by American Society for Testing and Materials Test Method E90. The barrier shall be required during the excavation and site preparation phases of construction.
- NOISE-F** The construction contractor shall ensure that music is not audible at offsite locations.
- NOISE-G** Prior to issuance of a building permit, the applicant shall submit an acoustical study showing that the interior noise level in residential units does not exceed 45 dBA CNEL or

L_{dn} . Prior to occupancy, this noise level shall be verified at a representative sample of residences by a qualified acoustical specialist.

NOISE-H Prior to commencement of construction activity, a qualified structural engineer shall survey the existing foundation and other structural aspects of residential land uses adjacent and to the north of the project site. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary of Interior's Standards to such projects.

The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions. These baseline conditions shall be forwarded to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building permit for the proposed project.

At the conclusion of vibration-causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to adjacent buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken by the applicant prior to issuance of any temporary or permanent certificate of occupancy for the proposed project.

3.9.5 SIGNIFICANCE AFTER MITIGATION

Mitigation measures NOISE-A and NOISE-B would reduce construction noise levels by approximately 3 dBA. Additionally, mitigation measures NOISE-C through NOISE-F would further assist in the attenuation of noise levels related to construction activities. Table 3.9-8 presents mitigated construction noise levels at nearby sensitive receptors. Mitigated construction noise levels would still exceed the 10 dBA significance threshold at multiple sensitive receptor locations, including nearby multi-family residential uses located adjacent to the north side of the project site and located northwest of the project site, as well as the Samy Hotel. Therefore, the proposed project would result in a significant and unavoidable impact related to short-term construction noise levels.

3.9 Noise

TABLE 3.9-8 CONSTRUCTION NOISE LEVELS - MITIGATED

Sensitive Receptor	Distance (feet) ^a	Maximum Construction Noise Level (dBA) ^b	Existing Ambient Noise Level (dBA, L _{eq}) ^c	New Ambient Noise Level (dBA, L _{eq}) ^d	Increase ^e
Single- and Multi-Family Residences located adjacent to the north of project site	Adjacent	86.0	57.4	86.0	28.6
Single- and Multi-Family Residences located northwest of project site	145	76.8	57.4	76.8	19.4
Single- and Multi-Family Residences located northeast of project site	220	73.1	66.1	73.9	7.8
Samy Hotel located north of project site	285	67.9	57.4	68.3	10.9
The Lot	360	65.9	57.4	66.4	9.0
Poinsettia Recreation Center located south of project site	1,090	53.2	59.2	60.2	1.0

^a Distance of noise source from receptor.

^b Construction noise source's sound level at receptor location, with distance and building adjustment.

^c Pre-construction activity ambient sound level at receptor location.

^d New sound level at receptor location during the construction period, including noise from construction activity.

^e An incremental noise level increase of 10 dBA or more would result in a significant impact.

Source: Terry A. Hayes Associates Inc. 2012.

During project operations, mitigation measure NOISE-G would ensure that the interior noise levels within the apartment units would be less than 45 dBA CNEL or L_{dn}. Therefore, the operational impact to interior noise levels would be reduced to a less than significant level. All other operational noise would be less than significant without mitigation.

During construction, mitigation measure NOISE-H would mitigate any building damage caused by the operation of heavy-duty construction equipment. Therefore, with implementation of mitigation, the proposed project would result in a less than significant vibration impact related to building damage. However, there are no feasible mitigation measures that would reduce impacts associated with vibration annoyance at the multi-family residences adjacent and to the north of the project site. The proposed project would comply with the allowable construction hours listed in the West Hollywood Municipal Code. However, the operation of heavy-duty equipment within 43 feet of these buildings would exceed the significance threshold established by the City. Therefore, the proposed project would result in a short-term significant and unavoidable impact related to vibration annoyance caused by construction activity.

Vibration impacts during project operation would be less than significant without mitigation.

3.10 PUBLIC SERVICES, UTILITIES AND RECREATION

3.10.1 ENVIRONMENTAL SETTING

FIRE PROTECTION

Fire protection is provided to the City of West Hollywood by the Los Angeles County Fire Department (LACoFD). The City of West Hollywood is located in Battalion 1, which encompasses six fire stations, two of which are located within the City boundaries. Fire Station No. 8, located at 7643 Santa Monica Boulevard, is approximately 0.6 miles west of the project site. Fire Station No. 8 has a staffing level of 13 persons and operates an engine, a light force, and a squad paramedic. Fire Station No. 7, located at 864 North San Vicente Boulevard, is approximately 2.3 miles west of the project site. Fire Station No. 7 has a paramedic engine, a squad paramedic, and a battalion chief for a staffing level of six persons. LACoFD generally operates three shifts of 24 personnel out of Fire Stations No. 7 and 8. Additionally, the West Hollywood office of the LACoFD Fire Prevention Bureau has a staffing level of 24, including 1 Captain, 2 Inspectors, 1 civilian staff member, and 20 operations staff. LACoFD is responsible for all hazards to public safety, including emergency medical calls, fire responses, inspections, and plan check services. LACoFD has an average emergency response time for first arriving units of just under 4 minutes and nonemergency response time of 5 minutes 20 seconds (City of West Hollywood 2010).

The project site is currently developed with a metal plating facility and a sound recording studio. Vehicular access to the project site is provided from driveways located on Formosa Avenue and Detroit Street. There is a driveway located along Santa Monica Boulevard, although this driveway is not used for daily vehicle ingress/egress.

POLICE PROTECTION

The Los Angeles County Sheriff's Department (LACoSD) provides police protection services to the City of West Hollywood. The LACoSD West Hollywood station is located at 780 North San Vicente Boulevard, approximately 2.2 miles west of the project site. The West Hollywood Sheriff's Station currently has 133 sworn personnel and 35 civilian employees serving the City of West Hollywood (City of West Hollywood 2010). The West Hollywood Sheriff's Station performs various law enforcement, community policing, traffic enforcement, entertainment district management, special event management, investigative functions, and various administrative duties. The West Hollywood Sheriff's Station has a sworn personnel-to-population ratio of 3.5 sworn personnel to 1,000 persons. The current ratio is considered adequate. Growth within the service area of the West Hollywood station and crime trends require that the ratio of police officers to population be periodically reassessed. The West Hollywood Station's citywide response time to emergency calls for service is 3.8 minutes and 6.5 minutes for priority calls for service. For routine calls, the station's goal is to respond to calls within 20 minutes (City of West Hollywood 2010).

3.10 Public Services, Utilities and Recreation

WASTEWATER

The project site is currently occupied by a 3,500-square-foot sound editing studio and a 36,000-square-foot metal plating facility. It is estimated that the existing uses generate approximately 4,637 gallons of wastewater per day (0.007 cubic feet per second) (PSOMAS 2012). Estimated wastewater generation under existing conditions was calculated utilizing rates corresponding to the existing commercial zoning for the project site.

The City of West Hollywood Public Works Department and City of Los Angeles Bureau of Sanitation provide sewer service in the project area. Wastewater mains are located in Santa Monica Boulevard, Formosa Avenue, and Detroit Street, which currently serve the existing project site uses. These mains discharge into Los Angeles local sewer lines on Formosa Avenue located south of Romaine Street. The City of Los Angeles has a contract with the Los Angeles County Sanitation Districts (Sanitation Districts) to receive sewage generated in West Hollywood and transport that sewage into the Sanitation District's conveyance system to the City of Los Angeles Sanitation Bureau's Hyperion Treatment Plant. The Hyperion Treatment Plant processes approximately 360 million gallons of wastewater per day and has a remaining capacity of approximately 90 million gallons per day (City of Los Angeles Bureau of Sanitation 2008).

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 \$75 for each net sewage unit of proposed land use for projects with new construction (City of West Hollywood Municipal Code Section 5322). In addition, the Sanitation Districts are empowered by the California Health and Safety Code to charge a fee for connecting directly or indirectly to their sewage system. Payment of this connection fee is required before a permit to connect to the sewer is issued. The City of Los Angeles requires that the applicant submit a Request for Waste Water Services Information.

The contract between the Sanitation Districts and the City of Los Angeles limits the amount of wastewater flow in the Formosa Avenue sewer to a peak flow of 0.42 cubic feet per second. If and when flows are anticipated to exceed these limits, the contract must be renegotiated or the City of Los Angeles can refuse to accept the excess flows. Flow tests conducted as part of the Lot Development located south of the project site were measured in 1992 at 0.60 cubic feet per second for the Formosa Avenue sewer, which is above the allowable limit. As such, there is an existing lack of capacity in the Formosa Avenue sewer line (The Keith Companies 1992). A sewer study prepared by the applicant (see Appendix G) confirmed that existing conditions in segments of the sewer line south of Willoughby Street, in the City of Los Angeles, are deficient and flowing near to full capacity. Additionally, the segment south of Romaine Street is currently flowing at approximately 62 percent full during peak flows (PSOMAS 2012).

SOLID WASTE

The project site is occupied by a 3,500-square-foot sound editing studio and a 36,000-square-foot metal plating facility. It is estimated that the existing office and manufacturing uses generate approximately 2,267.5 pounds per day of solid waste (CalRecycle 2012a).¹

The collection, transport, and disposal of solid waste and recyclables from all business and residential uses in West Hollywood are provided by Athens Services. In addition to the collection of non-recyclable solid waste, Athens Services is required to provide containers for the separation of newspaper and mixed paper, co-mingled recyclables, and yard and wood waste under the recycling program promoted by the City (City of West Hollywood 2008).

Most of the non-recyclable waste produced in the City is disposed of at the Puente Hills Landfill in Whittier. The permitted daily capacity of this landfill is approximately 13,200 tons per day. Puente Hills Landfill is scheduled to close in 2013 (CalRecycle 2012b). After closure, solid waste will be transferred by rail from Puente Hills to Mesquite Regional Landfill in Imperial County and Eagle Mountain Landfill in Riverside County. Mesquite Regional Landfill has capacity for approximately 600 million tons of residual municipal solid waste, or approximately 100 years of capacity. Eagle Mountain Landfill has a total capacity of 708 million tons and is currently permitted to accept up to 460 million tons (City of West Hollywood 2010).

Due to the declining landfill space for disposal, there is a need to divert solid waste. AB 939, or the Integrated Waste Management Act of 1989, mandates that the City divert 50 percent of the total solid waste generated. SB 1016 requires that the 50 percent diversion requirement mandated by AB 939 be measured in terms of pounds per person per day, instead of by volume or as an aggregate measure separate from population. CalRecycle sets a target for resident and employee per capita per day disposal rates. The target for residents is 5.8 and 7.7 for employees (City of West Hollywood 2010).

PARKS AND RECREATION

The City of West Hollywood has six parks, outdoor sports facilities (West Hollywood Park), a swimming pool, and tennis courts. Formosa Pocket Park is located approximately 200 feet north of the project site. Plummer Park is located approximately 0.5 miles west of the project site. Kings Road Park is located approximately 1.5 miles northwest of the project site. Poinsettia Recreation Center is located approximately 0.5 miles south of the project site in the City of Los Angeles. The City of West Hollywood has over 15 total acres of parkland.

The City has a ratio of approximately 0.41 acre of parkland per 1,000 persons (acreage of open space or green space is not included because it is not City of West Hollywood dedicated parkland). However, the Quimby Act recommends that municipalities provide 3.0 acres of parkland for every 1,000 residents (City of West Hollywood 2010). As such, there is a shortage of parkland in the City.

¹ Based on a generation factor of 5.0 pounds per day per 1,000 square feet of commercial uses and 62.5 pounds per day per 1,000 square feet of industrial uses.

3.10.2 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for schools and other public facilities. Accordingly, these issues are not further analyzed in the EIR.

The CEQA Guidelines establish that a proposed project would have a significant effect on public services, utilities and recreation if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives;
- Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives;
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Result in a determination by the wastewater treatment provider that 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;
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs;
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

IMPACT ANALYSIS

PS-1: *The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.*

The proposed project would involve the demolition of the existing 36,000-square-foot metal plating facility and 3,500-square-foot sound recording studio. It would result in the construction and operation of 166 residential units and approximately 9,300 square feet of retail and restaurant (up to 2,500 square feet of restaurant uses). Entry to and exit from the residential garage would be located on Detroit Street. Parking for on-site residents would be located in one and a half levels of subterranean parking. Entry to and exit from the retail/restaurant and guest parking lot would be located in the central portion of the site off of Formosa Avenue. Parking for retail/restaurant uses and guests would be located on the ground level. The proposed project would provide emergency access to the site in accordance with the applicable fire code, which includes adequate fire flows, width of emergency access routes, turning radii, automatic sprinkler systems, fire alarms, and floor to sky height limits along emergency access routes. The site is currently served by two existing fire stations.

LACoFD currently serves the project site and surrounding area. However, each additional development that provides net new square footage of residential units creates a greater demand on existing resources. The proposed project would add 166 net new residential units, as no residential uses are currently located on-site. The approximately 39,500 square feet of existing industrial and commercial uses would be replaced with approximately 2,500 square feet of restaurant uses and 6,800 square feet of retail uses. The increased use of the site would be expected to increase the frequency of emergency response calls, although the exact frequency and nature of emergency calls is not currently known.

No expansion of fire protection facilities is currently contemplated. Compliance with the fire code standards would be ensured through the plan check process and fire department review prior to the issuance of a building permit. Payment of development fees by the project applicant would be used to offset the costs of increased personnel or equipment in order to maintain acceptable service ratios, response times, and other performance objectives. However, the construction of new or expansion of existing fire facilities would not be required as a result of the proposed project. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. The impact would be less than significant.

PS-2: *The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.*

The proposed project would involve the demolition of the existing 36,000-square-foot metal plating facility and 3,500-square-foot sound recording studio. It would result in the construction and operation of 166 residential units and approximately 9,300 square feet of retail and restaurant uses (up to 2,500 square feet of restaurant uses). The approximately 39,500 square feet of existing industrial and commercial uses would be replaced with approximately 2,500 square feet of restaurant uses and 6,800 square feet of retail

3.10 Public Services, Utilities and Recreation

uses. The proposed project would add 166 net new residential units, as no residential uses are currently located on-site. However, it would comply with the police protection requirements of LACoSD, including defensible design, lighting, and landscaping. It is expected that the project site would employ its own patrol service to monitor the site. Nevertheless, the increased use of the site would be expected to increase the frequency of emergency and non-emergency (domestic related) calls for police protection services.

LACoSD currently serves the project site and the surrounding area and existing staffing levels are adequate to serve the existing uses. However, each additional development that provides net new square footage or residential units creates a greater demand on existing resources. LACoSD units are continuously mobile, and service calls are responded to by the nearest available mobile unit. As such, the location of the proposed project would not affect police protection. The construction of new or expansion of existing police facilities would not be required as a result of the proposed project. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. The impact would be less than significant.

PS-3: *The proposed project may require or result in the construction of new wastewater conveyance. The proposed project would not result in a determination by the wastewater treatment provider that serves or may serve the project that it ~~has~~ lacks adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

The project site is currently occupied by a 3,500-square-foot sound editing studio and a 36,000-square-foot metal plating facility. These existing uses generate approximately 4,637 gallons of wastewater per day (0.007 cubic feet per second) (PSOMAS 2012). The project site would be developed with approximately 9,300 square feet of retail and restaurant uses and 166 residential units. According to the sewer capacity report prepared by the applicant, the proposed project would be expected to generate up to 22,943 gallons per day of wastewater (0.035 cubic feet per second) (PSOMAS 2012). This is a net increase of 18,306 gallons per day of wastewater (0.028 cubic feet per second) generated at the proposed project site. As previously discussed, estimated wastewater generation under existing conditions was calculated utilizing rates corresponding to the existing commercial zoning for the project site. However, Faith Plating is an industrial land use and operates under a County Industrial Waste Permit, which allows sewer discharges much higher than are permitted under the existing zoning. Thus, actual existing wastewater flows generated at the project site are much higher than calculated for land uses under the existing zoning. Nonetheless, for a conservative analysis, the commercial land use wastewater generation rates were used (City of West Hollywood 2012).

The applicant prepared a sewer study, which is included as Appendix G. Based on a Sewer Capacity Availability Request submitted by the applicant, the City of Los Angeles Bureau of Engineering has determined that at this time the existing sewer system downstream of the proposed project site would be able to accommodate the total project wastewater flows for the proposed project at full occupancy (2012). However, the City of Los Angeles Bureau of Engineering only guarantees sewer capacity availability for a period of 180 days. The applicant would be required to obtain a new Sewer Capacity Availability Request from the City of Los Angeles Bureau of Engineering when construction of the proposed project

is complete, but prior to connection to the sewer system. If at that time the City of Los Angeles Bureau of Engineering determines that there is not sufficient capacity, the applicant would be required to implement improvements to the sewer system. Due to known sewer capacity deficiencies in the vicinity of the project site and the inability to guarantee available capacity at the time of occupancy, the impact would be significant and implementation of mitigation measure PS-A is required.

Wastewater generated by the project site is treated at the City of Los Angeles Bureau of Sanitation's Hyperion Treatment Plant. This treatment plant processes approximately 360 million gallons of wastewater per day and has a remaining capacity of approximately 90 million gallons per day (City of Los Angeles Bureau of Sanitation 2008). According to the sewer capacity report prepared by the applicant, the proposed project would generate approximately 22,943 gallons of wastewater per day, a net increase of 18,306 gallons per day (PSOMAS 2012). This represents approximately 0.005 percent of the total amount of wastewater treated at Hyperion Treatment Plant. The Los Angeles County Sanitation Districts estimates that the proposed project would generate approximately ~~28,919~~ 21,474 gallons of wastewater per day, or a net increase of ~~24,282~~ 16,537 gallons per day (Los Angeles County Sanitation Districts ~~2013~~ 2012). This represents approximately ~~0.008~~ 0.005 percent of the total amount of wastewater treated at Hyperion Treatment Plant. As such, the proposed project would be served by a wastewater treatment plant with adequate capacity. Furthermore, in accordance with existing City requirements, the applicant would be required to pay the wastewater mitigation fee and connection fees to the Sanitation Districts. These fees are used to pay for incremental increases to the capacity of the wastewater system.

PS-4: *The proposed project would not be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.*

Solid waste would be generated during demolition of the existing structure on-site and the construction of the new structure. In addition, solid waste would be generated during project operation by the residential and commercial uses. The project site is occupied by a 3,500-square-foot sound editing studio and a 36,000-square-foot metal plating facility. It is estimated that these commercial and industrial uses generated 2,267.5 pounds per day of solid waste (CalRecycle 2012a).² The project site would be developed with approximately 9,300 square feet of commercial uses (approximately 2,500 square feet of restaurant uses and 6,800 square feet of retail uses) and up to 166 residential units. The proposed project would be expected to generate approximately 645 pounds per day of solid waste (CalRecycle 2012a).³ Although this would represent a reduction from the previous commercial and industrial uses, the demolition of on-site structures and construction and operation of the proposed project would negatively impact the solid waste management infrastructure.

The City has mandatory recycling requirements in order to divert approximately 50 percent of the solid waste generated in the City in compliance with AB 939. Additionally, the City's Green Building Ordinance requires that approximately 80 percent of demolition debris and construction waste is diverted

² Based on a generation factor of 5.0 pounds per day per 1,000 square feet of commercial uses and 62.5 pounds per day per 1,000 square feet of industrial uses.

³ Based on a generation factor of 5.0 pounds per day per 1,000 square feet of retail uses, 3.6 pounds per day per residential unit, and 0.005 pounds per day per square foot of restaurant uses.

3.10 Public Services, Utilities and Recreation

away from area landfills. Most of the non-recyclable waste produced in the City is disposed of at the Puente Hills Landfill in Whittier. The permitted daily capacity of this landfill is approximately 13,200 tons per day. However, Puente Hills Landfill is scheduled to close in 2013 (CalRecycle 2012b). Following closure of the Puente Hills Landfill, waste will be transferred by rail from Puente Hills to the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County. The Mesquite Regional Landfill is located on 4,245 acres of land in Imperial County. The landfill will provide capacity for approximately 600 million tons of residual municipal solid waste (approximately 100 years of capacity). The Eagle Mountain Landfill has a total capacity of 708 million tons and is currently permitted to accept up to 460 million tons. The eventual operation of the Eagle Mountain Landfill is contingent upon successful resolution of pending federal legislation (West Hollywood 2011).

Due to the shortage of local landfill capacity, it is imperative for the City to maintain its solid waste diversion goals and to offset impacts associated with solid waste. To comply with City requirements, the proposed project would be required to implement waste reduction, diversion, and recycling measures during both demolition/construction and operation. For the demolition/construction phase of the work, the proposed project would be required to prepare and adhere to a Demolition and Debris Recycling Plan (Plan). The Plan must specify where materials would be sent for recycling or disposal. Debris must be hauled from the project site by a recycler or hauler permitted to operate in West Hollywood. The applicant would be required to establish a monitoring program to prove compliance with the demolition and construction debris recycling, including submitting monthly disposal reports and manifests to the West Hollywood Department of Public Works.

During project operation, the proposed project must contain adequate infrastructure for trash and recycling collection services. The proposed project site must contain enough space for trash and recycling to ensure that all residents of the site participate in the recycling program and to ensure that the site is easily serviceable by the trash hauler. The City requires that trash chutes and multiple trash bins be managed to prevent unsanitary buildup of trash on-site and extensive daily circulation in the garage areas of trash and recycling collection vehicles. The proposed project would also be required to provide green waste collection bins. Compliance with these standard City-required features would reduce the amount of solid waste generated by the proposed project site that would ultimately be disposed of at area landfills. In addition to these standard requirements, the proposed project would be required to implement mitigation measures PS-B and PS-C. These mitigation measures are intended to ensure that the proposed project has adequate solid waste disposal and recycling infrastructure to meet City standards and that the amount of waste generated at the proposed project site is reduced. It is expected that these measures would result in a diversion rate of approximately 50 percent in keeping with the City's requirements per AB 939. With implementation of mitigation, the amount of solid waste produced by the proposed project would be reduced to a less than significant level.

PS-5: *The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.*

The proposed project would require the demolition of the existing 36,000-square-foot metal plating facility and 3,500-square-foot sound recording studio. It would result in the construction and operation of 166 residential units and approximately 9,300 square feet of retail and restaurant uses (up to 2,500 square feet of restaurant uses). The proposed project would be expected to increase the City's population by approximately 267 persons (based on a conservative estimate of 1.6 persons per household) (California Department of Finance 2012). Implementation of the proposed project would increase the number of residents in West Hollywood. As such, the proposed project would increase the demand for recreation services and park space in the City.

The proposed project would provide approximately 16,000 square feet of common open space and 14,800 square feet of private open space for a total of approximately 30,800 square feet of open space provided in the form of private balconies, fitness room, pool, roof deck, lounge, and theater. These features would only be available for use by site residents and their guests. As part of the common open space, the proposed project would provide a public plaza.

With the expected increase in the City's population by 267 net new residents, the ratio of parkland per 1,000 residents would remain approximately 0.4 acres with implementation of the proposed project. The City would continue to have a deficit of parkland per 1,000 residents per the Quimby Act standards. The City requires developers to pay a public open space fee per square foot of commercial floor area. This fee funds the maintenance of existing City parks and recreational programs provided by the City as a result of increased demand from new development. As such, with the payment of public open space fees, the proposed project would comply with the City's requirements related to parks, recreation, and open space.

Provision of on-site recreational facilities and the payment of fees would ensure that the proposed project does not result in a substantial physical deterioration of existing recreational facilities. The construction of new or expansion of existing parks and recreational facilities would not be required as a result of the proposed project. The City could use the in-lieu fees to acquire land and construct new park and recreational facilities. Separate environmental review would be conducted at the time such a project is proposed to determine if substantial adverse physical impact would occur. However, the City has no plans to provide new parks or recreational facilities in conjunction with this project. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. The impact would be less than significant.

3.10.3 MITIGATION MEASURES

PS-A Prior to the issuance of a Certificate of Occupancy by the City of West Hollywood, the applicant shall obtain a Sewer Capacity Availability Request from the City of Los Angeles Bureau of Engineering in order to prove to the satisfaction of the City of West Hollywood Department of Public Works that there is adequate wastewater capacity to serve the proposed project. If the City of Los Angeles Bureau of Engineering determines by a subsequent Sewer Capacity Availability Request that the wastewater system no longer has capacity to serve the proposed project, the applicant shall be required to design and construct an alternate sewer connection with adequate downstream capacity.

PS-B Prior to the issuance of a Demolition Permit, the applicant shall submit a building plan to the Environmental Services Coordinator for review and approval. The building plan shall show the location and dimensions of the trash and recyclables storage area. The trash and recyclables storage area shall be designed with adequate space to accommodate the trash and recycling bins and dumpsters.

PS-C Prior to the issuance of a Certificate of Occupancy, trash and recycling operations shall be established at the project site as follows:

- Restaurants shall have a designated dumpster bin to dispose of food waste and other compostables.
- Restaurants, residential, and commercial uses shall have a designated dumpster bin to dispose of regular trash.
- Restaurants, residential, and commercial uses shall have a designated dumpster bin to dispose of recyclables.

3.10.4 SIGNIFICANCE AFTER MITIGATION

The impacts to police and fire protection services and recreation would be less than significant without mitigation. With implementation of mitigation measure PS-A, it would be determined that there is adequate capacity in the sanitary sewer system downstream of the project site to accommodate the additional wastewater flow generated by the proposed project. The impact would be mitigated to a less than significant level. With implementation of mitigation measures PS-B and PS-C, the amount of solid waste generated by the proposed project would be reduced by approximately 50 percent in accordance with City requirements and would be reduced from existing conditions. As such, the proposed project would be served by sufficient landfill capacity, and impacts after mitigation would be less than significant.

3.11 TRANSPORTATION AND TRAFFIC

The scope of work for the traffic study was developed in conjunction with the City of West Hollywood Transportation Department staff. The assumptions, technical methodologies, and geographic coverage of the study area were identified as part of the study approach. The traffic study analyzes the potential project-generated traffic impacts on the street system at full occupancy. Roadway segment and intersection impacts are analyzed for the morning, mid-day, and evening peak hour periods. A copy of the technical report is included in Appendix H.

The previous Draft EIR evaluated existing conditions as 2007, the year in which the NOP was issued. Occupancy of the project was anticipated to occur in 2011. The baseline for the Recirculated Draft EIR has been modified to 2012 to account for new projects that have been constructed since 2008 when the previous Draft EIR was made available for public review, in addition to modifications to the City's transportation facilities and transit system. Therefore, the baseline for the traffic analysis in this Recirculated Draft EIR represents current (2012) conditions to more accurately reflect the existing traffic volumes in the project vicinity.

3.11.1 ENVIRONMENTAL SETTING

A comprehensive data collection effort was undertaken to develop a detailed description of the existing conditions within the study area. The assessment of conditions relevant to this study includes an inventory of the street system, including identification of affected study intersections and roadway segments, operating conditions at the study intersections, and traffic volumes on the roadway segments.

In conjunction with City of West Hollywood staff and consistent with the previous Draft EIR, a total of 19 intersections were identified and are analyzed in the traffic study for weekday morning, mid-day, and evening peak hour conditions. Of the 19 intersections identified for inclusion in the analysis, 10 are located within the City of West Hollywood, four are within the City of Los Angeles (Los Angeles), and five are shared by the two cities. The name and jurisdictional authority of the study intersections are provided in Table 3.11-1 below. The locations of the study intersections are shown on Figure 3.11-1.

3.11 Transportation and Traffic

TABLE 3.11-1 STUDY INTERSECTIONS

No.	Study Intersection	Jurisdiction
1	Formosa Ave at Fountain Ave	West Hollywood/Los Angeles
2	Detroit St at Fountain Ave	West Hollywood/Los Angeles
3	La Brea Ave at Fountain Ave	West Hollywood/Los Angeles
4	Formosa Ave at Lexington Ave	West Hollywood
5	Detroit St at Lexington Ave	West Hollywood
6	La Brea Ave at Lexington Ave	West Hollywood
7	Vista St/Gardner St at Santa Monica Blvd	West Hollywood
8	Martel Ave/Plummer Pl at Santa Monica Blvd	West Hollywood
9	Fuller Ave at Santa Monica Blvd	West Hollywood
10	Poinsettia Pl (South) at Santa Monica Blvd	West Hollywood
11	Formosa Ave at Santa Monica Blvd	West Hollywood
12	Detroit St at Santa Monica Blvd	West Hollywood
13	La Brea Ave at Santa Monica Blvd	West Hollywood
14	Orange Dr at Santa Monica Blvd	Los Angeles
15	Highland Ave at Santa Monica Blvd	Los Angeles
16	Formosa Ave at Romaine St	West Hollywood/Los Angeles
17	La Brea Ave at Romaine St	West Hollywood/Los Angeles
18	La Brea Ave at Willoughby Ave	Los Angeles
19	La Brea Ave at Melrose Ave	Los Angeles

Source: KOA Corporation 2012.

In conjunction with City of West Hollywood staff and consistent with the previous Draft EIR, a total of 5 street segments were identified and are analyzed in the traffic study as part of the neighborhood residential impact analysis. The following street segments were chosen for analysis:

- Formosa Avenue between Santa Monica Boulevard and Lexington Avenue
- Formosa Avenue between Lexington Avenue and Fountain Avenue
- Detroit Street between Santa Monica Boulevard and Lexington Avenue
- Detroit Street between Lexington Avenue and Fountain Avenue
- Lexington Avenue between Detroit Street and La Brea Avenue

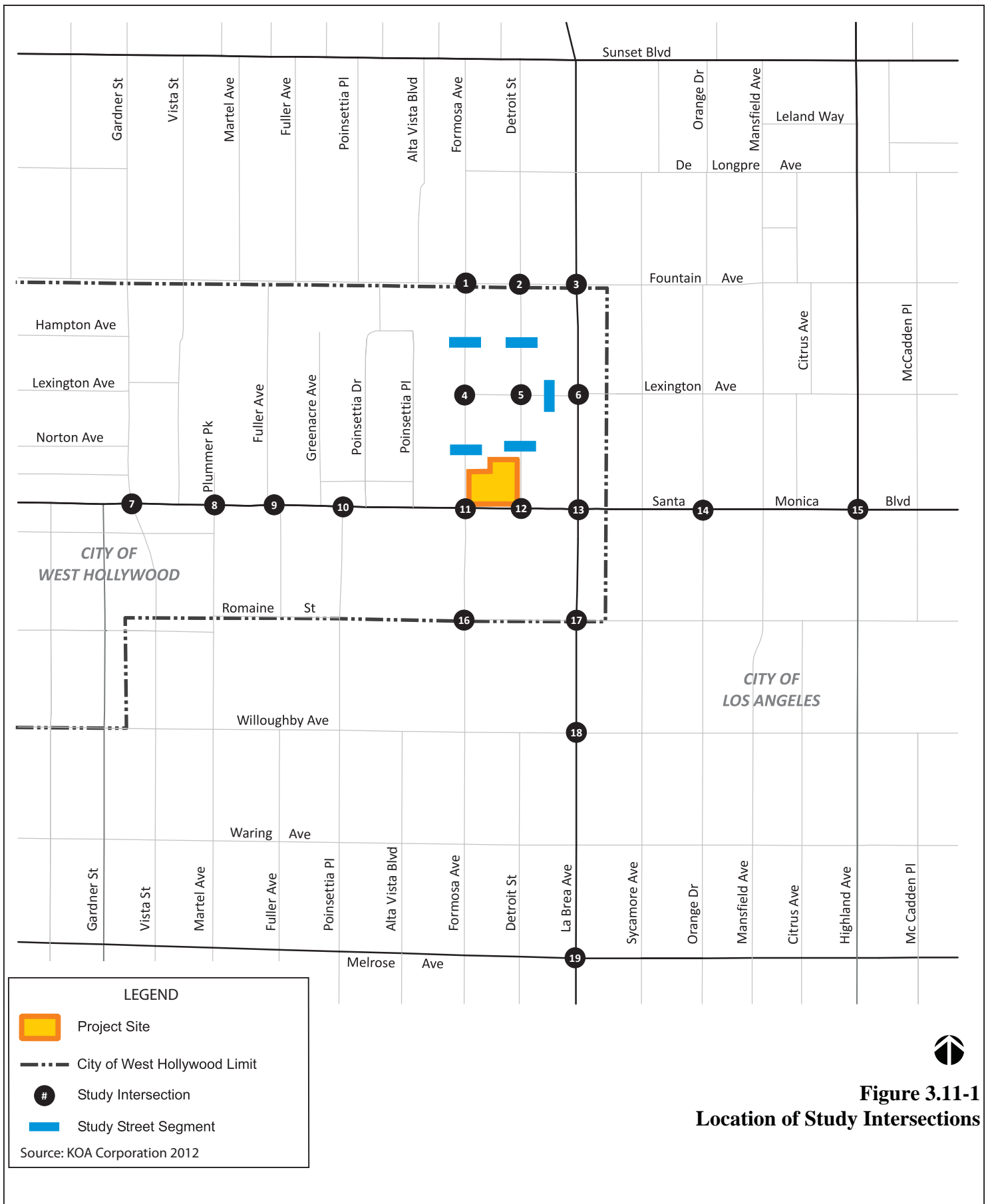


Figure 3.11-1
Location of Study Intersections



3.11 Transportation and Traffic

EXISTING TRAFFIC VOLUMES AND LEVELS OF SERVICE

The following discussion presents the existing peak hour turning movement traffic volumes for each of the intersections and roadway segments analyzed in the traffic study, describes the methodology used to assess the traffic conditions at each intersection and roadway segment, and analyzes the resulting operating conditions at each intersection and roadway segment studied, indicating volume-to-capacity (V/C) ratios, or delay, and levels of service (LOS).

Level of Service Methodology

Measurements for operations are based on a ratio of average daily volume on a roadway segment or at an intersection versus the volume that is calculated to be the design capacity. The efficiency of traffic operations at a location is measured in terms of LOS. LOS measures average operating conditions during an hour. It is based on a V/C ratio, or delay. LOS ranges from A to F, with A representing excellent (free-flow) conditions and F representing extreme congestion. The delay at an intersection or on a street segment corresponds to a LOS value, which describes the intersection or segment operations. Roadway segments and intersections with vehicular volumes that are at or near capacity experience greater congestion and longer vehicle delays. Table 3.6-2 provides descriptions of general roadway operations for each LOS value, as defined by the Transportation Research Board.

For the analysis of intersections located within the City of West Hollywood, the City has designated the methodology based on Highway Capacity Manual (HCM) published by the Transportation Research Board. The HCM expresses levels of service at an intersection in terms of average delay in seconds per vehicle for signalized and four-way stop controlled intersections. For one- or two-way stop controlled intersections, the levels of service are based on the average delay of the critical stop sign approach. The Synchro program was used to analyze intersections located within West Hollywood, which was also used in the traffic analysis for the City's General Plan. Therefore, the traffic analysis for this Recirculated Draft EIR is consistent with the City's General Plan.

For intersections located within the City of Los Angeles, the Los Angeles Department of Transportation (LADOT) has designated the Circular 212 "Critical Movement Analysis" (CMA) planning methodology be used to analyze traffic operating conditions for signalized intersections. The CMA methodology is based on a procedure that incorporates the effects of traffic volumes by turning movement, lane geometry, and traffic signal operation. The analytical base for this methodology is the understanding that a signalized intersection has a combination of conflicting movements that must be accommodated. The output from this model is a V/C ratio and LOS for the intersection as a whole. LADOT's Traffic Study Policies and Procedures state that unsignalized intersections within the City of Los Angeles should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device, but would not be included in the impact analysis.

For the analysis of intersections located under shared jurisdiction between the City of West Hollywood and the City of Los Angeles, both HCM and CMA methodologies were used, where applicable.

TABLE 3.11-2 INTERSECTION LEVEL OF SERVICE DEFINITIONS

LOS	Description	Signalized Intersection Average Stop Delay per Vehicle (seconds) (HCM)	Stop-Controlled Intersection Average Stop Delay per Vehicle (seconds) (HCM)	Signalized Intersection V/C Ratio (CMA)
A	Excellent operation. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	≤ 10	≤ 10	0.000 - 0.600
B	Very good operation. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.	> 10 - 20	> 10 - 15	0.601 - 0.700
C	Good operation. Occasionally backups may develop behind turning vehicles. Most drivers feel somewhat restricted.	> 20 - 35	> 15 - 25	0.701 - 0.800
D	Fair operation. There are no long-standing traffic queues. This level is typically associated with design practice for peak periods.	> 0.800 - 0.899	> 25 and ≤ 35	> 0.800 - 0.899
E	Poor operation. Some long standing vehicular queues develop on critical approaches.	> 0.900 – 0.999	> 35 and ≤ 50	> 0.900 – 0.999
F	Forced flow. Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movements of vehicles out of intersection approach lanes; therefore, volumes carried are not predictable. Potential for stop and go type traffic flow.	> 1.000	> 50	> 1.000

Source: Transportation Research Board 2000.

Existing Traffic Volumes

The morning (generally 7:30 a.m. to 9:30 a.m.), mid-day (generally 11:00 a.m. to 1:00 p.m.), and evening (generally 4:00 p.m. to 7:00 p.m.) peak hour level of service analyses were collected at the study intersections on Tuesday, September 11, 2012. Traffic volumes for the peak hour of each of the three time periods were determined based on the highest four consecutive 15-minute counts at each intersection. In addition, traffic counts were collected for a 24-hour period to estimate the average daily traffic along the residential street segments. Traffic count data is provided in Appendix H of this Recirculated Draft EIR. A field inventory was also conducted to identify intersection geometric layout, traffic control, lane configuration, posted speed limits, transit service, land use, and parking conditions. Figure 3.11-1 illustrates the existing intersection geometry (lane configurations) for the analyzed intersections. The existing conditions level of service analysis results are summarized in Table 3.11-3.

3.11 Transportation and Traffic

TABLE 3.11-3 LEVEL OF SERVICE SUMMARY – EXISTING CONDITIONS

	Intersection	Analysis Methodology	AM Peak Hour		Mid-Day Peak Hour		PM Peak Hour	
			LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)
1	Formosa Ave at Fountain Ave ^{3,a}	HCM	F	81.0	D	34.8	F	146.9
2	Detroit St at Fountain Ave ^{3,a}	HCM	E	35.5	C	24.6	F	113.4
3	La Brea Ave at Fountain Ave ¹	HCM	C	31.9	B	16.9	C	28.7
	La Brea Ave at Fountain Ave ²	CMA	D	0.849	B	0.683	C	0.769
4	Formosa Ave at Lexington Ave ^{1,b}	HCM	A	7.6	A	7.6	A	7.6
5	Detroit St at Lexington Ave ^{1,b}	HCM	A	7.3	A	7.4	A	7.5
6	La Brea Ave at Lexington Ave ^{1,a}	HCM	F	92.9	E	42.2	F	527.9
7	Vista St/Gardner St at Santa Monica Blvd ¹	HCM	B	15.3	B	13.4	B	16.3
8	Martel Ave/Plummer Pl at Santa Monica Blvd ¹	HCM	A	6.3	A	9.4	A	8.8
9	Fuller Ave at Santa Monica Blvd ¹	HCM	B	10.4	B	14.7	B	17.4
10	Poinsettia Pl (S) at Santa Monica Blvd ^{1,a}	HCM	B	12.9	E	42.9	E	44.9
11	Formosa Ave at Santa Monica Blvd ¹	HCM	A	8.9	B	17.0	B	16.4
12	Detroit St at Santa Monica Blvd ^{1,a}	HCM	B	11.8	B	12.9	B	14.6
13	La Brea Ave at Santa Monica Blvd ¹	HCM	D	43.0	D	43.5	D	52.6
14	Orange Dr at Santa Monica Blvd ²	CMA	A	0.442	A	0.419	A	0.483
15	Highland Ave at Santa Monica Blvd ²	CMA	D	0.806	C	0.783	C	0.760
16	Formosa Ave at Romaine St ^{3,a}	HCM	B	10.5	B	10.4	B	11.8
17	La Brea Ave at Romaine St ¹	HCM	B	13.0	B	18.7	B	17.8
	La Brea Ave at Romaine St ²	CMA	A	0.385	B	0.607	A	0.540
18	La Brea Ave at Willoughby Ave ²	CMA	A	0.438	A	0.521	B	0.632
19	La Brea Ave at Melrose Ave ²	CMA	D	0.824	B	0.677	D	0.821

Notes:

1 Intersection operates under West Hollywood jurisdiction

2 Intersection operates under Los Angeles jurisdiction

3 Intersection operates under both West Hollywood and Los Angeles jurisdictions

a One- or two-way stop sign controlled

b All-way stop controlled

Source: KOA Corporation 2012.

As shown in Table 3.11-3, 8 of the 19 study intersections are currently operating at LOS D or worse during one of the peak hour periods. These include the following locations:

- Formosa Avenue at Fountain Avenue (a.m., mid-day, and p.m. peak hours)
- Detroit Street at Fountain Avenue (a.m. and p.m. peak hours)
- La Brea Avenue at Fountain Avenue (a.m. peak hour)
- La Brea Avenue at Lexington Avenue (a.m., mid-day, and p.m. peak hours)
- South Poinsettia Place at Santa Monica Boulevard (mid-day and p.m. peak hours)
- La Brea Avenue at Santa Monica Boulevard (a.m., mid-day and p.m. peak hours)
- Highland Avenue at Santa Monica Boulevard (a.m. peak hour)
- La Brea Avenue at Melrose Avenue (a.m. and p.m. peak hours)

The remaining 11 study intersections are currently operating at LOS C or better during the peak hours.

Twenty-four hour traffic counts were collected along each street segment and were used as the baseline for the average daily traffic volume (ADT) occurring along that street. Table 3.11-4 below shows the existing traffic volumes along the study street segments.

TABLE 3.11-4 NEIGHBORHOOD IMPACT ANALYSIS – EXISTING CONDITIONS

No.	Roadway Segment	ADT
1	Formosa Ave between Santa Monica Blvd and Lexington Ave	2,767
2	Formosa Ave between Lexington Ave and Fountain Ave	2,127
3	Detroit St between Santa Monica Blvd and Lexington Ave	1,247
4	Detroit St between Lexington Ave and Fountain Ave	1,386
5	Lexington Ave between Detroit St and La Brea Ave	1,504

Source: KOA Corporation 2012.

LOS ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM

The Congestion Management Program (CMP) was created statewide as a result of Proposition 111 and has been implemented locally by the Los Angeles County Metropolitan Transportation Authority. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potential regional significance be analyzed. A specific system of arterial roadways and all freeways comprise the CMP system. A total of 164 intersections are identified for monitoring on the system in Los Angeles County. The intersection CMP arterial monitoring intersections within the study area include the following:

- Doheny Drive and Santa Monica Boulevard
- La Cienega Boulevard and Santa Monica Boulevard
- Highland Avenue and Santa Monica Boulevard
- Western Avenue and Santa Monica Boulevard
- La Brea Avenue and Wilshire Boulevard

The nearest CMP mainline freeway monitoring locations to the project site are the segments of U.S. 101 south of Santa Monica Boulevard, which is about 2.25 miles east of the project site, and Interstate 10 (I-10, Santa Monica Freeway) east of La Brea Avenue, which is about 4 miles south of the project site.

3.11.2 ENVIRONMENTAL IMPACTS

METHODOLOGY

The transportation and traffic impact analysis is based on the following approach:

- **Existing Conditions:** The analysis of 2012 existing traffic conditions provides a basis for analysis. The existing conditions analysis includes an assessment of streets, intersections, traffic volumes, and operating conditions.

3.11 Transportation and Traffic

- **Existing With Project Conditions:** This analysis considers traffic conditions based on a 2012 baseline with the addition of traffic expected to be generated during the project operation.
- **Future Without Project Conditions:** Future traffic conditions are projected without the proposed project during operation (2016). The objective of this portion of the analysis is to predict future traffic growth and operating conditions that could be expected to result from growth in the vicinity of the project site in order to provide an appropriate future condition upon which to base the analysis of potential future project impacts.
- **Future With Project Conditions (Cumulative):** This is an analysis of future traffic conditions with the traffic expected during the peak use of the project site combined with predicted future background traffic growth in the area in 2016. Thus, the impacts of the proposed project on future traffic conditions when the project site is fully occupied can then be identified.

THRESHOLDS OF SIGNIFICANCE

As part of the Initial Study (see Appendix A), it was determined that the proposed project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; inadequate emergency access; or conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). Accordingly, these issues are not further analyzed in the EIR.

The CEQA Guidelines establish that a proposed project would have a significant effect on transportation and traffic if it would:

- Conflict with an applicable plan, ordinance, or policy for establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, street segments, highways and freeways, pedestrian and bicycle paths, and mass transit;
- Conflict with an applicable congestion management program, including but not limited to level of service standards established by the county congestion management agency for designated roads or highways; or
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Traffic impacts are identified if the proposed project would result in a significant change in traffic conditions at a study intersection or roadway segment. The City of West Hollywood has established the following threshold criteria to determine if a project would have a significant traffic impact:

Signalized Intersections Formed by Two Commercial Corridors:¹ A traffic impact is considered significant if:

- The addition of project traffic results in a LOS D and an increase in delay of 12 seconds or greater.
- The addition of project traffic results in a LOS E or F and an increase in delay of 8 seconds or greater.

All Other Signalized and/or Four-Way Stop Controlled Intersections: A traffic impact is considered significant if:

- The addition of project traffic results in a LOS D and an increase in delay of 8 seconds or greater.
- The addition of project traffic results in a LOS E or F and an increase in delay of 5 seconds or greater.

Unsignalized Intersections: A traffic impact is considered significant if:

- The addition of project traffic results in a LOS D, E, or F and an increase in delay (most constrained approach) of 5 seconds or greater.

The City of West Hollywood has established the threshold criteria shown in Table 3.11-5 to determine if a project would have a significant neighborhood traffic impact:

TABLE 3.11-5 WEST HOLLYWOOD NEIGHBORHOOD IMPACT CRITERIA

ADT Without Project	Incremental Project-Related ADT Increase
< 2,000 vehicles	12 percent
2,000 – 3,000 vehicles	10 percent
3,000 – 6,750 vehicles	8 percent
> 6,750 vehicles	6.25 percent

¹ According to the City of West Hollywood’s impact thresholds, commercial corridors include Sunset Boulevard, Santa Monica Boulevard, Melrose Avenue, Beverly Boulevard, Doheny Drive, Robertson Boulevard, San Vicente Boulevard (at and/or south of Santa Monica Boulevard), La Cienega Boulevard, Fairfax Avenue and La Brea Avenue.

3.11 Transportation and Traffic

The City of Los Angeles threshold criteria state that a project would have a significant traffic impact if the conditions shown in Table 3.11-6 are met:

TABLE 3.11-6 LOS ANGELES INTERSECTION LEVEL OF SERVICE THRESHOLD CRITERIA

Intersections		
Pre-Project		Project V/C Increase
LOS	V/C	
C	> 0.700 - 0.800	0.040 or more
D	> 0.800 - 0.900	0.020 or more
E	> 0.900 - 1.000	0.010 or more
F	> 1.000	0.010 or more

In conformance with the CMP Transportation Impact Analysis Guidelines, a traffic impact would occur: if the proposed project would add more than 50 vehicle trips in either direction during the morning and evening peak hours at CMP arterial monitoring intersections, including freeway on- or off-ramps; and/or if the proposed project would add 150 or more trips in either direction during either the morning or evening peak hours to CMP mainline freeway monitoring locations.

IMPACT ANALYSIS

TRANS-1 *The proposed project would conflict with an applicable plan, ordinance, or policy for establishing measures of effectiveness for the performance of the circulation system established by West Hollywood and Los Angeles.*

EXISTING PROJECT CONDITIONS

This is an analysis of traffic expected during operation of the proposed project added to the existing (baseline) traffic conditions in 2012. This analysis does not take into account future background traffic volumes (ambient growth) or related project traffic at the time the project vehicle trips would be expected to occur in the future, 2016 for project operation.

Project Trip Generation. To evaluate the potential impact of the proposed project on local traffic conditions, it is necessary to estimate the number of new vehicle trips expected to be generated by the proposed project. The estimated trips for the proposed project were calculated using the trip generation rates contained in the Institute of Traffic Engineers *Trip Generation, 8th Edition*. The proposed project involves construction and operation of approximately 166 residential units, 6,800 square feet of retail uses, and 2,500 square feet of restaurant uses.

The trip generation rates for the proposed project are shown in Table 3.11-7. The proposed project is expected to generate 1,630 weekday daily trips. A total of 96 trips would occur during the morning peak hour, 152 during the mid-day peak hour, and 140 trips during the evening peak hour. These numbers do not take into consideration traffic that is currently generated by the existing on-site uses. When vehicular trips generated by existing uses are applied to the gross trip generation estimates as a trip credit, the

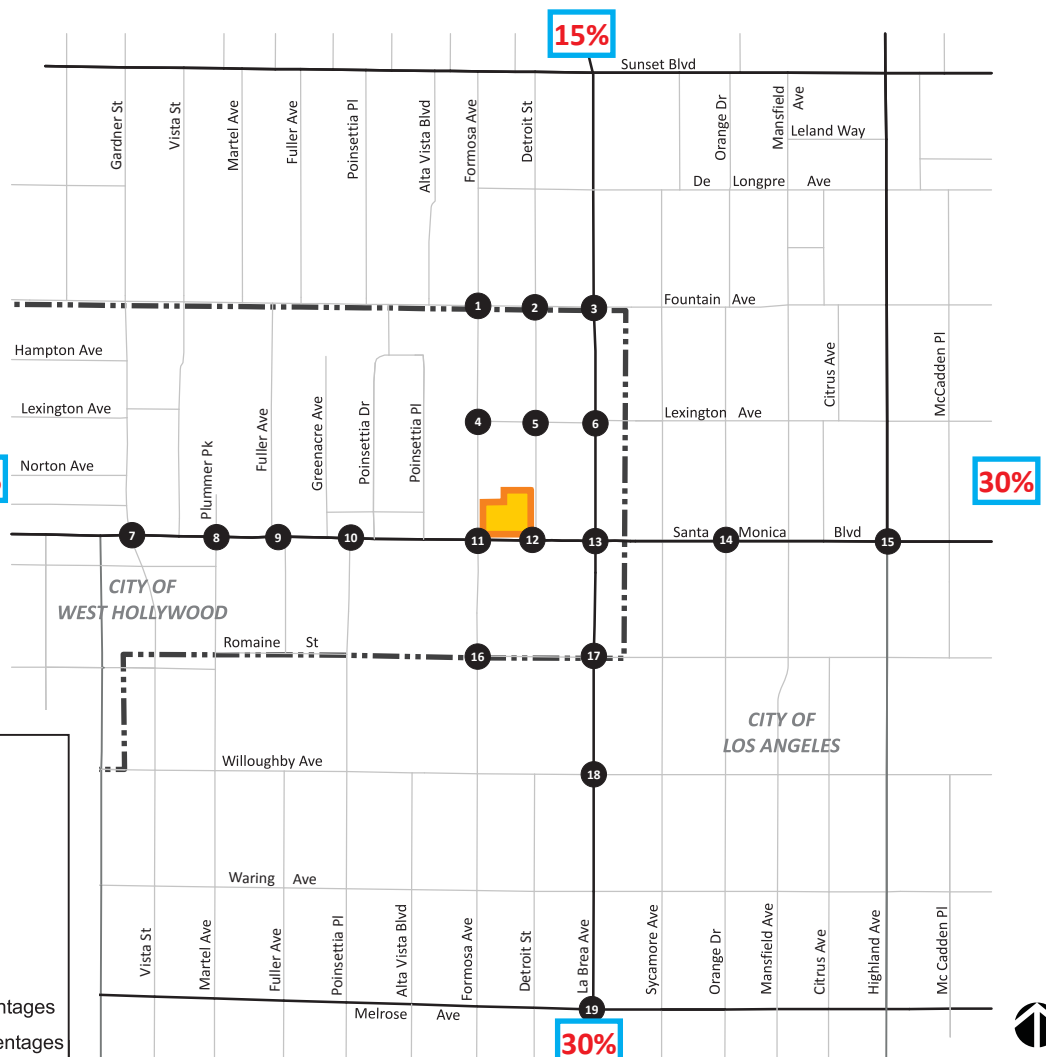
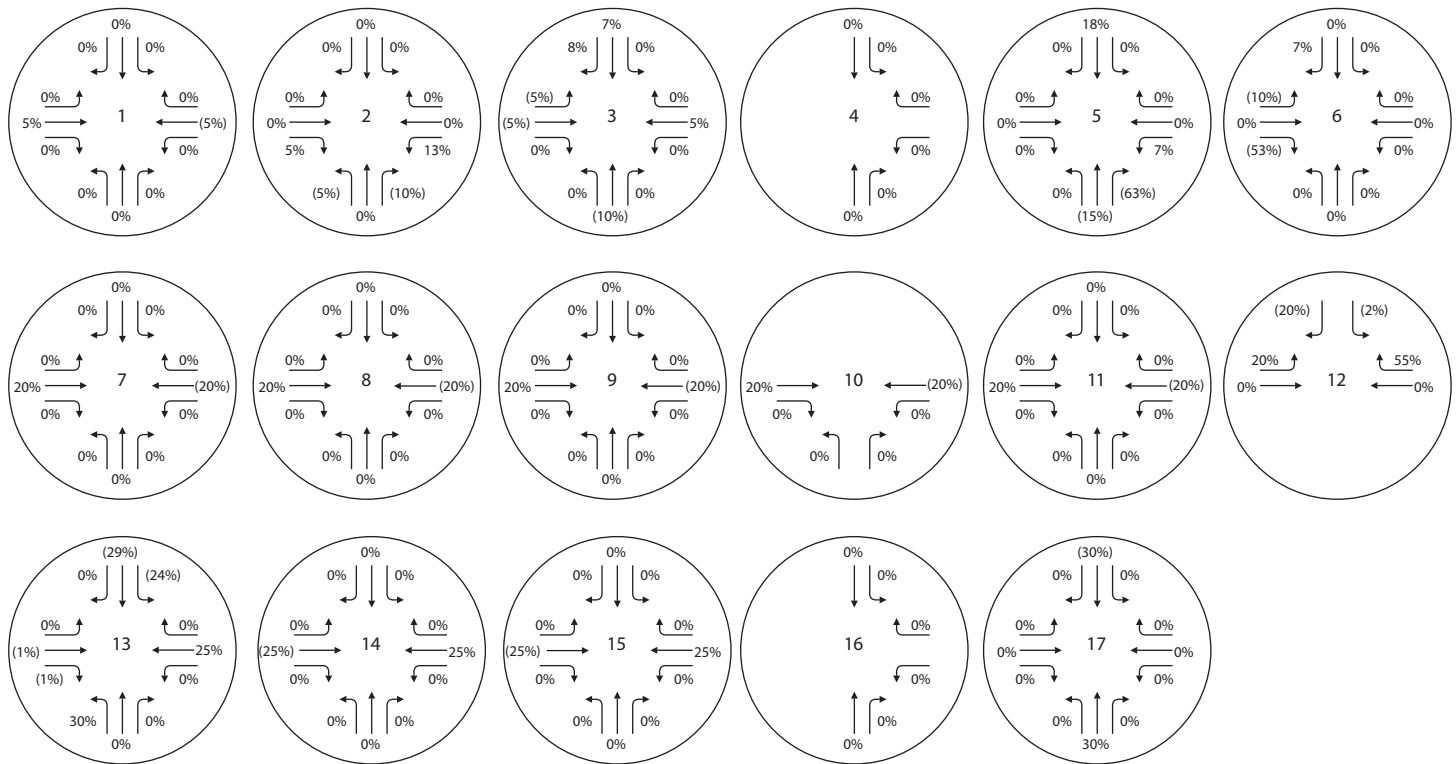
proposed project would generate a net of 1,453 new daily trips with 65 occurring during the morning peak hour, 119 during the mid-day peak hour, and 109 during the evening peak hour.

TABLE 3.11-7 PROJECT TRIP GENERATION ESTIMATES







Land Use	ITE Code	Size (du/ksf)	Trip Ends Generated									
			Daily	Weekday A.M.			Weekday Mid-day			Weekday P.M.		
				In	Out	Total	In	Out	Total	In	Out	Total
Apartments	220	166	1,104	17	68	85	26	65	91	67	36	103
Specialty Retail	814	6.8	301	5	4	9	23	24	47	8	10	18
Quality Restaurant	931	2.5	225	2	0	2	11	3	14	13	6	19
<i>Subtotal</i>			<i>1,630</i>	<i>24</i>	<i>72</i>	<i>96</i>	<i>60</i>	<i>92</i>	<i>152</i>	<i>88</i>	<i>52</i>	<i>140</i>
Existing Land Use												
Metal Plating Facility	140	36.0	138	20	6	26	19	9	28	9	17	26
Sound Editing Studio	710	3.5	39	4	1	5	4	1	5	1	4	5
<i>Subtotal</i>			<i>177</i>	<i>24</i>	<i>7</i>	<i>31</i>	<i>23</i>	<i>10</i>	<i>33</i>	<i>10</i>	<i>21</i>	<i>31</i>
Net Trip Generation (Residential)			1,104	17	68	85	26	65	91	67	36	103
Net Trip Generation (Non-Residential)			349	-17	-3	-20	11	17	28	11	-5	6
Net Total Trip Generation			1,453	0	65	65	37	82	119	78	31	109

Notes:
 du is dwelling unit.
 ksf is 1,000 square feet.
 Source: KOA Corporation 2012.

Project Trip Distribution. Trip distribution assumptions are used to determine the origin and destination of the new vehicle trips associated with the proposed project. The geographic distribution of the project trips is based on the locations of neighborhood and residential areas, employment and service centers, the street system that serves the site, and recent traffic data collected in the study area. Two separate trip distributions were developed for the proposed project due to the differences in the travel characteristics of individuals traveling to the site to patronize the on-site retail/restaurant uses and those who reside at the project site. Residential traffic would enter the subterranean parking garage using a driveway entrance located on Detroit Street. Retail/restaurant-related traffic would enter the site using a driveway located on Formosa Avenue. The trip distribution developed for residential traffic is shown on Figure 3.11-2 and the trip distribution developed for retail/restaurant traffic is shown on Figure 3.11-3.

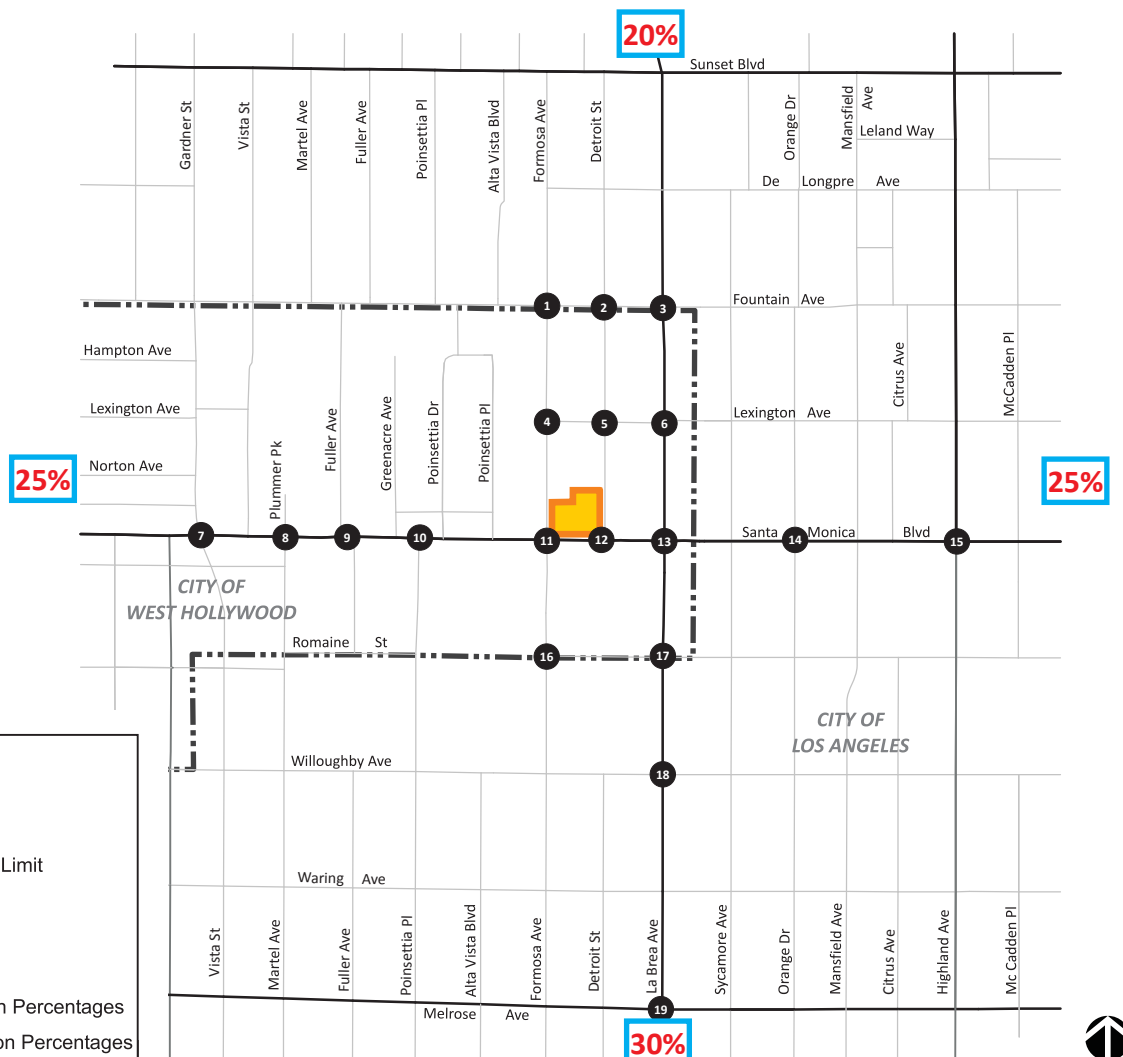
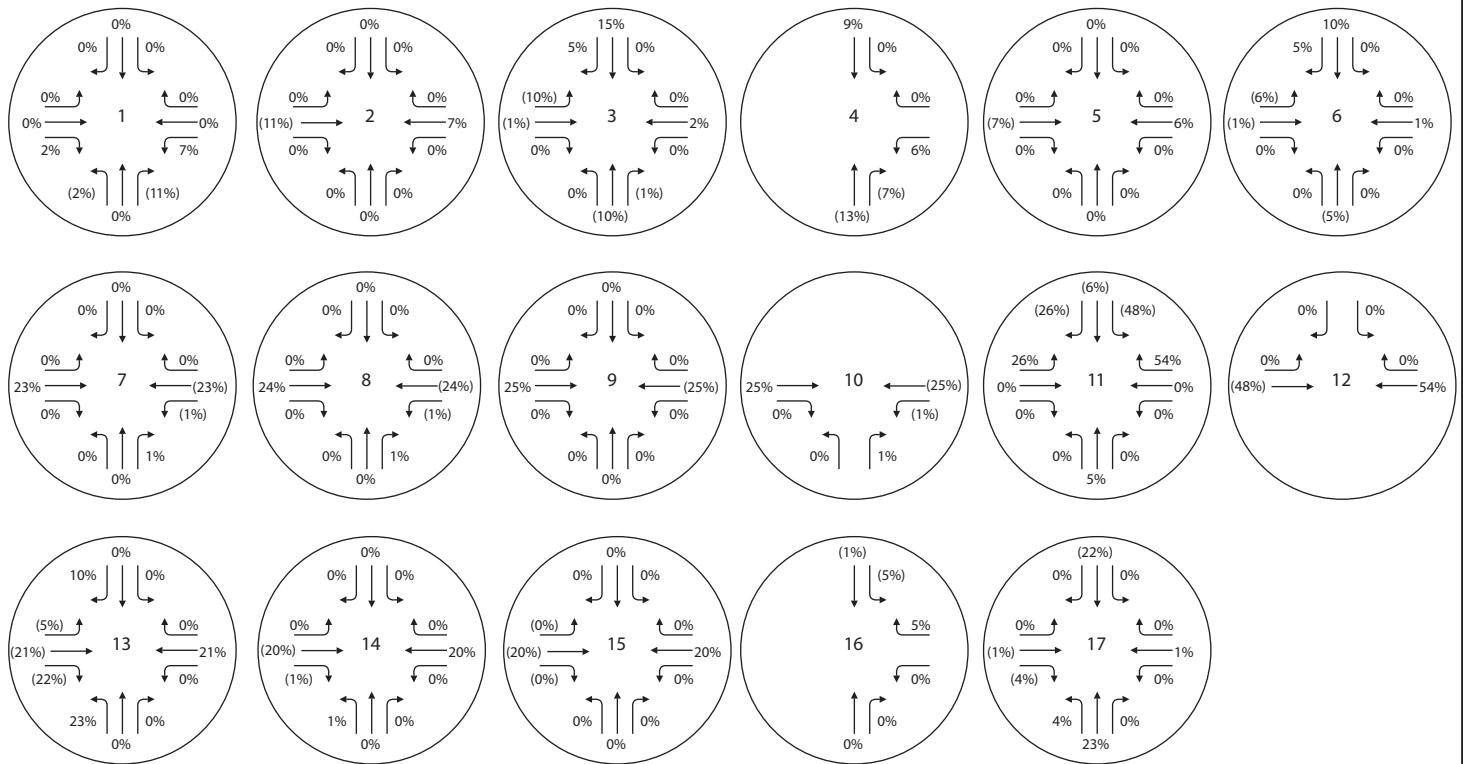


LEGEND

-  Project Site
-  City of West Hollywood Limit
-  Study Intersection
-  Study Street Segment
-  Inbound Trip Distribution Percentages
-  Outbound Trip Distribution Percentages

Source: KOA Corporation 2012

**Figure 3.11-2
Residential Trip Distribution**



LEGEND

- Project Site
- City of West Hollywood Limit
- Study Intersection
- Study Street Segment
- Inbound Trip Distribution Percentages
- Outbound Trip Distribution Percentages

Source: KOA Corporation 2012

Figure 3.11-3
Retail/Restaurant Trip Distribution



3.11 Transportation and Traffic

Intersection Impact Analysis: The project traffic volumes for this analysis are based on the project trip generation and trip distribution assumptions discussed above. The study intersection operations in 2012 with the proposed project are summarized in Table 3.11-8 below. The LOS calculation worksheets for this analysis are provided in Appendix H.

As shown in Table 3.11-8, in the existing with project scenario, the additional traffic generated by the proposed project would create significant impacts to two of the study intersections:

- Detroit Street at Fountain Avenue (a.m. and p.m. peak hours)
- La Brea Avenue at Lexington Avenue (a.m. and p.m. peak hours)

The intersection of Detroit Street at Formosa Avenue is forecast to be significantly impacted under existing with project conditions during the morning and evening peak hours. This impact is the result of the high existing traffic volumes on Fountain Avenue compared to the low project-generated traffic volumes on Detroit Street. Due to physical constraints to widening the intersection without the acquisition of private property and the City's desire to maintain on-street parking, this intersection is considered to be striped to its maximum capacity within the available curb-to-curb dimensions and right-of-way. No feasible mitigation measures are available to reduce project-related traffic impacts to a less than significant level without property acquisition. As such, impacts at this intersection would remain significant and unavoidable.

The intersection of La Brea Avenue at Lexington Avenue is forecast to be significantly impacted under the existing with project conditions during the morning and evening peak hours. As a condition of approval of the Monarch Project currently under construction adjacent to the project site, a traffic signal is currently being installed at this intersection. With the installation of a traffic signal, the impact of the additional traffic generated by the proposed project would be reduced to a less than significant level, and no additional mitigation is required.

TABLE 3.11-8 LEVEL OF SERVICE SUMMARY – EXISTING WITH PROJECT CONDITIONS

Intersection	Analysis Methodology	Existing Without Project						Existing With Project									
		A.M. Peak Hour		Mid-Day Peak Hour		P.M. Peak Hour		A.M. Peak Hour			Mid-Day Peak Hour			P.M. Peak Hour			
		LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C	
1	Formosa Ave at Fountain Ave ^{3,a}	HCM	F	81.0	D	34.8	F	146.9	F	81.2	0.2	D	34.4	-0.4	F	149.8	2.9
2	Detroit St at Fountain Ave ^{3,a}	HCM	E	35.5	C	24.6	F	113.4	E	40.8	5.3	D	26.4	1.8	F	132.1	18.7
3	La Brea Ave at Fountain Ave ¹	HCM	C	31.9	B	16.9	C	28.7	C	32.4	0.5	B	17.0	0.1	C	29.3	0.6
	La Brea Ave at Fountain Ave ²	CMA	D	0.849	B	0.683	C	0.769	D	0.853	0.004	B	0.689	0.006	D	0.803	0.007
4	Formosa Ave at Lexington Ave ^{1,b}	HCM	A	7.6	A	7.6	A	7.6	A	7.6	0.0	A	7.7	0.1	A	7.6	0.0
5	Detroit St at Lexington Ave ^{1,b}	HCM	A	7.3	A	7.4	A	7.5	A	7.4	0.1	A	7.6	0.2	A	7.6	0.1
6	La Brea Ave at Lexington Ave ^{1,a}	HCM	F	92.9	E	42.2	F	527.9	F	100.3	7.4	E	43.2	1.0	F	567.8	39.9
7	Vista St/Gardner St at Santa Monica Blvd ¹	HCM	B	15.3	B	13.4	B	16.3	B	15.4	0.1	B	13.4	0.0	B	16.3	0.0
8	Martel Ave/Plummer Pl at Santa Monica Blvd ¹	HCM	A	6.3	A	9.4	A	8.8	A	6.3	0.0	A	9.3	-0.1	A	8.9	0.1
9	Fuller Ave at Santa Monica Blvd ¹	HCM	B	10.4	B	14.7	B	17.4	B	10.5	0.1	B	14.8	0.1	B	17.5	0.1
10	Poinsettia Pl (S) at Santa Monica Blvd ^{1,a}	HCM	B	12.9	E	42.9	E	44.9	B	13.0	0.1	E	45.4	2.5	E	49.7	4.8
11	Formosa Ave at Santa Monica Blvd ¹	HCM	A	8.9	B	17.0	B	16.4	A	8.9	0.0	B	17.7	0.7	B	16.8	0.4

3.11 Transportation and Traffic

Intersection		Analysis Methodology	Existing Without Project						Existing With Project								
			A.M. Peak Hour		Mid-Day Peak Hour		P.M. Peak Hour		A.M. Peak Hour			Mid-Day Peak Hour			P.M. Peak Hour		
			LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C
12	Detroit St at Santa Monica Blvd ^{1,a4}	HCM	B	11.8	B	12.9	B	14.6	B	12.5	0.7	B	13.2	0.3	C	15.4	0.8
13	La Brea Ave at Santa Monica Blvd ¹	HCM	D	43.0	D	43.5	D	52.6	D	45.5	2.5	D	46.4	2.9	E	55.4	2.8
14	Orange Dr at Santa Monica Blvd ²	CMA	A	0.442	A	0.419	A	0.483	A	0.442	0.000	A	0.422	0.003	A	0.487	0.004
15	Highland Ave at Santa Monica Blvd ²	CMA	D	0.806	C	0.783	C	0.760	D	0.806	0.000	C	0.786	0.003	C	0.767	0.007
16	Formosa Ave at Romaine St ^{3,a}	HCM	B	10.5	B	10.4	B	11.8	B	10.5	0.0	B	10.4	0.0	B	11.8	0.0
17	La Brea Ave at Romaine St ¹	HCM	B	13.0	B	18.7	B	17.8	B	13.2	0.2	B	19.1	0.4	B	18.0	0.2
	La Brea Ave at Romaine St ²	CMA	A	0.385	B	0.607	A	0.540	A	0.390	0.005	B	0.616	0.009	A	0.541	0.001
18	La Brea Ave at Willoughby Ave ²	CMA	A	0.438	A	0.521	B	0.632	A	0.442	0.004	A	0.524	0.003	B	0.637	0.005
19	La Brea Ave at Melrose Ave ²	CMA	D	0.824	B	0.677	D	0.821	D	0.828	0.004	B	0.685	0.008	D	0.827	0.006

Notes:

1 Intersection operates under West Hollywood jurisdiction

2 Intersection operates under Los Angeles jurisdiction

3 Intersection operates under both West Hollywood and Los Angeles jurisdictions

a One- or two-way stop sign controlled

b All-way stop controlled

Source: KOA Corporation 2012.

Neighborhood Residential Impact Analysis. Twenty-four hour traffic counts were collected along each street segment and were used as the baseline volume for the ADT occurring along that street. Traffic generated by the proposed project was added to the existing (2012) ADT volumes and compared to the existing without project volume to determine the incremental increase in daily traffic volumes along the study street segments. This incremental increase in ADT was compared to the City’s thresholds, as shown in Table 3.11-9.

TABLE 3.11-9 NEIGHBORHOOD IMPACT ANALYSIS – EXISTING WITH PROJECT CONDITIONS

No.	Roadway Segment	Existing ADT	Total Project Traffic ADT	Existing Plus Project ADT	Change in ADT (%)
1	Formosa Ave between Santa Monica Blvd and Lexington Ave	2,767	65	2,832	2.3
2	Formosa Ave between Lexington Ave and Fountain Ave	2,127	47	2,174	2.2
3	Detroit St between Santa Monica Blvd and Lexington Ave	1,247	519	1,766	41.6
4	Detroit St between Lexington Ave and Fountain Ave	1,386	163	1,549	11.8
5	Lexington Ave between Detroit St and La Brea Ave	1,504	383	1,887	25.5

Source: KOA Corporation 2012.

The proposed project would create significant neighborhood residential traffic impacts at two of the study roadway segments in the existing with project scenario, as follows:

- Detroit Street between Santa Monica Boulevard and Lexington Avenue
- Lexington Avenue between Detroit Street and La Brea Avenue

The proposed project design includes a parking curb at the exit to the ground floor parking area to discourage left-turns out of the project site and into the residential neighborhood. Nonetheless, the residential component of the proposed project would generate a substantial increase in vehicle trips on these two study roadway segments. However, due to physical constraints to widening the intersection without the acquisition of private property and the City’s desire to maintain on-street parking, the impact would remain significant and unavoidable.

FUTURE WITHOUT PROJECT CONDITIONS

To evaluate the potential impact of the proposed project on local traffic conditions, it is necessary to develop a forecast of future traffic volumes in the study area under conditions without the proposed project. This provides a basis against which to measure the potential significant impacts of the proposed project.

Construction of the proposed project would be completed in 2015. For a more conservative analysis, the anticipated buildout of the proposed project at full occupancy was estimated to be 2016. The projection of year 2016 future without project conditions consists of existing traffic plus ambient traffic growth, or general background regional growth, plus growth in traffic generated by specific cumulative, or related, projects expected to be completed in 2016.

3.11 Transportation and Traffic

Ambient Traffic Growth. Ambient traffic growth is traffic growth that would occur in the study area due to general employment growth, housing growth, and growth in regional through trips in southern California. Even if there is no change in housing or employment in West Hollywood, there will be some background (ambient) traffic growth in the region. Per City staff, a one percent per year growth rate was assumed as a conservative estimate of traffic increases in the study area. Existing 2012 traffic volumes were increased by a factor of 1.04 to account for ambient traffic growth to the year 2016 (four years at one percent per year).

Cumulative Project Growth. Cumulative project traffic growth is due to specific, known development projects in the project vicinity that may affect traffic circulation in the study area. Since the study area covers portions of West Hollywood and Los Angeles, a list of development projects occurring within both cities was developed. A total of 95 projects were identified with 52 in West Hollywood and 43 in Los Angeles, as potentially affecting traffic circulation through the study area. The related projects for the purposes of the traffic analysis are listed in Table 3.11-10. The related projects list consists of all projects currently approved, under construction, or pending approval in the City of West Hollywood in order to provide the most conservative analysis of future traffic conditions within the City.

TABLE 3.11-10 CUMULATIVE PROJECT LIST FOR TRAFFIC

Project No.	Location	Description
1	612 Croft Ave, West Hollywood	11-unit condominium
2	1257 Detroit St, West Hollywood	7-unit condominium
3	920 Fairfax Ave, West Hollywood	Retail/office
4	937 Fairfax Ave, West Hollywood	17-unit condominium
5	1240 Fairfax Ave, West Hollywood	23-unit condominium
6	1216 Flores St, West Hollywood	14-unit condominium
7	1041 Formosa Avenue, West Hollywood	The Lot, office/media support
8	8210 Fountain Avenue, West Hollywood	9-unit condominium
9	1264 Harper Ave, West Hollywood	16-unit condominium
10	1345 Havenhurst Dr, West Hollywood	16-unit condominium
11	1342 Hayworth Ave, West Hollywood	16-unit condominium
12	1211 Horn Ave, West Hollywood	16-unit condominium
13	1217 Horn Avenue, West Hollywood	7-unit condominium
14	1125 Kings Rd, West Hollywood	10-unit condominium
15	1232 Kings Road, West Hollywood	25-unit apartment building
16	1145 La Brea Ave, West Hollywood	Apartment/office
17	1222 La Brea Ave, West Hollywood	187-unit apartment building, 19,559-square foot commercial
18	1201 La Brea Ave, West Hollywood	4,575-square foot restaurant
19	623 La Peer Drive, West Hollywood	Hotel
20	1223 Larrabee St, West Hollywood	8-unit condominium
21	8551 Melrose Ave, West Hollywood	6,500-square foot retail
22	8564 Melrose Ave, West Hollywood	28,67-square foot retail/commercial
23	8583 Melrose Ave, West Hollywood	9,545-square foot retail/commercial
24	8612 Melrose Ave, West Hollywood	9,998-square foot restaurant
25	8650 Melrose Avenue, West Hollywood	7-unit apartment building, 14,571-square foot retail
26	8687 Melrose Ave, West Hollywood	400,000-square foot office building

3.11 Transportation and Traffic

Project No.	Location	Description
27	8711 Melrose Ave, West Hollywood	21,565-square foot commercial
28	8008 Norton Ave, West Hollywood	8-unit condominium
29	500 Orlando Ave, West Hollywood	4-unit apartment building
30	507 Orlando Ave, West Hollywood	9-unit apartment building
31	611 Orlando Ave, West Hollywood	5-unit condominium
32	7113 Santa Monica Blvd, West Hollywood	184-unit apartment building, 13,350-square foot retail
33	7302 Santa Monica Blvd, West Hollywood	Movietown
34	8120 Santa Monica Blvd, West Hollywood	Walgreens
35	8350 Santa Monica Blvd, West Hollywood	Kings Road
36	8550 Santa Monica Blvd, West Hollywood	Retail/restaurant
37	8555 Santa Monica Blvd, West Hollywood	Mixed-use project
38	9001 Santa Monica Blvd, West Hollywood	Mixed-use project
39	9040, 9060, 9080, 9098 Santa Monica Blvd, West Hollywood	Melrose Triangle
40	1040 Spaulding Ave, West Hollywood	5-unit condominium
41	944 Stanley Ave, West Hollywood	5-unit condominium
42	8240 Sunset Boulevard, West Hollywood	27-unit condominium
43	8305 Sunset Blvd, West Hollywood	2,972-square foot retail, 10,300-square foot restaurant
44	8418 Sunset Blvd, West Hollywood	Sunset Time
45	8490 Sunset Blvd, West Hollywood	Sunset Millennium
46	8497 Sunset Blvd, West Hollywood	Mixed-use project
47	8873 Sunset Blvd, West Hollywood	9,995-square foot retail
48	8950 Sunset Blvd, West Hollywood	196-unit hotel, 4-apartment units
49	9040 Sunset Blvd, West Hollywood	Hotel
50	1253 Sweetzer Ave, West Hollywood	8-unit condominium
51	8565 West Knoll Dr, West Hollywood	6-unit condominium
52	916 Westbourne Dr, West Hollywood	8-unit condominium
53	2000 N. Fuller Ave, Los Angeles	80-space parking lot
54	6200 W. Hollywood Blvd, Los Angeles	952-unit apartment building, 190,00-square foot retail
55	1538 N. Vine St, Los Angeles	306-unit apartment and 68,000-square foot retail
56	5800 W. Sunset Blvd, Los Angeles	535,396-square foot office/studio expansion
57	5935 W. Sunset Blvd, Los Angeles	311-unit condominium, 53,500-square foot retail/restaurant/office
58	6230 W. Yucca St, Los Angeles	85-unit condominium, 13,890-square foot retail
59	959 N. Seward St, Los Angeles	240,000-square foot office
60	6911 W. Santa Monica Blvd, Los Angeles	374-unit condominium and 15,000-square foot retail
61	6516 W. Selma Ave, Los Angeles	85,000-square foot office
62	6608 W. Hollywood Blvd, Los Angeles	26,900-square foot restaurant, 3,000-square foot office
63	6677 W. Santa Monica Blvd, Los Angeles	787-unit apartment building, 22,200-square foot retail/restaurant
64	6417 W. Selma Ave, Los Angeles	85-room hotel, 12,840-square foot restaurant
65	1149 N. Gower St, Los Angeles	36-unit condominium, 21-unit apartment building
66	6100 W. Hollywood Blvd, Los Angeles	151-unit apartment building, 6,200-square foot retail
67	936 N. La Brea Ave, Los Angeles	88,750-square foot office, 12,000-square foot retail
68	6225 W. Hollywood Blvd, Los Angeles	214,000-square foot office
69	1601 N. Vine St, Los Angeles	121,609-square foot office, 2,613-square foot retail
70	6121 W. Sunset Blvd, Los Angeles	200-unit condominium, 200-unit apartment building, 391,000-square foot office, 125-room hotel, 30,300-square foot retail/restaurant
71	1800 N. Argyle Ave, Los Angeles	225-room hotel

3.11 Transportation and Traffic

Project No.	Location	Description
72	956 N. Seward St, Los Angeles	130,000-square foot office
73	6381 W. Hollywood Blvd, Los Angeles	80-room hotel, 15,290-square foot restaurant
74	1460 N. Gordon St, Los Angeles	224-unit student housing, 6,400-square foot retail
75	6311 W. Romaine St, Los Angeles	193,274-square foot gym & dance studio
76	6601 W. Romaine St, Los Angeles	104,155-square foot office
77	1603 N. Cherokee Ave, Los Angeles	66-unit apartment building
78	6523 W. Hollywood Blvd, Los Angeles	10,402-square foot restaurant, 4,074-square foot office
79	1313 N. Vine St, Los Angeles	44,000-square foot museum, 35,231-square foot storage
80	712 N. Wilcox Ave, Los Angeles	100-unit apartment building
81	1610 N. Highland Ave, Los Angeles	248-unit apartment building, 14,710-square foot retail
82	1740 Vine St, Los Angeles	500-unit apartment building, 220,000-square foot office, 87,750-square foot retail/commercial
83	5555 W. Melrose Ave, Los Angeles	2,152,200-square foot office, 4,319,600-square foot retail/studio
84	1411 N. Highland Ave, Los Angeles	90-unit apartment building
85	101 S. La Brea Ave, Los Angeles	118-unit apartment building, 26,400-square foot retail, 3,000-square foot restaurant
86	7300 W. Hollywood Blvd, Los Angeles	Temple
87	7045 W. Lanewood Ave, Los Angeles	43-unit apartment building
88	7002 Clinton St, Los Angeles	180-student school
89	7901 W. Beverly Blvd, Los Angeles	71-unit apartment building, 11,454-square foot retail
90	915 N. La Brea Ave, Los Angeles	179-unit apartment building, 33,500-square foot supermarket
91	1840 N. Highland Ave, Los Angeles	100-room hotel
92	1824 N. Highland Ave, Los Angeles	118-unit apartment building
93	5863 W. 3 rd St, Los Angeles	60-unit apartment, 5,350 square foot retail
94	1133 N. Vine St, Los Angeles	112-room hotel expansion
95	1057 N. Vine St, Los Angeles	34-unit apartment building, 6,900-square foot office

Source: KOA Corporation 2012.

In addition, future traffic analysis scenarios assume that a new traffic signal would be installed at the intersection of La Brea Avenue and Lexington Avenue as part of the Monarch Project that is currently under construction. Table 3.11-11 shows the future without project LOS calculations for the study intersections.

TABLE 3.11-11 LEVEL OF SERVICE SUMMARY – FUTURE WITHOUT PROJECT CONDITIONS

Intersection	Analysis Methodology	A.M. Peak Hour		Mid-Day Peak Hour		P.M. Peak Hour		
		LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	
		1	Formosa Ave at Fountain Ave ^{3,a}	HCM	F	336.1	F	90.9
2	Detroit St at Fountain Ave ^{3,a}	HCM	F	111.7	E	48.3	F	545.4
3	La Brea Ave at Fountain Ave ¹	HCM	D	43.0	D	26.0	D	43.4
	La Brea Ave at Fountain Ave ²	CMA	E	0.959	E	0.816	E	0.909
4	Formosa Ave at Lexington Ave ^{1,b}	HCM	A	7.8	A	7.9	A	7.9
5	Detroit St at Lexington Ave ^{1,b}	HCM	A	7.6	A	7.8	A	7.9
6	La Brea Ave at Lexington Ave ^{1,a}	HCM	A	7.1	A	10.2	B	10.7
7	Vista St/Gardner St at Santa Monica Blvd ¹	HCM	B	17.2	B	15.9	C	24.6
8	Martel Ave/Plummer Pl at Santa Monica Blvd ¹	HCM	A	7.8	A	10.8	B	12.4
9	Fuller Ave at Santa Monica Blvd ¹	HCM	B	17.3	B	23.3	D	43.4
10	Poinsettia Pl (S) at Santa Monica Blvd ^{1,a}	HCM	C	19.4	C	372.2	F	271.9
11	Formosa Ave at Santa Monica Blvd ¹	HCM	B	14.1	B	45.2	D	53.3
12	Detroit St at Santa Monica Blvd ^{1,a}	HCM	B	12.4	B	13.3	C	16.1
13	La Brea Ave at Santa Monica Blvd ¹	HCM	F	80.1	F	90.6	F	128.7
14	Orange Dr at Santa Monica Blvd ²	CMA	A	0.576	A	0.585	B	0.631
15	Highland Ave at Santa Monica Blvd ²	CMA	E	0.981	E	1.028	E	0.985
16	Formosa Ave at Romaine St ^{3,a}	HCM	B	10.7	B	10.6	B	13.1
	La Brea Ave at Romaine St ¹	HCM	B	16.4	B	40.7	C	29.9
	La Brea Ave at Romaine St ²	CMA	A	0.482	A	0.765	B	0.666
18	La Brea Ave at Willoughby Ave ²	CMA	A	0.507	A	0.658	C	0.761
19	La Brea Ave at Melrose Ave ²	CMA	E	0.991	E	0.882	F	1.007

Notes:

1 Intersection operates under West Hollywood jurisdiction

2 Intersection operates under Los Angeles jurisdiction

3 Intersection operates under both West Hollywood and Los Angeles jurisdiction

a One- or two-way stop sign controlled

b All-way stop controlled

Source: KOA Corporation 2012.

As shown in Table 3.11-11, 11 of the 19 study intersections would operate at LOS D or worse during one of the peak hours in 2016. These include the following locations:

- Formosa Avenue at Fountain Avenue (a.m., mid-day, and p.m. peak hours)
- Detroit Street at Fountain Avenue (a.m., mid-day, and p.m. peak hours)
- La Brea Avenue at Fountain Avenue (a.m., mid-day, and p.m. peak hours)
- Fuller Avenue at Santa Monica Boulevard (p.m. peak hours)
- South Poinsettia Place at Santa Monica Boulevard (mid-day and p.m. peak hours)
- Formosa Avenue at Santa Monica Boulevard (mid-day and p.m. peak hours)
- La Brea Avenue at Santa Monica Boulevard (a.m., mid-day and p.m. peak hours)
- Highland Avenue at Santa Monica Boulevard (a.m., mid-day and p.m. peak hours)

3.11 Transportation and Traffic

- La Brea Avenue at Melrose Avenue (a.m., mid-day and p.m. peak hours)

The remaining eight study intersections are currently operating at LOS C or better during the peak hours.

FUTURE WITH PROJECT CONDITIONS

Intersection Impact Analysis: The project-only peak hour traffic volumes were added to the future without project traffic volumes. The resulting year 2016 future with project study intersection V/C ratios and corresponding LOS were calculated as shown in Table 3.11-12.

When the future with project forecasts were analyzed at the signalized study intersections, the results indicated that the proposed project would create significant traffic impacts at three locations:

- Formosa Avenue at Fountain Avenue (p.m. peak hour)
- Detroit Street at Fountain Avenue (a.m., mid-day, and p.m. peak hours)
- South Poinsettia Place at Santa Monica Boulevard (mid-day and p.m. peak hours)

Under future conditions with the proposed project, the intersection of Formosa Avenue and Fountain Avenue would be significantly impacted during the evening peak hour. This impact is primarily the result of high existing traffic volumes on Fountain Avenue compared to low project-generated traffic volumes on Formosa Avenue. Due to physical constraints to widening the intersection without the acquisition of private property and the City's desire to maintain on-street parking, this intersection is considered to be striped to its maximum capacity within the available curb-to-curb dimensions and right-of-way. No feasible mitigation measures are available to reduce project-related traffic impacts to a less than significant level without property acquisition. As such, impacts at this intersection would remain significant and unavoidable.

Similarly, widening the intersection of Detroit Street and Fountain Avenue cannot be accomplished without the acquisition of property to alleviate the morning, mid-day, and evening peak hour impacts. This intersection is currently striped to its maximum capacity within the available curb-to-curb dimensions and right-of-way. Impacts at this intersection would remain significant and unavoidable.

The combination of future traffic growth in the project vicinity (cumulative traffic) and additional traffic generated during long-term operation of the proposed project would create a significant impact at the intersection of South Poinsettia Place and Santa Monica Boulevard during the mid-day and evening peak hour under future conditions. This same significant intersection impact was identified for Movietown project, as discussed in the Movietown Specific Plan Final EIR (SCH No. 2008071950). As part of the Movietown Specific Plan Final EIR, the City determine that this intersection is not striped to its maximum capacity within the available curb-to-curb dimensions and right-of-way and could be widened as part of the Movietown Project to mitigate the impact. Because initiation of construction of the Movietown project has not occurred, and because the proposed project would also create a significant project-level impact at this intersection, the proposed project would be required to implement mitigation measure TRANS-A, as identified in the Movietown Specific Plan EIR and approved by City Council, to reduce the impact to a less than significant level.

TABLE 3.11-12 LEVEL OF SERVICE SUMMARY – FUTURE WITH PROJECT CONDITIONS

Intersection	Analysis Methodology	Future Without Project						Future With Project									
		A.M. Peak Hour		Mid-Day Peak Hour		P.M. Peak Hour		A.M. Peak Hour			Mid-Day Peak Hour			P.M. Peak Hour			
		LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C	
1	Formosa Ave at Fountain Ave ^{3,a}	HCM	F	336.1	F	90.9	F	666.0	F	336.2	0.1	F	95.1	4.2	F	680.5	14.5
2	Detroit St at Fountain Ave ^{3,a}	HCM	F	111.7	E	48.3	F	545.4	F	146.2	34.5	F	54.4	6.1	F	660.6	115.2
3	La Brea Ave at Fountain Ave ¹	HCM	D	43.0	D	26.0	D	43.4	D	43.6	0.6	C	27.0	1.0	D	44.1	0.7
	La Brea Ave at Fountain Ave ²	CMA	E	0.959	E	0.816	E	0.909	E	0.963	0.004	D	0.823	0.007	E	0.916	0.007
4	Formosa Ave at Lexington Ave ^{1,b}	HCM	A	7.8	A	7.9	A	7.9	A	7.8	0.0	A	7.9	0.0	A	7.9	0.0
5	Detroit St at Lexington Ave ^{1,b}	HCM	A	7.6	A	7.8	A	7.9	A	7.7	0.1	A	8.0	0.2	A	8.1	0.2
6	La Brea Ave at Lexington Ave ^{1,a}	HCM	A	7.1	A	10.2	B	10.7	A	8.8	1.7	B	12.3	2.1	B	10.9	0.2
7	Vista St/Gardner St at Santa Monica Blvd ¹	HCM	B	17.2	B	15.9	C	24.6	B	17.3	0.1	B	16.1	0.2	C	25.0	0.4
8	Martel Ave/Plummer Pl at Santa Monica Blvd ¹	HCM	A	7.8	A	10.8	B	12.4	A	7.9	0.1	B	10.9	0.1	B	12.6	0.2
9	Fuller Ave at Santa Monica Blvd ¹	HCM	B	17.3	B	23.3	D	43.4	B	17.4	0.1	C	23.5	0.2	D	44.4	1.0
10	Poinsettia Pl (S) at Santa Monica Blvd ^{1,a}	HCM	C	19.4	C	372.2	F	271.9	C	19.5	0.1	F	391.4	19.2	F	292.4	20.5
11	Formosa Ave at Santa Monica Blvd ¹	HCM	B	14.1	B	45.2	D	53.3	B	14.2	0.1	D	46.6	1.4	E	57.2	3.9

3.11 Transportation and Traffic

Intersection		Analysis Methodology	Future Without Project						Future With Project								
			A.M. Peak Hour		Mid-Day Peak Hour		P.M. Peak Hour		A.M. Peak Hour			Mid-Day Peak Hour			P.M. Peak Hour		
			LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C	LOS	V/C (Delay)	Change V/C
12	Detroit St at Santa Monica Blvd ^{1,a}	HCM	B	12.4	B	13.3	C	16.1	B	13.2	0.8	B	14.0	0.7	C	18.6	2.5
13	La Brea Ave at Santa Monica Blvd ¹	HCM	F	80.1	F	90.6	F	128.7	F	84.0	3.9	F	95.9	5.3	F	134.0	5.3
14	Orange Dr at Santa Monica Blvd ²	CMA	A	0.576	A	0.585	B	0.631	A	0.576	0.000	A	0.587	0.002	B	0.638	0.007
15	Highland Ave at Santa Monica Blvd ²	CMA	E	0.981	E	1.028	E	0.985	E	0.981	0.000	F	1.031	0.003	E	0.991	0.006
16	Formosa Ave at Romaine St ^{3,a}	HCM	B	10.7	B	10.6	B	13.1	B	10.7	0.0	B	10.6	0.0	B	13.1	0.0
17	La Brea Ave at Romaine St ¹	HCM	B	16.4	B	40.7	C	29.9	B	16.8	0.4	D	42.6	1.9	C	30.2	0.3
	La Brea Ave at Romaine St ²	CMA	A	0.482	A	0.765	B	0.666	A	0.487	0.005	C	0.774	0.009	B	0.668	0.002
18	La Brea Ave at Willoughby Ave ²	CMA	A	0.507	A	0.658	C	0.761	A	0.512	0.005	B	0.661	0.003	C	0.765	0.004
19	La Brea Ave at Melrose Ave ²	CMA	E	0.991	E	0.882	F	1.007	E	0.996	0.005	D	0.890	0.008	F	1.012	0.005

Notes:

1 Intersection operates under West Hollywood jurisdiction

2 Intersection operates under Los Angeles jurisdiction

3 Intersection operates under both West Hollywood and Los Angeles jurisdiction

a One- or two-way stop sign controlled

b All-way stop controlled

Source: KOA Corporation 2012.

Neighborhood Residential Impact Analysis. Twenty-four hour traffic counts were collected along each study street segment and were used as the baseline volume for the ADT occurring along that street. Future without project traffic conditions resulting from ambient growth in the surrounding area and other pending or approved development projects were then added to the existing volumes. Traffic generated by the proposed project was added to the future without project volumes and compared to the future without project conditions to determine the incremental increase in daily traffic volumes along the study street segments. This incremental increase in ADT was compared to the City’s thresholds, as shown in Table 3.11-13.

TABLE 3.11-13 NEIGHBORHOOD IMPACT ANALYSIS – FUTURE WITH PROJECT CONDITIONS

No.	Roadway Segment	Future Without Project ADT	Total Project Only	Future With Project ADT	Change in ADT (%)
1	Formosa Ave between Santa Monica Blvd and Lexington Ave	4,539	65	4,604	1.4
2	Formosa Ave between Lexington Ave and Fountain Ave	2,656	47	2,703	1.8
3	Detroit St between Santa Monica Blvd and Lexington Ave	2,248	519	2,767	23.1
4	Detroit St between Lexington Ave and Fountain Ave	1,901	163	2,064	8.6
5	Lexington Ave between Detroit St and La Brea Ave	3,273	383	3,656	11.7

Source: KOA Corporation 2012.

The proposed project would create significant neighborhood residential traffic impacts at two of the study roadway segments in the future with project scenario, as follows:

- Detroit Street between Santa Monica Boulevard and Lexington Avenue
- Lexington Avenue between Detroit Street and La Brea Avenue

The proposed project design includes a parking curb at the exit to the ground floor parking area to discourage left-turns out of the project site and into the residential neighborhood. Nonetheless, the residential component of the proposed project would generate a substantial increase in vehicle trips on these two study roadway segments. However, due to physical constraints to widening the intersection without the acquisition of private property and the City’s desire to maintain on-street parking, the impact would remain significant and unavoidable.

TRANS-2: *The proposed project would not conflict with an applicable congestion management program, including but not limited to level of service standards established by the county congestion management agency for designated roads or highways.*

The intersection of Santa Monica Boulevard at Highland Avenue is the closest CMP arterial monitoring intersection to the project site and is included in the intersection-level impact analysis above. As shown in Tables 3.11-8 and 3.11-12, the addition of project-generated traffic to existing and future traffic volumes would not create a significant impact at this intersection. Further, based on the project trip generation and distribution patterns, the proposed project would not add 50 or more net new vehicle trips

3.11 Transportation and Traffic

to any of the other CMP monitoring intersections during either the morning or evening peak hours. Therefore, the impact would be less than significant, and no mitigation is required.

Additionally, based on the project trip generation and distribution patterns, the proposed project would not add 150 or more trips, in either direction, during the morning or evening peak hours to the nearby CMP mainline freeway segments. Therefore, the impact would be less than significant, and no mitigation is required.

The proposed project is anticipated to add new transit riders to existing transit facilities. Therefore, a transit impact analysis was performed per the CMP guidelines. The proposed project vehicular trip generation shown in Table 3.11-7, not taking into account alternative mode trips, is estimated to be approximately 1,453 net daily vehicle trips including 65 trips during the morning peak-hour, 119 trips during the mid-day peak-hour, and 109 trips during the evening peak-hour. By applying the CMP vehicle-to-person trip conversion factor of 1.4 to these values, the raw vehicle trips were estimated to represent 2,034 daily person trips, including 91 person trips during the morning peak hour, 167 trips during the mid-day peak-hour and 153 person trips during the evening peak hour.

According to the CMP guidelines, it is estimated that approximately 5 percent of the proposed project-generated person trips should be assigned to transit due to the proximity of the proposed project site to Santa Monica Boulevard, a CMP transit corridor. The proposed project is forecast to generate a total demand of transit usage of approximately 102 daily person trips, including 5 person trips during the morning peak hour, 8 person trips during the mid-day peak-hour, and 8 person trips during the evening peak hour.

There are 10 bus routes that traverse the project study area. Due to the number of bus routes in the study area, the level of additional transit usage by the proposed project would not create a significant regional transit impact. The impact would be less than significant, and no mitigation is required.

TRANS-3: *The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*

The proposed project would have two separate access points, one for the retail/restaurant uses and one for the residential units. The resident-only parking garage entrance would be located on Detroit Street at the northern boundary of the project site. It would provide ingress/egress to the subterranean parking garage, which would be restricted to residents. The parking lot for retail/restaurant patrons would be located on the ground floor level. The entrance/exit would be located on Formosa Avenue at approximately the center of the project site.

All three levels of parking have been designed according to West Hollywood Municipal Code. The parking areas and driveways do not feature sharp curves or other obstacles that would pose a hazard to vehicles entering or exiting. The proposed project would not introduce incompatible uses. By locating the parking garage entrances/exits on the side streets, the proposed project would not create a safety hazard to pedestrians and vehicles traveling along Santa Monica Boulevard. Vehicles exiting the retail/restaurant parking lot would be able to access Santa Monica Boulevard using the signal at the

intersection with Formosa Avenue. Residents wanting to travel east on Santa Monica Boulevard would be able to travel around the block to the signal at Formosa Avenue or turn onto La Brea Avenue to access the protected turn lane at the intersection of La Brea Avenue and Santa Monica Boulevard. As such, the proposed project would not locate entrances/exits on major streets or create dangerous intersections.

Within the residential parking garage, the parking spaces would be striped to provide travel lanes and clearly demarcate parking spaces. Residents would be assigned parking spaces. No congestion-related problems would be expected to occur within the garage or on Detroit Street due to low project-related traffic volumes estimated to occur at this ingress/egress point. Any queuing that may occur at this ingress/egress point can be readily accommodated by the proposed entrance ramp, which would provide approximately 80 feet of queuing area between Detroit Street and the first parking space within the garage. The relatively low volumes of traffic on Detroit Street would not create a safety hazard or interfere with through traffic on Detroit Street when residents enter or exit the project site.

Some vehicle queuing is expected to occur within the ground floor parking area due to vehicles blocking the aisles as they are exiting their parking stalls, attempting to find vacant stalls, and exiting the parking garage. However, the use of a parking attendant would provide the necessary policing of the structure to ensure that aisles are not blocked by normal-sized vehicles parking in compact spaces and reduce the need for vehicles entering the garage to backtrack down the fully-occupied aisles while looking for vacant stalls. The retail/restaurant garage entrance on Formosa Avenue would be located approximately 110 feet north of Santa Monica Boulevard. The relatively low volumes of traffic on Detroit Street would not create a safety hazard or interfere with through traffic on Detroit Street when residents enter or exit the project site.

Therefore, the proposed project would not create a safety hazard through a design feature or incompatible use. The impact would be less than significant, and no mitigation is required.

3.11.3 MITIGATION MEASURES

TRANS-A South Poinsettia Place at Santa Monica Boulevard: As also identified in the Movietown Specific Plan Final EIR (SCH No. 2008071950) and approved by City Council, prior to issuance of a certificate of occupancy by the City, the applicant shall be responsible for restriping Poinsettia Place to provide two northbound turn lanes (an exclusive left-turn lane and an exclusive right-turn lane) with a length of 260 feet, including storage and taper, by removing on-street parking on both sides of Poinsettia Place. In the event that the Movietown project applicant restripes Poinsettia to provide the two-northbound lanes with a length of 260 feet required for both projects before Domain completes this mitigation measure, the Public Works Director may deem this mitigation measure satisfied for this project as well.

3.11.4 SIGNIFICANCE AFTER MITIGATION

As discussed in impact analysis TRANS-1, implementation of the proposed project would result in significant impacts at three study intersections. These include the following:

- Formosa Avenue at Fountain Avenue (p.m. peak hour)
- Detroit Street at Fountain Avenue (a.m. and p.m. peak hours)
- South Poinsettia Place at Santa Monica Boulevard (mid-day and p.m. peak hours)

With implementation of mitigation measure TRANS-A, the project-generated impact to the intersection of South Poinsettia Place at Santa Monica Boulevard would be reduced to a less than significant level. This same significant intersection impact was identified to occur as a result of additional traffic generated by the Movietown Project. Implementation of restriping Poinsettia Place is also required of the Movietown Project as part of the Movietown Specific Plan Final EIR that was approved by City Council. Even though the Movietown Project was approved by City Council in 2010, construction has not begun and the mitigation has not been implemented. Therefore, the proposed project would be required to implement mitigation measure TRANS-A, if not completed by the Movietown applicant prior to the commencement of this project. Implementation of mitigation measure TRANS-A would result in the loss of 23 total on-street parking spaces on Poinsettia Place, including 11 spaces on the west side and 12 spaces on the east side of the roadway. No roadway widening would be required to accomplish re-striping.

Due to physical constraints within the curb-to-curb right-of-way and the City's desire to maintain current on-street parking, no feasible mitigation measures are available to increase the capacity of Formosa Avenue at Fountain Avenue and Detroit Street at Fountain Avenue. Without the acquisition of private property, impacts to these study intersections would remain significant and unavoidable. Similarly, no feasible mitigation measures are available to increase the capacity of Detroit Street between Santa Monica Boulevard and Lexington Avenue, and Lexington Avenue between Detroit Street and La Brea Avenue. Without the acquisition of private property, impacts to these study roadway segments would remain significant and unavoidable.

Impacts to CMP facilities and vehicle safety hazards would be less than significant.

4.0 IMPACT OVERVIEW

This chapter provides an overview of the environmental effects of the proposed project, including significant and unavoidable impacts, impacts not found to be significant, cumulative impacts, significant irreversible environmental changes, and growth-inducing impacts. Cross-references are made throughout this chapter to other sections of the EIR where more detailed discussions of the impacts of the proposed project can be found.

4.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

This section is prepared in accordance with Section 15126.2(b) of the CEQA Guidelines, which requires the discussion of any significant environmental effects that cannot be avoided if a project is implemented. These include impacts that can be mitigated but cannot be reduced to a less than significant level. An analysis of environmental impacts caused by the proposed project has been conducted and is contained in this EIR. Eleven issue areas were analyzed in detail in Chapter 3.0. According to the environmental impact analysis presented in Chapter 3.0 of this EIR, the proposed project would result in significant unavoidable impacts related to regional emissions during construction (Chapter 3.2), construction noise and vibration (Chapter 3.9), and transportation and traffic (Chapter 3.11).

As discussed in Chapter 3.2, although the proposed project would be required to implement SCAQMD Rule 403 to control fugitive dust emissions, $PM_{2.5}$ and PM_{10} emissions during the demolition, site preparation, and grading phases of construction would not be reduced below the SCAQMD significance thresholds. Additionally, implementation of the mitigation measures would not reduce regional NO_x emissions generated during grading activity below the SCAQMD significance threshold. The short-term construction impact would remain significant and unavoidable.

As discussed in Chapter 3.9, although the proposed project would be required to comply with the City of West Hollywood Noise Ordinance to limit noise during construction, the noise levels at nearby sensitive receptors would exceed acceptable noise levels. Even with implementation of mitigation, the construction impact would remain significant and unavoidable. Similarly, because construction would occur in close proximity to residential uses and a film studio, vibration levels during construction would exceed acceptable standards. Even with implementation of mitigation, the short-term construction noise and vibration impacts would remain significant and unavoidable.

As described in Chapter 3.11, traffic generated by the proposed project and in conjunction with ambient background growth and the cumulative projects would create significant impacts at Formosa Avenue at Fountain Avenue, and Detroit Street at Fountain Avenue. No feasible mitigation measures are available to increase capacity at these impacted intersections without the acquisition of private property to increase roadway width. Traffic generated by the proposed project would also increase the amount of vehicle trips in nearby residential areas creating a significant residential intrusion impact on two street segments that cannot be mitigated to a less than significant level: Detroit Street between Santa Monica Boulevard and Lexington Avenue, and Lexington Avenue between Detroit Street and La Brea Avenue. The long-term operational impact would remain significant and unavoidable.

4.2 EFFECTS NOT FOUND TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires the identification of impacts of a project that were determined not to be significant and that were not discussed in detail in the impact section of the EIR. These issues were eliminated from further review during the Initial Study process (see Appendix A). Therefore, the following section presents a brief discussion of environmental issues that were not found to be significant for this project, including agricultural resources, biological resources, mineral resources, and population and housing.

4.2.1 AGRICULTURAL AND FORESTRY RESOURCES

~~No agricultural activities presently occur onsite and the project site does not contain forestry resources. The project site is designated as Commercial in the City General Plan Land Use Element and zoned CA (Commercial, Arterial). Further, no agricultural activities presently occur onsite.~~ The project site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. There are no Williamson Act contracts applicable to the project site (California Department of Conservation 2006). Thus, the proposed project would not convert farmland to non-agricultural uses or forestland to non-forestry uses.

4.2.2 BIOLOGICAL RESOURCES

Based on a site reconnaissance survey, the existing on-site vegetation does not provide habitat for sensitive species. According to the City of West Hollywood General Plan, no significant original native chaparral or grassland vegetation, or associated native wildlife, exists in the City (City of West Hollywood 2011). Therefore, no sensitive or special status, riparian habitat, or other sensitive natural community, or wetlands exist on the project site. Because the project site is located in an urbanized area and no wildlife corridors are known to exist on the project site, the proposed project would not interfere with the movement of any native resident or migratory fish or wildlife corridors. There are no known sensitive biological resources in the project vicinity. The project site is not located within the boundaries of a habitat conservation plan or other designated resource area. As such, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat plan.

4.2.5 MINERAL RESOURCES

There are no known mineral deposits of economic importance underlying the project site (California Geological Survey 2006). Development of the proposed project would not result in the loss of availability of any known mineral resource.

4.2.6 POPULATION AND HOUSING

The project would result in increased residential population and economic activity on the site. The proposed project would include a mix of market rate and affordable apartment units with 133 market rate

units, 17 moderate income units, and 16 low income units. The City of West Hollywood General Plan states that the need for affordable housing will continue to grow and is a priority issue for the City. As such, the proposed project would have the beneficial effect of increasing the amount of affordable housing in the City. The proposed 166 net new residential units would not induce substantial population growth. The project site is located within a proposed Mixed Use Overlay Zone that would allow residential development on a commercially-designated parcel. Further, this level of development is within planned growth projections for the City and the region, including within planned growth projections for the City in the General Plan and for the region as developed by SCAG (West Hollywood 2011; SCAG 2012). The proposed project would redevelop an existing urban site and would not construct new infrastructure in a previously undeveloped area that would divide an established community. No residential units would be removed to construct the proposed project. Therefore, the proposed project would not displace existing housing or people, or necessitate construction of replacement housing elsewhere.

4.3 CUMULATIVE IMPACTS

According to Section 15355 of the CEQA Guidelines, cumulative impacts refer to:

“Two or more individual effects which, when considered together are considerable or which compound or increase other environmental effects. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

Section 15130(a) of the CEQA Guidelines states that:

“An EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.... When the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR.... An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project’s contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.”

According to Section 15130 (b)(1)(A) of the CEQA Guidelines, a list of past, present, and probable future projects producing related or cumulative impacts may be used as the basis of the cumulative impacts analysis. The “list” approach was used for the cumulative impacts discussion in this EIR. The scale or geographic scope of related projects varies for each impact category. For instance, cumulative geology and soils or aesthetics impacts are considered localized, while cumulative traffic and transportation and

4.0 Impact Overview

air quality impacts are considered regional. Table 4-1 includes all of the approved, under construction, or proposed development projects within the vicinity of the project site. The list of development projects is derived from lists provided by the City of West Hollywood and the City of Los Angeles.

TABLE 4-1 RELATED PROJECTS

Project No.	Location	Description
1	612 Croft Ave, West Hollywood	11-unit condominium
2	1257 Detroit St, West Hollywood	7-unit condominium
3	920 Fairfax Ave, West Hollywood	Retail/office
4	937 Fairfax Ave, West Hollywood	17-unit condominium
5	1240 Fairfax Ave, West Hollywood	23-unit condominium
6	1216 Flores St, West Hollywood	14-unit condominium
7	1041 Formosa Avenue, West Hollywood	The Lot, office/media support
8	8210 Fountain Avenue, West Hollywood	9-unit condominium
9	1264 Harper Ave, West Hollywood	16-unit condominium
10	1345 Havenhurst Dr, West Hollywood	16-unit condominium
11	1342 Hayworth Ave, West Hollywood	16-unit condominium
12	1211 Horn Ave, West Hollywood	16-unit condominium
13	1217 Horn Avenue, West Hollywood	7-unit condominium
14	1125 Kings Rd, West Hollywood	10-unit condominium
15	1232 Kings Road, West Hollywood	25-unit apartment building
16	1145 La Brea Ave, West Hollywood	Apartment/office
17	1222 La Brea Ave, West Hollywood	187-unit apartment building, 19,559-square foot commercial
18	1201 La Brea Ave, West Hollywood	4,575-square foot restaurant
19	623 La Peer Drive, West Hollywood	Hotel
20	1223 Larrabee St, West Hollywood	8-unit condominium
21	8551 Melrose Ave, West Hollywood	6,500-square foot retail
22	8564 Melrose Ave, West Hollywood	28,67-square foot retail/commercial
23	8583 Melrose Ave, West Hollywood	9,545-square foot retail/commercial
24	8612 Melrose Ave, West Hollywood	9,998-square foot restaurant
25	8650 Melrose Avenue, West Hollywood	7-unit apartment building, 14,571-square foot retail
26	8687 Melrose Ave, West Hollywood	400,000-square foot office building
27	8711 Melrose Ave, West Hollywood	21,565-square foot commercial
28	8008 Norton Ave, West Hollywood	8-unit condominium
29	500 Orlando Ave, West Hollywood	4-unit apartment building
30	507 Orlando Ave, West Hollywood	9-unit apartment building
31	611 Orlando Ave, West Hollywood	5-unit condominium
32	7113 Santa Monica Blvd, West Hollywood	184-unit apartment building, 13,350-square foot retail
33	7302 Santa Monica Blvd, West Hollywood	Movietown
34	8120 Santa Monica Blvd, West Hollywood	Walgreens
35	8350 Santa Monica Blvd, West Hollywood	Kings Road
36	8550 Santa Monica Blvd, West Hollywood	Retail/restaurant
37	8555 Santa Monica Blvd, West Hollywood	Mixed-use project
38	9001 Santa Monica Blvd, West Hollywood	Mixed-use project
39	9040, 9060, 9080, 9098 Santa Monica Blvd, West Hollywood	Melrose Triangle
40	1040 Spaulding Ave, West Hollywood	5-unit condominium

TABLE 4-1 RELATED PROJECTS

Project No.	Location	Description
41	944 Stanley Ave, West Hollywood	5-unit condominium
42	8240 Sunset Boulevard, West Hollywood	27-unit condominium
43	8305 Sunset Blvd, West Hollywood	2,972-square foot retail, 10,300-square foot restaurant
44	8418 Sunset Blvd, West Hollywood	Sunset Time
45	8490 Sunset Blvd, West Hollywood	Sunset Millennium
46	8497 Sunset Blvd, West Hollywood	Mixed-use project
47	8873 Sunset Blvd, West Hollywood	9,995-square foot retail
48	8950 Sunset Blvd, West Hollywood	196-unit hotel, 4-apartment units
49	9040 Sunset Blvd, West Hollywood	Hotel
50	1253 Sweetzer Ave, West Hollywood	8-unit condominium
51	8565 West Knoll Dr, West Hollywood	6-unit condominium
52	916 Westbourne Dr, West Hollywood	8-unit condominium
53	2000 N. Fuller Ave, Los Angeles	80-space parking lot
54	6200 W. Hollywood Blvd, Los Angeles	952-unit apartment building, 190,00-square foot retail
55	1538 N. Vine St, Los Angeles	306-unit apartment and 68,000-square foot retail
56	5800 W. Sunset Blvd, Los Angeles	535,396-square foot office/studio expansion
57	5935 W. Sunset Blvd, Los Angeles	311-unit condominium, 53,500-square foot retail/restaurant/office
58	6230 W. Yucca St, Los Angeles	85-unit condominium, 13,890-square foot retail
59	959 N. Seward St, Los Angeles	240,000-square foot office
60	6911 W. Santa Monica Blvd, Los Angeles	374-unit condominium and 15,000-square foot retail
61	6516 W. Selma Ave, Los Angeles	85,000-square foot office
62	6608 W. Hollywood Blvd, Los Angeles	26,900-square foot restaurant, 3,000-square foot office
63	6677 W. Santa Monica Blvd, Los Angeles	787-unit apartment building, 22,200-square foot retail/restaurant
64	6417 W. Selma Ave, Los Angeles	85-room hotel, 12,840-square foot restaurant
65	1149 N. Gower St, Los Angeles	36-unit condominium, 21-unit apartment building
66	6100 W. Hollywood Blvd, Los Angeles	151-unit apartment building, 6,200-square foot retail
67	936 N. La Brea Ave, Los Angeles	88,750-square foot office, 12,000-square foot retail
68	6225 W. Hollywood Blvd, Los Angeles	214,000-square foot office
69	1601 N. Vine St, Los Angeles	121,609-square foot office, 2,613-square foot retail
70	6121 W. Sunset Blvd, Los Angeles	200-unit condominium, 200-unit apartment building, 391,000-square foot office, 125-room hotel, 30,300-square foot retail/restaurant
71	1800 N. Argyle Ave, Los Angeles	225-room hotel
72	956 N. Seward St, Los Angeles	130,000-square foot office
73	6381 W. Hollywood Blvd, Los Angeles	80-room hotel, 15,290-square foot restaurant
74	1460 N. Gordon St, Los Angeles	224-unit student housing, 6,400-square foot retail
75	6311 W. Romaine St, Los Angeles	193,274-square foot gym & dance studio
76	6601 W. Romaine St, Los Angeles	104,155-square foot office
77	1603 N. Cherokee Ave, Los Angeles	66-unit apartment building
78	6523 W. Hollywood Blvd, Los Angeles	10,402-square foot restaurant, 4,074-square foot office
79	1313 N. Vine St, Los Angeles	44,000-square foot museum, 35,231-square foot storage
80	712 N. Wilcox Ave, Los Angeles	100-unit apartment building
81	1610 N. Highland Ave, Los Angeles	248-unit apartment building, 14,710-square foot retail
82	1740 Vine St, Los Angeles	500-unit apartment building, 220,000-square foot office, 87,750-square foot retail/commercial
83	5555 W. Melrose Ave, Los Angeles	2,152,200-square foot office, 4,319,600-square foot retail/studio
84	1411 N. Highland Ave, Los Angeles	90-unit apartment building

4.0 Impact Overview

TABLE 4-1 RELATED PROJECTS

Project No.	Location	Description
85	101 S. La Brea Ave, Los Angeles	118-unit apartment building, 26,400-square foot retail, 3,000-square foot restaurant
86	7300 W. Hollywood Blvd, Los Angeles	Temple
87	7045 W. Lanewood Ave, Los Angeles	43-unit apartment building
88	7002 Clinton St, Los Angeles	180-student school
89	7901 W. Beverly Blvd, Los Angeles	71-unit apartment building, 11,454-square foot retail
90	915 N. La Brea Ave, Los Angeles	179-unit apartment building, 33,500-square foot supermarket
91	1840 N. Highland Ave, Los Angeles	100-room hotel
92	1824 N. Highland Ave, Los Angeles	118-unit apartment building
93	5863 W. 3 rd St, Los Angeles	60-unit apartment, 5,350 square foot retail
94	1133 N. Vine St, Los Angeles	112-room hotel expansion
95	1057 N. Vine St, Los Angeles	34-unit apartment building, 6,900-square foot office

Source: KOA Corporation 2012.

AESTHETICS

The related projects within a one-mile radius include various commercial/mixed-use, office, industrial and residential projects that are currently under construction, approved but not built, or proposed for development. This development would occur in an area that has already been impacted by urban development. Due to its size, design, bulk, color, and construction materials, the proposed project would represent a substantial change to the visual setting and quality of views experienced from Santa Monica Boulevard and the adjacent residential neighborhood. Because the proposed structures would replace an industrial area with limited aesthetic value, construction of the proposed project would represent a substantial, though positive change on the landscape. The redevelopment of the project site would be aesthetically consistent with the character and level of development at the eastern gateway to West Hollywood, which is moving towards higher density urban development. The proposed project, like the related projects, would be required to comply with height limits and building setbacks established by the Zoning Code and the General Plan, or the relevant specific plan. In addition, all projects would be subject to design review by the City to ensure that project design is consistent with City standards. Therefore, the proposed project, in conjunction with the listed projects, would not have a cumulative aesthetic impact.

The proposed project would result in significant light and glare impacts if reflective surfaces are used during building construction. Therefore, the proposed project would be required to implement mitigation measures VIS-A and VIS-B to reduce the impact to a less than significant level. The related projects would be required to comply with the building materials and lighting standards specified in the City of West Hollywood Municipal Code or implement similar mitigation measures. Therefore, the project's incremental contribution to cumulative light and glare impacts would be less than significant.

Development of the related projects would have the potential to increase shade and shadow in the area as existing structures are demolished and larger structures are put in their place. These projects would be required to comply with height limits applicable to the area. As with the proposed project, taller structures would be expected to increase the amount of shade and shadow. However, even during the

shortest day of the year (December 21st) when shadows are the greatest, affected structures would still receive some sunlight. For the majority of the year, the shadows cast by the proposed project would not affect adjacent properties. Thus, the proposed project's incremental contribution to cumulative shade and shadow impacts would be less than significant.

AIR QUALITY

Cumulative air quality impacts are considered on a regional basis. As such, Table 3.2-5 in this EIR is used in the analysis of cumulative air quality impacts. As discussed in Section 4.1 above, the proposed project would exceed SCAQMD construction mass daily emission thresholds for criteria pollutants, even with implementation of mitigation measures. Construction emissions would be short-term, and would cease upon completion of the proposed structure; however, as they would exceed SCAQMD significance thresholds for daily emissions, construction-related air quality emissions would contribute to a cumulative impact.

Air quality impacts related to TACs and the impacts to sensitive receptors would be substantially benefited by the redevelopment of the project site and discontinuation of the existing metal plating activities. As such, the proposed project would have a beneficial impact on the community in relation to the existing uses. Other operational air quality impacts would be primarily attributed to the increase in vehicle trips associated with the proposed project, since the proposed project would not create any significant new stationary sources of pollution. As discussed in Section 3.2.3 of this EIR, criteria pollutant emissions would not exceed the SCAQMD daily thresholds even when project-related traffic is combined with cumulative traffic. Accordingly, the proposed project would not result in a significant long-term (operational) impact on cumulative regional and local air quality and attainment goals for criteria pollutants.

CULTURAL RESOURCES

The cumulative project list captures the past, present, and probable future projects that would potentially contribute to cumulative cultural resource impacts. The proposed project would not result in cumulative impacts to historic resources in the area. The existing site structures do not qualify for listing as historic resources. The proposed project site is not located in a historic district. The proposed project has been designed to enhance the closest historic structure, the Formosa Café, by creating a view corridor from the entrance of the Formosa Café to the Hollywood sign. Thus, the construction of the proposed project in conjunction with other projects in the area would not create a cumulatively considerable impact to historic resources. No archaeological sites were discovered or are known to exist within the project site. As with the proposed project, all related projects in the vicinity would be required to comply with CEQA Section 15064.5. If resources are uncovered during construction activities, all construction would cease until the find is analyzed. As such, the proposed project would not contribute to a significant cumulative impact to archaeological resources.

GEOLOGY AND SOILS

Geological impacts related to future development in the City would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site would be specific to that site and its users, and would not be common or contribute to the impacts on other sites. Additionally, development on each site would be subject to uniform site development and construction standards that are designed to protect public safety and structures. Therefore, cumulative geology and soils impacts would be less than significant.

GREENHOUSE GAS EMISSIONS

Consistency with adopted programs and policies to reduce GHG emissions has been suggested as a method to evaluate the significance of cumulative impacts. CEQA Guidelines Section 15064(h)(3) permits a finding that a project's effects would not be cumulatively considerable if the project would comply with the requirements in a previously approved plan or mitigation program specified by law. For purposes of this analysis, the proposed project's consistency with the City of West Hollywood CAP, adopted September 6, 2011, is used to determine cumulative significance. As discussed in Chapter 3.5 of this EIR, the proposed project is calculated to generate approximately 2,484 metric tons per year of CO₂e, or 8.7 metric tons of CO₂e per year per service population. Project-generated GHG emissions would fall below the City's 2008 business-as-usual baseline of 9.7 metric tons of CO₂e per year per service population as defined in the CAP and would not conflict with the City of West Hollywood General Plan and CAP, which is intended to exceed the AB 32 emission reduction targets. Furthermore, the analysis of GHG emissions is, by definition, based on the cumulative impacts of the proposed project. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to GHG emissions.

HAZARDS AND HAZARDOUS MATERIALS

The cumulative project list captures the past, present, and probable future projects that would potentially contribute to cumulative hazardous materials impacts. The proposed project would not result in cumulative impacts to hazardous materials in the area. As discussed in Chapter 3.6 of this EIR, the project site is a listed hazardous materials site as of result of the current metal plating activities. As discussed above, this project includes the closing of Faith Plating in December 2012, thus eliminating the plating activities at the project site. Additionally, the applicant entered into a VCA with DTSC and a RAW was prepared under DTSC supervision (approved on March 13, 2009). Pursuant to the RAW, the proposed project would involve environmental remedial actions that would, among other things, remove on-site sources of contamination to soil; obtain unrestricted regulatory site closure for the site; and provide a site ready for the unrestricted construction of residential uses. As such, construction of the proposed project would remove hazardous materials from the cumulative project radius. No long-term impacts associated with hazardous materials would occur from operation of the project site with retail/restaurant and residential uses. The related projects, as with the proposed project, would be required to assess the potential for hazardous materials onsite and comply with DTSC standards for the cleanup of any hazards. Therefore, the proposed project, in conjunction with the listed projects, would not have a cumulative hazardous materials impact.

HYDROLOGY AND WATER QUALITY

The proposed project, in conjunction with the related projects, would not impact storm drainage and water quality in the area. The proposed project is located in an urban area where most of the surrounding properties are developed. The existing storm drainage system serving this area has been designed to accommodate runoff from this built-out environment. Additionally, any potentially significant impacts of the related projects associated with the violation of water quality standards, alteration of drainage patterns, water runoff, and flood hazards, would be assessed on a project-by-project basis. Substantial additional runoff does not generally occur with development of related projects since new developments would also be required to control the amount and quality of stormwater runoff coming from their respective sites. Thus, the proposed project would not contribute to a significant cumulative impact in the event that any off-site areas served by local storm drains were to increase peak flows to the system. Additionally, no cumulatively considerable impacts related to water runoff and water quality would occur.

LAND USE AND PLANNING

Development of the proposed project, in conjunction with other cumulative projects in the vicinity of the project site, would result in further urbanization and redevelopment of both West Hollywood and nearby neighborhoods within the City of Los Angeles. Each cumulative project would be subject to independent environmental review, which would include land use conformity analyses, to evaluate potentially significant cumulative impacts related to land use compatibility and consistency. As discussed in Chapter 3.8 of this EIR, the proposed project would be consistent with the General Plan policies adopted for the purpose of avoiding or mitigating an environmental effect with approval of the requested Modification Permit, affordable housing density and height bonuses and incentives, and the Mixed-Use Overlay Zone incentives. Therefore, the proposed project would not result in a significant land use impact. When considered in conjunction with the past, present, and reasonably foreseeable projects listed in Table 4-1, the proposed project's impacts would not be cumulatively considerable since none of these projects would be expected to result in land use compatibility impacts.

NOISE

Noise impacts are localized in nature. Given the distance of the related projects from the project site, the timing of construction, and the decrease in noise levels with distance, construction activities associated with the related projects when considered together with the proposed project would not be cumulatively significant. Further, the proposed project and related projects would be required to comply with the City of West Hollywood Noise Ordinance for those projects located within City limits and the City of Los Angeles Noise Ordinance for those located in nearby Los Angeles to limit noise during construction.

Vibration impacts associated with construction activities are extremely localized because they are groundborne. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Although the proposed project would result in vibration annoyance at adjacent residential uses, because of the distance between them, ground vibration

4.0 Impact Overview

associated with the proposed project would not be heightened due to the related projects. Consequently, no cumulative impacts from vibration would result.

As discussed in Chapter 3.9 of this EIR, traffic generated by the proposed project would increase traffic noise on adjacent streets. It is assumed that the related projects would generate an increase in the amount of traffic on local roads, as well, and this increased noise was considered as part of the project-specific long-term noise impact to onsite residents in Chapter 3.9 of this EIR. When considered together, the proposed project and the related projects would not create a significant cumulative impact on permanent ambient noise levels in the vicinity of the project site. Traffic generated by the proposed project in conjunction with the related projects would not exceed the City's standards for residential and commercial uses, which are 65 dBA and 70 dBA, respectively.

PUBLIC SERVICES, UTILITIES AND RECREATION

The proposed project and each cumulative project listed in Table 4-1 would incrementally increase demand for police and fire protection services within the City and could potentially increase emergency response times. The LACoFD reviews fire station placement and fire services for the County through its annual budget process and resources are expanded or reassigned as necessary to meet increased service demands. Similarly, LACoSD evaluates its service needs on an annual basis to keep pace with projected growth. Payment of development fees by all projects is used to offset the costs of increase services as necessary. Therefore, the proposed project, in conjunction with the listed projects, would not have a significant cumulative impact related to police, fire, and emergency services.

The proposed project and each related project listed in Table 4-1 would incrementally increase the amount of water used and wastewater generated. These projects, as with the proposed project, would be required to pay a wastewater mitigation fee to offset any net increases in wastewater flow from new construction to the City of West Hollywood per Municipal Code Section 5322. In addition, the Sanitation Districts are empowered by the California Health and Safety Code to charge a fee for connecting directly or indirectly to their sewage system. Payment of this connection fee is required before a permit to connect to the sewer is issued and is used by the Sanitation Districts to construct system-wide improvements as necessary to accommodate increased demand. As discussed in Chapter 3.10 of this EIR, the proposed project and some of the related projects listed in Table 4-1 may contribute to an existing downstream deficiency that has been identified within the City of Los Angeles. As such, the applicant would be required to request a sewer capacity availability report from the City of Los Angeles Bureau of Engineering in order to prove to the satisfaction of the City of West Hollywood Department of Public Works that there is adequate downstream wastewater capacity to serve the proposed project at the time a Certificate of Occupancy is requested by the applicant. If the City of Los Angeles Bureau of Engineering has determined by a subsequent Sewer Capacity Availability Review that the wastewater system no longer has capacity to serve the proposed project, the applicant would design and construct an alternate sewer connection with adequate downstream capacity. Implementation of mitigation measure PS-A would ensure that the proposed project would not contribute to a cumulatively considerable impact to the wastewater system. Similarly, related projects located in the vicinity of the proposed project site would

be required to implement improvements to the wastewater system to accommodate additional flows generated as a result of their projects.

Los Angeles County and other counties in California have limited available landfill capacity remaining. Due to the declining landfill space for disposal, there is a need to divert solid waste. AB 939, or the Integrated Waste Management Act of 1989, mandates cities to divert 50 percent of the total solid waste generated. Additionally, the City's Green Building Ordinance requires that approximately 80 percent of demolition debris and construction waste is diverted away from area landfills. In order to maintain the City's goal of diverting 50 percent of solid waste and 80 percent of demolition debris and construction waste, and to offset impacts associated with solid waste, the proposed project and all related projects would be required to implement waste reduction, diversion, and recycling during both demolition/construction and operation. Compliance with standard City-required solid waste and recycling collection features would reduce the amount of solid waste generated by the project site that would ultimately be disposed of at area landfills. In addition, the proposed project and related projects would be required to implement mitigation measures to further reduce solid waste. Therefore, the proposed project, in conjunction with the related projects, would not have a significant cumulative impact on area landfills with implementation of mitigation.

The City aims to provide 3.0 acres of parkland for every 1,000 residents. With a current population of approximately 37,000 persons, the City provides approximately 0.4 acres of parkland for every 1,000 residents. As such, there is a shortage of parkland in the City. The proposed project and other related residential projects within West Hollywood would further exacerbate the shortage of parkland. However, the payment of fees would ensure that the proposed project and related projects do not result in substantial physical deterioration of existing recreational facilities. The construction of new or expansion of existing parks and recreational facilities would not be required as a result of the proposed project. The cumulative impact would be less than significant.

TRANSPORTATION AND TRAFFIC

As discussed in Chapter 3.11 of this EIR, the future traffic conditions take into account the related projects listed in Table 4-1 above. Even with implementation of mitigation measures TRANS-A, the proposed project traffic combined with the related projects would create significant and unavoidable cumulative impacts at two of the study intersections: Formosa Avenue at Fountain Avenue, and Detroit Street at Fountain Avenue. In addition, unmitigated cumulative residential neighborhood intrusion impacts would occur on two street segments: Detroit Street between Santa Monica Boulevard and Lexington Avenue, and Lexington Avenue between Detroit Street and La Brea. The long-term operation of the proposed project would create a significant and unavoidable cumulative impact.

4.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Public Resources Code section 21100(b)(2)(B) and section 15126.2(c) of the CEQA Guidelines require that an EIR analyze the extent to which the proposed project's primary and secondary effects would

4.0 Impact Overview

impact the environment and commit nonrenewable resources to uses that future generations will not be able to reverse.

Construction and operation of the proposed project would result in the use of nonrenewable resources during construction, including fossil fuels, natural gas, and water and building materials such as concrete and steel. As described in Chapter 2.0 of this EIR, building materials would be recycled to the maximum extent possible. In addition, the proposed facility would be designed to incorporate energy and water efficiency features in accordance with Title 24 standards. The proposed project is not anticipated to consume substantial amounts of energy in a wasteful manner, and it would not result in significant impacts from consumption of utilities. Although irreversible environmental changes would result from the proposed project, such changes would not be considered significant.

4.5 GROWTH-INDUCING IMPACTS

According to Section 15126.2 (d) of the CEQA Guidelines, growth-inducing impacts of the proposed project shall be discussed in the EIR. Growth-inducing impacts are those effects of the proposed project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. According to CEQA, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the implementation of the proposed project. Typically, the growth-inducing potential of a project would be considered significant if it results in growth or population concentration that exceeds those assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. However, the creation of growth-inducing potential does not automatically lead to growth, whether it would be below or in exceedance of a projected level.

The environmental effects of induced growth are secondary or indirect impacts of the proposed project. Secondary effects of growth could result in significant environmental impacts, which could include increased demand on community or public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses.

Implementation of the proposed project would induce growth by providing approximately 166 new apartment units. Further, the proposed project would be expected to increase the City's population by approximately 267 persons (based on a conservative estimate of 1.6 persons per household) (California Department of Finance 2012). This amount of growth is well within the population projections estimated for West Hollywood by SCAG of approximately 35,100 persons in 2020 from a population of 35,716 in 2000. The proposed project would not adversely induce growth because it would provide 17 moderate income and 16 low income units, or 100 percent of the City's current RHNA allocation, and provide needed rental units.

5.0 ALTERNATIVES

CEQA requires that an EIR objectively evaluate a “reasonable” range of alternatives. According to the CEQA Guidelines Section 15126.6(a), “an EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, which would feasibly attain most of the basic objectives of the proposed project, but would avoid or substantially lessen any of the significant effects of the proposed project, and evaluate the comparative merits of the alternatives.” The CEQA Guidelines also state that an EIR need not consider every conceivable alternative nor consider alternatives that are infeasible. Under CEQA, the factors that can determine feasibility are site suitability, economic limitations, availability of infrastructure, General Plan consistency, other plan or regulatory limitations, and jurisdictional boundaries. An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The alternatives analysis must also include a comparative evaluation of the No Project Alternative per Section 15126.6(e) of the CEQA Guidelines. Through comparison of the alternatives, the advantages and disadvantages of each alternative compared with the proposed project can be weighed and analyzed. Consequently, the No Project Alternative is described below.

5.1 PROJECT OBJECTIVES

The overall goal of the Domain Project, formerly the Formosa Specific Plan Project, is to create a mixed-use development that builds upon, complements, and is a catalyst to additional growth within an existing built environment. The primary objectives of the project include the following:

- Provide the financial resources to clean-up existing environmental contamination, to permit the redevelopment of the site with market rate and affordable housing, thereby converting an incompatible industrial use, which generates air and ground pollutants, into an attractive addition to the adjacent residential and retail uses.
- Establish a principal activity center and entry into the City of West Hollywood by the intensification of commercial uses and urban design improvements.
- Provide for the upgrading, infill, and new development of uses along Santa Monica Boulevard to create a consistent pattern of development and uses that serve adjacent residents and employees and continue the character of specialty uses.
- Enhance pedestrian activity along Santa Monica Boulevard, and provide much needed neighborhood serving retail/restaurant uses along Santa Monica Boulevard that responds to neighborhood needs and market demands.
- Develop a village-like environment by siting and massing buildings around common pedestrian areas and open spaces that are linked to Santa Monica Boulevard.
- Increase housing in West Hollywood and provide affordable housing.

5.2 ALTERNATIVES CONSIDERED BUT REJECTED

Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered by the lead agency, but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts.

5.2.1 ALTERNATIVE SITES

Section 15126.6(f)(2) of the CEQA Guidelines requires that an EIR consider alternative locations to the project site. The City of West Hollywood is almost entirely built out and there are few remaining vacant parcels remaining in the City. None of the existing vacant parcels are of a comparable size to the project site. Development within West Hollywood primarily occurs from the recycling of developed properties at a higher intensity of use, such as the proposed project. Thus, there are numerous sites within the City of an equivalent size that could be redeveloped with a mixed-use retail/restaurant and residential project. However, there are no other sites located on Santa Monica Boulevard that are owned or controlled by the applicant. Further, redevelopment of a similarly sized property on Santa Monica Boulevard would create the same impacts as the proposed project only those impacts would be shifted to the area immediately surrounding an alternative site. Construction of the same project design would not reduce or avoid significant impacts to transportation and traffic or construction noise.

Development of an alternative site would not result in the clean-up of the project site. Although the tenants have vacated the existing site uses, developing the proposed project on an alternative site would not remove the existing contamination and the site project could be leased to other, similar manufacturing uses. As such, the soil beneath the site would remain contaminated with no plan to clean up these hazards. The environmental benefits of cleaning up the project site that are associated with the proposed project would not be achieved if an alternative site were to be developed.

In addition, an alternative site would not accomplish most of the basic project objectives. For example, the project site is the only listed hazardous waste site in the City. Thus, development of an alternative site would not provide the necessary financial resources to clean-up existing environmental contamination and convert an incompatible industrial use into an attractive addition to the adjacent residential and retail uses. A site that is not located near the gateway to West Hollywood would not help the City establish a principal activity center and entry into the City of West Hollywood by the intensification of commercial uses and urban design improvements. An alternative site that is not located on Santa Monica Boulevard would not provide for the upgrading, infill, recycling, and new development of uses along Santa Monica Boulevard to create a consistent pattern of development and uses which serve adjacent residents and employees and continue the character of specialty uses. Further, it would not act to enhance pedestrian activity along Santa Monica Boulevard or develop a village-like environment by siting and massing of buildings around common pedestrian areas and open spaces which are linked to Santa Monica Boulevard.

5.2.2 UNIFORM BUILDING HEIGHT

During the initial design process for the proposed project, a mixed-use building of uniform height was considered. This alternative would provide the same uses as the proposed project: 166 residential units and approximately 9,300 square feet of retail and restaurant uses. The retail and restaurant uses would be restricted to the ground floor level and would front Santa Monica Boulevard. Instead of designing the building with six stories fronting Santa Monica Boulevard and stepping down to three stories on the northern boundary of the project site, this alternative considered a uniform height of five stories across the project site. Nearby residential buildings generally range from one and two stories in height for older buildings and four stories for new construction. The multi-family residential buildings located directly adjacent to the project site along the northern boundary are only two stories in height. As such, a five-story building abutting a two-story building would create additional shade and shadow impacts on these adjacent residences, and it would not have complemented the existing neighborhood character. Thus, this design alternative was eliminated from further consideration.

5.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED ANALYSIS

Three alternatives have been carried forward for detailed analysis in this EIR, including the “No Project” alternative as required by CEQA. Based on the environmental analysis conducted in the Draft EIR and Recirculated Draft EIR for the proposed project, significant impacts requiring mitigation have been identified regarding Aesthetics, Air Quality, Public Services, Utilities and Recreation, Noise, and Transportation and Traffic. The EIR also identifies less than significant impacts for Cultural Resources, Hazards and Hazardous Materials, and Land Use and Planning.

The alternatives carried forward for detailed analysis in this section include:

- No Project Alternative
- Reduced Density Alternative
- Mixed-Use with Retail Uses Only Alternative

5.3.1 OVERVIEW OF ALTERNATIVES AND IMPACTS

Table 5-1 at the end of this chapter provides a comparison of the alternatives to the proposed project. In accordance with the CEQA Guidelines Section 15126.6(d), each alternative was evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed project.

5.3.2 NO PROJECT ALTERNATIVE

According to the CEQA Guidelines Section 15126.6(e)(3)(b), the No Project Alternative is defined as the “circumstance under which the proposed project does not proceed.” The impacts of the No Project Alternative shall be analyzed “by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.” The purpose of describing and analyzing the No Project Alternative is “to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Under the No Project Alternative, the proposed new mixed-use facility would not be constructed. The existing metal plating facility and sound editing studio buildings would remain on-site and continue to be vacant. No new structures would be constructed and no change in land use would occur. The environmental characteristics would be the same as those described in the environmental setting sections of Chapter 3.

Construction impacts associated with the proposed project would be avoided because no development would occur on the project site under the No Project Alternative. The existing structures would not be demolished, but would be reused with other similar manufacturing and office uses. No expansion of these facilities would occur or reuse of the existing structures for other land uses because of the on-site contamination from the metal plating facility. Maintenance activities would occur as needed to maintain the existing structures. There would be no change to cultural resources during project operation as none of the existing structures would be changed and none of them qualify for listing as historic resources. Further, uncovering previously unknown archaeological or paleontological resources would not occur because no excavation of new structures would take place.

Operational impacts associated with air quality, land use and planning, noise, public services, and transportation and traffic would be avoided because no changes to the project site would occur. The number of vehicles trips to/from the project site would not be expected to change substantially because similar uses would be operating at the site. Thus, no increase in mobile emissions or vehicular noise would be expected to occur. No land use changes would occur because similar manufacturing and office uses would be expected to operate on the project site as under current conditions. Impacts to police and fire protection services and emergency response would not be expected to occur. No new uses would operate at the project site and no expansion of existing site uses would occur.

Under the No Project Alternative, the visual setting of the project site would continue to be a series of separate buildings that are not remarkable in style, color, or bulk, and the project site would not stand out as a particularly memorable or remarkable feature in the landscape. As such, the eastern gateway of West Hollywood located on the north side of Santa Monica Boulevard would continue to be characterized by unremarkable wood-framed plaster buildings with zero-lot setbacks and no visual connection between the structures. There would be no unifying visually interesting single new structure erected on the project site as part of this alternative. In addition, the environmental benefits associated with the removal of industrial uses and remediation of the soil contamination at the project site would not be achieved under the No Project Alternative.

This alternative would not achieve any of the basic objectives of the proposed project. As discussed above, the site would continue to operate as manufacturing and office uses. No demolition of existing structures would occur and no new construction would take place. Thus, the existing site contamination would continue to go untreated on the site and uses on the project site could continue to use hazardous materials adjacent to a residential neighborhood. This alternative would not provide the financial resources to clean-up existing environmental contamination and convert an incompatible industrial use into more compatible residential and retail uses. This alternative would not establish a principal activity center and entry into the City of West Hollywood by the intensification of commercial uses and urban design improvements because it would maintain the existing industrial uses and aesthetically unremarkable buildings. This alternative would not provide for the upgrading, infill, and new development of uses along Santa Monica Boulevard to create a consistent pattern of development and uses which serve adjacent residents and employees and continue the character of specialty uses. No changes at the site would occur that would enhance pedestrian activity along Santa Monica Boulevard. It would not develop a village-like environment by siting and massing buildings around common pedestrian areas and open spaces which are linked to Santa Monica Boulevard. Lastly, it would not increase housing in West Hollywood or provide affordable housing.

5.3.3 REDUCED DENSITY ALTERNATIVE

Under the Reduced Density Alternative, the existing site buildings would be demolished and a mixed-use building would be constructed and operated. However, the size of the development would be reduced. The Reduced Density Alternative represents approximately 54 percent of the density of the proposed project. This alternative considers a mixed-use development with approximately 9,000 square feet of retail/restaurant uses and approximately 90 apartment units. The residential and retail uses would be constructed in a single structure at a maximum of four stories and 45 feet in height. The retail/restaurant uses would be located on the ground floor fronting Santa Monica Boulevard and wrapping around to Formosa Avenue. Residential uses would generally be located on the upper stories. As with the proposed project, this alternative would provide a mix of market rate and affordable units. Affordable units would be provided in accordance with the City's Inclusionary Housing Ordinance. Thus, approximately 14 of the 90 residential units would be affordable. This alternative would also provide a view corridor along Santa Monica Boulevard to the Hollywood sign located north of the project site and from a plaza located on the second floor of the building.

Parking for the retail/restaurant uses would be located on the ground floor level and a subterranean parking level would provide parking for the residential uses. Ingress/egress would be the same as for the proposed project. The entrance/exit to the residential parking garage would be located on the northern boundary of the project site on Detroit Street. The entrance/exit to the commercial parking lot would be located in the central portion of the project site along Formosa Avenue.

AESTHETICS

Aesthetic and visual impacts associated with this alternative would be similar to those associated with the proposed project. The design of this alternative would be expected to be consistent with the proposed project and newer development that has occurred in the project vicinity. Therefore, it would not conflict with the existing visual character of the project site or the surrounding area. Shadows cast by the Reduced Density Alternative would be smaller than the proposed project because the building height would be two stories shorter along the Santa Monica Boulevard frontage. However, the building height would be one story taller than the proposed project along the northern boundary. Thus, the shade and shadow cast on the adjacent residences to the north would be longer than the proposed project during the winter solstice. This alternative has the potential to create a significant shade and shadow impact because the adjacent residences would be shadowed for nearly the entire day during the winter months. As with the proposed project, this alternative would not create substantial light and glare impacts with implementation of mitigation measures requiring the use of non-reflective building materials and using low-intensity lighting directed into the site. The Reduced Density Alternative would not have a significant impact on scenic vistas. The project site does not currently have views of the Hollywood sign or the Hollywood Hills. Therefore, construction of a four-story structure would not block these views, similar to the proposed project. Further, this alternative would create a new view corridor of the Hollywood sign that is not currently provided by the existing site uses. Similar to the proposed project, this alternative would have a beneficial impact on scenic vistas.

AIR QUALITY

The amount of grading and type of construction activities required under the Reduced Density Alternative would be similar to the proposed project. Soils within the project site are contaminated by hazardous materials associated with the existing metal plating facility. Thus, the same amount of soil would have to be removed from the project site under the Reduced Density Alternative as the proposed project. Further, this alternative would still involve the construction of a subterranean parking garage. Construction activities would be required to comply with SCAQMD Rule 403 and the same mitigation measures that apply to the proposed project would apply to this alternative. The Reduced Density Alternative would involve the same types and duration of construction activities as the proposed project. Thus, as with the proposed project, construction air quality would exceed the SCAQMD daily emissions thresholds for NO_x even after implementation of mitigation. The short-term regional air quality impact would remain significant and unavoidable. Additionally, as with the proposed project, the Reduced Density Alternative would result in a short-term significant and unavoidable impact related to localized $\text{PM}_{2.5}$ and PM_{10} construction emissions associated with site grading activities.

The Reduced Density Alternative would result in construction of 76 fewer residential units than the proposed project and only a four-story building. Because of the reduced building occupancy, air pollutant emissions associated with vehicles trips would be reduced. Fewer people would live at the proposed project site under this alternative. Energy consumption would be reduced compared to the proposed project because less energy would be required for a smaller development. Similar to the proposed project,

operational emissions would not exceed the SCAQMD daily emissions thresholds. The impact would be less than significant.

CULTURAL RESOURCES

Similar to the proposed project, the Reduced Density Alternative would not significantly impact cultural resources. The site buildings do not appear eligible for listing on the California Register of Historic Resources due to a significant loss of historic integrity. Thus, removal of these buildings as part of the proposed project or the Reduced Density Alternative would not result in a significant impact to historic resources. Both the proposed project and the Reduced Density Alternative involve excavation of on-site soils for hazardous materials remediation and construction of the subterranean parking garage. Although no archaeological or paleontological resources are known to exist at the project site, these construction activities have the potential to unearth previously unknown resources. Both the proposed project and the Reduced Density Alternative would be required to comply with existing regulations should previously unknown artifacts or human remains be uncovered during construction. The impact to archaeological and paleontological resources would be less than significant with compliance with existing regulations.

GEOLOGY AND SOILS

Similar to the proposed project, the Reduced Density Alternative would be required to implement the recommendations of the geotechnical investigation and comply with the California Building Code, West Hollywood Municipal Code, and other state and local regulations. The project site contains artificial fill in the upper levels of soil that are not suitable soils for building construction. As with the proposed project, the Reduced Density Alternative would be required to implement the appropriate building foundation and excavate unsuitable soils as specified in the geotechnical investigation (see Appendix D). Additionally, the project site is subject to seasonal fluctuations of high groundwater levels. Therefore, as with the proposed project, the Reduced Density Alternative would be required to implement a temporary dewatering system during construction and waterproof the building foundation in lieu of a permanent dewatering system during operation, as recommended in the geotechnical investigation (see Appendix D). Compliance with the California Building Code, West Hollywood Municipal Code, other state and local regulations and implementation of the design recommendations in the geotechnical investigation would be required to ensure a less than significant impact related to geology and soils.

GREENHOUSE GAS EMISSIONS

The Reduced Density Alternative would result in construction of 76 fewer residential units than the proposed project and only a four-story building. Because of the reduced size, GHG emissions associated with vehicles trips would be reduced. In addition, fewer people would live at the project site and energy consumption would be reduced. As with the proposed project, this alternative would comply with the plans and policies in the CAP, comply with mitigation measure 3.15-1 in the General Plan EIR for reducing GHG emissions, and meet the requirements of the City's Green Building Ordinance. GHG emissions would be less than the City's current business-as-usual baseline of 9.7 metric tons of CO₂e per year per service population 2008 baseline identified in the EIR for the City of West Hollywood General

5.0 Alternatives

Plan and CAP for the entire City (2010). The CAP features, General Plan measure, and design features would meaningfully reduce GHG emissions. The impact would be less than significant.

HAZARDS AND HAZARDOUS MATERIALS

Site assessments conducted for the proposed project site concluded that elevated concentrations of VOCs and other metals exist in the soil beneath the project site. The contaminants exceed the allowable thresholds. As part of redevelopment of the site, the contaminated soils must be removed. Removal of onsite soils in accordance with DTSC guidance and the RAW would result in remediation of the site to level suitable for residential habitation. Thus, implementation of the proposed project or the Reduced Density Alternative would have the beneficial impact of cleaning up a known hazardous materials site and removing existing emissions of toxic materials and hazardous solid waste. As with the proposed project, compliance with existing regulations during the clean-up process and monitoring during project operation would ensure that the Reduced Density Alternative would result in a less than significant impact related to hazards and hazardous materials.

HYDROLOGY AND WATER QUALITY

Similar to the proposed project, the Reduced Density Alternative would follow guidelines for BMPs per a SWPPP, which would include erosion and sediment control BMPs. Implementation of these requirements, including preparation of a SWPPP, would ensure that impacts to water quality during construction would be less than significant. Unlike the proposed project, construction dewatering and constructing a waterproof membrane around the building foundation would not be required because the Reduced Density Alternative would only include one level of subterranean parking. Compliance with existing state and local regulations would ensure a less than significant impact to water quality from stormwater runoff during long-term operation of the Reduced Density Alternative, the same as for the proposed project.

LAND USE AND PLANNING

Under this alternative, the proposed project site would be developed to a lesser degree than allowed under the West Hollywood General Plan 2035, adopted in September 2011, and the corresponding Zoning Ordinance development standards. Although the overall amount of development would be reduced, the Reduced Density Alternative would include all of the same design elements as the proposed project, including elements intended to encourage pedestrian activity along Santa Monica Boulevard, as well as reduce the need for automobiles by locating development near public transit. Additionally, this alternative would provide affordable housing in accordance with the City's Inclusionary Housing Ordinance. As with the proposed project, this alternative would not conflict with existing plans. The impact would be less than significant.

NOISE

As stated above, the amount of grading and type of construction activities required under the Reduced Density Alternative would be similar to the proposed project. Thus, construction activities associated

with the Reduced Density Alternative, as with the proposed project, would significantly impact the nearby sensitive receptors (adjacent residences) during construction. Due to the proximity of multi-family residences to the project site, the noise levels experienced at these residences would exceed the City Noise Ordinance during project construction. The impact would be significant even with implementation of mitigation. Additionally, as with the proposed project, the proximity of construction equipment to nearby residential uses under the Reduced Density Alternative would create a significant and unavoidable impact to vibration and vibration annoyance, even with implementation of mitigation.

Operational characteristics of Reduced Density Alternative would be similar to the proposed project. However, the number of vehicle trips generated would be less than the proposed project because this alternative provides for fewer residential units. As such, noise levels along affected roadways would be less under this alternative than the proposed project. However, as with the proposed project, operational noise levels would not exceed the City's standards for residential and commercial uses, which are 65 dBA and 70 dBA, respectively. With implementation of mitigation measure NOISE-G, the impact from operational noise to onsite residential would be less than significant. As with the proposed project, the operational noise and vibration impacts to offsite sensitive receptors would be less than significant under the Reduced Density Alternative.

PUBLIC SERVICES, UTILITIES AND RECREATION

The Reduced Density Alternative would result in construction and operation of fewer residential units than the proposed project. As such, the demand for police and fire protection services and recreational amenities would be reduced compared to the proposed project. As with the proposed project, the net increase in residential units would not require the construction of new or expanded police or fire protection facilities in order to maintain acceptable response times. The impact would be less than significant.

Although the Reduced Density Alternative and the proposed project would increase the total population in West Hollywood and add to the existing parkland deficit, the provision of on-site recreational facilities and the payment of park fees would ensure that the Reduced Density Alternative would not result in a substantial physical deterioration of existing recreational facilities. The construction of new or expansion of existing parks and recreational facilities would not be required as a result of the proposed project or the Reduced Density Alternative. The impact to recreation would be less than significant.

As with the proposed project, this alternative would increase the amount of water used and wastewater generated at the project site compared to the existing uses. Thus, this alternative would contribute to an existing deficiency located downstream of the project site within the City of Los Angeles. As with the proposed project, this alternative would be required to design and construct improvements to the wastewater system if the City of Los Angeles determines that there is not adequate capacity downstream prior to obtaining a Certificate of Occupancy.

The land uses that occupied the project site, particularly the metal plating facility, generated large quantities of solid waste. Redevelopment of the site with a mix of commercial and residential uses would substantially reduce the amount of solid waste generated at the project site. However, landfill capacity in

5.0 Alternatives

Los Angeles County is limited. Thus, the Reduced Density Alternative would be required to provide the same recycling and solid waste disposal system as the proposed project and the same mitigation measures related to solid waste would apply. With implementation of mitigation measures, the impact on area landfills would be less than significant.

TRANSPORTATION AND TRAFFIC

The trip distribution patterns under the Reduced Density Alternative would be similar to the proposed project. However, the number of vehicle trips would be reduced by approximately 518 fewer weekday daily trips with the reduction in residential uses to 90 units. As with the proposed project, the Reduced Density Alternative would create significant impacts at two of the study intersections when the Reduced Density Alternative-generated traffic is added to existing traffic volumes in the study area, and significant impacts at three of the study intersections when the Reduced Density Alternative-generated traffic is added to future traffic volumes in the study area. As with the proposed project, impacts to two of the study intersections cannot be mitigated due to physical constraints within the existing right-of-way. The traffic intersection impact would remain significant and unavoidable, which is the same as for the proposed project. Similar to the proposed project, the addition of traffic generated by the Reduced Density Alternative would not create a residential neighborhood intrusion on the surrounding street segments or CMP facilities, and these impacts would be less than significant.

CONCLUSION

Under the Reduced Density Alternative, the project site would be developed at approximately 54 percent of the density of the proposed project. Only 90 residential units would be constructed as part of the residential component and 9,000 square feet of retail/restaurant uses would be provided. These uses would be constructed in a single structure at a maximum of four stories and 45 feet in height. Affordable housing would be provided at the project site in accordance with the City's Inclusionary Housing Ordinance.

Compared to the proposed project, the Reduced Density Alternative would result in reduced impacts related to operational air quality, greenhouse gas emissions, operational noise, public services, utilities and recreation, and transportation and traffic. The Reduced Density Alternative would have the same level of impact as the proposed project for construction air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, construction noise, and transportation and traffic. Unlike the proposed project, this alternative has the potential to result in significant shade and shadow impacts.

The Reduced Density Alternative would provide a mechanism to clean-up existing environmental contamination, and convert an incompatible industrial use into an attractive addition to the adjacent residential and retail uses. This alternative would involve the removal of the existing industrial use structures, which would be an environmental benefit to the community. It would provide for the upgrading, infill, and new development of uses along Santa Monica Boulevard to create a consistent pattern of development and uses, which would serve adjacent residents and employees and continue the

character of specialty uses. The addition of landscape features and street-front retail and restaurant uses would enhance pedestrian activity along Santa Monica Boulevard. It would develop a village-like environment by siting and massing the buildings around common pedestrian areas and open spaces which are linked to Santa Monica Boulevard. However, this alternative would not achieve the basic project objectives as well as the proposed project. The Reduced Density Alternative differs from the proposed project in that it would not increase housing in West Hollywood and provide affordable housing to the same extent as the proposed project. It would not build out the site to the full extent envisioned in the City's General Plan 2035. This alternative would not provide the financial return to facilitate clean-up of the existing environmental contamination through removal of an existing industrial use that continues to generate air and ground pollutants.

5.3.4 MIXED-USE WITH RETAIL USES ONLY ALTERNATIVE

Under the Mixed-Use with Retail Uses Only Alternative, the project site would be developed with 130 residential units and 9,000 square feet of specialty retail uses. No restaurant uses would be developed along the ground floor Santa Monica Boulevard frontage. As with the proposed project, the Mixed-Use with Retail Uses Only Alternative would be constructed in a single structure at a maximum of six stories along Santa Monica Boulevard and three stories on the northern boundary. Parking for the retail uses would still be located on the ground floor level and a subterranean parking level would provide parking for the residential uses. Ingress and egress would be the same as for the proposed project. This alternative would include the creation of a view corridor along the Santa Monica Boulevard frontage. It would provide street-level views to the Hollywood sign, which is currently obscured by the existing structures.

AESTHETICS

Aesthetic and visual impacts associated with this alternative would be similar to those associated with the proposed project. The design of this alternative would be expected to be consistent with the proposed project and newer development that has occurred in the project vicinity. Therefore, it would not conflict with the existing visual character of the project site or the surrounding area. Shadows cast by the Mixed-Use with Retail Uses Only Alternative would be the same as the proposed project because the building heights and articulation would be the same. As with the proposed project, this alternative would not create substantial light and glare impacts with implementation of mitigation measures requiring the use of non-reflective building materials and using low-intensity lighting directed into the site. The Mixed-Use with Retail Uses Only Alternative would not have a significant impact on scenic vistas. The project site does not currently have views of the Hollywood sign or the Hollywood Hills. As such, construction of a three- and six-story structure would not block these views, similar to the proposed project. Further, this alternative would create a new view corridor of the Hollywood sign that is currently not provided by the existing development. Similar to the proposed project, this alternative would have a beneficial impact on scenic vistas.

AIR QUALITY

The amount of grading and type of construction activities required under the Mixed-Use with Retail Uses Only Alternative would be similar to the proposed project. Soils within the project site are contaminated by hazardous materials associated with the existing metal plating facility. Thus, the same amount of soil would have to be removed from the project site under the Mixed-Use with Retail Uses Only Alternative as the proposed project. Further, this alternative would still involve the construction of a subterranean parking garage. Construction activities would be required to comply with SCAQMD Rule 403 and the same mitigation measures that apply to the proposed project would apply to this alternative. The Mixed-Use with Retail Uses Only Alternative would involve the same types and duration of construction activities as the proposed project. Thus, as with the proposed project, construction air quality would exceed the SCAQMD daily emissions thresholds for NO_x even after implementation of mitigation. The short-term regional air quality impact would remain significant and unavoidable. Additionally, as with the proposed project, the Reduced Density Alternative would result in a short-term significant and unavoidable impact related to localized $\text{PM}_{2.5}$ and PM_{10} construction emissions associated with site grading activities.

The Mixed-Use with Retail Uses Only Alternative would result in construction of 36 fewer residential units than the proposed project and no restaurant uses. Because of the reduced building occupancy, air pollutant emissions associated with vehicles trips would be reduced. Fewer people would live at the proposed project site under this alternative. Energy consumption would be reduced compared to the proposed project because less energy would be required for a smaller development. Similar to the proposed project, operational emissions would not exceed the SCAQMD daily emissions thresholds for the Mixed-Use with Retail Uses Only Alternative. The impact would be less than significant.

CULTURAL RESOURCES

Similar to the proposed project, the Mixed-Use with Retail Uses Only Alternative would not significantly impact cultural resources. The site buildings do not appear eligible for listing on the California Register of Historic Resources due to a significant loss of historic integrity. Thus, removal of these buildings as part of the proposed project or the Mixed-Use with Retail Only Alternative would not result in a significant impact to historic resources. Both the proposed project and the Retail Uses Only Alternative involve excavation of on-site soils for hazardous materials remediation and construction of the subterranean parking garage. Although no archaeological or paleontological resources are known to exist at the project site, these construction activities have the potential to unearth previously unknown resources. Both the proposed project and the Mixed-Use with Retail Uses Only Alternative would be required to comply with existing regulations should previously unknown artifacts or human remains be uncovered during construction. The impact to archaeological and paleontological resources would be less than significant with compliance with existing regulations.

GEOLOGY AND SOILS

Similar to the proposed project, the Mixed-Use with Retail Uses Only Alternative would be required to implement the recommendations of the geotechnical investigation and comply with the California Building Code, West Hollywood Municipal Code, and other state and local regulations. The project site contains artificial fill in the upper levels of soil that are not suitable soils for building construction. As with the proposed project, the Mixed-Use with Retail Uses Only Alternative would be required to implement the appropriate building foundation and excavate unsuitable soils as specified in the geotechnical investigation (see Appendix D). Additionally, the project site is subject to seasonal fluctuations of high groundwater levels. Therefore, as with the proposed project, the Mixed-Use with Retail Uses Only Alternative would be required to implement a temporary dewatering system during construction and waterproof the building foundation in lieu of a permanent dewatering system during operation, as recommended in the geotechnical investigation (see Appendix D). Compliance with the California Building Code, West Hollywood Municipal Code, other state and local regulations and implementation of the design recommendations in the geotechnical investigation would be required to ensure a less than significant impact related to geology and soils.

GREENHOUSE GAS EMISSIONS

The Reduced Density Alternative would result in construction of 36 fewer residential units than the proposed project and no restaurant uses. Because of the reduced size, GHG emissions associated with vehicles trips would be reduced. In addition, fewer people would live and work at the project site and energy consumption would be reduced. As with the proposed project, this alternative would comply with the plans and policies in the CAP, comply with mitigation measure 3.15-1 in the General Plan EIR for reducing GHG emissions, and meet the requirements of the City's Green Building Ordinance. GHG emissions would be less than the City's current business-as-usual baseline of 9.7 metric tons of CO₂e per year per service population identified in the EIR for the City of West Hollywood General Plan and CAP for the entire City (2010). The CAP features, General Plan measure, and design features would meaningfully reduce GHG emissions. The impact would be less than significant.

HAZARDS AND HAZARDOUS MATERIALS

Site assessments conducted for the project site concluded that elevated concentrations of VOCs and other metals exist in the soil beneath the site above applicable thresholds. These contaminants currently exceed the allowable thresholds and the site is listed as a known hazardous waste site. In addition, the existing metal plating facility generates toxic air emissions and hazardous solid waste as part of its operation. As part of this alternative, contaminated soils would be removed. Removal of onsite soils in accordance with DTSC guidance and the RAW would result in remediation of the project site to allow construction of residential uses. Thus, implementation of the proposed project or the Mixed-Use with Retail Uses Only Alternative would have the beneficial impact of cleaning up a known hazardous materials site and removing existing emissions of toxic materials and hazardous solid waste. As with the proposed project, compliance with existing regulations during the clean-up process and monitoring during project operation

5.0 Alternatives

would ensure that the Mixed-Use with Retail Uses Only Alternative would result in a less than significant impact related to hazards and hazardous materials.

HYDROLOGY AND WATER QUALITY

Similar to the proposed project, the Mixed-Use with Retail Uses Only Alternative would follow guidelines for BMPs per a SWPPP, which would include erosion and sediment control BMPs. Implementation of these requirements, including preparation of a SWPPP, would ensure that impacts to water quality during construction would be less than significant. Unlike the proposed project, construction dewatering and constructing a waterproof membrane around the building foundation would not be required because the Mixed-Use with Retail Uses Only Alternative would only include one level of subterranean parking. Compliance with existing state and local regulations would ensure a less than significant impact to water quality from stormwater runoff during long-term operation of the Mixed-Use with Retail Uses Only Alternative, the same as for the proposed project.

LAND USE AND PLANNING

Under the Mixed-Use with Retail Uses Only Alternative, fewer residential units would be provided than under the proposed project, and no restaurant uses would be included. All other aspects of the project, including landscaping, open space, height, and massing would be similar to those included under the proposed project. The Mixed-Use with Retail Uses Only Alternative would also take advantage of density bonuses allowed under the Mixed-Use Incentive Overlay Zone and for the provision of on-site affordable housing, as well as inclusionary housing parking standards. As such, the Mixed-Use with Retail Uses Only Alternative would be consistent with applicable plans and policies of the General Plan and Zoning Ordinance, similar to the proposed project, upon receiving a Modification Permit for an additional two feet in height and a reduction in open space. As with the proposed project, this alternative would not conflict with the existing plans. The impact would be less than significant.

NOISE

As stated above, the amount of grading and type of construction activities required under the Mixed-Use with Retail Uses Only Alternative would be similar to the proposed project. Thus, construction activities associated with the Mixed-Use with Retail Uses Only Alternative, as with the proposed project, would significantly impact the nearby sensitive receptors (adjacent residences) during construction. Due to the proximity of multi-family residences to the project site, the noise levels experienced at these residences would exceed the City Noise Ordinance during project construction. The impact would be significant even with implementation of mitigation. Additionally, as with the proposed project, the proximity of construction equipment to nearby residential uses under the Mixed-Use with Retail Uses Only Alternative would create a significant and unavoidable impact to vibration and vibration annoyance, even with implementation of mitigation.

Operational characteristics of Mixed-Use with Retail Uses Only Alternative would be similar to the proposed project. However, the number of vehicle trips generated would be less than the proposed project because this alternative provides for fewer residential units. As such, noise levels along affected

roadways would be less under this alternative than the proposed project. However, as with the proposed project, operational noise levels would not exceed the City's standards for residential and commercial uses, which are 65 dBA and 70 dBA, respectively. With implementation of mitigation measure NOISE-G, the impact from operational noise to onsite residential would be less than significant. As with the proposed project, the operational noise and vibration impacts to offsite sensitive receptors would be less than significant under the Mixed-Use with Retail Uses Only Alternative.

PUBLIC SERVICES, UTILITIES AND RECREATION

The Mixed-Use with Retail Uses Only Alternative would result in construction and operation of 36 fewer residential units and 2,500 less square feet of restaurant uses than the proposed project. As such, the demand for police and fire protection services and recreational amenities, which is based on population, would be the slightly less than the proposed project. As with the proposed project, the increase in net residential units would not require the construction of new or expanded police or fire facilities in order to maintain acceptable response times. The impact to police and fire would be less than significant.

Although the Mixed-Use with Retail Uses Only Alternative and the proposed project would increase the total population in West Hollywood and add to the existing parkland deficit, the provision of on-site recreational facilities and the payment of park fees would ensure that the proposed project does not result in a substantial physical deterioration of existing recreational facilities. The construction of new or expansion of existing parks and recreational facilities would not be required as a result of the proposed project or the Mixed-Use with Retail Uses Only Alternative. The impact to recreation would be less than significant.

As with the proposed project, this alternative would increase the amount of water used and wastewater generated at the project site compared to the existing uses. Thus, this alternative would contribute to an existing deficiency located downstream of the project site within the City of Los Angeles. As with the proposed project, this alternative would be required to design and construct improvements to the wastewater system if the City of Los Angeles determines that there is not adequate capacity downstream prior to obtaining a Certificate of Occupancy.

The land uses that occupied the project site, particularly the metal plating facility, generate large quantities of solid waste. Redevelopment of the site with a mix of commercial and residential uses would substantially reduce the amount of solid waste generated at the proposed project site. However, landfill capacity in Los Angeles County is limited. Thus, the Mixed-Use with Retail Uses Only Alternative would be required to provide the same recycling and solid waste disposal system as the proposed project and the same mitigation measures related to solid waste would apply. With implementation of mitigation measures, the impact on area landfills would be less than significant.

TRANSPORTATION AND TRAFFIC

The trip distribution patterns would be similar under the Mixed-Use with Retail Uses Only Alternative as the proposed project. However, the number of vehicle trips would be reduced. This alternative would be expected to generate 36 fewer daily trips than the proposed project with the reduction in residential units

5.0 Alternatives

and elimination of restaurant uses. As with the proposed project, the Mixed-Use with Retail Uses Only Alternative would create significant impacts at two of the study intersections when the Mixed-Use with Retail Uses Only Alternative-generated traffic is added to existing traffic volumes in the study area, and significant impacts at three of the study intersections when the Mixed-Use with Retail Uses Only Alternative-generated traffic is added to future traffic volumes in the study area. As with the proposed project, impacts to two of the study intersections cannot be mitigated due to physical constraints within the existing right-of-way. The traffic intersection impact would remain significant and unavoidable, which is the same as for the proposed project. Similar to the proposed project, the addition of traffic generated by the Mixed-Use with Retail Uses Only Alternative would not create a residential neighborhood intrusion on the surrounding street segments or CMP facilities, and these impacts would be less than significant.

CONCLUSION

Under the Mixed-Use with Retail Uses Only Alternative, the project site would be developed with 130 residential units and 9,000 square feet of retail uses. No restaurant uses would be developed and there would be 36 fewer residential units than the proposed project. As with the proposed project, the Mixed-Use with Retail Uses Only Alternative would be constructed in a single structure at a maximum of six stories along Santa Monica Boulevard and three stories on the northern boundary. Compared to the proposed project, the Mixed-Use with Retail Uses Only Alternative would result in reduced impacts related to operational air quality, greenhouse gas emissions, and operational noise. However, no significance conclusions would be expected to change.

The Mixed-Use with Retail Uses Only Alternative would provide a mechanism to clean-up existing environmental contamination, and convert an incompatible industrial use into an attractive addition to the adjacent residential and retail uses. This alternative would involve the removal of existing industrial use structures, which would be an environmental benefit to the community. It would provide for the upgrading, infill, and new development of uses along Santa Monica Boulevard to create a consistent pattern of development and uses, which would serve adjacent residents and employees and continue the character of specialty uses. It would increase housing in West Hollywood and provide affordable housing to a similar extent as the proposed project. In addition, the Mixed-Use with Retail Uses Only Alternative would result in an intensification of urban uses.

However, this alternative would not achieve all of the basic project objectives as well as the proposed project. This alternative differs from the proposed project in that elimination of the restaurant component would not enhance pedestrian activity along Santa Monica Boulevard to the same extent as a frontage developed exclusively with retail shops. The commercial uses are intended to be developed based on market demands and the needs of neighborhood in order to generate pedestrian activity along Santa Monica Boulevard. Retail uses would not provide a reason to linger at the project site and it would not attract as many pedestrians. Specifically, it would not achieve the goal of providing economically viable neighborhood serving retail/restaurant uses along Santa Monica Boulevard. Sit-down restaurant uses, or coffee houses would all provide valuable services that complement the neighborhood. Restricting the type of permissible commercial uses would undermine the project's economic viability and thereby

potentially hinder the basic project objective of redeveloping an environmentally compromised site with vibrant retail and housing. This alternative would not provide the financial return to facilitate clean-up of the existing environmental contamination through removal of an existing industrial use that continues to generate air and ground pollutants.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Due to the reduction in vehicle trips associated with the Mixed-Use with Retail Uses Only Alternative compared to the proposed project, and the resultant reduction in operational noise, operational air quality, and global climate, this alternative would be considered the environmentally superior alternative. The Reduced Density Alternative would provide 76 fewer residential units than the proposed project and 40 fewer residential units than the Mixed-Use with Retail Uses Only Alternative, resulting in the lowest number of daily trips of all of the alternatives. However, the Reduced Density Alternative, with its uniform building height, has the potential to create greater shade and shadow impacts than the proposed project and the Mixed-Use with Retail Uses Only Alternative. Therefore, the Mixed-Use with Retail Uses Only Alternative is considered the environmentally superior alternative. It would allow for the remediation of the project site, which would be an environmental benefit to the community. However, as stated above, this alternative would not achieve all of the basic project objectives as well as the proposed project. It would provide fewer affordable units and would not activate the street as well as the proposed project. Further, this alternative would not provide the financial return to facilitate clean-up of the existing environmental contamination through removal of an existing industrial use that continues to generate air and ground pollutants. Table 5-1 provides a comparison of the impacts of the alternatives to the proposed project.

5.0 Alternatives

TABLE 5-1 COMPARISON OF IMPACTS FOR THE PROPOSED PROJECT AND THE ALTERNATIVES

Impact Area	Proposed Project	No Project Alternative	Reduced Density Alternative	Mixed-Use with Retail Uses Only Alternative
Aesthetics	II	IV (Less)	I (Greater)	II (Similar)
Air Quality: Construction	I	IV (Less)	I (Similar)	I (Similar)
Operation	III	I (Less)	III (Less)	III (Less)
Cultural Resources	III	IV (Less)	III (Similar)	III (Similar)
Geology and Soils	III	IV (Less)	III (Similar)	III (Similar)
Greenhouse Gas Emissions	III	III (Less)	III (Less)	III (Less)
Hazards and Hazardous Materials	III	I (Greater)	III (Similar)	III (Similar)
Hydrology and Water Quality	III	IV (Less)	III (Similar)	III (Similar)
Land Use and Planning	III	IV (Less)	III (Greater)	III (Similar)
Noise/Vibration: Construction	I	IV (Less)	I (Similar)	I (Similar)
Operation	II	IV (Less)	II (Less)	II (Similar)
Public Services, Utilities and Recreation	II	I (Less)	II (Less)	II (Similar)
Transportation and Traffic	I	IV (Less)	I (Similar)	I (Less)

Notes:

- I: Significant and Unavoidable Impact
- II: Potentially Significant Impact Unless Mitigated
- III: Less Than Significant Impact
- IV: No Impact

- Less: Impact is lower in magnitude than impacts of the proposed project
- Similar: Impact is similar in magnitude to impacts of the proposed project
- Greater: Impact is greater in magnitude than impacts of the proposed project
- Mixed: Some impacts are less than, similar to, and/or greater in magnitude than impacts of the proposed project

6.0 CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft EIR and Recirculated Draft EIR both in response to the comments received during the public review period for the Draft EIR and the Recirculated Draft EIR. The following clarifications and modifications also show revisions made to convert the Draft EIR and Recirculated Draft EIR into this Final EIR, a single document that encompasses the final impact analysis for the proposed project. None of these revisions made to the Draft EIR and Recirculated Draft EIR have resulted in new significant impacts or mitigation measures, nor has the severity of an impact increased. None of the criteria for recirculation have been met.

The changes to the Draft EIR and Recirculated Draft EIR are listed by section, page number or paragraph number, as applicable. Text which has been removed is shown with a ~~strike through~~ line, while text that has been added is shown underlined, as shown herein.

<u>Page</u>	<u>Clarification/Revision</u>
-------------	-------------------------------

ES-3	<i>2nd paragraph, 2nd to last sentence is modified as follows:</i>
------	--

The proposed project would provide approximately 35,000 square feet of open space in the form of private balconies, fitness room, pool, roof deck, lounge, and ~~theater~~ common patio areas.

ES-4	<i>Last paragraph at the bottom of the page, 2nd sentence is modified as follows:</i>
------	--

The Faith Plating Company conducted onsite chrome, copper, and nickel plating activities at 7141 Santa Monica Boulevard, and 1107 and 1117 Detroit Street ~~since~~ from 1937 through 2012.

ES-5	<i>1st paragraph at the top of the page is modified as follows:</i>
------	--

Therefore, the applicant entered into a voluntary cleanup agreement (VCA) with California Department of Toxic Substances Control (DTSC). Under the VCA, the applicant would engage in investigation and environmental remediation of the proposed project site under the supervision of DTSC. The environmental remediation would include the implementation of a Remedial Removal Action Work Plan (RAW) to remove onsite contaminated soil contaminants to the satisfaction of DTSC. Prior to the start of construction, the project site would be clearly defined with fencing and staking. Then the project site would be abated for ACM and LBP prior to demolition of existing buildings and site clearing. The next step would be excavation of contaminated soil and other site cleanup activities in accordance with the VCA and under the oversight of DTSC. ~~Under the VCA, the applicant would engage in investigation and environmental remediation of the project site under the supervision of DTSC. The environmental remediation would include the implementation of the RAW to remove contaminants to the satisfaction of DTSC. After excavation of all contaminated soils from the project site has activities have been completed to the satisfaction of DTSC, closure~~

6.0 Clarifications and Modifications

and post-closure activity would involve testing of onsite soils and documentation that the remaining soil would have concentrations of heavy metals less than 10 times their respective Soluble Threshold Limit Concentration (STLC). A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter, per the Condition of Approval of the proposed project, the City would issue a building permit and building construction would begin. In addition, per the Removal Action Objectives in the RAW, groundwater would be monitored for a two-year period following removal of contaminated soils.

ES-7 *AIR-1, mitigation measures is modified as follows:*

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

AIR-L All on-site construction equipment shall meet EPA Tier 3 or higher emissions standards according to the following:

- Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

ES-10 *NOISE-1, mitigation measures is modified as follows:*

NOISE-E ~~If feasible, the~~ The construction contractor shall install a 12-foot high temporary barrier along the northern property line. The acoustical barrier shall be constructed of material having a minimum surface weight of two pounds per square foot or greater, and a demonstrated Sound Transmission Class rating of 25 or greater as defined by American Society for Testing and Materials Test Method E90. The barrier shall be required during the excavation and site preparation phases of construction.

ES-11 *PS-3, Potential Environmental Impacts is modified as follows:*

PS-3: The proposed project may require or result in the construction of new wastewater conveyance. The proposed project would not result in a determination by the wastewater treatment provider that serves or may serve the project that it ~~has~~ lacks adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

2-6 *1st full paragraph, 2nd to last sentence is modified as follows:*

The proposed project would provide approximately 35,000 square feet of open space in the form of private balconies, fitness room, pool, roof deck, lounge, and ~~theater~~ common patio areas.

2-12 *4th paragraph is modified as follows:*

The Faith Plating Company conducted onsite chrome, copper, and nickel plating activities at 7141 Santa Monica Boulevard, and 1107 and 1117 Detroit Street ~~since~~ from 1937 through 2012.

2-12 *Last paragraph at the bottom of the page is modified as follows:*

The applicant entered into a voluntary cleanup agreement (VCA) with the California Department of Toxic Substances Control (DTSC). Under the VCA, the applicant would engage in investigation and environmental remediation of the proposed project site under the supervision of DTSC. The environmental remediation would include the implementation of a Removal Remedial Action Work Plan (RAW) to remove onsite contaminated soils ~~contaminants~~ to the satisfaction of DTSC.

2-13 *1st paragraph at the top of the page is modified as follows:*

The RAW, which has been approved by DTSC, requires specific removal action objectives (RAO) based on site-specific media of concern chemicals of concern (COCs), exposure routes and receptors, and acceptable contaminant concentrations or range of contaminant concentrations for each exposure route. The media of concern for the project site are soil,

6.0 Clarifications and Modifications

subsurface gas, and ground water. The COCs for the site are heavy metals (primarily chromium, nickel, copper, and lead), VOCs (perchloroethylene [PCE], trichloroethylene [TCE], benzene and naphthalene), and petroleum hydrocarbons. ~~While these RAOs have not received final approval from DTSC, they do serve as a useful guide for the types of remediation that is contemplated for the project site.~~ The RAOs for the project site are:

2-14 *3rd paragraph is modified as follows:*

Prior to the start of construction, the project site would be clearly defined with fencing and staking. Then the project site would be abated for ACM and LBP prior to demolition of existing buildings and site clearing. The next step would be excavation and site cleanup in accordance with the VCA, as described in Section 2.5 above. Under the VCA, the applicant would engage in investigation and environmental remediation of the project site under the supervision of DTSC. The environmental remediation would include the implementation of the RAW to remove onsite contaminated soils ~~contaminants~~ to the satisfaction of DTSC. After excavation of all contaminated soils from the project site has ~~activities have been completed to the satisfaction of DTSC,~~ closure and post-closure activity would involve testing of onsite soils and documentation that the remaining soil would have concentrations of heavy metals less than 10 times their respective STLC. A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter, per the Condition of Approval of the proposed project, the City would issue a building permit and building construction would begin.

3.1-6 *1st paragraph at the top of the page is modified as follows:*

On the northern side of Santa Monica Boulevard, immediately west of the project site, is a single-story brown-brick café (see Figure 3.1-9). A commercial property ~~is~~ was located along the eastern side of Detroit Street adjacent to Santa Monica Boulevard (see Figure 3.1-10), which has since been demolished and construction of the Monarch West Hollywood – Santa Monica & La Brea Project is now underway. This ~~commercial~~ property used to feature ~~features~~ an approximately 6 feet tall red/brown metal fence. ~~One with one- and two-story structures are~~ visible behind the fence. The project will consist of 184 residential units and 13,350 square feet of ground floor retail when construction is complete in late 2013. Neither of these sites is unexpected in an urban setting and consequently, neither is likely to be especially memorable.

3.1-6 *Section 3.1.2 Regulatory Setting under the heading City of West Hollywood General is deleted and replaced as follows:*

~~There are no elements in the City of West Hollywood General Plan that specifically refer to aesthetics or visual quality; however, the Land Use and Urban Design Element contains several policies related to the appearance of new structures, stating that “in general, new development in the City’s commercial corridors shall be consistent in scale and character~~

~~with existing uses” and “new development shall be required to contribute to the overall quality and character of the City. All uses will be required to provide extensive landscaping on-site and along street frontages” (City of West Hollywood 1988).~~

~~This Element also notes that there are differing opinions about the optimal height for new buildings: “[O]ne suggests that all new construction be limited to low rise structures while the other suggests that taller buildings be permitted to promote variability and visual interest.” However, the Element notes that discussion of visual quality should include “the impacts on viewsheds of the mountains and Los Angeles basin; shadow and bulk effects of tall buildings; and potential visual monotony of continuous low rise ‘bulky’ buildings” (City of West Hollywood 1988).~~

~~The Land Use and Urban Design Element encourages the development of pedestrian friendly design. “In all commercial areas of the city, it is a basic land use principle that the uses and design of development induce and enhance high levels of pedestrian activity. This would be achieved through limiting the ground elevation of structures for the majority of every block to ‘pedestrian friendly’ uses (i.e., high turnover, customer active uses, such as retail sales establishments and restaurants). Additionally, pedestrian activity will be enhanced by requirements for the architectural design and siting of the structures” (City of West Hollywood 1988).~~

~~The following are policies from the Land Use and Urban Design Element with which the project would be required to comply.~~

~~Policy 1.13.31 — Encourage that new development be designed to create a “village like” environment, by the siting and massing of buildings around common pedestrian areas and open spaces which are linked to Santa Monica Boulevard, inclusion of pedestrian oriented uses at the ground elevation, and use of vertical setbacks of buildings in excess of 30 feet above grade.~~

~~Policy 1.35.32 — c. — Dedicate the courtyard as a semi-public space which is easily accessed from the street, with a grand processional entry, grand stairs if appropriate, and so on. The courtyard is best if located at street level or a few feet above.~~

~~e. — Design the courtyard space with a distinctive character created through special landscape elements such as fountains, lush landscaping, reflective pools, towers, decorative tile, and special entry stairs to second level units.~~

~~h. — Emphasize the importance of relationship of the housing project to the context of the street.~~

6.0 Clarifications and Modifications

- ~~Policy 1.29.30—Require that new residential development be compatible with and complement existing structures, including the:~~
- ~~a.—maintenance of the predominant or average existing front yard setbacks, except for balconies or building extensions to achieve additional common courtyard area;~~
 - ~~b.—inclusion of a vertical setback of one foot for every two feet in height above the second story along 50 percent of the building front;~~
 - ~~c.—use of compatible building materials, colors, and forms, while allowing flexibility for distinguished architectural design solutions;~~
 - ~~d.—use of site landscape to complement the architectural design of the structure;~~
 - ~~e.—limitation of front yard paving for driveways with a maximum width of 24 feet, or 40 percent of the property frontage, whichever is less;~~
 - ~~f.—covering of all required on-site parking;~~
 - ~~g.—use of a minimum of 50 percent of the street facing facade of the building at the graded elevation of the site for occupiable space and entries, unless inappropriate, where the intent shall be preserved by the use of architectural design elements which shall visually convey the sense of occupiable space;~~
 - ~~h.—incorporation of a minimum of 60 percent of the required common open space at grade or the level of the first habitable floor;~~
 - ~~i.—design of common space so that it is easily accessible and of sufficient size to be usable by residents; and~~
 - ~~j.—inclusion of entries which convey a sense of individual identity for each residential unit at the lowest habitable level facing a public street or courtyard.~~

~~Policy 1.29.31—Encourage that multi-unit residential structures incorporate architectural design details and elements which provide visual character and interest, avoiding flat planar walls and "box-like" appearances, and reflect the heritage of significant structures in the City (e.g., use of courtyards, balconies, offset planes and levels, deeply recessed or projecting windows, sloping roofs, and extensively landscaped yards).~~

~~Policy 1.49.1 Encourage that new structures be designed in architectural styles which reflect the City's diversity and creativity; yet are compatible in scale and character with the City's existing buildings within residential neighborhoods and commercial districts.~~

There are no elements in the City of West Hollywood General Plan that specifically refer to aesthetics or visual quality; however, the Land Use and Urban Form Element contains several policies related to the appearance of new structures and the integration of new uses within the existing urban context. It also designates the project area the Santa Monica/La Brea Transit District, the intent of which is to “create a high-intensity, lively and vibrant transit node with an active sidewalk scene and an identifiable sense of place, marking a major eastern entry to the City” (City of West Hollywood 2011).

The following are policies from the Land Use and Urban Form Element with which the proposed project would be required to comply.

LU 1.2 Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.

LU 2.5 Allow increases to permitted density/intensity and height for projects that provide affordable housing.

LU 4.2 Continue to improve the pedestrian environment through a coordinated approach to street tree planting, sidewalk maintenance and enhancement, pedestrian amenities, and a focus on human-scale frontage design for buildings renovations and new development projects.

LU 4.4 Require development projects along commercial corridors to employ architectural transitions to adjoining residential properties to ensure compatibility of scale and a sense of privacy for the existing residences.

LU 4.5 Require development projects to incorporate landscaping in order to extend and enhance the green space network in the City.

LU 5.1 Continue to encourage diverse architectural styles that reflect the City's diversity and creativity.

LU 5.4 Encourage the use of high quality, permanent building materials that do not require excessive maintenance and utilize the design review process to evaluate such materials.

LU 6.1 Where appropriate, development projects should incorporate open spaces that are accessible to the public.

6.0 Clarifications and Modifications

LU 7.3 Require development projects to install street trees consistent with the City's street tree specifications along public sidewalks adjacent to the project site, as sidewalk width permits, where such trees do not currently exist or where replacement is needed.

LU 14.6 Encourage the design of buildings to emphasize this area as a unique point along the Santa Monica Boulevard corridor and within the City.

LU 14.8 Enhance pedestrian activity along Santa Monica Boulevard through the following building and public realm activities.

- a. Improve the streetscape with tree plantings, landscaping, and public amenities such as benches.
- b. Locate building at or near the sidewalk edge to create an attractive pedestrian environment.
- c. Encourage projects to incorporate landscape elements into the design of buildings to enhance green space in the City.
- d. Support pedestrian activity and the experience along the streetscape through active and transparent ground floor frontages.

3.1-6 *4th paragraph is modified as follows:*

~~As indicated in the Formosa Specific Plan, the~~ The design of the proposed project is intended to avoid monotony and repetition in building elevations by varying building heights, massing, rooflines, color, texture, materials, and placement. It does not allow long, uninterrupted building planes by varying massing and/or facade treatments. ~~Per the Specific Plan, the~~ The design articulates each building elevation, providing visual interest with window patterns, size, and placement. It also integrates overhangs and other external elements into the overall building design. The varying heights, rooflines, color and textures of the proposed structure would provide the visual variety to soften the bulk and mass of the proposed structure.

3.1-22 *3rd paragraph is modified as follows:*

The existing site uses have nighttime building lighting and security lighting. The proposed project would also use nighttime building lighting and security lighting; however, the increased intensity of use of the site would create additional sources of light and glare than currently exist. ~~The Formosa Specific Plan requires~~ However, all outdoor lighting and other means of illumination for signs, structures, landscaping, parking, loading, unloading, and similar areas ~~to~~ would be focused, directed, and arranged to prevent glare and illumination on streets or adjoining properties. ~~It~~ The proposed project would also ~~requires the use of~~ low intensity, energy conserving night lighting. A detailed lighting plan has not been finalized for

this project; however, ~~meeting the requirements of the Specific Plan,~~ project design in conjunction with mitigation measure VIS-A, would reduce potential lighting impacts to a less than significant level.

3.1-22 *4th paragraph, 1st sentence is modified as follows:*

The construction materials intended for the proposed project are not yet finalized; however, ~~the Specific Plan states it is anticipated~~ that there would be variation of compatible building materials for large expanses of wall surface (tile, cement plaster, glass, metal panels, etc).

3.2-6 *1st paragraph at the bottom of the page, 2nd sentence is modified as follows:*

The facility has ~~and~~ active permits for the chrome plating process line, a mist eliminator, abrasive blasting, and a spray booth. The most recent publicly available emissions data is from 2000.

3.2-14 *4th paragraph, last sentence is modified as follows:*

Implementation of mitigation measures AIR-A through ~~AIR-J~~ AIR-L would be required to reduce ~~the impact to a less than significant level~~ regional construction emissions.

3.2-18 *4th paragraph, 1st sentence is modified as follows:*

As shown in Table 3.2-3 above, Faith Plating ~~currently~~ recently emitted approximately 0.60 tons per year of criteria air pollutants and 1.5 pounds per year of TACs.

3.2-20 *Mitigation measures are modified as follows:*

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

AIR-L All on-site construction equipment shall meet EPA Tier 3 or higher emissions standards according to the following:

- Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

6.0 Clarifications and Modifications

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

3.2-21 *2nd paragraph, 1st sentence is modified as follows:*

Mitigation measures AIR-A through ~~AIR-G~~ AIR-L would reduce regional NO_x emissions by at least five percent.

3.3-2 *2nd paragraph, 3rd sentence is modified as follows:*

By the 1950s, the area had been subdivided and heavily developed as the movie industry flourished in this part of the City and entertainment workers moved into nearby housing. West Hollywood also served as a center of production associated with the continuous use of the Lot as a movie studio and the City as a whole often served as a backdrop for location filming. The eastern portion of the City became a regional population center for Jews from the Former Soviet Union beginning in the last decades of the twentieth century and into the twenty-first century (City of West Hollywood 2008).

3.3-5 *Last paragraph at the bottom of the page is modified as follows:*

The Historic Preservation Commission may approve a nomination application for and recommend designation of, and the Council may designate a cultural resource, or any portion thereof (both interior and exterior) or historic district in compliance with Sections 19.58.60 (Designation of Historic Districts) and 19.58.070 (Review and Approval of Designations) below if it finds that the cultural resource meets one or more of the following criteria:

3.3.6 *Bullet D at the bottom of the page is modified as follows:*

D. Notable Work. It is representative of the work of a notable architect, builder, or designer (Ord. 03-663 § 4 (part), 2003; Ord. 02-643 § 48, 2003; Ord. 01-594 § 2 (Exh. A (part)), 2001).

3.3-7 *1st paragraph is added as follows:*

The City of West Hollywood Municipal Code Section 19.58.020(b) states that one of the purposes of the Historic Preservation Ordinance is “developing and maintaining an appropriate setting and environment for cultural resources, cultural resource sites, and historic districts.” In accordance with Section 19.58.040(h), the Historic Preservation Commission has the authority of “Reviewing all applications for permits, environmental assessments, environmental impact reports, environmental impact statements, and other similar documents pertaining to designated and potential cultural resources, or related neighboring property within public view. Neighboring properties within public view shall mean any property that can be seen from a public right-of-way and which is within the same street block (on either side of the street) as a cultural resource.” Because the proposed project is located directly across the street from the Formosa Café, which is a locally-designated historic resource, this EIR was subject to the review of the Historic Preservation Commission.

3.3-9 *Impact CR-2, 1st paragraph is modified as follows:*

~~No prehistoric or historic archaeological resources have been previously recorded within the limits of the record search during ground disturbing activities in the project vicinity. Additionally, the pedestrian site survey conducted in connection with this project failed to reveal any surface evidence of archaeological resources within the project site. Lastly, ground disturbing activities within the project site boundaries have not previously encountered historic or prehistoric archaeological resources. Therefore, archaeological resources are not expected to be encountered during construction, and the impact would be less than significant. No mitigation measures are required. However, the lack of surface evidence of archaeological materials does not preclude the possibility that subsurface archaeological materials may exist. In the event any archaeological materials are encountered during earthmoving activities, the construction contractor would be required cease activity in the affected area until the discovery can be evaluated by a qualified cultural resources specialist (archaeologist) in accordance with the provisions of CEQA Guidelines Section 15064.5. Compliance with existing regulations would ensure a less than significant impact, and no mitigation measures are required.~~

3.3-9 *Impact CR-3, 1st paragraph is modified as follows:*

A paleontological resources assessment was conducted by Dr. Samuel McLeod, Vertebrate Paleontology Division of the Natural History Museum of Los Angeles County on November 16, 2007. While no fossil vertebrate localities have been recorded within the boundaries of the project site, there are known fossil resources nearby. Ground disturbing activities within the project site boundaries have not previously encountered fossil resources. Therefore, paleontological resources are not expected to be encountered during construction, and the impact would be less than significant. No mitigation measures are required. In the event any paleontological resources are encountered during earthmoving activities, the construction

6.0 Clarifications and Modifications

contractor shall cease activity in the affected area until the discovery can be evaluated by a qualified paleontological resource specialist in accordance with the provisions of CEQA Guidelines Section 15064.5. ~~Compliance with existing regulations would ensure a less than significant impact, and no mitigation measures are required.~~

3.6-2 *2nd and 3rd bullets at the top of the page are modified as follows:*

- Professional Services Industry, Inc. *Remedial Removal Action Work Plan for the property at 7141 and 7155 Santa Monica Boulevard and 1107-1117 Detroit Street, West Hollywood, Los Angeles County, California.* ~~September 24, 2007~~ August 9, 2008.
- Professional Services Industry, Inc. *Human Health Risk Assessment for the property at 7141 and 7155 Santa Monica Boulevard, West Hollywood, Los Angeles County, California 90046.* ~~September 24, 2007~~ July 7, 2008.

3.6-2 *Section 3.6.1 Environmental Setting, 2nd paragraph is modified as follows:*

The 7141 Santa Monica Boulevard and 1107 and 1117 Detroit Street parcels have been occupied by Faith Plating Company ~~since~~ from 1937 through 2012, and contain five contiguous structures totaling approximately 36,000 square feet. The structures are interconnected, two-story, wood-framed plaster buildings constructed between 1926 and 1958. ~~Faith Plating conducts metal fabrication and plating operations in the south central portion of the property. Discharge of treated industrial waste is located in the north central portion of the property. Underground fuel storage tanks were formerly located in the northern portion of the property.~~ The plating operation, polishing, and metal working area are located in the first floor of the largest building, located in the southeastern portion of the property. The southeastern main building and the adjacent building in the southwestern portion of the property house degreasing operations. An employee locker room and a bumper storage area are located on the second floor of the main building. The northeastern building contains bumper metal work and polishing areas on the first floor, and bumper storage on the second floor, which appears to have previously been used as apartments. In the northern portion of the property, a small, unpaved parking lot is now used for automobile maintenance and bumper storage and contains an onsite wastewater treatment plant, clarifier, hydraulic lift, and a monitoring well.

3.6-2 *Section 3.6.1 Environmental Setting, 3rd paragraph has been deleted.*

3.6-3 *Section 3.6.1 Environmental Setting, headings, paragraphs, and tables have been added as follows:*

WASTEWATER DISCHARGE PERMIT

As part of the existing conditions, Faith Plating recently operated pursuant to an industrial wastewater discharge permit No. 000J122557 and Los Angeles County Health Department

permit No. 105700. These permits specify the quality of wastewater that Faith Plating may discharge into the wastewater collection and treatment system, the amount of pre-treatment required, as well as the quality of storm water runoff from the facility that may be discharged into local storm drains and ultimately into the Pacific Ocean. The wastewater produced from the project site resulted from rinses of plating, anodizing, and stripping. The wastewater contained, among other things, chromium, copper, and nickel. Pre-treatment consisted of chrome reduction, neutralization, metals precipitation, and filter press.

Numerous Notices of Non-Compliance or Notices of Violation (NOV) were issued against Faith Plating from 1992 to 2007. The majority of the NOVs were due to insufficient pre-treatment of nickel prior to discharge and violations of the EPA monthly average efficiency discharge limit.

AIR QUALITY PERMITS

As part of the existing conditions, Faith Plating recently operated pursuant to permits issued by the SCAQMD, permit No.s F43973, F56683, F56684, and F7933. These permits regulate the emissions of VOCs and various TACs (including hexavalent chromium). Based on a 2000 annual emissions report, Faith Plating produced the criteria air pollutants shown in Table 3.6-1.

TABLE 3.6-1 CRITERIA AIR POLLUTANTS PRODUCED BY FAITH PLATING (YEAR 2000)

<u>Pollutant</u>	<u>Description</u>	<u>Annual Emission (tons per year)</u>
<u>CO</u>	<u>Carbon Monoxide</u>	<u>0.149</u>
<u>NO_x</u>	<u>Nitrogen Oxide</u>	<u>0.182</u>
<u>ROG</u>	<u>Reactive Organic Gases</u>	<u>0.174</u>
<u>SO_x</u>	<u>Sulfur Oxide</u>	<u>0.001</u>
<u>TSP</u>	<u>Total Suspended Particulates</u>	<u>0.095</u>

Based on a 2000 annual emissions report, Faith Plating produced the toxic air pollutants shown in Table 3.6-2.

6.0 Clarifications and Modifications

TABLE 3.6-2 TOXIC AIR POLLUTANTS PRODUCED BY FAITH PLATING (YEAR 2000)

<u>Pollutant ID</u>	<u>Description</u>	<u>Annual Emission (pounds per year)</u>
<u>75070</u>	<u>Acetaldehyde</u>	<u>0.015</u>
<u>107028</u>	<u>Acrolein</u>	<u>0.009</u>
<u>71432</u>	<u>Benzene</u>	<u>0.028</u>
<u>18540299</u>	<u>Chromium (VI)</u>	<u>0.006</u>
<u>100414</u>	<u>Ethyl Benzene</u>	<u>0.034</u>
<u>50000</u>	<u>Formaldehyde</u>	<u>0.061</u>
<u>110543</u>	<u>Hexane</u>	<u>0.022</u>
<u>7440020</u>	<u>Nickel</u>	<u>1.128</u>
<u>1151</u>	<u>polycyclic aromatic hydrocarbons (PAHs) (total with components not reported)</u>	<u>0.001</u>
<u>108883</u>	<u>Toluene</u>	<u>0.132</u>
<u>1330207</u>	<u>Xylenes</u>	<u>0.098</u>

This data from the 2000 annual emissions report represents the latest information available regarding Faith Plating's criteria pollutants and toxic pollutant air emissions. It is likely that Faith Plating's 2012 air emissions are similar to this year 2000 data.

HAZARDOUS WASTE AND SOLID WASTE

In 2007, Faith Plating generated 14.2520 tons of hazardous waste that is transported under a hazardous waste manifest to various authorized hazardous waste treatment, storage, and disposal (TSD) facilities in southern California. The 14.2520 tons are comprised of 3.2109 tons of aqueous solution with metals, 0.2294 tons of unspecified aqueous solution, 8.6225 of other inorganic solid waste, and 2.1893 tons of California Code 726 (liquids with nickel greater than or equal to 134 million gallons).

PHASE I ENVIRONMENTAL SITE ASSESSMENT

In November 2005, a Phase I Environmental Site Assessment was conducted for the project site. As part of the site assessment, an environmental database records (EDR) report was prepared for the project site. According to the EDR report, the 7155 Santa Monica Boulevard property is not listed on any hazardous materials databases or lists; however, the 7141 Santa Monica Boulevard / 1107-1117 Detroit Street property is listed on seven databases: Hazardous Waste Information System (HAZNET); Resource Conservation and Recovery Act – Large Quantity Generator (RCRA-LQG); Historic Underground Storage Tank (HIST UST); Leaking Underground Storage Tank (LUST); Cortese; Statewide Environmental Evaluation and Planning System (SWEEPS) UST; and Los Angeles County Hazardous Materials System (HMS).

The 7141 Santa Monica Boulevard / 1107-1117 Detroit Street property is listed on HIST UST and SWEEPS UST for records of five USTs installed on the property: a 3,000-gallon gasoline tank installed in 1971 and removed in 1988; a 5,000-gallon product tank installed in 1971 and removed in 1988; a 500-gallon tank installed in 1982; a 30-gallon tank installed in 1984; and

6.0 Clarifications and Modifications

a 300-gallon tank with an unknown installation date. No further information is available for the 500-, 300-, or 30-gallon tanks. The property is listed on the HAZNET and RCRA-LOG databases for the plating operations that occur on the site and the generation of hazardous materials associated with the plating processes. The inclusion of sites on these databases do not necessarily indicate an environmental concern; however, the records for the property also indicate that the plating facility was issued two chromium discharge violations (dated September 25, 2002 and November 1, 2004), one nickel discharge violation (dated November 12, 2002), and one failure to respond to a notice of violation (dated July 23, 2003).

The property is also listed on the Cortese and LUST databases for a reported release of gasoline into the soil and groundwater from the 3,000-gallon tank. The release was discovered in 1988 during the removal of the 3,000- and 5,000-gallon USTs. Contaminated soils beneath the USTs were overexcavated and hydrogen peroxide was injected into the soil and groundwater as a treatment method. The site was given a case closed status in 1996; however, two monitoring wells remain onsite.

In addition to the 7141 Santa Monica Boulevard / 1107-1117 Detroit Street property records, two adjoining and two nearby properties were included on the hazardous materials databases. The former UNOCAL site (7144 Santa Monica Boulevard), located approximately 60 feet south of the project site is listed on the RWQCB's Spills, Leaks, and Investigation Cleanup (SLIC) and LUST databases for a release of gasoline into the soil in 1991. The site is currently undergoing pollution characterization. The BA Studios site (7144 Santa Monica Boulevard), also located approximately 60 feet south of the project site, is listed on the SLIC database for a release of volatile organic compounds (VOCs) in the form of perchloroethylene at the facility. The site is currently undergoing site assessment. The Warner Hollywood Studios site (1041 Formosa Avenue), located approximately 150 feet southwest of the project site, is listed on the RCRA – Small Quantity Generator (RCRA-SQG), HAZNET, LUST, and SWEEPS UST databases. Although the facility has no reported violation associated with their RCRA-SQG status, one release of gasoline into the onsite soils occurred in 1995. The release was granted a case closed status by the RWQCB in 1997. The final site, the Quality Care Cleaners site (1110 La Brea Avenue), located approximately 350 feet east of the project site, is listed on the HAZNET and Cleaners databases. No violations or releases are reported for the facility, and it is currently an operating dry cleaners.

The Phase I concluded that the inherent nature of the onsite chrome, copper, and nickel plating activities coupled with observed housekeeping practices, the age of the operations, and the violations discussed above, the presence of the plating facility represents an environmental risk to the project site. Additionally, the unknown status of the three remaining underground storage tanks (USTs), the conditions of the adjoining and nearby properties, and the remaining groundwater monitoring wells represent additional environmental risks to the site. The report recommended further investigation to address the three USTs and possible soil and groundwater contamination from the plating operations.

6.0 Clarifications and Modifications

PHASE II AND LIMITED PHASE III ENVIRONMENTAL SITE ASSESSMENTS

In accordance with the recommendations of the Phase I, a Phase II and Limited Phase III Environmental Site Assessments were conducted for the project site in January 2006. The site assessment included concrete, soil gas, soil, and groundwater sampling. Preliminary soil gas samples were collected from 30 locations throughout the site and were analyzed for VOCs. Four of the samples contained detectable amounts of VOCs and based on these results, 37 soil borings were collected: 31 within the interior of the facility and 6 around the perimeter of the property. Eighty soil samples and 25 groundwater samples were collected from the borings and were analyzed for VOCs and metal concentrations. Additionally, seven concrete samples were collected from throughout the interior of the plating facility and were analyzed for VOCs and metals.

Analysis results for VOCs were compared to applicable California Preliminary Remediation Goals (PRGs). Analysis results for metals in soils and concrete were compared to California Code of Regulations Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC), and the federal RCRA Total Concentration Leaching Potential (TCLP) to determine disposal requirements. Metal concentrations below the STLC are considered to be non-hazardous while those higher than the TTLC are considered to be hazardous under California disposal requirements. Concentrations between the lower STLC and higher TCLP values are further evaluated by a California Waste Extraction Test (WET) and values are again compared to the STLC. A test similar to the WET is conducted to compare values to the TCLP to determine if the sediment is considered a federal hazardous waste for disposal purposes. Analysis results for metals in soils were further compared to the California Residential Human Health Screening Levels (CHHSLs) and PRGs to assess the volume of soil requiring remediation. The CHHSLs and PRGs were developed by the California Environmental Protection Agency and Region IX of the US EPA, respectively, and are guidance levels based on human cancer risks.

Soil analytical results determined that VOCs exceed PRGs in the upper five feet of soil in the area of the oil storage area and at a depth of 25 feet in the area of the former dispenser island. Concentrations of cadmium, chromium, lead, and nickel exceed both CHHSLs and PRGs in six samples of shallow soils in the vicinity of the plating operation. Subsequent analysis of chromium indicated that it was predominantly in the trivalent form. As a result, chromium concentrations were below the CHHSLs and PRGs for trivalent chromium. Concentrations of metals exceeded STLCs in every soil sample analyzed; however, only cadmium and nickel in one sample adjacent to the southwest corner of the plating room exceeded California TTLCs. No samples contained metals in excess of federal RCRA TCLP levels. Results of the concrete analysis indicated that no samples contained VOCs in excess of applicable thresholds. Concentrations of metals in the concrete exceeded STLCs in every sample; however, only chromium, copper, and nickel levels in three samples in the vicinity of the hazardous storage area and adjacent to the plating area exceeded California TTLCs. One

sample in the motorcycle room adjacent to the plating operations contained chromium in excess of the federal TCLP thresholds.

Groundwater analytical results indicated that 11 samples contained VOCs in excess of California Drinking Water Standards, with benzene representing the most frequently detected VOC, occurring in 8 samples. Samples containing VOCs in excess of Drinking Water Standards were collected from locations beneath the plating facility and south of the facility along Santa Monica Boulevard. Metals were detected above California Drinking Water Standards in eight samples collected west of the onsite wastewater treatment plant, east of the former fuel dispensing island, and surrounding the plating operation. Based on the relatively low concentrations of metals detected throughout and surrounding the property, it does not appear that metal contamination in the groundwater has migrated offsite.

The Phase II and Limited Phase III Environmental Assessment concluded that the sources of metals and VOCs appear to be limited to the southeastern portion of the project site in the area of the plating baths operated by Faith Plating. Additionally, the extent of impact from metals is greatest near the surface and generally extends to a depth of approximately 10 feet bgs. In addition to the analytical results, the assessment determined that the information indicating that three USTs remained onsite was unsubstantiated. The Regional Water Quality Control Board, State Water Resources Control Board, Los Angeles County Department of Public Works, and West Hollywood Building Department have no records of the tanks. Additionally, a geophysical study conducted on accessible portions of the property did not locate the tanks. The assessment concluded that the records most likely refer to onsite water treatment and plating tanks. The assessment also determined that one of the two remaining groundwater monitoring wells observed during the Phase I have been properly abandoned under a permit from the Los Angeles County Department of Public Works. The monitoring well located in the sidewalk on the southeastern portion of the property has not been abandoned and the assessment recommends that it be secured or abandoned if no longer in use.

VOLUNTARY CLEANUP AGREEMENT (VCA)

On September 13, 2006, the prior applicant, Hanover West, entered into a VCA with DTSC, pursuant to the voluntary cleanup program administered by DTSC and authorized under California Health and Safety Code Section 25355.5(a)(1)(C). Under the VCA, the applicant first engages in a comprehensive investigation of the environmental condition of the project site; once that is approved by DTSC, the applicant then proposes and completes an environmental remediation of the project site, which occurs under the oversight of DTSC. DTSC has approved the site characterization of the property and the Removal Action Work Plan (RAW) to remove contaminated soils at the site to the satisfaction of DTSC. Under the VCA, the applicant reimburses DTSC for its costs and expenses incurred in supervising the environmental remediation of the project site. As discussed in Chapter 2.0, Project

6.0 Clarifications and Modifications

Description, the current applicant, Domain WH, LLC, has since entered into the VCA with DTSC.

HUMAN HEALTH RISK ASSESSMENT

Following the completion of the site assessments, a Human Health Risk Assessment (HHRA) was prepared for the project site to determine potential risks to human health, including cancer, from the site specific contaminants and conditions. During the site assessments, cadmium, nickel, and lead were found at concentrations in excess of applicable hazardous materials thresholds as detailed above. Accordingly, they were identified as the COCs for the site. VOCs identified as COCs included benzene, toluene, ethylbenzene, xylenes, naphthalene, perchloroethylene, trichloroethylene, and vinyl chloride.

The assessment of health risks is based on ways in which receptors are exposed to COCs, or exposure pathways. Based on the current and proposed future land use at the site, the HHRA determined that potential human exposure pathways exist for the following receptors and exposure routes:

- Excavation and construction workers: Potential exposure of excavation and construction workers to metals and VOCs in soil in the upper 20 feet bgs by incidental ingestion, dermal contact, and inhalation of dust.
- Neighboring residents: Potential exposure of neighboring residents to metals and VOCs in soil in the upper 20 feet bgs by incidental inhalation of dust.
- Future residents and occupational workers: Potential inhalation exposure to VOCs migrating into structures from subsurface soil gas by future occupational workers and residents.

Exposure to groundwater was not considered a complete exposure pathway for this site based on the following:

- Shallow groundwater beneath the site has low concentrations of VOCs and metals below or slightly above Maximum Contaminant Levels (MCL).
- Natural attenuation and biodegradation of the reported concentrations should occur within the limits of the property or at some limited distance down-gradient, but at considerable distance from any municipal wells or discharge locations.
- The low concentrations of metals found in filtered water samples suggest that further attenuation on soils shall occur.
- VOC concentrations in groundwater should also naturally biodegrade and attenuate.
- Shallow groundwater beneath the site is not used for beneficial purposes.

The HHRA also evaluated the risks associated with the human exposure to contaminants on the site during construction and after construction is complete. In short, with implementation

of the remediation in the RAW (discussed below), there would be no unacceptable human health risks associated with either construction or future occupation at the site.

Following construction of the project's subterranean parking structure, which would occupy the entire footprint of the property, no direct exposure to soils surrounding or beneath the site are anticipated. After completion of the development, pathways of exposure to metals would be eliminated and risks of vapor intrusion would be minimized for the following reasons:

- Soil across the entire property would be excavated and removed from the project site to at least 14 feet bgs;
- The residual soils in the unsaturated zone would have considerably lower concentrations of metals than the removed material resulting in an expected lower exposure point concentration;
- The proposed structure would occupy the entire footprint of the subject property with the foundation of the structure providing the effective mitigating barrier for contact with subsurface soils on the property; and
- Shallow groundwater would not be pumped or used onsite or down gradient from the property.

Construction

According to the HHRA, exposure to VOCs during construction would be limited. Low concentrations of VOCs may volatilize during the excavation process, but concentrations are expected to be low. The duration of exposure would be less than 6 months for excavation workers and neighboring residents with frequencies not exceeding 8 hours.

The carcinogenic risks associated with nickel and cadmium, for construction workers for all three exposure pathways (ingestion, dermal, and inhalation) would be greater than the recognized acceptable level of 1×10^{-6} . The largest calculated risk would be the risk associated with the inhalation of nickel (1.7×10^{-2}). Based on these assessments, the applicant has proposed that during the construction phase of the project appropriate worker protection measures such as dust suppression and monitoring, an appropriate level of personal protective equipment (PPE), and sufficient safe work procedures (washing and containment of soiled clothes) shall be employed at the subject property to protect the health of both onsite construction workers and off-site residents. These standard worker protection measures are a part of the RAW and thus are specifically designed by an independent responsible agency (i.e., DTSC) to provide sufficient protection to workers in these types of environments. Deployment of these RAW worker protection measures would reduce carcinogenic risks associated with nickel and cadmium for construction workers for all three exposure pathways (ingestion, dermal, and inhalation). Additionally, the results indicate the calculated cancer risk associated with the inhalation of nickel and cadmium in fugitive dust for off-site residents (1.68×10^{-7} to 1.27×10^{-8}) would be significantly lower than the generally acceptable risk level of 1 in 1 million (1.0×10^{-6}). The maximum detected concentration of lead in the

6.0 Clarifications and Modifications

soils at the site is 810 milligrams per kilogram (mg/kg), which is below the acceptable level of human health risk of 1,039 mg/kg. Therefore, lead would not represent a significant health risk to either construction workers or off-site residents. Accordingly, through implementation of the RAW, construction workers and off-site residents would not be exposed to significant health risks.

Operation

Following construction of the proposed project, cadmium, nickel, and lead impacted soil would be excavated to a depth of 14 feet bgs and removed from the project site. Additionally, the proposed structure would occupy the entire footprint of the property and no existing topsoil would be exposed. Accordingly, no direct exposure to soils surrounding or beneath the site would occur.

The summed total carcinogenic risk associated with vapor intrusion of VOCs at the project site was calculated to be 1.7×10^{-6} , slightly above the acceptable value of 1.0×10^{-6} . While this value is slightly above the acceptable value of 1.0×10^{-6} , this risk value is less than one order of magnitude above the accepted level. Additionally, according to the California Office of Environmental Health Hazard Assessment web page, these calculated risk values are also below the Proposition 65 acceptable risk level of 1 in 100,000. It should be noted that the calculation did not include the benefits of the presence of the underground parking and the implementation of a standard vapor barrier, both of which are included in the proposed project. The standard vapor barrier is designed to prevent vapor invasion into the building. Additionally, the subterranean parking garage would have a separate air handling system from the remainder of the building. The air exchange rate for parking garages would be very high in order to prevent the buildup of CO. Thus, the combined effect of the garage and the vapor barrier would reduce the total carcinogenic risk associated with vapor intrusion of VOCs at the project site to below the acceptable value. The summed total hazard index for non-carcinogenic risk (0.043) is well below the threshold of 1 in 100,000, and therefore, no additional action would be warranted to mitigate this risk. In summary, upon the completion of the work in accordance with the RAW discussed above, there would be no excess risks to future occupants of the project site.

3.6-10 *1st heading is modified as follows:*

2012 PHASE I ENVIRONMENTAL SITE ASSESSMENT

3.6-10 *1st paragraph under the heading 2012 Phase I Environmental Site Assessment is modified as follows:*

In April 2012, a Phase I Environmental Site Assessment Report was prepared for the project site to determine whether conditions at the site had changed since the previous Phase I, Phase II and Limited Phase III Environmental Site Assessments were prepared in 2005 and 2006, respectively Draft EIR (see Appendix E C of this Recirculated Draft EIR). The 2012 Phase I

Environmental Site Assessment indicates that the project site is listed on the following 10 regulatory lists:

3.6-11 *Heading and 1st and 2nd paragraphs added as follows:*

REMEDIAL REMOVAL ACTION WORK PLAN (RAW)

On ~~September 24, 2007~~ August 9, 2008, a proposed RAW was prepared for the project site by Hanover West in coordination with and under the regulatory oversight of DTSC. The RAW was approved by DTSC on March 13, 2009. The applicant, in coordination with DTSC, has agreed to implement the RAW as part of the proposed project. The purpose of the RAW is to provide a plan to ~~remediate~~ remove the COCs identified in the Site Characterization Report in conjunction with the proposed project. The primary objective of the RAW is to ensure the protection of human health and the environment, and to prepare the property for residential uses.

3.6-14 4th paragraph, 1st and 2nd sentences are modified as follows:

Faith Plating generates polluted wastewater containing, chromium, copper, and nickel, among other things. Additionally, Faith Plating has occasionally been discharging beyond the permitted levels.

3.6-15 *Heading and 1st and 2nd paragraphs added as follows:*

Construction

As discussed above, during construction of the proposed project, potential exposure pathways consist of inhalation, ingestion, and dermal contact of cadmium, nickel, lead, and VOCs by construction workers and inhalation of cadmium, nickel, lead, and VOCs by neighboring residents. Potential pathways during operation of the proposed project consist of inhalation of VOCs by residents and occupational workers.

According to the HHRA calculations detailed above, during construction, exposure of construction workers to VOCs and lead and exposure of neighboring residents to cadmium, nickel, lead, and VOCs would be below the acceptable risk levels and impacts would be less than significant. However, the calculated risk of exposure of construction workers to cadmium and nickel exceed the acceptable risk levels and impacts to the health of construction workers would potentially occur. Therefore, as detailed in the project description and the environmental setting section above, a RAW has been approved for the proposed project detailing the required remedial actions for the contaminated soil beneath the properties.

6.0 Clarifications and Modifications

3.6-16 *Heading and 5th paragraph added as follows:*

Operation

As discussed above, the calculated risk for VOC intrusion into the proposed structure exceeds the acceptable risk level. According to the California Office of Environmental Health Hazard Assessment web page, the calculated risk values are below the Proposition 65 acceptable risk level of 1 in 100,000. Additionally, the risk calculation was based on conservative assumptions that did not account for the subterranean parking garage and the implementation of a standard vapor barrier, both of which are included in the proposed project. The standard vapor barrier is designed to prevent vapor invasion into the building. Additionally, the subterranean parking garage would have a separate air handling system from the remainder of the building. The air exchange rate for parking garages is typically very high in order to prevent the buildup of carbon monoxide. Thus, the combined effect of the garage and the vapor barrier would mitigate the total carcinogenic risk associated with vapor intrusion of VOCs at the subject property to a less than significant level. No additional mitigation measures are required.

3.6-16 *6th paragraph, 2nd sentence is added as follows:*

Potential remaining sources may include residual concentrations in the remaining soil and groundwater.

3.8-7 *4th paragraph, last sentence is modified as follows:*

A more thorough discussion of specific elements of the General Plan and Zoning Ordinance is included in Chapter 3.1, Aesthetics, Chapter ~~3.1-3.2~~, Air Quality, Chapter 3.3, Cultural Resources, Chapter ~~3.2~~ 3.5, Greenhouse Gas Emissions, and Chapter ~~3.7~~ 3.9, Noise, of this Recirculated Draft EIR, and Chapter 3.1, Aesthetics, and Chapter 3.3, Cultural Resources, of the previous Draft EIR.

3.8-12 *1st paragraph, last sentence is modified as follows:*

A more thorough discussion of specific elements of the General Plan and Zoning Ordinance is included in Chapter 3.1, Aesthetics, Chapter ~~3.1-3.2~~, Air Quality, Chapter 3.3, Cultural Resources, Chapter ~~3.2~~ 3.5, Greenhouse Gas Emissions, and Chapter ~~3.7~~ 3.9, Noise, of this Recirculated Draft EIR, and Chapter 3.1, Aesthetics, and Chapter 3.3, Cultural Resources, of the previous Draft EIR.

3.9-6 *7th paragraph is modified as follows:*

NOISE-E ~~If feasible, the~~ The construction contractor shall install a 12-foot high temporary barrier along the northern property line. The acoustical barrier shall be constructed of material having a minimum surface weight of two

pounds per square foot or greater, and a demonstrated Sound Transmission Class rating of 25 or greater as defined by American Society for Testing and Materials Test Method E90. The barrier shall be required during the excavation and site preparation phases of construction.

3.10-6 *2nd paragraph is modified as follows:*

PS-3: *The proposed project may require or result in the construction of new wastewater conveyance. The proposed project would not result in a determination by the wastewater treatment provider that serves or may serve the project that it ~~has~~ lacks adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

3.10-7 *2nd paragraph is modified as follows:*

Wastewater generated by the project site is treated at the City of Los Angeles Bureau of Sanitation's Hyperion Treatment Plant. This treatment plant processes approximately 360 million gallons of wastewater per day and has a remaining capacity of approximately 90 million gallons per day (City of Los Angeles Bureau of Sanitation 2008). According to the sewer capacity report prepared by the applicant, the proposed project would generate approximately 22,943 gallons of wastewater per day, a net increase of 18,306 gallons per day (PSOMAS 2012). This represents approximately 0.005 percent of the total amount of wastewater treated at Hyperion Treatment Plant. The Los Angeles County Sanitation Districts estimates that the proposed project would generate approximately 28,919 ~~24,174~~ gallons of wastewater per day, or a net increase of 24,282 ~~46,537~~ gallons per day (Los Angeles County Sanitation Districts 2012). This represents approximately 0.008 ~~0.005~~ percent of the total amount of wastewater treated at Hyperion Treatment Plant. As such, the proposed project would be served by a wastewater treatment plant with adequate capacity. Furthermore, in accordance with existing City requirements, the applicant would be required to pay the wastewater mitigation fee and connection fees to the Sanitation Districts. These fees are used to pay for incremental increases to the capacity of the wastewater system.

4-2 *Subsection 4.2.1 has been modified as follows:*

4.2.1 AGRICULTURAL AND FORESTRY RESOURCES

No agricultural activities presently occur onsite and the project site does not contain forestry resources. The project site is designated as Commercial in the City General Plan Land Use Element and zoned CA (Commercial, Arterial). Further, no agricultural activities presently occur onsite. The project site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. There are no Williamson Act contracts applicable to the project site (California Department of Conservation 2006). Thus, the proposed project would not convert farmland to non-agricultural uses or forestland to non-forestry uses.

6.0 Clarifications and Modifications

10-3 *The following references have been added:*

City of Los Angeles

2008 *Wastewater Facts and Figures.* website
<http://www.lacity.org/san/wastewater/factsfigures.htm>, accessed March 3, 2008.

City of West Hollywood

2008 *Draft City of West Hollywood R2, R3, R4 Multifamily Survey Report.*
February 2008.

County Sanitation Districts of Los Angeles County

2008 Letter from Ruth I. Frazen, Customer Service Specialist, Facilities
Planning Division to David DeGrazia, Senior Planner, Community
Development Department, City of West Hollywood. August 19, 2008
2013 Letter from Adriana Raza, Customer Service Specialist, Facilities
Planning Department to Emily Stadnicki, Senior Planner, Community
Development Department, City of West Hollywood. February 25, 2013.

Professional Services Industry, Inc.

2008 *Human Health Risk Assessment for the property at 7141 and 7155 Santa
Monica Boulevard, West Hollywood, Los Angeles County, California
90046.* July 7, 2008.
2008 *Removal Action Work Plan for the property at 7141 and 7155 Santa
Monica Boulevard and 1107-1117 Detroit Street, West Hollywood, Los
Angeles County, California.* August 9, 2008.

State of California Governor's Office of Planning and Research (OPR)

2001 *The Planner's Guide to Specific Plans.* January 2001 edition. website
http://ceres.ca.gov/planning/specific_plans/sp_index.html, accessed
October 2, 2008.

West Hollywood Community Development Commission

1997 *Redevelopment Plan for the East Side Project Area.* April 1997.

7.0 RESPONSE TO COMMENTS

A Draft EIR for the Formosa Specific Plan Project was circulated for public review and comment by the City of West Hollywood (City) on August 15, 2008, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until September 29, 2008. During this public review period, a total of six letters were received. A Final EIR was prepared including responses to comments received on the Draft EIR. However, the Final EIR was not circulated for public review and was not brought before the Planning Commission and City Council for approval hearings.

The project plans and project site have since been purchased from Formosa Partners, LP, by Domain WH, LLC. Pursuant to CEQA Guidelines Section 15088.5, the City of West Hollywood (lead agency) prepared a Recirculated Draft EIR to provide an explanation of the changes to the proposed project and an evaluation of those environmental issue areas where modifications to the environmental setting have occurred and revisions to the previous Draft EIR analysis were warranted. The Recirculated Draft EIR was circulated for public review and comment on January 11, 2013, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until February 25, 2013. During the public review period for the Recirculated Draft EIR, a total of nine letters and emails were received.

According to CEQA Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” This chapter provides responses to those oral comments received through the public hearing process and written comments received during the public comment period for both the Draft EIR and Recirculated Draft EIR period that address environmental issues. This chapter is organized into two parts; 1) responses to comments received on the Recirculated Draft EIR, and 2) responses to comments received on the Draft EIR. Each comment letter has been assigned a number code, and individual comments in each letter have been coded to facilitate responses. For example, the letter from the Native American Heritage Commission is identified as letter 1, with comments noted at 1-1, 1-2, 1-3, etc. Copies of each comment letter are provided prior to each response. A summary of the comments received at the public hearings are provided at the end of this chapter.

7.1 RESPONSES TO COMMENTS ON THE RECIRCULATED DRAFT EIR

The Recirculated Draft EIR was distributed for public review on January 11, 2013 until February 25, 2013, pursuant to CEQA Guidelines Section 15105. A total of eight comment letters and emails were received. All of the comment letters received on the Recirculated Draft EIR are listed in Table 7-1 and the corresponding responses are provided in this section. A copy of each comment letter is provided prior to each response.

7.0 Response to Comments

TABLE 7-1 LIST OF COMMENT LETTERS ON RECIRCULATED DRAFT EIR

Letter No.	Agency/Organization/Individual	Date of Letter	Page # of Response
1	Native American Heritage Commission <i>Signed: Dave Singleton</i>	January 17, 2013	7-8
2	Los Angeles County Metropolitan Transportation Authority <i>Signed: Scott Hartwell</i>	February 12, 2013	7-11
3	South Coast Air Quality Management District <i>Signed: Ian MacMillan</i>	February 22, 2013	7-16
4	County Sanitation Districts of Los Angeles County <i>Signed: Adriana Raza</i>	February 25, 2013	7-18
5	Governor's Office of Planning and Research <i>Signed: Scott Morgan</i>	February 26, 2013	7-26
6	California Safe Schools <i>Signed: Robina Suwol</i>	February 27, 2013	7-29
7	Department of Toxic Substances Control <i>Signed: Robert Krug</i>	February 25, 2013	7-38
8	California Department of Transportation <i>Signed: Dianna Watson</i>	March 6, 2013	7-41
9	Governor's Office of Planning and Research <i>Signed: Scott Morgan</i>	March 11, 2013	7-47

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net



January 17, 2013

Ms. Emily Stadnicki, Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Re: SCH#2012081053; CEQA Notice of Completion; Re-circulated draft Environmental Impact Report (REIR) for the "Domain Project/Formosa Specific Plan (Mixed Use Residential [165 units] and Commercial);" located in the City of West Hollywood; Los Angeles County, California

Dear Ms. Stadnicki:

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

1-1

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

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

1-2

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

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural

1-3

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

1-3
Cont'd

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

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

1-4

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

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

1-5

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

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

**Native American Contacts
Los Angeles County
January 17, 2013**

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3094 Mace Avenue, Apt. B Gabrielino
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Gabrielino-Tongva Tribe
Bernie Acuna, Chairperson
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(619) 294-6660-work
(310) 428-5690 - cell
(310) 587-0170 - FAX
bacuna1@gabrieinotribe.org

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
palmsprings9@yahoo.com
626-676-1184- cell
(310) 587-0170 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2007081053; cEQA Notice of Completion; Re-Circulated draft Environmental Impact Report (REIR) for the Domain Project/Formosa Specific Plan; located in the City of West Hollywood; Los Angeles County, California.

**Native American Contacts
Los Angeles County
January 17, 2013**

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
(626) 926-4131
gabrielenoindians@yahoo.
com

Gabrielino-Tongva Tribe
Conrad Acuna,
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
310-587-2203

310-587-2203

1-6
Cont'd

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2007081053; cEQA Notice of Completion; Re-Circulated draft Environmental Impact Report (REIR) for the Domain Project/Formosa Specific Plan; located in the City of West HOLLYWOOD; Los Angeles County, California.

7.0 Response to Comments

Comment Letter 1: Native American Heritage Commission

Response 1-1

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Recirculated Draft EIR. No further response to this comment is required.

Response 1-2

As discussed in Chapter 3.3, Cultural Resources, of the Draft EIR, the cultural resources analysis was based on the Cultural Resources Assessment prepared for the proposed project, which is included as Appendix C. As discussed on page 14 of the Initial Study prepared for the proposed project (included as Appendix A of the Draft EIR), “no religious or sacred uses have been identified at the project site.” Additionally, as discussed on page 3.3-8 of the Draft EIR, “no prehistoric or historic archaeological resources have been previously recorded within the limits of the records search. The survey conducted in connection with this project failed to reveal any surface evidence of archaeological resources within the project site.” As clarified on page 3.3-9 of this Final EIR (see also page 6-7 of this Final EIR), ground disturbing activities within the project site boundaries have not previously encountered historic or prehistoric archaeological resources. Therefore, archaeological resources are not expected to be encountered at the project site, and the impact to such resources would be less than significant. Further, as explained on page 3.3-8 of the Draft EIR and page 3.3-9 of this Final EIR, “in the event that archaeological materials are encountered during earthmoving activities, the construction contractor would be required cease activity in the affected area until the discovery can be evaluated by a qualified cultural resources specialist (archaeologist) in accordance with the provisions of CEQA Guidelines section 15064.5.”

Response 1-3

As discussed on page 19 of Appendix C, Cultural Resources Assessment, of the Draft EIR, Native American contact was conducted in the preparation of the Draft EIR. No changes to the analysis occurred as a result of the changes to the project description. Therefore, recirculation of the Cultural Resources chapter was not warranted at the time the Recirculated Draft EIR was prepared.

Response 1-4

The comment regarding confidentiality of historic properties of religious and cultural significance is noted. However, as discussed in Response 1-2 above, no archaeological resources are known to occur in the project area and such resources are not expected to be encountered at the project site. Additionally, as discussed on page 14 of the Initial Study prepared for the proposed project (included as Appendix A of the Draft EIR), no religious or sacred uses have been identified at the project site. The proposed project would adhere to all guidelines and procedures related to the disclosure of items of religious and/or cultural significance. See also Response 1-2 above regarding the discovery of previously unknown archaeological materials.

Response 1-5

As discussed on page 14 of the Initial Study (see Appendix A of the Draft EIR), it was determined that the proposed project would not directly or indirectly destroy human remains interred outside of a formal cemetery. “No religious or sacred uses, including sacred burial grounds, have been identified on the project site. No human remains are known to exist on the project site, and the project site is not designated nor has it been designated for use as a cemetery. Therefore, no impacts to human remains are anticipated to occur. In the event that human remains are encountered during site excavation, an approach to recover and respectfully treat the remains would be developed in accordance with CEQA requirements and other state and federal laws. The impacts would be less than significant, and no further evaluation of this issue is required.” Accordingly, this issue was not further analyzed in the Draft EIR.

Response 1-6

See Response 1-3 regarding consultation with Native American tribes and contacts.



Metro

February 12, 2013

Emily Stadnicki, Senior Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Ms. Stadnicki:

Los Angeles County Metropolitan Transportation Authority (LACMTA) is in receipt of the Recirculated Draft Environmental Impact Report (RDEIR) for the Domain Project. This letter conveys recommendations concerning issues that are germane to MTA's statutory responsibilities in relation to the proposed project.

2-1

The Traffic Impact Analysis prepared for the RDEIR satisfies the requirements of the 2010 Congestion Management Program (CMP). However, the following additional elements related to the transit impact analysis should be included in the EIR, as required by the Transit Impact Review guidelines in Appendix D.8.4 of the 2010 CMP:

2-2

1. Evidence that affected transit operators received the Notice of Preparation; and
2. A summary of existing transit services in the project area that includes not only local fixed-route services within a one quarter mile radius of the project, but also includes express bus routes within a 2 mile radius of the project and rail service within a 2 mile radius of the project.

2-3

In addition, construction of the proposed project could impact existing bus service and bus stops. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines.

2-4

MTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-2836 or by email at hartwells@metro.net. Please send the Final EIR to the following address:

MTA CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Sincerely,

Scott Hartwell
CEQA Review Coordinator, Long Range Planning

Comment Letter 2: Los Angeles County Metropolitan Transportation Authority**Response 2-1**

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Recirculated Draft EIR. No further response to this comment is required.

Response 2-2

In accordance with CEQA Guidelines Section 15082, an Initial Study was prepared and a Notice of Preparation (NOP) was distributed on August 9, 2007, to public agencies and organizations, as well as private organizations and individuals with possible interest in the proposed project. The purpose of the NOP was to provide notification that the City planned to prepare an EIR and to solicit input on the scope and contents of the EIR. Over 16 copies of the NOP were distributed, including one copy to the City of Los Angeles Department of Transportation, Bureau of Planning and Land Use, Office of Transportation Development and Transit Services. The Draft EIR for the Formosa Avenue Specific Plan Project was circulated for public review and comment on August 15, 2008, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until September 29, 2008. The Draft EIR and Notice of Completion (NOC) were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to over 18 interested parties and adjacent property owners and residents, which included the City of Los Angeles Department of Transportation Bureau of Planning and Land Use and the Los Angeles County Metropolitan Transportation Authority.

As discussed in Chapter 1, Introduction, of this Final EIR, the Recirculated Draft EIR was circulated for public review and comment on January 11, 2013, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines until February 25, 2013. The Recirculated Draft EIR and NOC were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A NOA was distributed to over 18 interested parties, including the City of Los Angeles Department of Transportation and the Los Angeles County Metropolitan Transportation Authority. As such, notices have been distributed to the affected transit operators pursuant to the CEQA Guidelines throughout the environmental review process for the proposed project.

Response 2-3

The commenter is referred to the Traffic Impact Analysis prepared for the proposed project (see Appendix E of the Recirculated Draft EIR and reprinted as Appendix F of this Final EIR), which includes a summary of existing transit service in the project vicinity. As discussed in the Traffic Impact Analysis, the project study area is served by 10 bus lines, including 7 Los Angeles County Metropolitan Transportation Authority bus lines, 1 City of Los Angeles Department of Transportation bus line, and 2 West Hollywood City bus lines; no rail lines serve the project site. Additionally, as stated on page 3.11-

7.0 Response to Comments

26 of the Recirculated Draft EIR, “due to the number of bus routes in the study area, the level of additional transit usage by the proposed project would not create a significant regional transit impact.”

Response 2-4

If the project is approved, the applicant would coordinate with the Los Angeles County Metropolitan Transportation Authority during the construction phase regarding existing bus service and bus stops. As discussed on page 2-9 of the Recirculated Draft EIR, the applicant would be required to work with the City and affected transit agencies to prepare a traffic mitigation plan for the construction phase of the project. The plan would include haul truck routing, construction worker parking, encroachment in the public right-of-way, and temporary relocation of public transit facilities, among others.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

E-Mailed: February 22, 2013
estadnicki@weho.org

February 22, 2013

Ms. Emily Stadnicki
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Review of the Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed Domain/Formosa Specific Plan Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final environmental impact report (Final EIR) as appropriate.

3-1

Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality benefits from the proposed project given that it will facilitate a mix of land uses in close proximity to mass transit. However, the AQMD staff is concerned about the project's significant regional and localized construction air quality impacts. Specifically, the lead agency determined that the project will exceed the AQMD's CEQA regional significance thresholds for NOx emissions and localized significance threshold for PM10 and PM2.5 emissions during construction of the project. As a result, the AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the lead agency require the construction related mitigation measures listed below to the Final EIR. Further, AQMD staff requests that the lead agency provide a more extensive discussion on the implementation of mitigation measure AIR-D including details about the type of alternative fuel that will be used for off-road construction equipment, the emissions benefits from the use of such fuel and the number of equipment pieces that will use an alternative fuel.

3-2

Additional Construction Mitigation Measures

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

- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)¹ have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

3-2
Cont.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency

3-3

¹ For example see the Metro Green Construction Policy at:

http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

3-3
Cont.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

[IM:DG](#)

LAC130115-05
Control Number

7.0 Response to Comments

Comment Letter 3: South Coast Air Quality Management District

Response 3-1

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Recirculated Draft EIR. No further response to this comment is required.

Response 3-2

The proposed project would be located a block of the intersection of Santa Monica Boulevard and La Brea Avenue, which provides access to numerous bus lines. Neighborhood-serving retail amenities would also be provided onsite and within walking distance. Therefore, as stated in the comment, operation of the proposed project would not generate a substantial source of regional or localized emissions. Further, as discussed on page 3.1-18 of the Recirculated Draft EIR (see also page 3.2-18 of this Final EIR, Faith Plating currently emits approximately 0.60 tons per year of criteria air pollutants and 1.5 pounds per year of Toxic Air Contaminants (TACs) that would no longer be generated as result of redevelopment of the project site. There would be a substantial reduction in air quality emissions of TACs and volatile organic compounds (VOCs) compared to existing conditions, and the proposed project would have a beneficial long-term air quality impact.

As acknowledge by the commenter and discussed in detail in Chapter 3.1 of the Recirculated Draft EIR (see also Chapter 3.2 of this Final EIR), the proposed project would generate significant and unavoidable air quality impacts during the construction phase. Even with implementation of mitigation measures AIR-A through AIR-J, short-term regional emissions of nitrogen oxides (NO_x) during grading activity and short-term localized emissions of inhalable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}) during demolition, site preparation, and grading would exceed the South Coast Air Quality Management District's (SCAQMD) thresholds of significance. As suggested in the comment, revisions have been made to this Final EIR to include additional mitigation measures. The commenter is referred to pages ES-7, 3.1-20, 6-1 and 6-2, and 6-7 and 6-8 of this Final EIR.

Response 3-3

As stated in the comment, Public Resources Code Section 21092.5 requires that the lead agency (City of West Hollywood) provide written responses to public agencies on comments made by that agency at least 10 days prior to the Planning Commission hearing at which the EIR will be considered. Therefore, a copy of the Final EIR, including the comment letters and responses, will be provided to the SCAQMD.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON CHAN
Chief Engineer and General Manager

February 25, 2013

Ref. File No: 2475175

Ms. Emily Stadnicki, Senior Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Ms. Stadnicki:

Domain Project/Formosa Specific Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Recirculated Draft Environmental Impact Report for the subject project on January 11, 2013. The proposed development is located within the jurisdictional boundaries of District No. 4. We offer the following comments regarding sewerage service:

4-1

1. Wastewater generated by the proposed project will be conveyed through City of West Hollywood and City of Los Angeles sewer lines for treatment at the Los Angeles Hyperion Treatment System. Information regarding available capacities in the service lines and at the treatment plant are available from the City of Los Angeles' Department of Public Works.

2. The expected average wastewater flow from the project site is 28,919 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

4-2

3. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

4-3

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

7.0 Response to Comments

Comment Letter 4: County Sanitation Districts of Los Angeles County

Response 4-1

The commenter confirms that the wastewater generated by the Domain Project would be conveyed through the City of West Hollywood and the City of Los Angeles sewer lines for treatment at Hyperion Treatment Plant, as stated on page 3.10-2 of the Recirculated Draft EIR.

Response 4-2

The County Sanitation Districts of Los Angeles County estimates that the average wastewater flow from the project site would be 28,919 gallons per day, which represents approximately 0.008 percent of the total amount of wastewater treated at Hyperion Treatment Plant. This updated information has been incorporated into this Final EIR. The commenter is referred to pages 3.10-7, and 6-18 through 6-19 of this Final EIR, which include changes to the text regarding the amount of wastewater estimated to be generated by the proposed project. As concluded on page 3.10-7 of the Recirculated Draft EIR, the proposed project would be served by a wastewater treatment plant with adequate capacity. Furthermore, in accordance with existing City requirements, the applicant would be required to pay the wastewater mitigation fee and connection fees to the Sanitation Districts. These fees are used to pay for incremental increases to the capacity of the wastewater system.

Response 4-3

As discussed on page 3.10-2 of the Recirculated Draft EIR, the County Sanitation Districts of Los Angeles County are authorized to charge a fee for connecting directly or indirectly to their sewage system per the California Health and Safety Code.



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

February 26, 2013

Emily Stadnicki
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Subject: Formosa Specific Plan
SCH#: 2007081053

Dear Emily Stadnicki:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 25, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

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

5-1

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

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott Morgan".

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007081053
Project Title Formosa Specific Plan
Lead Agency West Hollywood, City of

Type EIR Draft EIR

Description The proposed project would construct up to 166 residential units and approximately 9,300 sf of commercial uses (i.e., retail/restaurant). The residential units would consist of studios, one-bedrooms, one-bedrooms with dent, and two-bedrooms. The proposed project would include a mix of market-rate and affordable units: 133 would be market -rate, 17 would be moderate income and 16 would be low income. In addition to providing mixed-use development, the project would involve environmental remedial actions that would remove on-site sources of contamination to soil; obtain unrestricted regulatory site closure for the site; and provide a site ready for the unrestricted construction of a retail and residential complex.

Lead Agency Contact

Name Emily Stadnicki
Agency City of West Hollywood
Phone 323 848 6891 **Fax**
email
Address 8300 Santa Monica Boulevard
City West Hollywood **State** CA **Zip** 90069

Project Location

County Los Angeles
City West Hollywood
Region
Lat / Long 34° 5' 27.2" N / 118° 20' 43.7" W
Cross Streets Santa Monica Boulevard and Detroit Street/Formosa Avenue
Parcel No. 5531-009-021, 022, 001, 002
Township **Range** **Section** **Base**

5-2

Proximity to:

Highways SR 101 and SR 2
Airports
Railways
Waterways
Schools Various
Land Use Metal Plating Facility / CC (Commercial, Community) / Commercial

Project Issues Air Quality; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 01/10/2013 **Start of Review** 01/10/2013 **End of Review** 02/25/2013

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-6251
 Fax (916) 657-5390
 Web Site www.nahc.ca.gov
 ds_nahc@pacbell.net



RECEIVED

JAN 18 2013

STATE CLEARING HOUSE

January 17, 2013

Ms. Emily Stadnicki, Planner

City of West Hollywood

8300 Santa Monica Boulevard
 West Hollywood, CA 90069

2007061053

Re: SCH#2042084053; CEQA Notice of Completion; Re-circulated draft Environmental Impact Report (REIR) for the "Domain Project/Formosa Specific Plan (Mixed Use Residential [165 units] and Commercial);" located in the City of West Hollywood; Los Angeles County, California

Dear Ms. Stadnicki:

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

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

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

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

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural

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

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

5-3
Cont'd

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

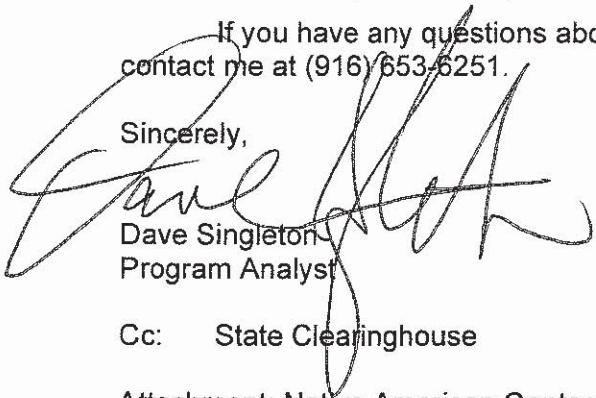
Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other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

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

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

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton". The signature is fluid and cursive, with a large initial "D" and "S".

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

5-3
Cont'd

**Native American Contacts
Los Angeles County
January 17, 2013**

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908
Los Angeles , CA 90086
samdunlap@earthlink.net
Gabrielino Tongva
(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3094 Mace Avenue, Apt. B Gabrielino
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower , CA 90707
gtongva@verizon.net
Gabrielino Tongva
562-761-6417 - voice
562-761-6417- fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrielino-Tongva Tribe
Bernie Acuna, Chairperson
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(619) 294-6660-work
(310) 428-5690 - cell
(310) 587-0170 - FAX
bacuna1@gabrieinotribe.org

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
palmsprings9@yahoo.com
626-676-1184- cell
(310) 587-0170 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2007081053; cEQA Notice of Completion; Re-Circulated draft Environmental Impact Report (REIR) for the Domain Project/Formosa Specific Plan; located in the City of West Hollywood; Los Angeles County, California.

**Native American Contacts
Los Angeles County
January 17, 2013**

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
(626) 926-4131
gabrielenoindians@yahoo.
com

Gabrielino-Tongva Tribe
Conrad Acuna,
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
310-587-2203

310-587-2203

5-3
Cont'd

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2007081053; cEQA Notice of Completion; Re-Circulated draft Environmental Impact Report (REIR) for the Domain Project/Formosa Specific Plan; located in the City of West HOLLYWOOD; Los Angeles County, California.

7.0 Response to Comments

Comment Letter 5: Governor's Office of Planning and Research

Response 5-1

The commenter states that the Lead Agency has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. No further response to this comment is required.

Response 5-2

The Document Details Report from the State Clearinghouse database explaining the distribution of the Final EIR is noted. No further response to this comment is required.

Response 5-3

See Responses 1-1 through 1-6 above for responses to comments submitted by the Native American Heritage Commission.

Subject: FW: FAITH PLATING - EIR & VOLUNTARY CLEAN UP

Importance: High

From: Robina Suwol [robinasuwol@earthlink.net]

Sent: Monday, February 25, 2013 3:26 PM

To: Emily Stadnicki

Cc: tdoduc@waterboards.ca.gov; debbie.raphael@dtsc.ca.gov; tom.cota@dtsc.ca.gov; stewart.black@dtsc.ca.gov; brian.johnson@dtsc.ca.gov; sunger@waterboards.ca.gov; blumenfeld.jared@epa.gov; john.steven@epa.gov; Jeffrey Prang; Abbe Land; John Duran; John D'Amico; John Heilman; cshaffer@weho.org; Will.Lightbourne@DSS.ca.gov; Sarah.Morrison@doj.ca.gov

Subject: RE: FAITH PLATING - EIR & VOLUNTARY CLEAN UP

February 23, 2013

Emily Stadnicki

City of West Hollywood

Community Development Department

8300 Santa Monica Boulevard

West Hollywood, California 90069

Sent Via email: estadnicki@weho.org<<mailto:estadnicki@weho.org>>

Re: Faith Plating - EIR & Voluntary Clean Up

Dear Ms. Stadnicki,

To avoid any possible confusion or misunderstanding now or in the future, we are commenting on the Faith Plating proposed project clean up, not the proposed development project.

Issues of concern include, but are not limited to the following:

- 1) Groundwater Contamination
- 2) Contaminated Soil Gas
- 3) Contaminated Surface
- 4) Voluntary Clean Up lacks specific detail
- 5) General clean up refers to street level clean-up, no mention of ground water, soil gas, or vapor intrusion protocols, and no characterization of offsite contamination.
- 6) There is no mention of groundwater clean-up, locating the site of offsite contamination, stopping it, or ongoing monitoring for vapor intrusion in proposed buildings, and businesses at and near site construction.
- 7) RAW does not cover groundwater clean-up ONLY soil.
- 8) The work plan of 2009 was never implemented, and the RAW was approved 5 years ago.
- 9) Faith Plating continued to operate after RAW and closed in December 2012 while receiving numerous non-compliance violations.
- 10) F Wells 2, 3, 4 were placed over four years ago yet there is monitoring data posted on Envirostor. The data from these wells could contribute to understanding the etiology of the offsite source of contamination.
- 11) There is no Voluntary Clean Up Well Installation Work Plan provided, and nothing in record where well monitoring is posted.
- 12) There are community concerns for vulnerable populations (preschoolers, and elderly) who are served in the Plummer Park Community Center, and park. There are also demolition and construction concerns by residents who live, work, and regularly dine outdoors at restaurants within feet from Faith Plating.
- 13) Until the offsite source of contamination is identified , it is pointless to clean up the site as it will just become recontaminated.

Respectfully,

Robina Suwol
California Safe Schools
PO Box 2756
Toluca Lake, CA 91610
818.785.5515 office

Jane Williams
California Communities Against Toxics
PO Box 845
Rosamond, CA 93560
661.510.3412 cell

cc:

California Department of Toxic Substances Control California Environmental Protection Agency USEPA Region IX Regional
Water Board State Water Board Department of Social Services Office of California Attorney General Mayor Prang, City of West
Hollywood City Councilmembers of West Hollywood West Hollywood City Clerk

Comment Letter 6: Robina Suwol**Response 6-1**

As discussed on pages 3.4-1 through 3.4-5 of the Draft EIR (see also pages 3.6-4 through 3.6-10 of this Final EIR), a Phase II and Limited Phase III Environmental Site Assessments were conducted for the project site in January 2006. The site assessment included concrete, soil gas, soil, and groundwater sampling. Preliminary soil gas samples were collected from 30 locations throughout the site and were analyzed for VOCs. Four of the samples contained detectable amounts of VOCs and based on these results, 37 soil borings were collected: 31 within the interior of the facility and 6 around the perimeter of the property. Eighty soil samples and 25 groundwater samples were collected from the borings and were analyzed for VOCs and metal concentrations. Additionally, seven concrete samples were collected from throughout the interior of the plating facility and were analyzed for VOCs and metals. The Phase II and Limited Phase III Environmental Assessments concluded that the sources of metals and VOCs appear to be limited to the southeastern portion of the subject site in the area of the plating baths operated by Faith Plating. Additionally, the extent of impact from metals is greatest near the surface and generally extends to a depth of approximately 10 feet bgs.

As discussed on page 3.6-10 of the Recirculated Draft EIR (see also pages 3.6-10 and 3.6-11 of this Final EIR), a new Phase I Environmental Site Assessment Report for the project site was prepared in April 2012 by the new project applicant to confirm the concrete, soil gas, soil, and groundwater contamination identified in the previous Phase I, Phase II and Limited Phase III Environmental Site Assessments, which were prepared in 2005 and 2006, respectively. Additionally, a Groundwater Monitoring Report was prepared for the project site in April 2012. Groundwater samples were taken from five wells on March 26, 2012. The 2012 Phase I Environmental Site Assessment confirmed the concrete, soil gas, and soil contamination. The Groundwater Monitoring Report found that hexavalent chromium was nondetectable in all five wells and significant levels of VOCs were not measured in the groundwater under the project site.

In response to the existence of known contaminants at the project site related to the metal plating activities historically performed at the site, the applicant and the California Department of Toxic Substances Control (DTSC) entered into a Voluntary Cleanup Agreement (VCA) and a Removal Action Work Plan (RAW) was prepared for the project site on August 9, 2008. As discussed on page 3.4-4 and 3.4-5 of the Recirculated Draft EIR (see also pages 3.6-11 through 3.6-12 of this Final EIR), the RAW was approved by DTSC on March 13, 2009. The current project applicant, Domain WH, LLC, has entered into a VCA with DTSC and agreed to implement the 2009 RAW as part of the proposed project. The purpose of the RAW is to provide a plan to remove contaminated soils containing the chemicals of concern (COCs) identified in the Site Characterization Report in order to redevelop the project site. The primary objective of the RAW is to ensure the protection of human health and the environment, and to prepare the property for residential uses. As stated on pages 2-8, and 3.4-4 and 3.4-5 of the Recirculated Draft EIR (see also page 3.6-12 of this Final EIR):

7.0 Response to Comments

The RAW requires specific removal action objectives (RAO), based on site-specific media of concern, COCs, exposure routes and receptors, and acceptable contaminant concentrations or range of contaminant concentrations for each exposure route. These RAOs indicate the types of remediation that is contemplated for the project site. The RAOs for the project site are as follows:

- *Remove onsite sources to contamination to soil and groundwater;*
- *Minimize construction worker and adjacent residents' exposure to COCs during the construction program;*
- *Comply with all required permits including the SCAQMD 1166 Permit which includes daily monitoring for VOCs until the onsite soil excavation has been completed and the excavation area is sealed;*
- *Compliant demolition, removal and disposal of building materials from the site;*
- *Remove soils impacted with heavy metals until concentrations are below the CTTL concentration and 10 times the STLC or below hazardous concentrations within the property boundary and to a maximum depth of 20 feet bgs;*
- *Remove soils impacted with VOCs, or petroleum hydrocarbons to a depth of 15 feet bgs across the entire project boundary. Additional soil removal may occur beneath the plating operation floor to a maximum depth of 20 feet bgs if heavy metal concentrations exceed 10 times the STLC;*
- *Minimize the volume of soil designated as non-hazardous being transported and disposed of as hazardous through segregation based on existing data and supplemental data obtained during the excavation processes;*
- *Verify remaining conditions following excavation for documentation through verification sampling and testing;*
- *Assess post-remedial risks of subsurface vapors to determine if further mitigation is necessary;*
- *Monitor groundwater for a defined period of decreasing trends in the minor concentration of COCs. No groundwater remediation is anticipated to achieve unrestricted regulatory site closure for this site;*
- *Obtain unrestricted regulatory site closure for the site; and*
- *Provide a site ready for the unrestricted construction of a beneficial retail and residential complex that will enhance the community.*

The Final EIR concludes that, because implementation of the RAW would effectively remove any existing contamination and provide a site safe for residential construction, no significant impacts related to hazards and hazardous materials would occur as a result of the proposed project.

As stated on page 3.4-8 of the Recirculated Draft EIR (see also page 3.6-16 of this Final EIR), “after excavation activities have been completed, closure and post-closure activity would document that the remaining soil would have concentrations of heavy metals less than 10 times their respective STLC. A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter of No Further Action (NFA), building construction would begin.” DTSC would review tests of groundwater and soils present at the project site to certify that the existing contamination has been remediated and the project site is clear for residential construction. Upon receipt of the NFA, the City would then issue a building permit. Completion of this process is a Condition of Approval for the project.

Further, the applicant has conservatively agreed to implement the 2009 RAW requirement of groundwater remediation and testing despite the fact that groundwater beneath the project site no longer requires remediation. As stated on 3.4-8 of the Recirculated Draft EIR (see also page 3.6-16 of this Final EIR), “as required by DTSC, groundwater monitoring would occur for a two-year period to evaluate if contaminant concentrations are exhibiting an increasing trend. If no increasing trend is exhibited, no further action would be recommended. At the close of the two-year monitoring period, a letter would be issued from DTSC that groundwater monitoring has been completed and the project site would be considered remediated.”

Response 6-2

As discussed on pages 2-7 and 2-8 of the Recirculated Draft EIR (see also pages 2-12 of the Final EIR), the applicant has entered into a VCA with DTSC. Under the VCA, the applicant would engage in investigation and environmental remediation of the project site under the supervision of DTSC. The environmental remediation would include the implementation of the RAW to remove contaminants to the satisfaction of DTSC. The RAW, which has been approved by DTSC, requires specific RAOs based on site-specific media of concern, COCs, exposure routes and receptors, and acceptable contaminant concentrations or range of contaminant concentrations for each exposure route. The commenter is referred to Response 6-1 above, which lists the RAOs to be implemented under the RAW. The commenter is also referred to pages 3.4-7 and 3.4-8 of the Recirculated Draft EIR (see also pages 3.6-15 of the Final EIR), which outlines the RAW’s site cleanup activities.

Response 6-3

As discussed on page 3.6-11 of the Final EIR, “a Groundwater Monitoring Report was prepared for the project site in April 2012. Groundwater samples were taken from five wells on March 26, 2012. The highest concentrations of most metal contaminants were measured in March 2008, when groundwater was at its shallowest level in all wells, while the lowest concentrations were measured in March 2012, when groundwater was at its deepest level. This most recent groundwater testing found that hexavalent chromium was nondetectable in all five wells. Additionally, significant levels of VOCs were not measured in the groundwater under the project site.”

7.0 Response to Comments

Monitoring of groundwater and soil gas, and design features implemented to avoid risk associated with vapor intrusion during operation of the proposed project are discussed on pages 3.4-7 through 3.4-9 of the Recirculated Draft EIR (see also pages 3.6-16 and 3.6-17 of this Final EIR), which states:

The calculated risk for VOC intrusion into the proposed structure exceeds the acceptable risk level. According to the California Office of Environmental Health Hazard Assessment web page, the calculated risk values are below the Proposition 65 acceptable risk level of 1 in 100,000. Additionally, the risk calculation was based on conservative assumptions that did not account for the subterranean parking garage and the implementation of a standard vapor barrier, both of which are included in the proposed project. The standard vapor barrier is designed to prevent vapor invasion into the building. Additionally, the subterranean parking garage would have a separate air handling system from the remainder of the building. The air exchange rate for parking garages is typically very high in order to prevent the buildup of carbon monoxide. Thus, the combined effect of the garage and the vapor barrier would mitigate the total carcinogenic risk associated with vapor intrusion of VOCs at the subject property to a less than significant level. No additional mitigation measures are required.

Following implementation of the RAW, the potential existing source(s) of VOCs in soil gas are expected to be minimized with the removal of soils to a depth of 25 feet bgs and construction of the subterranean parking garage. Potential remaining sources may include residual concentrations in the remaining soil and groundwater. However, as required by DTSC, groundwater monitoring would occur for a two-year period to evaluate if contaminant concentrations are exhibiting an increasing trend. If no increasing trend is exhibited, no further action would be recommended. At the close of the two-year monitoring period, a letter would be issued from DTSC that groundwater monitoring has been completed and the project site would be considered remediated. Accordingly, compliance with existing state and federal regulations, including compliance with the RAW, would be expected to provide substantial environmental benefits to the project site and ensure a less than significant impact related to exposure of residents and occupational workers to VOCs during operation. No additional mitigation measures are required.

As discussed on pages 3.4-1 through 3.4-10 of the Draft EIR and pages 3.4-2 through 3.4-4 of the Recirculated Draft EIR (see also pages 3.6-2 through 3.6-12 of this Final EIR), the contamination at the project site poses a hazard to the project site and surrounding properties. There is no offsite contamination identified in any of the Environmental Site Assessments conducted that poses a hazard to the project site or adjacent properties. Additionally, as discussed on page 3.4-4 of the Recirculated Draft EIR (see also 3.6-6 of the Final EIR), based on the relatively low concentrations of metals detected throughout and surrounding the subject property in the Phase II and Limited Phase III Environmental Site Assessments, it does not appear that metal contamination in the groundwater has migrated offsite.

Response 6-4

Because Faith Plating continued to operate after the RAW was approved in 2009, the current applicant, Domain WH, LLC, conducted a new Phase I Environmental Site Assessment to characterize the conditions at the project since the Phase I, Phase II and Limited Phase III Environmental Site Assessments, were prepared in 2005 and 2006, respectively. As discussed on page 3.6-10 of the Recirculated Draft EIR (see also pages 3.6-10 and 3.6-11 of this Final EIR), the 2012 Phase I Environmental Site Assessment confirmed that the soil gas, soil, and concrete contamination identified in the previous Phase I, Phase II and Limited Phase III Environmental Site Assessments is still present at the project site.

New groundwater testing conducted in 2012 indicated that groundwater contamination is no longer present. Groundwater samples were taken from five wells on March 26, 2012. The highest concentrations of most metal contaminants were measured in March 2008, when groundwater was at its shallowest level in all wells, while the lowest concentrations were measured in March 2012, when groundwater was at its deepest level. This most recent groundwater testing found that hexavalent chromium was nondetectable in all five wells. Additionally, significant levels of VOCs were not measured in the groundwater under the project site.

As such, the most current Environmental Site Assessments and groundwater monitoring conducted at the project site have indicated a reduction in contaminant levels as compared to the previously prepared assessments for the project site. Although site conditions have improved since approval of the RAW, the applicant has elected to implement all of the conditions of the RAW as outlined and approved in 2009, which includes RAOs in exceedance of what is necessary to remediate the project site under the current conditions.

As discussed on pages 2-7 and 2-8 (see also page 2-14 of the Final EIR), site cleanup and environmental remediation would occur in accordance with the VCA under the supervision of DTSC, which includes implementation of the RAW. As stated on page 3.4-8 of the Recirculated Draft EIR (see also page 3.6-16 of this Final EIR), “after excavation activities have been completed, closure and post-closure activity would document that the remaining soil would have concentrations of heavy metals less than 10 times their respective STLC. A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter of No Further Action (NFA), building construction would begin.” DTSC would review tests of groundwater and soils present at the project site to certify that the existing contamination has been remediated and the project site is clear for residential construction. Upon receipt of the NFA, the City would then issue a building permit. Completion of this process will be a Condition of Approval for the project.

Response 6-5

See Response 6-3 above regarding well monitoring and the absence of offsite contamination. All of the reports prepared for the project site, including the 2012 Phase I Environmental Site Assessment and Groundwater Monitoring Report, are included as Appendix E of the Recirculated Draft EIR, as explained

7.0 Response to Comments

on page 3.4-1 of the Recirculated Draft EIR. The commenter is also referred to Comment Letter 7 submitted by DTSC, which explains that documents associated with the site cleanup activities are available on Envirostor for review.

Response 6-6

As discussed on pages 3.4-8 through 3.4-10 of the Draft EIR (see also pages 3.6-7 through 3.6-10 of this Final EIR), a Human Health Risk Assessment (HHRA) was prepared for the project site to determine potential risks to human health, including cancer, from the site specific contaminants and conditions. The risks associated with the construction and operation phases of the proposed project are discussed as follows:

Construction

According to the HHRA, exposure to VOCs during construction would be limited. Low concentrations of VOCs may volatilize during the excavation process, but concentrations are expected to be low. The duration of exposure would be less than 6 months for excavation workers and neighboring residents with frequencies not exceeding 8 hours.

The carcinogenic risks associated with nickel and cadmium, for construction workers for all three exposure pathways (ingestion, dermal, and inhalation) would be greater than the recognized acceptable level of 1×10^{-6} . The largest calculated risk would be the risk associated with the inhalation of nickel (1.7×10^{-2}). Based on these assessments, the applicant has proposed that during the construction phase of the project worker protection measures such as dust suppression and monitoring, an appropriate level of personal protective equipment (PPE), and sufficient safe work procedures (washing and containment of soiled clothes) should be employed at the subject property to protect the health of both onsite construction workers and off-site residents. These standard worker protection measures are a part of the Removal Action Work Plan (RAW) and thus are specifically designed by an independent responsible agency (i.e., DTSC) to provide sufficient protection to workers in these types of environments. Deployment of these RAW worker protection measures would reduce carcinogenic risks associated with nickel and cadmium for construction workers for all three exposure pathways (ingestion, dermal, and inhalation). Additionally, the results indicate the calculated cancer risk associated with the inhalation of nickel and cadmium in fugitive dust for off-site residents (1.68×10^{-7} to 1.27×10^{-8}) would be significantly lower than the generally acceptable risk level of 1 in 1 million (1.0×10^{-6}). The maximum detected concentration of lead in the soils at the site is 810 milligrams per kilogram (mg/kg), which is below the acceptable level of human health risk of 1,039 mg/kg. Therefore, lead would not represent a significant health risk to either construction workers or off-site residents. Accordingly, through implementation of the RAW, construction workers and off-site residents would not be exposed to significant health risks.

Operation

Following construction of the proposed project, cadmium, nickel, and lead impacted soil would be excavated to a depth of 14 feet bgs and removed from the project site. Additionally, the proposed structure would occupy the entire footprint of the property and no existing topsoil would be exposed. Accordingly, no direct exposure to soils surrounding or beneath the site would occur.

The summed total carcinogenic risk associated with vapor intrusion of VOCs at the subject property was calculated to be 1.7×10^{-6} , slightly above the acceptable value of 1.0×10^{-6} . While this value is slightly above the acceptable value of 1.0×10^{-6} , this risk value is less than one order of magnitude above the accepted level. Additionally, according to the California Office of Environmental Health Hazard Assessment web page, these calculated risk values are also below the Proposition 65 acceptable risk level of 1 in 100,000. It should be noted that the calculation did not include the benefits of the presence of the underground parking and the implementation of a standard vapor barrier, both of which are included in the proposed project. The standard vapor barrier is designed to prevent vapor invasion into the building. Additionally, the subterranean parking garage would have a separate air handling system from the remainder of the building. The air exchange rate for parking garages would be very high in order to prevent the buildup of CO. Thus, the combined effect of the garage and the vapor barrier would reduce the total carcinogenic risk associated with vapor intrusion of VOCs at the subject property to below the acceptable value. The summed total hazard index for non-carcinogenic risk (0.043) is well below the threshold of 1 in 100,000, and therefore, no additional action would be warranted to mitigate this risk. In summary, upon the completion of the work in accordance with the RAW discussed above, there would be no excess risks to future occupants of the project site.

**Emphasis added*

As discussed in the impact analysis on page 3.4-13 of the Draft EIR (see also page 3.6-15 of this Final EIR), the HHRA calculations indicate the exposure of construction workers to VOCs and lead, and exposure of neighboring residents to cadmium, nickel, lead, and VOCs during the construction phase would be below the acceptable risk levels and impacts would be less than significant. However, the calculated risk of exposure of construction workers to cadmium and nickel exceed the acceptable risk level. Thus, risk of exposure of residents and visitors in the area surrounding the project site during construction would be less than significant. However, impacts to the health of construction workers would potentially occur. The EIR concludes that through implementation of the RAW and removal of the contaminated soil in accordance with state and federal standards for residential occupancy, construction impacts related to hazardous conditions at the project site would be less than significant. The EIR further concludes that compliance with existing state and federal regulations, including compliance with the RAW, would be expected to provide substantial environmental benefits to the project site and ensure a

7.0 Response to Comments

less than significant impact related to exposure of residents and occupational workers to VOCs during operation of the proposed project.

Response 6-7

See Response 6-3 above, there is no offsite contamination posing a hazard to the project site.

Subject: FW: FAITH PLATING CONCERNS

From: Krug, Robert@DTSC [<mailto:Robert.Krug@dtsc.ca.gov>]
Sent: Wednesday, February 27, 2013 1:10 PM
To: Cota, Thomas@DTSC; Lavinger, Steve@DTSC; Robina Suwol - Calif Safe Schools
Cc: Black, Stewart@DTSC; Chandler, Phil@DTSC; Emily Stadnicki; Akula, Maya@DTSC
Subject: RE: FAITH PLATING CONCERNS

Hi Robina,

Thank you for your concerns and comments, please let me give you more information on the approved Removal Action Workplan (RAW) and activities done on this project. DTSC along with the old RP/developer investigated the site for soil contamination, soil gas contamination, and groundwater contamination. A risk assessment was done to determine the potential health risks, contaminants of concern includes cadmium, lead, nickel, and VOCs. Additionally Chromium VI is a potential risk to groundwater. A draft RAW was submitted and went through a 30 day comment period for the public to address their concerns. DTSC also held 2 public meetings in the community to discuss the site and answer questions and concerns. DTSC responded to all those who submitted comments on the draft RAW, then approved the RAW on March 13, 2009, the RP/developer cancelled the project due to financial issues. Since then other developers were interested in the property and met with DTSC, and finally we now have a developer who I think will complete the project/development and implement the approved RAW. The RAW includes; 1) excavating out most of the soil down to 14-20 feet below ground surface, 2) adding a reducing agent to the soil at groundwater (about 20 feet) to help remediate the chrome VI, 3) putting in a vapor barrier and, 4) monitor the groundwater for 2 years at which time DTSC will evaluate the monitoring results and determine if any further action is needed in the groundwater. The RAW also addresses construction issues such as; 1) dust control and air monitoring will be monitored as specified by SCAQMD Rule 1166, and 2) asbestos and lead paint in structures which they will notify and obtain permits from SCAQMD, OSHA and, the City of West Hollywood. The development planned for the site includes installing an underground parking garage and building commercial and residential units above the parking garage. The RAW, CEQA, Site Characterization, and other documents are all available on Envirostor for your review. Hopefully this information helps with your concerns on this project.

7-1

Sincerely,

Robert Krug
Project Manager
818-717-6562
Rkrug@dtsc.ca.gov
CalEPA / Department of Toxic Substances Control
Brownfields & Environmental Restoration Program – Chatsworth Office
9211 Oakdale Avenue
Chatsworth, California 91311

7.0 Response to Comments

Comment Letter 7: Department of Toxic Substances Control

Response 7-1

The commenter reiterates the process through which the RAW for the project site was approved by the Department of Toxic Substances Control in response to Comment Letter 6. The commenter also restates the conditions of the RAW to be implemented at the project site. The City appreciates DTSC's cooperation in the proposed project and assistance in responding to Comment Letter 6. This comment does not state a specific concern or question regarding the adequacy of the analysis in the Recirculated Draft EIR. Therefore, pursuant to CEQA Guidelines Section 15024(a), no further response to this comment is required.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337



*Flex your power!
Be energy efficient!*

March 6, 2013

Ms. Emily Stadnicki
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

IGR/CEQA No. 130116
Ref. IGR/CEQA No. 080829AL, DEIR
Domain Project/Formosa Specific Plan
Mixed-Use Development
Vic. LA-02 / PM 10.52 (Relinquished)
SCH # 2007081053

Dear Ms. Stadnicki:

Per our phone conversation with you on March 5, 2013, the City is willing to accept Caltrans late comment and extend the deadline to March 8, 2013. Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would construct up to 166 residential units and approximately 9,300 square feet of commercial uses (i.e., retail/restaurant).

From the Table 3.9-7 Project Trip Generation Estimates of Domain Project Recirculated Draft Environmental Impact Report (DEIR), the project will generate a net increase of 1,453 daily vehicle trips with 65/119/109 vehicle trips during AM/Mid-day/PM peak hours. We noted in our letter dated September 29, 2008, the project would generate 3,338 average daily traffic and 285/318/165 trips during AM/Mid-day/PM peak hours with project construct up to 130 residential units and approximately 9,000 square feet of commercial uses. Please clarify why the project increases the number of residential units but the vehicle trips decreases.

8-1

On Table 3.9-10 Cumulative Project List for Traffic (Page 3.9-20), there are a total of 95 projects identified as cumulative project in the project vicinity. The Level of Service on Santa Monica Blvd., around the development would be worsen. There may be cumulative significant traffic impacts when all the related projects are developed. Caltrans has concerns at intersection #15 Highland Ave. at Santa Monica Blvd. which is in the City of Los Angeles jurisdiction. The Lead Agency should work with the City of Los Angeles to identify potential cumulative traffic impacts to the State facilities and cumulative traffic mitigation measures for all related projects. A Fair share contribution towards the future improvement of on Santa Monica Blvd. is recommended. The decision makers should be aware of this cumulative traffic issue and be prepared to mitigate cumulative project impact in the future. We recommend the Lead Agency establish a mechanism to address cumulative transportation impacts from similar size development in the project vicinity.

8-2

Ms. Emily Stadnicki

March 6, 2013

Page 2 of 2

Please be reminded that although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. CMP requirements were developed by Los Angeles County in the context of CMP goals and objectives; it does not supersede the criteria from the responsible agency under CEQA. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis. The CMP analysis may not include site-specific safety considerations, or may not be based on an appropriate measure of effectiveness for site-specific considerations.

8-3

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water.

8-4

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

8-5

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 130116AL.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Comment Letter 8: California Department of Transportation**Response 8-1**

As discussed in Chapter 1, Introduction, of Recirculated Draft EIR, a new project applicant has taken over development of the proposed project since the time the Draft EIR was circulated for public review in August 2008. The new project applicant made minor modifications to the site plan of the previously proposed project, the Formosa Specific Plan, which were analyzed for the currently proposed project, the Domain Project, in the Recirculated Draft EIR. The Formosa Specific Plan Project included 130 dwelling units, approximately 3,200 square feet of high-turnover restaurant uses, and approximately 5,800 square feet of specialty retail uses. As stated on page 3.8-9 of the Draft EIR,

The proposed project is expected to generate 3,489 daily trips. A total of 314 trips would occur during the morning peak hour, 349 during the mid-day peak hour, and 195 trips during the evening peak hour. Based on the ITE trip generation rates and parcel data, the existing uses are currently generating a total of 151 daily trips. These uses generate a total of 29 trips during the morning peak hour, 31 trips during the mid-day peak hour, and 30 trips during the evening peak hour. The existing trips were subtracted from the proposed project trip generation estimates to determine the total net new trips. As such, the proposed project would generate 3,338 net new daily trips with 285 occurring during the morning peak hour, 318 during the mid-day peak hour, and 165 during the evening peak hour.

The majority of the traffic trips were estimated to be generated by the 3,200 square feet of high-turnover restaurant uses with 2,291 daily trips.

As discussed on page 2-6 of the Recirculated Draft EIR, the currently proposed Domain Project includes 166 dwelling units, approximately 6,800 square feet of retail uses, and approximately 2,500 square feet of restaurant uses. As discussed on pages 3.9-10 and 3.9-11 of Recirculated Draft EIR (see also page 3.11-11 of this Final EIR),

The proposed project is expected to generate 1,630 weekday daily trips. A total of 96 trips would occur during the morning peak hour, 152 during the mid-day peak hour, and 140 trips during the evening peak hour. These numbers do not take into consideration traffic that is currently generated by the existing on-site uses. When vehicular trips generated by existing uses are applied to the gross trip generation estimates as a trip credit, the proposed project would generate a net of 1,453 new daily trips with 65 occurring during the morning peak hour, 119 during the mid-day peak hour, and 109 during the evening peak hour.

As shown in Table 3.9-7 on page 3.9-11 of the Recirculated Draft EIR (see also page 3.11-11 of this Final EIR), it is estimated that the daily number of trips to be generated by the proposed project would be 1,104 for the residential units, 301 for the specialty retail uses, and 225 for the quality restaurant uses. Thus, although the number of residential units has increased, the decrease in square footage of the restaurant uses and the change in designation from high-turnover to quality restaurant accounts for the decrease in the estimated number of daily trips resulting from the proposed project.

7.0 Response to Comments

Response 8-2

As discussed on page 3.9-8 of the Recirculated Draft EIR (see also 3.11-18 of this Final EIR), “since the study area covers portions of West Hollywood and Los Angeles, a list of development projects occurring within both cities was developed. A total of 95 projects were identified with 52 in West Hollywood and 43 in Los Angeles, as potentially affecting traffic circulation through the study area.” The commenter is also referred to page 3.9-18 of the Recirculated Draft EIR (see also page 3.11-18 of this Final EIR), which explains that the list of related projects was derived from lists provided by the City of West Hollywood and the City of Los Angeles. Thus, the cumulative traffic analysis considers development in both jurisdictions, including development projects similar in size to the proposed project, in conjunction with the implementation of the proposed project. As shown in Table 3.11-12, Level of Service Summary – Future With Project Conditions (see pages 3.9-23 and 3.9-24 of the Recirculated Draft EIR), study intersection No. 15, Highland Avenue at Santa Monica Boulevard, would not be significantly impacted by traffic generated by the proposed project combined with the related projects and ambient background traffic growth. Therefore, no mitigation is required for this study intersection.

Response 8-3

As discussed in Chapter 3.9, Transportation and Traffic, of the Recirculated Draft EIR (see also Chapter 3.11 of this Final EIR), all issues required to be analyzed pursuant to CEQA have been discussed in this chapter. The commenter is referred to pages 3.9-8 through 3.9-10 of the Recirculated Draft EIR (see also pages 3.11-8 through 3.11-10 of this Final EIR), which includes a discussion of the thresholds of significance used in the transportation and traffic analysis to determine the level of impacts anticipated to result from implementation of the proposed project. In addition to the thresholds established in the CMP Guidelines, City of West Hollywood and City of Los Angeles threshold criteria were used to determine level of significance of potential impacts resulting from the proposed project. Thus, the significance criteria used in preparation of the traffic impact analysis includes requirements from local jurisdictions with knowledge of the conditions of the intersections in the project vicinity with the potential to be impacted by the proposed project. Further, as concluded on page 3.9-27 of the Recirculated Draft EIR (see also page 3.11-27 of this Final EIR), “the proposed project would not create a safety hazards through a design feature or incompatible use. The impact would be less than significant, and no mitigation is required.”

Response 8-4

The proposed project would require coverage under a General Construction Activity Stormwater Permit, which requires the development and implementation of a SWPPP pursuant to the NPDES. As stated on page 3.5-4 of the Recirculated Draft EIR (see also page 3.7-4 of the Final EIR), “the proposed project would follow guidelines for BMPs per the SWPPP, which would include erosion and sediment control BMPs. Implementation of these requirements, including preparation of a SWPPP, would ensure that impacts to water quality during construction would be less than significant.” Based on the groundwater levels identified in the geotechnical report, pre-construction dewatering measures would be needed to achieve the required excavation depths. As discussed on page 3.5-5 of the Recirculated Draft EIR (see

also page 3.7-5 of this Final EIR), “all groundwater removed from the project site during construction would be disposed of in accordance with DTSC procedures, as per the requirements of the RAW. Compliance with existing regulations would ensure that there would be no adverse impact to water quality associated with onsite groundwater disposal. Additionally, the building foundation would be designed to prevent groundwater from intruding into the structure and be coated with a waterproof membrane. Therefore, a permanent dewatering program would not be required during long-term project operation.” The Recirculated Draft EIR concludes “that compliance with the state and local regulations and implementation of site specific consultant geotechnical design guidelines would ensure that impacts to water quality, both during construction and operation, are less than significant. In addition, the proposed project would have the beneficial effect of removing hazardous waste water discharges currently generated by Faith Plating.”

Response 8-5

The proposed project would be required to comply with all applicable California Department of Transportation regulations during construction. As applicable, a Transportation Permit would be obtained from the California Department of Transportation by the construction contractor for the use of oversized or overweight vehicles (i.e., construction trucks) associated with the proposed project that would be expected to travel on State facilities. To the extent practicable, large size truck trips would be limited to off-peak commute periods.



Edmund G. Brown Jr.
Governor

Comment Letter No. 9
STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

March 11, 2013

Emily Stadnicki
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Subject: Formosa Specific Plan
SCH#: 2007081053

Dear Emily Stadnicki:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on February 25, 2013. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

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

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2007081053) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

9-1

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337



*Flex your power!
Be energy efficient!*

RECEIVED

MAR 11 2013

STATE CLEARING HOUSE

*clear
02/25/13
later*

March 6, 2013

Ms. Emily Stadnicki
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

IGR/CEQA No. 130116
Ref. IGR/CEQA No. 080829AL, DEIR
Domain Project/Formosa Specific Plan
Mixed-Use Development
Vic. LA-02 / PM 10.52 (Relinquished)
SCH # 2007081053

Dear Ms. Stadnicki:

Per our phone conversation with you on March 5, 2013, the City is willing to accept Caltrans late comment and extend the deadline to March 8, 2013. Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would construct up to 166 residential units and approximately 9,300 square feet of commercial uses (i.e., retail/restaurant).

From the Table 3.9-7 Project Trip Generation Estimates of Domain Project Recirculated Draft Environmental Impact Report (DEIR), the project will generate a net increase of 1,453 daily vehicle trips with 65/119/109 vehicle trips during AM/Mid-day/PM peak hours. We noted in our letter dated September 29, 2008, the project would generate 3,338 average daily traffic and 285/318/165 trips during AM/Mid-day/PM peak hours with project construct up to 130 residential units and approximately 9,000 square feet of commercial uses. Please clarify why the project increases the number of residential units but the vehicle trips decreases.

On Table 3.9-10 Cumulative Project List for Traffic (Page 3.9-20), there are a total of 95 projects identified as cumulative project in the project vicinity. The Level of Service on Santa Monica Blvd., around the development would be worsen. There may be cumulative significant traffic impacts when all the related projects are developed. Caltrans has concerns at intersection #15 Highland Ave. at Santa Monica Blvd. which is in the City of Los Angeles jurisdiction. The Lead Agency should work with the City of Los Angeles to identify potential cumulative traffic impacts to the State facilities and cumulative traffic mitigation measures for all related projects. A Fair share contribution towards the future improvement of on Santa Monica Blvd. is recommended. The decision makers should be aware of this cumulative traffic issue and be prepared to mitigate cumulative project impact in the future. We recommend the Lead Agency establish a mechanism to address cumulative transportation impacts from similar size development in the project vicinity.

9-2

Ms. Emily Stadnicki

March 6, 2013

Page 2 of 2

Please be reminded that although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. CMP requirements were developed by Los Angeles County in the context of CMP goals and objectives; it does not supersede the criteria from the responsible agency under CEQA. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis. The CMP analysis may not include site-specific safety considerations, or may not be based on an appropriate measure of effectiveness for site-specific considerations.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 130116AL.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

9-2
Cont.

Comment Letter 9: Governor's Office of Planning and Research

Response 9-1

The commenter states that a late comment letter was received and the Lead Agency is not required to respond to late comment letters, pursuant to CEQA. No further response to this comment is required.

Response 5-2

See Responses 8-1 through 8-5 above for responses to comments submitted by Caltrans.

7.0 Response to Comments

7.2 RESPONSES TO COMMENTS ON THE DRAFT EIR

The Draft EIR was distributed for public review on August 15, 2008, initiating a 45-day public review period until September 29, 2008, pursuant to CEQA and its implementing guidelines. During this public review period, a total of five letters were received. One letter was received after the close of the review period, and has been included. All of the comment letters received on the Draft EIR are listed in Table 7-2 and the corresponding responses are provided in this section. A copy of each comment letter is provided prior to each response.

The City held a Planning Commission meeting and Historic Preservation Commission meeting to solicit additional comments from the public during the public review period. A summary of the comments from the Planning Commission meeting and Historic Preservation Commission meeting are included at the end of this section with corresponding responses.

TABLE 7-2 LIST OF COMMENT LETTERS ON DRAFT EIR

Letter No.	Agency/Organization/Individual	Date of Letter	Page # of Response
10	County of Sanitation Districts of Los Angeles County <i>Signed: Ruth Frazen</i>	August 19, 2008	7-50
11	California Department of Transportation <i>Signed: Elmer Alvarez</i>	September 3, 2008	7-53
12	Governor's Office of Planning and Research <i>Signed: Terry Roberts</i>	September 29, 2008	7-57
13	County of Los Angeles Department of Public Works <i>Signed: Dean Efstathiou</i>	October 6, 2008*	7-60
14	Gregory Sanders	September 3, 2008	7-64

* Denotes late comment letter.



Comment Letter No. 10

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

August 19, 2008

File No: 04-00.04-00

Mr. David DeGrazia, Senior Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Mr. DeGrazia:

Formosa Specific Plan Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on August 15, 2008. The proposed development is located within the jurisdictional boundaries of District No. 4. We offer the following comments regarding sewerage service:

1. Wastewater generated by the proposed project will be conveyed through City of West Hollywood and City of Los Angeles sewer lines for treatment at the Hyperion Treatment Plant. Information regarding available capacities in the sewer lines and at the treatment plant are available from the City of Los Angeles' Department of Public Works. 10-1
2. The expected average wastewater flow from the project site is 23,205 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. 10-2
3. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727. 10-3

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin


Ruth I. Frazen
Customer Service Specialist
Facilities Planning Department

RIF:rf

Doc #: 1095285.1

7.0 Response to Comments

Letter 10: County Sanitation Districts of Los Angeles County

Response 10-1

The Los Angeles County Sanitation Districts confirmed the wastewater generated by the Formosa Specific Plan Project would be conveyed through the City of West Hollywood and the City of Los Angeles sewer lines for treatment at Hyperion Treatment Plant, as stated on page 3.7-6 in Section 3.7 of the Draft EIR.

Response 10-2

The Los Angeles County Sanitation Districts estimate that the average wastewater flow from the project site would be 23,205 gallons per day, which represents approximately 0.005 percent of the total amount of wastewater treated at Hyperion Treatment Plant. As concluded on page 3.7-6 and 3.7-7 of the Draft EIR, the Formosa Specific Plan Project would be served by a wastewater treatment plant with adequate capacity. See also Response 4-2 above.

Response 10-3

See Response 4-3 above.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING
 IGR/CEQA BRANCH
 100 MAIN STREET, MS # 16
 LOS ANGELES, CA 90012-3606
 PHONE: (213) 897-6696
 FAX: (213) 897-1337



*Flex your power!
 Be energy efficient!*

IGR/CEQA No. 080829AL, EIR
 Formosa Specific Plan
 Mixed-Use Development
 Vic. LA-02 / PM 10.52 (Relinquished)
 SCH # 2007081053

September 29, 2008

Mr. David DeGrazia
 City of West Hollywood
 8300 Santa Monica Blvd.
 West Hollywood, CA 90069

Dear Mr. DeGrazia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is to construct up to 130 residential units and approximately 9,000 square feet of commercial uses.

The project is not far away from Caltrans Right-of-Way, Santa Monica Blvd. From Table 3.8-9 Project Trip Generation Estimates, the project would generate 3,338 average daily traffic and 285/318/165 trips during AM/Mid Day/PM peak. Many of those trips will utilize SR-02, Santa Monica Blvd.

11-1

From Table 3.8-7, Cumulative Project List For Traffic, a total of 104 projects were identified with 58 in West Hollywood and 47 in Los Angeles. Some of the existing Level of Services (LOS) on Santa Monica Blvd. on Caltrans Right-of-Way are operating at LOS E and F or is operating near capacity (Table 3.8-2 Level of Service Summary-Existing Conditions). There may be cumulative significant traffic impacts when all the related projects are developed. Please identify potential cumulative traffic impacts to the State facilities and cumulative traffic mitigation measures for all related projects.

After reviewing the environmental document, we recommend the City provide a right turn lane on westbound Santa Monica Blvd. to Detroit St. due to future LOS F at this location. We also conclude that there may be a significant project impact and cumulative traffic impact to the State Route 2, Santa Monica Blvd. We encourage the City of West Hollywood and City of Los Angeles to work with Caltrans in developing mitigation alternatives that would be feasible and mutually acceptable. These may include but not limit to vehicle trip reducing strategies, improvements to public transit, and/or a local shuttle bus, and a Project Study Report (PSR). Caltrans also accepts fair share funding contributions toward pre-established of future highway improvements.

11-2

In the spirit of mutual cooperation, we would like to invite the lead agency, City of Los Angeles, and the consultant to the Caltrans office to discuss project generated traffic impacts on the State facilities and mitigation measures that could alleviate traffic congestion in the future. We would also like to discuss possible transportation solutions to accommodate future developments. Please contact this office at your earliest convenience to schedule a meeting within the next few weeks.

11-3

We would like to remind you that any work to be performed within the State Right-of-way will need an Encroachment Permit from the California Department of Transportation.

11-4

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water.

11-5

Any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods.

11-6

If you have any questions, please feel free to contact me at (213) 897-6696 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 080829AL.

Sincerely,



ELMER ALVAREZ
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Letter 11: California Department of Transportation**Response 11-1**

Caltrans requests that the EIR identify significant traffic impacts when all of the related projects listed in Table 3.8-7 are developed. As stated on page 3.8-16 of the Draft EIR, the future traffic conditions with and without the Formosa Specific Plan Project assume that all 104 related projects would be developed. Under the future with project conditions, significant traffic impacts would occur and feasible mitigation measures were identified in Chapter 3.8, Transportation and Traffic. Cumulative impacts without the proposed project are listed on page 3.8-19 of the Draft EIR and cumulative impacts with the Formosa Specific Plan Project are listed on page 3.8-26 of the Draft EIR. Mitigation measures are listed on page 3.8-34 of the Draft EIR. As discussed on page 3.8-35 of the Draft EIR, even with implementation of mitigation, significant and unavoidable cumulative impacts would occur at the following five intersections on Santa Monica Boulevard:

- Formosa Avenue at Santa Monica Boulevard
- La Brea Avenue at Santa Monica Boulevard
- Highland Avenue at Santa Monica Boulevard
- La Brea Avenue and Melrose Avenue
- Detroit Street and Santa Monica Boulevard

Response 11-2

Caltrans recommends providing a right-turn lane on westbound Santa Monica Boulevard at Detroit Street. However, it should be noted that Caltrans relinquished control of the portion of Santa Monica Boulevard within the City of West Hollywood in 1999. Thus, the City of West Hollywood owns and maintains the portion of Santa Monica Boulevard within the City limits and it is not considered a State facility. The proposed mitigation measure was reviewed by the City of West Hollywood Transportation Department. As shown in Figure 3.8-5 on page 3.8-27 of the Draft EIR, there would be approximately 21 right-hand turn movements from Santa Monica Boulevard onto Detroit Street during the a.m. peak hour and 31 right-hand turn movements during the p.m. peak hour. Due to the low volume of turning movements at this location, the City determined that the right-turn lane at this location would not be warranted and would not substantially improve traffic flow along Santa Monica Boulevard. Note that no impact was identified at the intersection of Santa Monica Boulevard and Detroit Street in the Recirculated Draft EIR.

Response 11-3

Caltrans suggests a meeting between the lead agency, City of Los Angeles, and the consultant to the Caltrans office to discuss project-generated traffic impacts on State facilities. The commentor's suggestion has been forwarded to the Transportation Department for consideration.

7.0 Response to Comments

Response 11-4

Caltrans states that any work to be performed within the state right-of-way would require an encroachment permit. As stated above, Santa Monica Boulevard is a City facility, and therefore, a Caltrans encroachment permit would not be required. The applicant would coordinate with and obtain an encroachment permit from the City for all work within the right-of-way along Santa Monica Boulevard.

Response 11-5

See Response 8-4 above.

Response 11-6

See Response 8-5 above.



Comment Letter No. 12
STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

September 30, 2008

David DeGrazia
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Subject: Formosa Specific Plan
SCH#: 2007081053

Dear David DeGrazia:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 29, 2008, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

12-1

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

Sincerely,

Terry Roberts
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007081053
Project Title Formosa Specific Plan
Lead Agency West Hollywood, City of

Type EIR Draft EIR

Description The Formosa Specific Plan proposes to construct up to 130 residential units and approximately 9,000 square feet of commercial uses (i.e., retail/restaurant/banking). The proposed project would provide the necessary financial resources to remove an existing industrial use, which continues to generate air and ground pollutants, and clean-up existing environmental contamination. In addition to providing mixed-use development of housing and commercial uses, the project would involve environmental remedial actions that would remove on-site sources of contamination to soil and groundwater; obtain unrestricted regulatory site closure for the site; and provide a site that meets the health and safety standards for construction of a retail and residential complex.

Lead Agency Contact

Name David DeGrazia
Agency City of West Hollywood
Phone (323) 848-6844 **Fax**
email
Address 8300 Santa Monica Boulevard
City West Hollywood **State** CA **Zip** 90069

12-2

Project Location

County Los Angeles
City West Hollywood
Region
Lat / Long 34° 5' 27.2" N / 118° 20' 43.7" W
Cross Streets Santa Monica Boulevard and Detroit Street/Formosa Avenue
Parcel No. 5531-009-021, 022, 001, 002
Township **Range** **Section** **Base**

Proximity to:

Highways SR 101 and SR 2
Airports
Railways
Waterways
Schools Various
Land Use Metal Plating Facility / CC (Commercial, Community) / Commercial

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 4; Department of Parks and Recreation; Native American Heritage Commission; Integrated Waste Management Board; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control

Date Received 08/14/2008 **Start of Review** 08/14/2008 **End of Review** 09/29/2008

Letter 12: Governor's Office of Planning and Research

Response 12-1

The commenter states that the Lead Agency has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. No further response to this comment is required.

Response 12-2

The Document Details Report from the State Clearinghouse database explaining the distribution of the Final EIR is noted. No further response to this comment is required.



DEAN D. EFSTATHIOU, Acting Director

Comment Letter No. 13
COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE REFER TO FILE: **LD-1**

October 6, 2008

Mr. David DeGrazia, Senior Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Dear Mr. DeGrazia:

**RESPONSE TO NOTICE OF AVAILABILITY
FORMOSA SPECIFIC PLAN PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
CITY OF WEST HOLLYWOOD**

Thank you for the opportunity to review the Notice of Preparation for the subject project. We offer the following comments for your consideration.

Hazard-Geotechnical

Referenced geotechnical reports addressing the proposed development and recommending mitigation measures for geotechnical hazards should be included as part of the Environmental Impact Report.

13-1

Underground Storage Tanks/Industrial Waste/Storm water

- Existing industrial waste facilities are on-site. Closure of the industrial waste permit will require sampling to determine if site needs further remediation work.
- Should any operation within the subject project include the construction, installation, modification, or removal of underground storage tanks, industrial waste treatment or disposal facilities, and/or storm water treatment facilities, Public Works' Environmental Programs Division must be contacted for required approvals and operating permits.

13-2

13-3

Mr. David DeGrazia
October 6, 2008
Page 2

- Food service establishments may be required to provide a grease treatment device and will be subject to review and approval by Public Works' Environmental Programs Division. | 13-4
- All development and redevelopment projects which fall into one of the Standard Urban Stormwater Mitigation Plans project types, characteristics, or activities, must obtain Standard Urban Stormwater Mitigation Plans approval by the appropriate agency. | 13-5

If you have any questions regarding environmental programs, please contact Mr. Corey Mayne at (626) 458-3511.

If you have any other questions, please contact Mr. Toan Duong at (626) 458-4945.

Very truly yours,

DEAN D. EFSTATHIOU
Acting Director of Public Works


for DENNIS HUNTER, PLS PE
Assistant Deputy Director
Land Development Division

TD:ca
P:\LDPUB\CEQA\CDM\West Hollywood_FormosaSpecificPlan_NOA-DEIR.doc

7.0 Response to Comments

Letter 13: County of Los Angeles Department of Public Works

Response 13-1

The County Department of Public Works suggests that referenced geotechnical reports addressing the proposed development should be included in as part of the EIR. The comment is noted. Background technical studies were provided by the applicant and used in preparation of the Draft EIR were available by request at the City of West Hollywood Planning Counter. Additionally, the updated geotechnical report prepared by the current project applicant is included as Appendix B of the Recirculated Draft EIR (see Appendix D of this Final EIR).

Response 13-2

The County Department of Public Works states that closure of industrial waste facilities would require sampling to determine if the site needs further remediation work. As stated on page 3.4-14 of the Draft EIR (see also pages 3.4-8 of the Recirculated Draft EIR and 3.6-16 of the Final EIR:

After excavation activities have been completed, closure and post-closure activity would document that the remaining soil would have concentrations of heavy metals less than ten times their respective Soluble Threshold Limit Concentration (STLC). A letter would be issued from DTSC within 30 days of the completion of excavation activity indicating that the extent of soil contamination has been removed from the subject property. Upon receipt of the letter of No Further Action (NFA), building construction would begin. Building construction would not be permitted until the NFA is received.

Thus, closure of the site would not be obtained without soil testing and building construction could not proceed until the site is considered remediated. This process will be a Condition of Approval of the proposed project.

Response 13-3

As discussed on page 3.4-6 of the Draft EIR, the Phase II and Limited Phase III Environmental Site Assessment determined that there are no underground storage tanks located on the project site. However, the project site does contain industrial waste and storm water clarifiers associated with the Faith Plating operations. Thus, as described by the County Department of Public Works, removal of these facilities would require coordination with the Environmental Programs Division.

Response 13-4

As indicated by the commentor, operation of restaurant uses on the project site may require a grease treatment device that would be subject to review and approval by the County of Los Angeles Department of Public Works' Environmental Programs Division. As such, upon final determination of the commercial uses, the applicant would coordinate with the City Department of Public Works and the County Environmental Programs Division to install a grease trap to the satisfaction of both agencies.

Response 13-5

As discussed on page 3.7-5 of the Recirculated Draft EIR (see also page 3.9-5 of this Final EIR), “the proposed project would be required to implement BMPs identified in the SWPPP during construction and operation and comply with the SUSMP.

Comment Letter No. 14
GREGORY SANDERS
1123¼ North Detroit St.
West Hollywood, CA 90046
(323) 851-5115
email: sandersg1123@sbcglobal.net

September 3, 2008

David Garcia
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

Dear Mr. Garcia:

I am writing with regard to the Formosa Specific Plan for the redevelopment of the property on Santa Monica Blvd. now currently occupied by Faith Plating et al. I rent an apartment in the Detroit St. building directly contiguous to this proposed project, so obviously it is of great concern to me. In the best of all possible worlds, I would prefer a much smaller project than the one proposed. However, I am a realist. I recognize that redevelopment is the only alternative to decay, and that this project must be of sufficient size to offset the cost of environmental cleanup. However, after reading the report posted on the city's website, I am astounded at the conclusions reached regarding the parking to be provided on this site. I am an not expert on traffic flow or parking patterns, but I live on this street and I can tell you that the number of parking spaces being proposed is not only inadequate but woefully so.

14-1

Our is a permit parking district, and before permit parking was introduced, the city did a study in which on various dates during the week, on weekends, at night, during the day, etc., the sheriffs went up and down our street, running all the license plates to determine which cars were registered to residents and which were not. The conclusion reached was that while permit parking might be helpful, it would by no means solve the parking problem in our neighborhood because (here I am quoting from memory) something like 80 to 90 percent of the cars parked on the street (and the street was fully parking including some illegal spaces) belonged to residents. This was because many of the buildings, my own included, were built decades ago and have no dedicated parking whatsoever. In addition, as rents have risen, more people are doubling up, sharing one bedroom apartments for example, so that a unit that formerly put one car on the street now puts two. I know that currently, with permit parking in place, it is often impossible to find a space on my block after nine o'clock at night. It is a common occurrence that I have to park several blocks away. And on street cleaning days the competition for spots is Darwinian.

14-2

I am not sure what the exact number of units in this project will be. The numbers I have seen range from 125 to 145, but regardless, all of those units will doubtless be eligible for parking permits. Theoretically, counting two resident stickers and two guest permits per unit, that could be around 500 permits added to an already saturated parking environment. Obviously, not all those permits would be applied for, nor would they all be in use at any one time, but even if this project were to put 30 more cars on the street at any given time of the day or night, that would be a disaster for people like myself who have no other place to park. This project, at present, provides no residential guest parking whatsoever, and only one space per one-bedroom unit. Does anyone truly believe that none of those one-bedroom units will be occupied by couples or that no single persons living alone will have boyfriends or girlfriends spending the night on a regular basis. Furthermore, by a formula I do not understand, a reduction of 35 spaces from the maximum required by code is being considered. To grant such a reduction would be irresponsible, not only to current residents like myself, but to future tenants of this proposed project and indeed the owners if they could but see their own long-term interests. Currently, permit parking operates here only at night, but if this project has inadequate parking, there will be a move among the residents to demand that it be in effect 24/7 as it is in some other high traffic areas of the city. In that event, how many restaurants or business will rent space in this project if their customers have no place to park?

14-2
Cont.

One final concern, unrelated to the above: From the plans it is clear that the residential driveway leading to the residential garage will run parallel to the back wall of my building, and indeed the back wall of my own apartment, but it is not clear whether there will be some sort of wall or barrier between the two properties. In my view, there should be, and it should be of sufficient high and thickness to mitigate any noise etc. None of the apartments in my complex have south-facing windows overlooking this proposed driveway, other than tiny windows high above the bathtub for the purposes of ventilation, so such a barrier would not block anyone's view.

14-3

Sincerely,



Greg Sanders

7.0 Response to Comments

Letter 14: Gregory Sanders

Response 14-1

As discussed in Section 3.8, Transportation and Traffic of the Draft EIR, the Formosa Specific Plan Project would provide a total of 206 parking spaces with 159 reserved for residential uses in a subterranean parking garage and 47 parking spaces for retail/restaurant/bank uses located on the ground floor level parking garage. The parking spaces would consist of a combination of compact, handicap, tandem, and standard parking spaces.

As stated on page 3.8-33 of the Draft EIR, the Formosa Specific Plan Project would provide 39 fewer spaces than required by the City's parking standards. Approval of a specific plan supplements relevant controls in the Municipal Code and General Plan by adding regulations specifically applicable to the site (City of West Hollywood 1988). In West Hollywood, specific plans have been used to provide flexibility and enable developers to increase buildable area and height above that permitted by zoning conditioned on analyses and mitigation of impacts and contribution of specific benefits to the City. The Formosa Specific Plan applies only to the project site and provides site specific development standards that would enable a higher density of development in order to justify the costs associated with cleanup of the site contamination prior to residential development.

A parking demand analysis was used to determine the peak parking demand for each type of land use onsite and to identify the peak parking demand throughout the day. This analysis was conducted for average weekday and Saturday parking demand. Based on this analysis, the parking standards in the Formosa Specific Plan were established. Additionally, the Formosa Specific Plan Project would provide an additional 6 parking spaces above the amount required per the revised parking standards. The Draft EIR concluded that the Formosa Specific Plan Project would not result in an inadequate parking supply, and the impact to parking would be less than significant (see pages 3.8-32 and 3.8-33 of the Draft EIR).

As discussed in Chapter 1, Introduction, of Recirculated Draft EIR, a new project applicant has taken over development of the proposed project since the time the Draft EIR was circulated for public review in August 2008. The new project applicant made minor modifications to the site plan of the previously proposed project, the Formosa Specific Plan. As stated on page 1-3 of the Recirculated Draft EIR, the proposed project was revised to increase the total number of onsite parking spaces up from 206 to 260 by providing an additional half level of subterranean parking. As stated on page 3.6-12 of the Recirculated Draft EIR (see also page 3.8-12 of this Final EIR), per Article 19-3, Chapter 19.28 and Article 19-3, Article 19.22 of the City of West Hollywood Municipal Code, the proposed project would be required to provide a total of 245 parking spaces. Therefore, the Domain Project would provide more parking than required for the project by the West Hollywood Municipal Code with the inclusionary housing parking incentive.

Response 14-2

As stated on page 2-19 of the Draft EIR, the proposed project and all similar development projects are not eligible for preferential parking permits for site residents. All site residents would be required to park onsite. Thus, the proposed project would provide 159 parking spaces for the residential uses made up of a combination of handicap, compact, tandem, and standard parking stalls. Guest parking would be shared with the parking for the retail/restaurant/banking uses in the ground level parking garage. A total of 47 parking spaces would be provided in the ground floor garage.

However, as discussed in Response 14-1 above, the proposed project was revised to increase the total number of onsite parking spaces up from 206 to 260 by providing an additional half level of subterranean parking. The proposed project would provide 199 parking spaces for the residential units and 15 parking spaces for guests, 46 parking spaces for the retail/restaurant uses, and 45 bicycle parking spaces (see pages 1-2 and 1-3 of the Recirculated Draft EIR).

Response 14-3

The commentor suggests installing a wall or barrier of sufficient height and thickness between the residential parking entrance ramp and neighboring residences. As shown on Figure 2-5 on page 2-13 of the Draft EIR, under the Formosa Specific Plan Project a block wall would be installed along the northern boundary of the project site on Detroit Street to create a buffer between the entrance to the residential parking garage and the adjacent residences. Under the revised project, as shown on Figure 2-2 on page 2-5 of the Recirculated Draft EIR, the building exterior would be located near the northern boundary of the project site on Detroit Street to provide a buffer between the project site and adjacent residences. Vehicles would enter the building to gain access to the residential parking area instead of along a driveway and ramp.

7.0 Response to Comments

RESPONSES TO ORAL COMMENTS RECEIVED AT PUBLIC MEETINGS REGARDING THE DRAFT EIR

Two public meetings were held during the 45-day public review period for the Draft EIR. The first meeting was the Planning Commission meeting held at 6:30 p.m. on September 4, 2008 at the West Hollywood Park Auditorium (647 North San Vicente Boulevard, West Hollywood, CA 90069). The second meeting was the Historic Preservation Commission meeting held at 7:00 p.m. on September 22, 2008 at the Plummer Park Community Center (7377 Santa Monica Boulevard, West Hollywood CA 90069). At the meetings, City staff presented an overview of the project and the Draft EIR conclusions. After the presentation, verbal testimony was accepted and approximately four members of the public provided comments on the EIR. A summary of the comments received at each meeting and responses are shown in Table 7-3 below.

TABLE 7-3 RESPONSES TO COMMENTS RECEIVED DURING PUBLIC MEETINGS

No.	Comment	Response
September 4, 2008 Planning Commission Meeting		
PC-1	The underlying zoning at the project site allows for 3 stories and 45 feet in height, not 6 stories and 75 feet in height.	<p>As discussed on page 3.5-2 in Section 3.5.2 Regulatory Setting of the Draft EIR, the City of West Hollywood General Plan Land Use Element and Zoning Ordinance states that the project site is zoned CC (Commercial, Community), which allowed a density of 1.5 FAR in up to three stories and 35 feet in height. In addition, commercial projects that incorporate residential units, such as the Formosa Specific Plan Project, would be granted a height bonus of up to 10 feet and one story for a total of 4 stories and 45 feet. Additional density bonuses were offered for the inclusion of affordable housing, which the project includes. The Formosa Specific Plan Project seeks a maximum building height of six stories and 75 feet and a maximum allowable FAR of 3.0.</p> <p>Pursuant to Government Code Section 65450, specific plans are tools for the systematic implementation of the general plan. As a planning tool, a specific plan establishes a link between the general plan's goals and policies and specific development proposal(s) within a defined area. According to the California Governor's Office of Planning and Research's <i>The Planner's Guide to Specific Plans</i> (2001), a well designed specific plan has the advantage of enabling the City to effectively implement selected long term general plan objectives in the short term.</p> <p>Per the City of West Hollywood General Plan (1988, Section II.4 pp. 108-109) "specific plans are intended to provide more finite specification of the types of uses to be permitted, development standards (setbacks, heights, landscape, architecture, etc.), and circulation and infrastructure improvements. Traditionally, in West Hollywood, specific plans have been used to provide flexibility and enable developers to increase buildable area and height above that permitted by zoning for projects on sites of at least 100,000 square feet, conditioned on analyses and mitigation of impacts and contribution of specific "benefits" to the city (e.g., additional parking, community open space and meeting rooms, funds for community beautification and housing, day care facilities, and other</p>

7.0 Response to Comments

No.	Comment	Response
		<p>similar amenities).” Further, Policy 1.10.3 of the General Plan (1988, pp. 34-36) states,</p> <p style="padding-left: 40px;">Allow modification of the Plan’s permitted density/intensity, height, and other development standards for: (a) development projects which expand existing facilities or introduce new uses which are considered to be of significant importance (municipal revenue, historical use, socially valued use, etc.), (b) contribute significant benefits to the city, and/or (c) whose architectural design is of unusual merit and will enhance the City of West Hollywood provided that:</p> <ol style="list-style-type: none"> a. impacts of the modifications can be mitigated by an acceptable compensation mechanism, b. the use of additional height will reduce the impacts of bulk along the sidewalk, street, and adjacent properties, increase the ground level open space, result in a structure of variable heights, and/or create additional view corridors, provided that the additional height does not adversely impact adjacent uses, and c. the modification shall be reviewed by the community and approved by the Planning Commission and City Council prior to consideration of the project. <p>The Formosa Specific Plan Project seeks modifications to the General Plan’s permitted density and height. The project site is zoned CC (Commercial, Community). The CC designation allows a density of 1.5 FAR (floor-to-area ratio) in up to three stories and 35 feet in height. Within the CC zone, commercial projects that incorporate residential units may be granted a bonus of 0.5 FAR to be added to the base FAR as long as the total FAR does not exceed 2.0, excluding parking. A height bonus of up to 10 feet and one story may accompany a FAR bonus of up to 0.5 FAR for residential uses provided that: a) if the proposed project is adjacent to a residential zoning district, the 25 feet of the structure located closest to the residential zoning district is limited in height to 35 feet; and b) all of the additional area allowed by the height bonus is developed exclusively with residential uses. The Formosa Specific Plan Project seeks a maximum building height of six stories and 75 feet and a maximum allowable FAR of 3.0, which would exceed the permitted density and height.</p> <p>In keeping with General Plan policy, implementation of the Formosa Specific Plan Project would introduce new uses that are considered to be of significant importance by the community. The Formosa Specific Plan Project would convert an industrial/commercial area that generates substantial amounts of pollution with new residential and neighborhood-serving retail. Further, the Formosa Specific Plan Project would add uses that are more in character with the adjacent residential neighborhood and create a better transition between the higher density commercial</p>

7.0 Response to Comments

No.	Comment	Response
		<p>uses and the adjacent residential uses. It would contribute to the redevelopment of the intersection of Santa Monica Boulevard and La Brea Avenue that was initiated with the Gateway project.</p> <p>The Formosa Specific Plan Project would contribute significant benefits to the City by replacing the current uses. As discussed throughout the Draft EIR, the project site is a listed hazardous waste site with known contamination of groundwater and soil, as well as continually generating large quantities of toxic air emissions. Removing Faith Plating from the project site would terminate the continued release of pollutants into the air, soil, and water.</p> <p>In addition, the Formosa Specific Plan Project would provide an architectural design of unusual merit. When the project was originally proposed and introduced to the community, it consisted of a single four-story structure 45 feet in height in keeping with the permitted height for the site. After review by the community, it was suggested that the height be increased along the Santa Monica Boulevard frontage in order to provide a more moderate transition between the adjacent one- and two-story residential buildings that directly abut the site to the north. It was determined that the Uniform Building Height alternative (see page 5-3 of the Draft EIR) would create a significant shade and shadow impact that is not created by the proposed project because the bulk of the building would front Santa Monica Boulevard. Thus, modifying the height of the structure actually reduced shade and shadow cast during the winter months (worst-case scenario). Further, by having the building step down from six to three stories at the north end of the project site, it is more in character with the existing residential uses and reduces the visual intrusion to the adjacent residential neighborhood, which range in height from one to four stories. In addition, the applicant was able to incorporate a view corridor into the project that would open up previously obscured views of the Hollywood sign along Santa Monica Boulevard by cutting out the street-level and second story portion of the building fronting Santa Monica Boulevard and establishing a public viewing platform (see Figure 3.1-13 on page 3.1-13 of the Draft EIR). Thus, although the proposed project would exceed the height limits permitted on the project site, the project design exhibits unusual architectural merit.</p> <p>Remediation of the Faith Plating site is estimated to cost approximately \$1 million more than conventional development. To enable the remediation to be accomplished and accommodate affordable housing at the project site, both without public subsidy, the applicant is seeking an increase in building density, or floor area ratio. As described above, the proposed increases in height allowances and density above that permitted in land use policy is consistent with the intent of General Plan Policy 1.10.3. A complete discussion of the Formosa Specific Plan Project's consistency with applicable General Plan policies is included in Section 3.7, Land Use and Planning of the Draft EIR. Implementation of the Formosa Specific Plan would allow the City to ensure that the additional height and density that are justified by the level of design and the private sector investment in remediation</p>

7.0 Response to Comments

No.	Comment	Response
		<p>of the site are targeted to this area.</p> <p>Further, the project site is located within the East Side Redevelopment Plan Area. The purpose of the redevelopment plan is to establish a process and a framework for the redevelopment, rehabilitation, and revitalization of any area within the redevelopment plan area (West Hollywood Community Development Commission 1997). The Formosa Specific Plan Project is consistent with the intentions of the plan, which include recycling and/or developing underutilized parcels to accommodate higher and better economic uses; improving environmental deficiencies; creating a pedestrian-oriented environment and an urban-village atmosphere; improving the visual environment of the community; and developing attractive market-rate and affordable housing for both ownership and rental. Major land uses permitted in the plan area include residential, commercial, public, and special land uses such as specific plan uses. The East Side Redevelopment Plan provides the City a mechanism for the assembling of parcels for redevelopment and revitalization of the plan area through the use of specific plans. The Formosa Specific Plan Project would be consistent with the redevelopment plan, and the specific plan would allow redevelopment of a contaminated site in order to create a mix of uses that would contribute to the urban-village atmosphere near the eastern boundary of the City.</p> <p>As discussed in Chapter 1, Introduction, of the Recirculated Draft EIR, a new project applicant has taken over development of the proposed project since the time the Draft EIR was circulated for public review in August 2008. The new project applicant made minor modifications to the site plan of the previously proposed project, the Formosa Specific Plan. As stated on page 1-2 of the Recirculated Draft EIR, the proposed project would no longer require a specific plan because the proposed project is consistent with the West Hollywood General Plan 2035 and to the recently updated West Hollywood Zoning Ordinance. As stated on page 3.6-7 of the Recirculated Draft EIR (see also page 3.8-7 of this Final EIR), the CA designation allows for development of up to five stories and 60 feet in height with an additional 10 feet in height bonuses granted within the Mixed-Use Incentive Overlay Zone, for a total allowable height of 70 feet in up to six stories. The proposed project would construct up to six stories in height, but would be up to 72 feet in height not including architectural features. Therefore, a Modification Permit is required to permit greater height than is allowed by right and with bonuses.</p>
PC-2	Why is the City allowing specific plans that are not included in the General Plan?	See Response PC-1 above.
PC-3	Traffic during construction will be a big problem, as well as noise generated during construction.	As discussed in the Draft EIR and Recirculated Draft EIR, construction of the proposed project would be expected to create traffic and noise impacts. Under the existing operations of the site as a metal plating facility and sound editing studio, there are approximately 29 vehicle trips to and from the site each day. Construction is expected to require approximately 30 construction workers traveling to and from the project site each day. This would

7.0 Response to Comments

No.	Comment	Response
		<p>be similar to the existing number of vehicle trips to and from the site. However, construction activities would also require the delivery of materials to the site and the removal of excavated soil (approximately 33,200 cubic yards) that would generate additional vehicle trips to and from the site. As stated on pages 2-23 of the Draft EIR and 2-9 of the Recirculated Draft EIR, construction would require no more than 60 truck trips per day with an average of 35 haul trucks entering and leaving the site on a typical day during hauling operations. Thus, during a day with a large amount of deliveries and/or excavation of soil, there could be as many as 90 trips to and from the site. This would represent an increase of approximately 61 trips compared to the existing uses. However, the number of delivery trucks passing through an intersection would not generally trigger a significant intersection impact because these truck trips would be spread over a work day. Nevertheless, delivery trucks and haul trucks generally travel at slower speeds than passenger cars. To minimize the disturbance to the adjacent residential streets, haul and delivery trucks would be required to use approved City haul routes, such as Santa Monica Boulevard. In addition, as stated on pages 2-20 of the Draft EIR and 2-9 of the Recirculated Draft EIR, all development projects in West Hollywood are required to prepare a construction mitigation plan that would address such issues as truck routing, dust control, construction worker parking, hours of operation, and materials storage. In this way, the City would work with applicant to determine the most appropriate haul route and timing of deliveries to minimize the temporary impacts to the City's street system during construction.</p> <p>As stated on page 3.6-9 through 3.6-11 of the Draft EIR and pages 3.7-10 through 3.7-13 of the Recirculated Draft EIR, construction of the proposed project would result in a substantial temporary increase in ambient noise levels experienced by the nearby sensitive receptors. The construction activities that would generate the loudest noise levels include demolition of existing structures, excavation and soil cleanup, and grading activities. The nearest sensitive noise receptors are the residences to the northwest, north, and northeast of the project site. Some excavation work would occur within 20 feet of the residences to the north, and short-term noise events could have a maximum noise level of greater than 90 dBA. At the nearest residences, the average construction noise levels would exceed the typical standards for construction noise. The impact would be significant and the applicant would be required to install a 12-foot high temporary noise barrier along the northern property line (mitigation measure NOISE-E) to reduce construction noise levels. With implementation of mitigation measure NOISE-A through NOISE-F, construction noise impacts to residents of the buildings north of the project site would be reduced by approximately 3 dBA, but the short-term construction noise impact would remain significant and unavoidable.</p>
PC-4	This project will have a massive impact on the City. There will be impacts on water, gas, and electricity. There will be a big	As discussed in Chapter 3.7 of the Draft EIR and Chapter 3.8 of the Recirculated Draft EIR, the proposed new residential and retail/restaurant uses would increase the demand for water and other utilities, as well as public services and facilities in general. As part

7.0 Response to Comments

No.	Comment	Response
	impact on the sewer system. A tremendous amount of additional water will be used.	<p>of the environmental review process, service providers were contacted to determine if there would be sufficient supplies for water, gas, and electricity. The service providers also received copies of the Notice of Preparation/Initial Study, the Notice of Availability/Draft EIR, and the Notice of Availability/Recirculated Draft EIR. The service providers indicated that they would be able to supply the proposed project with water, gas, and electricity.</p> <p>As discussed in detail in Chapter 3.7 of the Draft EIR and Chapter 3.8 of the Recirculated Draft EIR, implementation of the proposed project may contribute to an existing deficiency in the downstream capacity of the sewer system located in the City of Los Angeles. Mitigation measure PS-A requires the applicant to request a Sewer Capacity Availability review from the City of Los Angeles Bureau of Sanitation prior to obtaining a Certificate of Occupancy. If the City of Los Angeles Bureau of Sanitation determines that there is inadequate capacity in the downstream sewer lines, the applicant would be required to design and construct upgrades to the wastewater system to accommodate the additional flow generated by the proposed project. Therefore, with implementation of mitigation measures to upgrade the capacity of the downstream sewer lines, the increased wastewater generated by the proposed project would be mitigated to a less than significant level.</p>
PC-5	The community will need 24-hour permit parking on Formosa if a light is installed on this street.	Formosa Avenue north of Santa Monica Boulevard is within Preferential Parking District 8. Changes to the permit parking district to require 24-hour permit parking must go through the City's permit parking process and can be initiated by residents. This would occur outside of the scope of the proposed project and would not be necessitated by implementation of the proposed project because, as stated in Chapter 2 of the Draft EIR and Recirculated Draft EIR, residents of the project site and other similar projects are not eligible to receive preferential permit parking. All parking must be accommodated onsite.
PC-6	The left-hand turn going to Fountain will be backlogged.	As described in Chapter 3.8 of the Draft EIR and Chapter 3.9 of the Recirculated Draft EIR, the combination of future traffic and traffic generated by the proposed project (cumulative scenario) would create a significant impact at the intersection of Fountain Avenue and Formosa Avenue. This impact is due primarily to high traffic volumes on Fountain Avenue. As discussed on page 3.9-22 of the Recirculated Draft EIR, due to physical constraints to widening the intersection without the acquisition of private property and the City's desire to maintain on-street parking, the intersection is considered to be striped to its maximum capacity within the available curb-to-curb dimensions and right-of-way. No feasible mitigation measures are available to reduce project-related traffic impacts to a less than significant level. The cumulative impact would remain significant and unavoidable.
PC-7	There will be more traffic with this project, as stated in the EIR.	As stated on page 3.8-20 of the Draft EIR, implementation of the Formosa Specific Plan Project would generate 3,338 net new daily trips with 285 occurring during the morning peak hour, 318 during the mid-day peak hour, and 165 during the evening peak hour. The additional traffic on the City's roadway system would create significant impacts at 7 of the 19 study intersections (signalized and unsignalized). Even with implementation of mitigation, the

7.0 Response to Comments

No.	Comment	Response
		<p>following five intersections would be significantly impacted as a result of the Formosa Specific Plan Project:</p> <ul style="list-style-type: none"> • Formosa Avenue at Santa Monica Boulevard • La Brea Avenue at Santa Monica Boulevard • Highland Avenue at Santa Monica Boulevard • La Brea Avenue and Melrose Avenue • Detroit Street and Santa Monica Boulevard <p>In addition, traffic generated by the Formosa Specific Plan Project would create significant impacts to all five study street segments before implementation of mitigation measures. Even with implementation of mitigation measures, significant impacts would remain on the following three street segments:</p> <ul style="list-style-type: none"> • Formosa Avenue between Santa Monica Boulevard and Lexington Avenue • Detroit Street between Santa Monica Boulevard and Lexington Avenue • Lexington Avenue between Detroit Street and La Brea Avenue <p>Please refer to Section 3.8, Transportation and Traffic of the Draft EIR for a complete discussion of the traffic impacts created by the Formosa Specific Plan Project.</p> <p>Since the Draft EIR was released, changes to the project were made, as discussed on pages 1-1 through 1-3 of the Recirculated Draft EIR. As discussed on pages 3.9-10 and 3.9-11 of the Recirculated Draft EIR, the currently proposed Domain Project would generate 3,338 net new daily trips with 285 occurring during the morning peak hour, 318 during the mid-day peak hour, and 165 during the evening peak hour. The additional traffic generated by the proposed project would create significant and unavoidable impacts at one of the study intersections:</p> <ul style="list-style-type: none"> • Detroit Street at Santa Monica Boulevard <p>After implementation of mitigation, the combination of project generated by the proposed project and the related projects would result in significant and unavoidable cumulative impacts at three study intersections:</p> <ul style="list-style-type: none"> • Formosa Avenue at Fountain Avenue • Detroit Street at Fountain Avenue • South Poinsettia Place at Santa Monica Boulevard <p>In addition, traffic generated by the Domain Project would create significant impacts to two study street segments before implementation of mitigation measures. Even with implementation of mitigation measures, significant impacts would remain on both street segments:</p> <ul style="list-style-type: none"> • Detroit Street between Santa Monica Boulevard and

7.0 Response to Comments

No.	Comment	Response
		<p style="text-align: center;">Lexington Avenue</p> <ul style="list-style-type: none"> • Lexington Avenue between Detroit Street and La Brea Avenue <p>Traffic generated by the Domain Project combined with related project traffic would create significant impacts to two study street segments before implementation of mitigation measures. Even with implementation of mitigation measures, significant impacts would remain on both street segments:</p> <ul style="list-style-type: none"> • Detroit Street between Santa Monica Boulevard and Lexington Avenue • Lexington Avenue between Detroit Street and La Brea Avenue
PC-8	The City should re-examine the parking plan to include guest parking on-site and tandem parking to create more on-site parking spaces. The City should work with the community when it looks at the parking plan.	See Response 14-1 above.
PC-9	The City is being asked to change codes and the general plan through all of these specific plans that allow certain allowances for specific project site. If applicants are allowed to throw out zoning and parking requirements then they will be able to do whatever they would like. It mocks the request of citizens to participate because it does not matter, the developer will submit a specific plan.	Your comments regarding the integrity of the specific plan process and public participation are noted. As discussed in response PC-1 above, a specific plan is no longer required to implement the proposed project.
PC-10	The City should consider a smaller project to mitigate impacts.	<p>The Draft EIR considers a reduced density alternative on pages 5-5 through 5-10 of the Draft EIR. As discussed in Section 5.3.3, the Reduced Density Alternative considers a mixed use development with approximately 9,000 square feet of retail/restaurant/banking uses and approximately 90 units. The residential and retail uses would be constructed in a single structure at 70 percent density of the Formosa Specific Plan Project at a maximum of four stories and 45 feet in height, and in accordance with the Zoning Code and General Plan requirements applicable to the project site. The Reduced Density Alternative would result in reduced impacts related to air quality, noise, public services and recreation, and transportation and traffic compared to impacts created by the proposed project; however would not achieve the basic project objectives of the Formosa Specific Plan Project. The Reduced Density Alternative would not increase housing and affordable housing within the City to the same degree as the Formosa Specific Plan Project. Further, it would not provide sufficient funds to finance remediation of the existing environmental contamination.</p> <p>Additionally, the Recirculated Draft EIR also considers a reduced</p>

7.0 Response to Comments

No.	Comment	Response
		<p>density alternative on pages 3.11-5 through 3.11-11 of the Recirculated Draft EIR. As discussed in Section 3.11.3.3, the Reduced Density Alternative considers a mixed use development with approximately 9,000 square feet of retail/restaurant uses and approximately 90 apartment units. The residential and retail uses would be constructed in a single structure at 54 percent density of the proposed project at a maximum of four stories and 45 feet in height. The Reduced Density Alternative would result in reduced impacts related to operational air quality, operational noise, public services, utilities and recreation, and transportation and traffic compared to impacts created by the proposed project; however, this alternative has the potential to create significant shade and shadow impacts. The Reduced Density Alternative would not achieve the basic project objectives as well as the proposed project because it would not increase housing and affordable housing within the City to the same degree as the Domain Project and it would not provide the financial return to facilitate clean-up of the existing environmental contamination.</p>
PC-11	What is in the specific plan?	<p>The characteristics of the Formosa Specific Plan are listed on pages 2-6 and 2-7 of the Draft EIR. In summary, the Formosa Specific Plan considers permitted uses, maximum building height, floor area ratio, parking and loading, open space, setbacks, primary street façade ground floor pedestrian oriented uses, affordable housing, percentage of residential uses, and recycling and solid waste storage. However, as discussed in Response PC-1 above, a specific plan is no longer required to implement the proposed project.</p>
PC-12	This project seems big enough that it should be able to provide enough parking spaces on-site such that it does not need to provide less parking spaces than required by the Zoning Ordinance.	<p>Refer to response PC-8 above.</p>
PC-13	The existing uses emit certain particulates and other harmful pollutants. One of the alternatives mentions that leaving the site alone would be worse than adding 206 cars to the City. How was this measured? Does this ignore the emissions that are generated by those cars?	<p>There is no such calculation or statement in the Draft EIR that leaving the project site in its existing condition would be worse than adding 206 cars to the City streets. However, as discussed on page 5-5 of the Draft EIR, continued operation of Faith Plating would have a larger impact to air quality than the additional vehicle trips generated by the proposed project. Faith Plating generates toxic air contaminants (TACs) on a daily basis, whereas cars and commercial or residential development generates criteria air pollutants. However, TACs have more severe health ramifications than criteria air pollutants. Criteria pollutants are defined in page 3.2-2 of the Draft EIR as follows:</p> <p>“Air Pollution” is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere. Individual air pollutants may adversely affect human or animal health and reduce visibility. Seven air pollutants have been identified by the U.S. Environmental Protection Agency (EPA) as being of concern nationwide: CO, O₃, nitrogen dioxide (NO₂), PM₁₀, PM_{2.5}, sulfur dioxide (SO₂), and lead (Pb). These pollutants are collectively referred to as criteria pollutants.</p>

7.0 Response to Comments

No.	Comment	Response
		<p>As described on page 3.2-5 of the Draft EIR:</p> <p>Toxic air contaminants (TACs) are pollutants that may be expected to result in an increase in mortality or serious illness, or that may pose a present or potential hazard to human health. Health effects of TACs include cancer, birth defects, neurological damage, damage to the body's natural defense system, and diseases that lead to death. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations. In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no threshold level below which adverse health impacts may not be expected to occur. This contrasts with the criteria air pollutants for which acceptable levels of exposure can be determined and for which the ambient standards have been established. Most TACs originate from human-made sources, including on-road mobile sources, non-road mobile sources (e.g., construction equipment and airplanes), area sources (e.g., dry cleaners), and stationary sources (e.g., factories or refineries).</p> <p>As discussed in Section 3.2 of the Draft EIR and Chapter 3.1 of the Recirculated Draft EIR, the project site currently generates additional site-specific pollutants as a result of the existing metal plating operations as shown in Table 3.2-3 on page 3.2-7 of the Draft EIR and Tables 3.1-2 and 3.1-3 on page 3.1-7 of the Recirculated Draft EIR.</p> <p>Implementation of the proposed project, the Reduced Density Alternative, or the Mixed-Use with Retail Uses Only Alternative would result in the closure of Faith Plating and redevelopment of the site with a mixed-use complex. Negligible (too small to be calculated) TACs would be produced during operation of the proposed project or the build alternatives associated with diesel particulate matter (diesel PM) from delivery trucks. Thus, there would be a substantial improvement to the air quality surrounding the project site by removing Faith Plating from operation.</p>
PC-14	One of the immitigable impacts is a left turn signal in the City of Los Angeles. But this project would generate eastbound traffic.	When a significant impact is identified at an intersection, the mitigation measures are designed to get the intersection to operate at an appropriate level of service (LOS). In many cases, the actual improvement may not be related to the project-specific turning movement(s), but may increase the overall operation of the intersection will improve.
PC-15	Under shade and shadow, this project is 6 stories tall and would create some shade and shadows. Why is this below the threshold?	As discussed on page 3.1-21 through 3.1-26 of the Draft EIR, the proposed project would not create a new source of substantial shade and shadow that would adversely affect daytime views in the area. Simulations of shade and shadow that would be cast by the proposed project were prepared for the summer solstice (June 21 st), fall equinox (September 22), winter solstice (December 22), and spring equinox (March 20 th at 9:00 a.m., noon, and 3:00 p.m. The analysis is shown on Figures 3.1-18 through 3.1-20 of the Draft EIR. During the summer solstice, fall equinox, and spring equinox, shade and shadows would be cast on the adjacent streets but would not fall on

7.0 Response to Comments

No.	Comment	Response
		<p>the adjacent buildings. Shadows cast on December 21 would be the longest shadows and represent the worst-case scenario. The proposed project would be four stories taller than the existing site buildings when viewed from Santa Monica Boulevard and approximately two to four stories taller than the surrounding uses. As such, the proposed project would cast shade and shadows on nearby sensitive viewers (residential uses directly abutting the northern project boundary). By reducing the building bulk toward the north through a stepped design, the proposed project would minimize overshadowing effects, and most shadows would fall on the project site itself. None of the adjacent structures would be shaded for the entire day when the shadows are the longest. The structures north of the project site would be affected for two to four hours during the winter days with the longest shadows. However these structures are neither part of, nor experience views of, particular scenic quality that would be affected by the occasional overshadowing. Consequently, the proposed project would not create a new source of substantial shade and shadow that would adversely affect daytime views in the area. Thus, these shadow impacts are not considered significant.</p>
PC-16	<p>Further explanation is required to determine what makes a specific plan. The City should provide an inventory of the existing specific plans. What other specific plans have been approved? What other applications for specific plans are underway?</p>	<p>See Response PC-1 above for an explanation of the specific plan process. The other specific plans approved within the City, besides the Sunset Specific Plan and the Pacific Design Center Specific Plan, is the Movietown Specific Plan. Besides the proposed project, there is one specific plan application undergoing environmental review by the City: Melrose Triangle Specific Plan.</p>
PC-17	<p>Are there parking standards at reduced levels in any of these other specific plans?</p>	<p>The approved specific plan for Movietown Plaza and the pending specific plan for Melrose Triangle do not include reduced parking requirements.</p>
PC-18	<p>The City must have an accepted standard to allow a specific plan.</p>	<p>See Response PC-1 above for an explanation of the specific plan process.</p>
<p>September 22, 2008 Historic Preservation Commission Meeting</p>		
HPC-1	<p>When the developer originally presented the proposed project it was designed as a solid box. None of the community members were excited about it. The developer came back with a revised design that incorporated community comments. The revised design includes a pass through to the Hollywood sign that will increase the significance of the Formosa Café.</p>	<p>The commentator states support for the Formosa Specific Plan Project. This comment will be considered by the City in the decision-making process for the project.</p>
HPC-2	<p>The La Brea Gateway project was set back from the street in keeping with the Formosa Café. The proposed project comes right up to the street. It would be better if the proposed project</p>	<p>The commentator suggests that the proposed project should be set back from Santa Monica Boulevard in keeping with the Formosa Café. It should be noted that there is currently no setback for the existing site buildings (see Figure 3.1-1 of the Draft EIR). However, the proposed project would provide setbacks to allow for outdoor dining and landscape amenities. The proposed ground floor</p>

7.0 Response to Comments

No.	Comment	Response
	could be set back from the street in keeping with the Formosa Café and surrounding development.	restaurant uses are expected to include sidewalk dining. A second row of street trees would be added along the Santa Monica Boulevard frontage to buffer pedestrians from traffic. In this way, the proposed project would be set back from Santa Monica Boulevard similar to the setbacks for the Gateway Project at the intersection of Santa Monica Boulevard and La Brea Avenue and the Formosa Café (see Figures 3.1-5 and 3.1-7 of the Draft EIR). Further, the proposed project would provide a view corridor from Santa Monica Boulevard north to the Hollywood sign and the Hollywood Hills, thereby creating a new scenic vista from the steps of the Formosa Café that is currently blocked by the existing development.
HPC-3	There were additional surveys conducted within a half-mile radius that are listed in the references section of the EIR but are not spelled out in Table 3.3-1. This includes the Terry Hayes survey of the Lot project.	The comment states that although it is cited as a reference, the cultural resources survey for the Lot Development does not appear in Table 3.3-1 on page 3.3-2 of the Draft EIR as a cultural resource investigation occurring within ½-mile of the project site. Table 3.3-1 is derived from a records search conducted at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. Records searches are standard procedures for collecting background data on a project site. These reports can provide information about known resources within the project vicinity and can be used to help determine potential resources that could be encountered at the project site. The records search encompasses all cultural resource investigations that are recorded with the SCCIC. Upon completion of a cultural resources assessment, it is a requirement of the State Office of Historic Preservation, in accordance with the Secretary of Interior's Standards, to file the report with SCCIC for use by other professionals. However, not all professionals file their reports and there is no known enforcement mechanism. Thus, it is likely that the record of the cultural resources assessment for the Lot Development was never submitted to the SCCIC.
HPC-4	The EIR should include more discussion of the local or neighborhood history of the project area. How did the area develop?	<p>Section 3.3.1 Environmental Setting discusses the history of the project area starting from the early 18th century until the current use of the project site. Per the request of the commentor, additional research was conducted to find more information specific to the development of the neighborhood. Generalized information about the eastern portion of West Hollywood has been added to page 3.3-2 of the Final EIR, as shown below. This information is taken from the Draft City of West Hollywood R2, R3, R4 Multifamily Survey Report (2008c).</p> <p>By the 1950s, the area had been subdivided and heavily developed as the movie industry flourished in this part of the City and entertainment workers moved into nearby housing. West Hollywood also served as a center of production associated with the continuous use of the Lot as a movie studio and the City as a whole often served as a backdrop for location filming. The eastern portion of the City became a regional population center for Jews from the Former Soviet Union beginning in the last decades of the twentieth century and into the twenty-first century (City of West Hollywood 2008). The City of West Hollywood was incorporated in 1984 and is currently one of the most densely populated and developed</p>

7.0 Response to Comments

No.	Comment	Response
HPC-5	<p>I agree with the analysis that the existing structures are not historically significant and that the Formosa Café would not be negatively impacted. However, the EIR should include language addressing the historic preservation ordinance and explaining that because the project site is within view of a historic property it is being reviewed by the Historic Preservation Commission.</p>	<p>areas in the Los Angeles area.</p> <p>At the request of the Historic Preservation Commission, text has been added to the Final EIR explaining that this environmental document is subject to review by the Historic Preservation Commission because it is within view of a City-designated cultural resource. The following text has been added to page 3.3-7 of this Final EIR:</p> <p>The City of West Hollywood Municipal Code Section 19.58.020 (b) states that one of the purposes of the Historic Preservation Ordinance is to “develop and maintain an appropriate setting and environment for cultural resources, cultural resource sites, and historic districts.” In accordance with Section 19.58.040 (h), the Historic Preservation Commission has the authority of “Reviewing all applications for permits, environmental assessments, environmental impact reports, environmental impact statements, and other similar documents pertaining to designated and potential cultural resources, or related neighboring property within public view. Neighboring properties within public view shall mean any property that can be seen from a public right-of-way and which is within the same street block (on either side of the street) as a cultural resource.” Because the proposed project is located directly across the street from the Formosa Café, which is a locally-designated historic resource, this EIR was subject to the review of the Historic Preservation Commission.</p>

8.0 MITIGATION MONITORING AND REPORTING PROGRAM

Public Resources Code, Section 21081.6 requires that mitigation measures identified in the environmental review documents prepared in accordance with CEQA are implemented after a project is approved. Therefore, this Mitigation Monitoring and Reporting Program (MMRP) has been prepared to ensure compliance with the adopted mitigation measures during the pre-construction, construction, and post-construction phases of the proposed Domain Project.

The City of West Hollywood is the agency responsible for implementation of the mitigation measures identified in the EIR. This MMRP provides the City with a convenient mechanism for quickly reviewing all of the mitigation measures, including the ability to focus on select information such as timing. The MMRP includes the following information for each mitigation measure:

- the phase of the project during which the required mitigation measure must be implemented;
- the phase of the project during which the required mitigation measure must be monitored;
- the enforcement agency responsible for enforcing the mitigation measure; and
- the monitoring agency to which reports including feasibility, compliance, implementation, and development are made.

The MMRP also includes a checklist to be used during the mitigation monitoring period. The checklist will verify the name of the monitor, the date of the monitoring activity, and any related remarks for each mitigation measure.

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Verification of Compliance		
				Initial	Date	Remarks
AESTHETICS						
VIS-A All outdoor lighting, other than identification signage, shall be directed from the perimeter of the property toward building entrances and parking areas utilizing cut-off fixtures to prevent nighttime illumination to spill onto adjacent properties, particularly the residential properties located immediately north of the project site.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
VIS-B The exterior finish of the south-facing walls shall be fabricated with non-reflective glass, non-high gloss paint, and other light-absorbing materials to minimize the glare from the new structure.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR QUALITY						
AIR-A The construction contractor shall use electricity from power poles rather than temporary diesel or gasoline generators.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-B The construction contractor shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-C The construction contractor shall use alternative-fueled off-road equipment.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-D The construction contractor shall configure construction parking to eliminate interference with traffic operations on Santa Monica Boulevard.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			

8.0 Mitigation Monitoring and Reporting Program

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Verification of Compliance		
				Initial	Date	Remarks
AIR-E The construction contractor shall provide temporary traffic controls, such as a flag person, during all phases of construction to maintain smooth traffic flows.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-F The construction contractor shall schedule construction activities that effect traffic flow on the arterial system for off-peak hours.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-G All construction equipment and delivery vehicles shall be turned off when not in use or prohibit idling in excess of five minutes.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-H The construction contractor shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (SCAQMD) (volatile organic compound [VOC] standard of less than 10 grams per liter).	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-I The construction contractors shall utilize materials that do not require painting.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-J The construction contractor shall use pre-painted construction materials.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			
AIR-K The construction contractor shall use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the construction contractor shall use trucks that meet United States Environmental Protection Agency (EPA) 2007 model	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Verification of Compliance		
				Initial	Date	Remarks
year nitrogen oxide (NO _x) emissions requirements.						
<p>AIR-L All on-site construction equipment shall meet EPA Tier 3 or higher emissions standards according to the following:</p> <p>Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.</p> <p>Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.</p> <p>A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB</p>	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			

8.0 Mitigation Monitoring and Reporting Program

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Verification of Compliance		
				Initial	Date	Remarks
or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.						
NOISE						
NOISE-A The construction contractor shall ensure that equipment is properly maintained per the manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc).	Construction	Construction	City of West Hollywood Community Development Department			
NOISE-B The construction contractor shall shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.	Construction	Construction	City of West Hollywood Community Development Department			
NOISE-C The construction contractor shall ensure that construction equipment does not idle for extended periods of time.	Construction	Construction	City of West Hollywood Community Development Department			
NOISE-D The construction contractor shall locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers).	Construction	Construction	City of West Hollywood Community Development Department			
NOISE-E The construction contractor shall install a 12-foot high temporary barrier along the northern property line. The acoustical barrier shall be constructed of material having a minimum surface weight of two pounds per square foot or greater, and a demonstrated Sound Transmission Class rating of 25 or greater as defined by American Society for Testing and Materials Test Method E90. The barrier shall be required during the excavation and site preparation phases of construction.	Construction	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Verification of Compliance		
				Initial	Date	Remarks
NOISE-F The construction contractor shall ensure that music is not audible at offsite locations.	Construction	Construction	City of West Hollywood Community Development Department			
NOISE-G Prior to issuance of a building permit, the applicant shall submit an acoustical study showing that the interior noise level in residential units does not exceed 45 A-weighted decibels (dBA CNEL or L _{dn}). Prior to occupancy, this noise level shall be verified at a representative sample of residences by a qualified acoustical specialist.	Pre-Construction; Final Plans and Specifications; Pre-Occupancy	Final Plans and Specifications; Pre-Occupancy	City of West Hollywood Community Development Department			
NOISE-H Prior to commencement of construction activity, a qualified structural engineer shall survey the existing foundation and other structural aspects of residential land uses adjacent and to the north of the project site. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of 10 years specific experience rehabilitating historic buildings and applying the Secretary of Interior's Standards to such projects. The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions. These baseline conditions shall be forwarded to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building permit for the proposed project. At the conclusion of vibration-causing activities, the qualified structural engineer shall issue a follow-up letter describing	Construction	Final Plans and Specifications; Construction	City of West Hollywood Community Development Department			

8.0 Mitigation Monitoring and Reporting Program

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Verification of Compliance		
				Initial	Date	Remarks
damage, if any, to adjacent buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken by the applicant prior to issuance of any temporary or permanent certificate of occupancy for the proposed project.						
PUBLIC SERVICES, UTILITES, AND RECREATION						
PS-A Prior to the issuance of a Certificate of Occupancy by the City of West Hollywood, the applicant shall obtain a Sewer Capacity Availability Request from the City of Los Angeles Bureau of Engineering in order to prove to the satisfaction of the City of West Hollywood Department of Public Works that there is adequate wastewater capacity to serve the proposed project. If the City of Los Angeles Bureau of Engineering determines by a subsequent Sewer Capacity Availability Request that the wastewater system no longer has capacity to serve the proposed project, the applicant shall be required to design and construct an alternate sewer connection with adequate downstream capacity.	Pre-Occupancy	Pre-Occupancy	City of West Hollywood Department of Public Works			
PS-B Prior to the issuance of a Demolition Permit, the applicant shall submit a building plan to the Environmental Services Coordinator for review and approval. The building plan shall show the location and dimensions of the trash and recyclables storage area. The trash and recyclables storage area shall be designed with adequate space to accommodate the trash and recycling bins and dumpsters.	Pre-Construction; Final Plans and Specifications	Final Plans and Specifications; Construction	City of West Hollywood Department of Public Works			

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Verification of Compliance		
				Initial	Date	Remarks
<p>PS-C Prior to the issuance of the Certificate of Occupancy, trash and recycling operations shall be established at the project site as follows:</p> <ul style="list-style-type: none"> • Restaurants shall have a designated dumpster bin to dispose of food waste and other compostables. • Restaurants, residential, and commercial uses shall have a designated dumpster bin to dispose of regular trash. • Restaurants, residential, and commercial uses shall have a designated dumpster bin to dispose of recyclables. 	Pre-Occupancy	Pre-Occupancy; Occupancy	City of West Hollywood Department of Public Works			
TRANSPORTATION/TRAFFIC						
<p>TRANS-A South Poinsettia Place at Santa Monica Boulevard: As also identified in the Movietown Specific Plan Final EIR (SCH No. 2008071950) and approved by City Council, prior to issuance of a certificate of occupancy by the City, the applicant shall be responsible for restriping Poinsettia Place to provide two northbound turn lanes (an exclusive left-turn lane and an exclusive right-turn lane) with a length of 260 feet, including storage and taper, by removing on-street parking on both sides of Poinsettia Place. In the event that the Movietown project applicant restripes Poinsettia to provide the two-northbound lanes with a length of 260 feet required for both projects before Domain completes this mitigation measure, the Public Works Director may deem this mitigation measure satisfied for this project as well.</p>	Pre-Occupancy	Pre-Occupancy; Occupancy	City of West Hollywood Community Development Department			

9.0 ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
ADT	average daily traffic
AQMP	Air Quality Management Plan
AST	above ground storage tank
bgs	below ground surface
BMP	Best Management Practices
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CH ₄	methane
CHHSLs	California Human Health Screening Levels
City	City of West Hollywood
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent

9.0 Acronyms and Abbreviations

COCs	chemicals of concern
CRHR	California Register of Historic Resources
CTTL	California's Total Threshold Limit
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agencies
dB	decibel
dba	A-weighted decibel
diesel PM	diesel particulate matter
DTSC	Department of Toxic Substances Control
du	dwelling unit
EIR	Environmental Impact Report
EMI	Emissions Inventory Data
EPA	United States Environmental Protection Agency
°F	Fahrenheit
FAR	floor-to-area ratio
FINDS	Facility Index Registry System
FTA	Federal Transit Administration
GHG	greenhouse gases
HAZNET	Hazardous Waste Information System
HCM	Highway Capacity Manual
HHRA	Human Health Risk Assessment
HIST-UST	Historic Underground Storage Tank
HMS	Los Angeles County Hazardous Material System
I-10	Interstate 10, Santa Monica Freeway

ICIS	Integrated Compliance Information System
ksf	1,000 square feet
LACoFD	Los Angeles County Fire Department
LACoSD	Los Angeles County Sheriff's Department
LADOT	Los Angeles Department of Transportation
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	lead-based paint
L _{dn}	Day-Night Noise Level
L _{eq}	Equivalent Noise Level
LOS	levels of service
LST	localized significance threshold
LUST	leaking underground storage tank
MCL	Maximum Contaminant Levels
µg/m ³	micrograms per cubic meter
MMT	million metric tons
MRF	material recovery facility
MSL	mean sea level
NFA	No Further Action
NO	nitric oxide
N ₂ O	nitrogen dioxide
NO ₂	nitrogen dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation

9.0 Acronyms and Abbreviations

NOV	Notice of Violation
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OSHA	Occupational Safety and Health Act
PAH	polycyclic aromatic hydrocarbons
Pb	lead
PCE	perchloroethylene
PM _{2.5}	fine particulate matter
PM ₁₀	inhalable particulate matter
ppd	pounds per day
ppm	parts per million
PPV	peak particle velocity
PRGs	Preliminary Remediation Goals
RAW	Removal Action Work Plan
RCRA	Resource Conservation and Recovery Act
RCRA-LQG	Resource Conservation and Recovery Act – Large Quantity Generator
RCRA-SQG	Resource Conservation and Recovery Act – Small Quantity Generator
RHNA	regional housing needs allocation
ROA	removal action objectives
ROC	reactive organic compounds
ROG	reactive organic gases
Sanitation Districts	Los Angeles County Sanitation Districts
SB	Senate Bill

9.0 Acronyms and Abbreviations

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SLIC	Spills, Leaks, and Investigation Cleanup
SO ₂	sulfur dioxide
STLC	Soluble Threshold Limit Concentration
SUSMP	Standard Urban Storm Water Mitigation Plan
SWEEPS	Statewide Environmental Evaluation and Planning System
SWPPP	Storm Water Pollution Prevention Plan
TACs	toxic air contaminants
TCE	trichlorethylene
TCLP	Total Concentration Leaching Potential
TTLC	Total Threshold Limit Concentration
US 101	United States Route 101, Hollywood Freeway
UST	underground storage tank
V/C	volume-to-capacity
VCA	Voluntary Cleanup Agreement
VCP	Voluntary Cleanup Program
VdB	vibration decibel
VI	chromium
VOC	volatile organic compound
WET	Waste Extraction Test

This page is intentionally left blank.

10.0 REFERENCES

- Ahrens, D.C.
2003 *Meteorology Today; an Introduction to Weather, Climate, & the Environment*. Brooks Cole, Inc. Pacific Grove, CA.
- Air Resources Board
2005 *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.
2007a *2007 South Coast and Coachella Valley 8-Hour Ozone and PM_{2.5} Plans*. website <http://www.arb.ca.gov/planning/sip/2007sip/southcoast/scabsip.htm>, accessed February 5, 2008.
2007b ARB letter from James N. Goldstene, Executive Officer to Mr. Wayne Nastri, Regional Administrator, Region 9, EPA. November 28, 2007.
- Arnold, Jeanne E., Michael Walsh and Sandra E. Hollimon
2004 The Archaeology of California. *Journal of Archaeological Research* 12(1):1-73.
- Bean, Lowell John and Charles R. Smith
1978 *Gabrielino*. In Handbook of North American Indians, vol. 9, pp. 538-562. Robert F. Heizer, editor. Smithsonian Institution, Washington, D.C.
- California Air Pollution Control Officers Association
2008 *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, January 2008.
- California Air Resources Board
2008 *Air Quality Data*. website <http://www.arb.ca.gov/adam/cgi-bin/db2www/adamtop4b.d2w/start>, accessed October 1, 2012.
2011 *Area Designation Maps/State and National*. February 2011. website <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed September 11, 2012
- California Climate Action Registry
2006 *General Reporting Protocol, Version 2.1*. Los Angeles, CA. June 2006. website <http://www.climateregistry.org/docs/PROTOCOLS/GRP%20V2.1.pdf>.
- California Climate Action Team
2006 *Climate Action Team Report to Governor Schwarzenegger and the Legislature*.
- California Department of Conservation
2006 *Farmland Mapping and Monitoring Program*. website http://www.consrv.ca.gov/DLRP/fmmp/overview/survey_area_map.htm, accessed June 28, 2006.
- California Department of Finance
2012 *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011 and 2012, with 2012 Benchmark*. website <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>, accessed October 8, 2012.

10.0 References

California Department of Transportation (Caltrans)

- 1998 *Technical Noise Supplement to Traffic Noise Analysis Protocol for New Highway Construction and Highway Reconstruction Projects*. website <http://www.dot.ca.gov/>.
- 2002 *Transportation Related Earthborne Vibrations*. February 20, 2002.
- 2009 *Technical Noise Supplement*. November 2009.

California Energy Commission

- 2006 *Inventory of California Greenhouse Gas Emissions and Sinks:1990 to 2004*. Staff Final Report, Publication CEC-600-2006-013-SF.

California Geological Survey

- 2006 *SMARA Mineral Land Classification*. Updated 2006. website <http://www.consrv.ca.gov/CGS/minerals/mlc/index.htm>, accessed April 29, 2007.

CalRecycle (Formerly the California Integrated Waste Management Board)

- 2007 *Estimated Solid Waste Generation Rates*. Updated November 1, 2007. website <http://www.ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm>, accessed March 3, 2008.
- 2008 *California Waste Stream Profiles*. website <http://www.ciwmb.ca.gov/Profiles/>, accessed March 3, 2008.
- 2012a *Estimated Solid Waste Generation Rates*. Updated January 4, 2012. website <http://www.calrecycle.ca.gov/wastechar/wastegenrates/>, accessed October 7, 2012.
- 2012b CalRecycle Solid Waste Information System (SWIS). website <http://www.calrecycle.ca.gov/SWFacilities/Directory/>, accessed October 7, 2012.

California Office of Historic Preservation

- 1990 *Archeological Resource Management Reports (ARMR) Guidelines*. Department of Parks and Recreation, State of California, Sacramento.

City of Los Angeles Bureau of Sanitation

- 2004 *Water and Wastewater Generation Factors*. September 2004.
- 2006 Sewer System Management Plan. May 2, 2006.
- 2008 *Wastewater Facts and Figures*. website <http://www.lacity.org/san/wastewater/factsfigures.htm>, accessed March 3, 2008.
- 2012 *Wastewater Facts and Figures*. website <http://www.lacity.org/san/wastewater/factsfigures.htm>, accessed November 13, 2012.

City of Los Angeles Bureau of Engineering

- 2012 *Sewer Capacity Availability Report*. October 15, 2012.

City of Los Angeles Department of Water and Power

- 2005 *2005 Urban Water Management Plan*. website <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>, accessed May 1, 2007.

City of West Hollywood

- 2008 Exclusive Waste Hauler: Athens Services. website <http://www.weho.org/index.cfm/fuseaction/detail/navid/53/cid/2683/>, accessed February 28, 2008.
- 2008 *Draft City of West Hollywood R2, R3, R4 Multifamily Survey Report*. February 2008.
- 2010 *Final Program Environmental Impact Report for City of West Hollywood General Plan 2035 and Climate Action Plan*. October 2010.

- 2011 *West Hollywood General Plan 2035*. Adopted September 6, 2011.
2011 *Climate Action Plan*. Adopted September 6, 2011.
2011 *West Hollywood Zoning Ordinance*. Article 19-2, Section 19.10.020 Purposes of Commercial and Public Zoning Districts. Article 19-3, Section 19.22.050 Affordable Housing Incentives.
2012 City of West Hollywood Municipal Code, Chapter 9.08, Noise.

County Sanitation Districts of Los Angeles County

- 2008 Letter from Ruth I. Frazen, Customer Service Specialist, Facilities Planning Division to David DeGrazia, Senior Planner, Community Development Department, City of West Hollywood. August 19, 2008
2013 Letter from Adriana Raza, Customer Service Specialist, Facilities Planning Department to Emily Stadnicki, Senior Planner, Community Development Department, City of West Hollywood. February 25, 2013.

CPPOA (Cahuenga Pass Property Owners Association)

- 2007 History. Electronic document <http://www.cppoa.org/History.html>, accessed December 4, 2007.

Erlandson, Jon M

- 1994 *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

Federal Register

- 2007 Vol 72, No 91. pp. 26718-26721. May 11, 2007.

Federal Transportation Administration

- 1978 Federal Highway Administration, 1978
2006 *Transit Noise and Vibration Impact Assessment*. FTA-VA-90-1003-06.

Formosa Café Website

- 2007 Where the Stars Dine (www.seeingstars.com). Electronic document republished at <http://formosacafe.com>, accessed November 2007.

Geocon West, Inc.

- 2012 *Updated Geotechnical Investigation Report*. June 1, 2012.

Geotechnologies, Inc.

- 2005 *Geotechnical Engineering Investigation for Proposed Apartment Building, Northwest Corner of Santa Monica Boulevard and Detroit Street, West Hollywood, CA*. December 9, 2005.

Governor's Office of Planning Research (OPR)

- 2008 *CEQA and Climate Change: Addressing Climate Change through California Environmental Act (CEQA) Review*. June 19, 2008.

Gumprecht, Blake

- 1999 *The Los Angeles River: Its Life, Death and Possible Rebirth*. John Hopkins University Press, Baltimore, MD.

10.0 References

Jackson, Robert H

- 1999 Agriculture, Drought & Chumash Congregation in the California Missions (1782-1834), *California Mission Studies Association*. Articles, May Newsletter.

Kielbasa, John R.

- 1997 *Historic Adobes of Los Angeles County*. Dorrance Publishing Co., Pittsburgh, P.A.

Kimley-Horn and Associates, Inc.

- 2008 *Sewer Study Formosa Specific Plan Project*. June 30, 2008.

KOA Corporation

- 2012 *Traffic Impact Study for Domain Mixed-Use Project West Hollywood, CA*. October 18, 2012.

Kroeber, A.L

- 1925 Handbook of Indians of California. *Bureau of American Ethnology Bulletin 78*, Smithsonian Institution, Washington D.C.

Los Angeles Public Library

- 1906-1950 Sanborn Fire Insurance Map, Volume 10, 1919. Sheet 1085.
1906-1951 Sanborn Fire Insurance Map, Volume 10, 1919-1950. Sheet 1085.
1906-1955 Sanborn Fire Insurance Map, Volume 10. Sheet 1031.

McCawley, W.

- 1996 *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning.

PIC Environmental Services

- 2012 *Groundwater Monitoring Report*. April 12, 2012.
2012 *Phase I Environmental Site Assessment Report*. April 16, 2012.

Professional Services Industry, Inc.

- 2005 *Phase I Environmental Site Assessment for the Faith Plating and SSI Studios, 7141 and 7155 Santa Monica Boulevard, West Hollywood, Los Angeles County, California 90046*. December 29, 2005.
- 2006 *Phase II and Limited Phase III Environmental Site Assessment for the property at 7141 and 7155 Santa Monica Boulevard, West Hollywood, Los Angeles County, California*. April 18, 2006.
- 2007 *Site Characterization Report for the property at 7141 and 7155 Santa Monica Boulevard and 1107-1117 Detroit Street, West Hollywood, Los Angeles County, California*. September 24, 2007.
- 2008 *Human Health Risk Assessment for the property at 7141 and 7155 Santa Monica Boulevard, West Hollywood, Los Angeles County, California 90046*. July 7, 2008.
- 2008 *Removal Action Work Plan for the property at 7141 and 7155 Santa Monica Boulevard and 1107-1117 Detroit Street, West Hollywood, Los Angeles County, California*. August 9, 2008.

PSOMAS

2012 *Sewer Area Study for Domain Apartments*. October 2012.

Reid, Hugo

1939 [1852] Letters on the Los Angeles County Indians. *A Scotch Paisano in Old Los Angeles*, by Susanna Bryant Dakin, pp. 215-286. University of California Press.

1977 [1851] The Decay of the Mission. In *Los Angeles, Biography of a City*, edited by John Caughey and LaRee Caughey, pp. 102-104. University of California Press, Berkeley.

SCS Engineers

2012 *Soil Sample Analytical Results*. July 23, 2012.

South Coast Air Quality Management District (SCAQMD)

2000 *Multiple Air Toxics Exposure Study in the South Coast Basin*. March 2000. website <http://www.aqmd.gov/matesiidf/matestoc.htm>.

2005 *Final Localized Significance Threshold Methodology*.

2005 *Rule 403 – Fugitive Dust*. June 3, 2005.

2005 *Sample Construction Scenarios for Projects Less Than Five Acres in Size*. February 2005. website <http://www.aqmd.gov/ceqa/handbook/lst/FinalReport.pdf>.

2006 *Air Quality Analysis Guidance Handbook*. website <http://www.aqmd.gov/ceqa/hdbk.html>.

2007 *2007 Air Quality Management Plan*. Adopted June 1, 2007. website <http://www.aqmd.gov/aqmp/07aqmp/index.html>.

2007 *SCAQMD Air Quality Analysis Guidance Handbook and Air Quality Significance Thresholds*. website <http://www.aqmd.gov/ceqa/hdbk.html>.

2012 Facility Information Database, Facility ID 20162.

2012 *Historical Data by Year*. website <http://www.aqmd.gov/smog/historicaldata.htm>, accessed October 1, 2012.

2012 *Super-Compliant Architectural Coatings Manufacturers and Industrial Maintenance Coatings List*. website <http://www.aqmd.gov/prdas/Coatings/super-compliantlist.htm>, accessed October 1, 2012.

2012 *Revised Draft 2012 Air Quality Management Plan*. September/October 2012. website <http://www.aqmd.gov/aqmp/2012aqmp/RevisedDraft/index.html>.

Southern California Association of Governments

2012 *5th Cycle Final Regional Housing Needs Assessment (RHNA) Allocation Plan*, adopted October 4, 2012. website: <http://rtpscsc.scag.ca.gov/Documents/rhna/5thCyclePFinalRHNAplan.pdf>, accessed December 13, 2012.

State of California Governor's Office of Planning and Research (OPR)

2001 *The Planner's Guide to Specific Plans*. January 2001 edition. website http://ceres.ca.gov/planning/specific_plans/sp_index.html, accessed October 2, 2008.

Takahashi, Keith

1980 River Battle: Saga of an Ox Cart Navy. *Los Angeles Times*. 10 January: SG2. Los Angeles.

10.0 References

Terry A. Hayes Associates LLC

2006 The Lot Motion Picture Studio Supplemental Environmental Impact Report. Presented to City of West Hollywood Department of Community Development.

The Keith Companies North Counties, Inc.

1992 *Sewer Study for Warner Hollywood Studios Comprehensive Development Plan*. April 1992.

Transportation Research Board

1980 *Transportation Research Circular 212 Interim Materials on Highway Capacity*.

2000 *Highway Capacity Manual Special Report 209*.

U.S. Environmental Protection Agency

1971 *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717.

Wallace, William J.

1955 A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214-230.

Warren, Claude N.

1968 Cultural Traditions and Ecological Adaptation on the Southern California Coast. *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams. Eastern New Mexico University Contributions in Anthropology 1(3):1-14.

West Hollywood Community Development Commission

1997 *Redevelopment Plan for the East Side Project Area*. April 1997.

11.0 LIST OF PREPARERS

EIR PREPARATION AND OVERSIGHT

- Emily Stadnicki, Senior Planner, City of West Hollywood Community Development Department
- David DeGrazia, Senior Planner, City of West Hollywood Community Development Department
- Melissa Hatcher, Project Manager, AECOM
- Cristina Lowery, Environmental Analyst, AECOM
- Tim Harris, GIS Specialist, AECOM
- Shannon Daniels, QA/QC, AECOM
- Jennifer Martinez, Environmental Specialist, AECOM
- Shawn Godkin, Urban Designer, AECOM
- Marisa Grivas, Environmental Analyst, AECOM
- Jeanette Duffels, Biologist, AECOM
- Rebecca Apple, Principal Cultural Resources Specialist, AECOM
- Monica Strauss, Senior Archaeologist, AECOM
- Angel Tomes, Project Historian, AECOM
- Candace Ehringer, Project Cultural Resources Specialist, AECOM

AIR QUALITY ANALYSIS

- Sam Silverman, Senior Environmental Scientist, Terry A. Hayes and Associates
- Annie Ho, Environmental Scientist, Terry A. Hayes and Associates

NOISE ANALYSIS

- Sam Silverman, Senior Environmental Scientist, Terry A. Hayes and Associates
- Annie Ho, Environmental Scientist, Terry A. Hayes and Associates

11.0 List of Preparers

TRAFFIC ANALYSIS

- Jonathan Louie, Senior Transportation Planner, KOA Corporation
- Bruce Chow, Senior Transportation Planner, KOA Corporation