IV. ENVIRONMENTAL IMPACT ANALYSIS
H. NOISE

1. INTRODUCTION

This section of the EIR evaluates the potential construction-related and operational noise impacts of the proposed Project. The purpose of this analysis is to evaluate the construction-related and operational noise and ground-borne vibration impacts of the Project on the surrounding (off-site) areas.

This section is based upon the Environmental Noise Impact Analysis for the 8899 Beverly Boulevard Project, prepared by Cadence Environmental Consultants, October 2013. The Environmental Noise Impact Analysis is provided as Appendix G to this EIR.

2. BACKGROUND INFORMATION

A. Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources, such as an occasional aircraft or train passing by to virtually continuous noise sources like traffic on a major highway. Table IV.H-1 (Representative Environmental Noise Levels) illustrates representative noise levels in the environment.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

L_{eq} – The equivalent energy noise level is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

L_{min} – The minimum instantaneous noise level experienced during a given period of time.

L_{max} – The maximum instantaneous noise level experienced during a given period of time.

L_{dn} – The Day-Night Level is a 24-hour average Leq with a 10 dBA "penalty" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime.

Table IV.H-1
Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet Fly-Over at 100 Feet	105	
	100	
Gas Lawnmower at 3 Feet	95	
	90	
	85	Food Blender at 3 Feet
Diesel Truck Traveling at 50 MPH at 50 Feet	80	Garbage Disposal at 3 Feet
Noisy Urban Area during Daytime	75	
Gas Lawnmower at 100 Feet	70	Vacuum Cleaner at 10 Feet
Commercial Area	65	Normal Speech at 3 Feet
Heavy Traffic at 300 Feet	60	
	55	Large Business Office
Quiet Urban Area during Daytime	50	Dishwasher in Next Room
	45	
Quiet Urban Area during Nighttime	40	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime	35	
	30	Library
Quiet Rural Area during Nighttime	25	Bedroom at Night, Concert Hall (background)
	20	
	15	Broadcast/Recording Studio
	10	
	5	
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: California Department of Transportation, October 1998.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the L_{dn} is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

When evaluating changes in 24-hour community noise levels, a difference of 3 dBA is a barely perceptible increase to most people. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness.

Noise levels from a particular source decline as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from

the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer homes and office buildings is generally more than 30 dBA.

B. Fundamentals of Ground-Borne Vibration

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby, creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as ground-borne vibration. Ground-borne vibration is measured as peak particle velocity (PPV) in inches per second. The general human response to different levels of ground-borne vibration velocity levels is described below in Table IV.H-2 (Human Response to Levels of Ground-borne Vibration). Ground-borne vibration levels that could induce potential damage to buildings are identified in Table IV.H-3 (Ground-borne Vibration Damage Potential Criteria).

Table IV.H-2
Human Response to Levels of Ground-Borne Vibration

Human Response	Maximum PPV in Inches per Second	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely Perceptible Monuments	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.1
Severe	2.0	0.4
Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.		
Source: California Department of Transportation, 2004.		

Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible.

C. Noise Analysis Methodology

The analysis of the existing and future noise environments presented in this report is based on noise level measurements, noise prediction modeling, and empirical observations. Existing ambient noise levels were measured using a Larson•Davis Model 820 sound level meter, which meets and exceeds the minimum industry performance requirements for "Type 1" standard instruments as defined in the American National Standards Institute (ANSI) S1.4. The sound level meter was programmed to measure

using the "A" weighting scale and the "fast" detector response as recommended by the California Department of Transportation (Caltrans). The sound level meter was calibrated immediately prior to the first measurement to a sound level of 114 dB with a Larson•Davis Precision Acoustic Calibrator Model CAL200 and checked again following the final measurement. Each measurement occurred over a period of 20 minutes along residential roadway segments and 15 minutes along commercial roadway segments, and the traffic volumes along the adjacent roadway segments were counted during each measurement.

Table IV.H-3
Ground-Borne Vibration Damage Potential Criteria

Structure and Condition	Maximum PPV in Inches per Second	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely Fragile Historic Buildings, Ruins, Ancient Monuments	0.12	0.08
Fragile Buildings	0.2	0.1
Historic and Some Old Buildings	0.5	0.25
Older Residential Structures	0.5	0.25
New Residential Structures	1.0	0.5
Modern Industrial/Commercial Buildings	2.0	0.5
Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.		
Source: California Department of Transportation, 2004.		

The City of West Hollywood requires that noise impact analyses evaluate 24-hour noise levels in terms of L_{dn}. In order to do so, 24-hour roadway traffic volumes must be estimated. The Transportation Study prepared for the proposed Project identified roadway traffic volumes for the a.m. and p.m. peak traffic hours and 24-hour roadway traffic volumes for the segment of Rosewood Avenue between Almont Street and Robertson Boulevard. The existing traffic volumes identified in the Transportation Study are based on actual traffic counts conducted in the vicinity of the Project Site. The existing traffic counts for Rosewood Avenue identified a 24-hour volume of 760 vehicle trips and a peak traffic volume of 76, which is 10% of the daily count. The peak hour volume was measured during the P.M. peak traffic hour. In order to provide 24-hour noise levels for the other study-area roadway segments, the P.M. peak traffic hour volumes were assumed to be 10% based upon the existing counts for Rosewood Avenue. The estimated 24-hour roadway noise levels at the measurement locations were then calculated using a spreadsheet noise model based upon the equations provided in the Caltrans Technical Noise Supplement (TeNS) document (2009). Peak hour noise levels were also calculated in order to confirm the estimated changes in roadway noise levels and these peak hour calculations are included in Appendix B of the Environmental Noise Impact Analysis Report (located in Appendix G to this EIR).

3. ENVIRONMENTAL SETTING

A. Regulatory Setting

i) Applicable State Standards

Title 24, Part 2 of the California Code of Regulations codifies Sound Transmission Control requirements and establishes uniform minimum noise insulation performance standards for new hotels, motels,

dormitories, apartment houses, and dwellings other than single-family dwellings. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA L_{dn} in any habitable room of a new building. Dwellings are to be designed so that interior noise levels will meet this standard for at least 10 years from the time of building permit application. This standard applies to all new multi-family units developed at the Project Site.

ii) Applicable City Standards

The Safety and Noise Element of the West Hollywood General Plan 2035 identifies the noise standards that have been adopted by the City for the purpose of establishing standards for noise exposure. Based on Table 10-2 (Noise/Land Use Compatibility Matrix) of the Safety and Noise Element, new residential development is considered to be compatible with the noise environment if noise level does not exceed 60 dBA L_{dn}, provided that the buildings are constructed using conventional techniques consistent with conventional Title 24 standards. New residential uses may be constructed in areas with noise levels between 60 and 70 dBA L_{dn} after a detailed noise analysis is made and noise reduction measures are identified and included in the project design. If a new residential use is proposed in an area with noise levels between 70 and 75 dBA L_{dn}, mitigation is likely needed to meet City standards, which may include noise barriers and/or the inclusion of substantial building sound insulation. Table 10-1 (Non-Transportation Source Noise Standards Effecting Noise-Sensitive Land Uses) of the Safety and Noise Element identifies exterior noise standards for non-transportation sources affecting noise sensitive land uses of 55 dBA L_{eq} between 8:00 a.m. and 10:00 p.m., and 50 dBA L_{eq} between 10:00 p.m. and 8:00 a.m.

In adopting the West Hollywood General Plan 2035, the City also adopted the following mitigation measures for noise under the Final Program EIR for the City of West Hollywood General Plan and Climate Action Plan that apply to new development Projects proposed within West Hollywood.

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

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

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

- Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc).
- Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.

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

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

"All potential buyers and/or renters of residential property within mixed-use areas in the City of West Hollywood are hereby notified that they may be subject to audible noise levels generated by business- and entertainment-related operations common to such areas, including amplified sound, music, delivery and passenger vehicles, mechanical noise, pedestrians, and other urban noise sources. Binding arbitration is required for disputes regarding noise in mixed-use buildings that require legal action."

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

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

construction-generated vibration levels in accordance with Caltrans recommendations during pile driving and impact activities in the vicinity of the historic structures.
- Provide protective coverings or temporary shoring of on-site or adjacent historic features as necessary, in consultation with the Community Development Director or designee.

The City of West Hollywood has also adopted a Noise Ordinance (Title 9 Public Peace, Morals and Safety, Chapter 9.08 of the West Hollywood Municipal Code), which identifies noise standards intended to "strike a balance between normal, every day noises that are unavoidable in an urban environment and those that are so excessive and annoying to persons of ordinary sensitivity that they must be curtailed in order to protect the comfort and tranquility of all persons who live and work in the city."

Section 9.08.050(f) of the Noise Ordinance prohibits exterior 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 designated holidays. Interior construction is also prohibited during these times except for Saturdays when interior construction may occur between 8:00 a.m. and 7:00 p.m.

Additional sources of noise regulated by the Noise Ordinance that would be applicable to the proposed Project are as follows:

- Section 9.08.050(a) Radios, Phonographs, etc.
- Section 9.08.050(b) Band or orchestra Rehearsals.
- Section 9.08.050(c) Engines, Motors, and Mechanical Devices Near Residential District.
- Section 9.08.050(d) Motor Vehicles.
- Section 9.08.050(e) Loading and Unloading.
- Section 9.08.050(h) Fire and Burglar Alarms.
- Section 9.08.050(i) Noises by Animals.
- Section 9.08.050(j) Leaf Blowers.
- Section 9.08.050(k) Commercial Establishments Adjacent to Residential.
- Section 9.08.050(l) Loud Parties and Gatherings.

Chapter 19.20 of the Municipal Code identifies 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.

B. Existing Noise Levels

The Project Site is located along a heavily trafficked segment of Beverly Boulevard within an urbanized area consisting of residential, retail, and commercial uses. The primary sources of noise at the Project Site include traffic along Beverly Boulevard and Rosewood Avenue, vehicle activities within the Project Site, human activity (e.g., people talking), landscape maintenance at the Project Site and adjacent properties, and occasional aircraft over flights.

Existing daytime noise levels were measured at five locations on October 3, 2013. The measurement locations are illustrated in Figure IV.H-1, Noise Measurement Locations and each of these is described as follows:

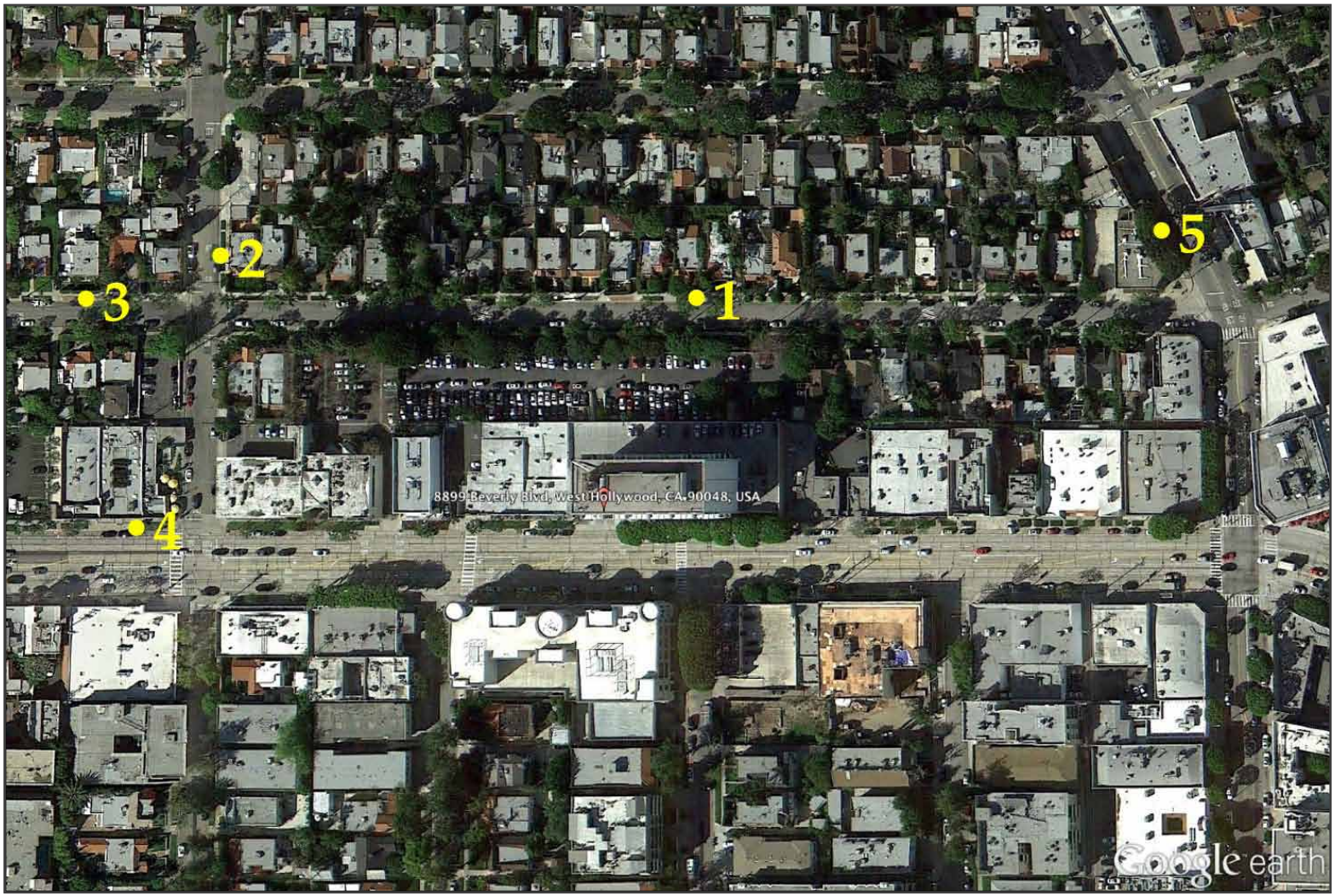
Location 1 - Northern side of Rosewood Avenue between Almont Avenue and Robertson Boulevard: The nearest residential uses to the Project Site are located along Rosewood Avenue. Noise levels were measured within the public right-of-way directly across from the Project Site in front of the home at 8859 Rosewood Avenue. The primary sources of noise at this location were traffic on Rosewood Avenue, HVAC equipment on the roof of the existing building at the Project Site, parking activities (doors opening and closing, alarm chirps) within the Project Site and along Rosewood Avenue, and people talking. A total of 26 vehicles travelled along this segment of Rosewood Avenue during the 20-minute noise level measurement period. Noise levels at this location would also be representative of the existing home adjacent to the eastern border of the Project Site.

Location 2 - Almont Avenue north of Rosewood Avenue: Residential uses are located along Almont Avenue north of Rosewood Avenue. Noise levels were measured within the public right-of-way near the home at the northeast corner of this intersection. The primary sources of noise at this location were traffic along Almont Avenue, Rosewood Avenue, Beverly Boulevard, and people talking. A total of 29 vehicles travelled along this segment of Almont Avenue during the 20-minute noise level measurement period.

Location 3 - Rosewood Avenue west of Almont Avenue: Residential uses are located along Rosewood Avenue west of Almont Avenue. Noise levels were measured within the public right-of-way in front of the home at 9011 Rosewood Avenue. The primary sources of noise at this location were traffic along Rosewood Avenue, Almont Avenue, Doheny Drive, people talking, and an aircraft over flight. A total of 23 vehicles travelled along this segment of Rosewood Avenue during the 20-minute noise level measurement period.

Location 4 - Beverly Boulevard west of Almont Drive: Beverly Boulevard is a commercial corridor and commercial uses are located along this roadway segment. Noise levels were measured along the northern side of this roadway within the public right-of-way in front of an art store. The primary sources of noise at this location were traffic on Beverly Boulevard and people talking. A total of 451 vehicles travelled along this segment of Beverly Boulevard during the 15-minute noise level measurement period.

Location 5 - Robertson Boulevard north of Rosewood Avenue: Robertson Boulevard is a commercial corridor and commercial uses are located along this roadway segment. Noise levels were measured along the western side of this roadway within the public right-of-way in front of an optical store. The primary sources of noise at this location were traffic on Robertson Boulevard, parking activities (doors opening and closing, alarm chirps) and people talking. A total of 235 vehicles travelled along this segment of Robertson Boulevard during the 15-minute noise level measurement period.



Source: Cadence Environmental Consultants, October, 2013.

EcoTierra consulting

Figure IV.H-1
Noise Monitoring Locations

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The daytime noise levels measured at each of the locations are identified in Table IV.H-4 (Existing Daytime Noise Levels). The estimated 24-hour and peak traffic hour noise levels at the receptors along the study area roadway segments are presented in Table IV.H-5 (Existing Roadway Noise Levels at Locations Off Site).

Table IV.H-4
Existing Daytime Noise Levels

Noise Measurement Location	Primary Noise Sources	Noise Level Statistics		
		L_{eq}	L_{max}	L_{min}
1. Rosewood Ave. between Almont Ave. and Robertson Bl.	Traffic on Rosewood Ave., HVAC equipment, parking activities (doors opening and closing, alarm chirps), people talking.	60.4	79.2	54.9
2. Almont Ave. north of Rosewood Ave.	Traffic along Almont Ave., Rosewood Ave., Beverly Bl., people talking.	53.4	68.1	47.0
3. Rosewood Ave. west of Almont Ave.	Traffic along Rosewood Ave., Almont Ave., Doheny Dr., people talking, aircraft over flight.	67.3	83.1	47.7
4. Beverly Bl. west of Almont Ave.	Traffic on Beverly Bl. and people talking.	73.0	84.0	55.7
5. Robertson Bl. north of Rosewood Ave.	Traffic on Robertson Bl., parking activities, people talking.	61.0	83.8	52.9
Source: Cadence Environmental Consultants, October 2013.				

Table IV.H-5
Existing Roadway Noise Levels at Locations Off Site

Roadway	Roadway Segment	Land Use	24-Hour CNEL
Rosewood Avenue	Almont Avenue to Robertson Boulevard	Residential	55.3
	west of Almont Avenue	Residential	53.2
Almont Avenue	north of Rosewood Avenue	Residential	54.5
Beverly Boulevard	west of Almont Avenue	Commercial	70.0
Robertson Boulevard	north of Rosewood Avenue	Commercial	67.2
Source: Cadence Environmental Consultants, 2012.			

In addition to the mechanical equipment and parking lot activities at the project site that were discussed for Location 1, there is also fire water pressure equipment that is tested weekly at 9:00 AM. Noise levels from this testing operation affects local noise levels on a weekly basis for short periods of time.

4. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with guidance provided by Appendix G to the CEQA Guidelines, a project could have a potentially significant impact associated with noise if any of the following were to occur:

a) Exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies;
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels;
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
d) A substantial temporary or periodic increase in ambient noise levels in the project above levels existing without the project;
e) Exposure of people residing or working in the project area to excessive noise levels if the project is located within an area covered by an airport land use plan, or where such plan has not been adopted, within two miles of a public airport or public use airport; or
f) Exposure of people residing or working in the project area to excessive noise levels if the project is located in the vicinity of a private airstrip.

The Initial Study (included as Appendix A) determined that no impact would occur with respect to Thresholds (e) and (f), listed above. As such, no further analysis of airport-related noise levels is required. The following impact analysis addresses Thresholds (a) through (d) listed above, which the Initial Study determined to be potentially significant.

i) Applicable Noise Standards

The noise standards adopted by the City are discussed previously in this section. These standards would apply to the new residential use that would be constructed within the Project Site.

ii) Ground-borne Vibration

The State CEQA Guidelines do not define the levels at which ground-borne vibration or ground-borne noise is considered "excessive." In addition, the City of West Hollywood has not adopted any thresholds for ground-borne vibration impacts. However, Caltrans has adopted the vibration standards identified previously in Tables IV.H-2 and IV.H-3 to evaluate potential impacts related to construction activities. This analysis utilizes the Caltrans thresholds to evaluate the construction-related and operational impacts of the proposed Project.

iii) Permanent Increase in Ambient Noise Levels

As discussed previously in this analysis report, the City of West Hollywood has determined that an increase in ambient noise levels is assumed to be a significant noise concern if a proposed project causes ambient noise levels to exceed the following:

- Where the existing ambient noise level is less than 60 dB, a project-related permanent increase in ambient noise levels of 5 dB L_{dn} or greater.
- Where the existing ambient noise level is greater than 60 dB, a project-related permanent increase in ambient noise levels of 3 dB L_{dn} or greater.

iv) Temporary or Periodic Increase in Ambient Noise Levels

As discussed previously in this analysis section, the City of West Hollywood has determined that a significant impact would occur if construction would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location.

B. Project Impacts and Mitigation

Threshold	*Exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies.*

Impact H-1: Construction activities associated with the proposed Project would comply with the City's Noise Ordinance standards for construction. The proposed Project would also comply with State standards and the City's Noise Ordinance standards for operational noise sources. The impact of the proposed Project would be less than significant.

i) Construction-Related Impacts

Demolition of interior portions of the Existing Building and construction activities associated with the proposed Project would require the use of heavy equipment for building modification, excavation, and building construction. Noise from smaller power tools, generators, and other sources of noise would also be associated with construction of the proposed Project. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The City's Noise Ordinance does not contain noise limits or standards for construction activities. Instead, construction activities would be restricted to the hours of 8:00 AM and 7:00 PM Monday through Friday (excluding designated holidays) in accordance with Section 9.08.050(f) of the City's Noise Ordinance. Interior construction may also occur between 8:00 AM and 7:00 PM on Saturdays. The Applicant is not requesting any exemptions from the Noise Ordinance restrictions. Therefore, construction activities would comply with the City's Noise Ordinance limits on hours on hours of construction and the impact of the Project would be less than significant.

ii) Operational Impacts

Future noise levels at the Project Site would continue to be dominated by vehicular traffic on Beverly Boulevard and Rosewood Avenue. As shown in Table IV.H-10 later in this report, future noise levels along Rosewood Avenue are expected to average approximately 56 dBA L_{dn}, which is well below the City's basic 60 dBA L_{dn} standard for residential uses. Future noise levels along Beverly Boulevard in the vicinity of the Project Site are expected to average just over 70 dBA L_{dn}. This noise level is based upon ground-level sound level measurements conducted within the roadway right-of-way near the roadway edge. Noise levels at the residential units of which all would be above ground level would be slightly lower. Table 3.9-8 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan indicates that future roadway noise levels along this roadway segment in 2035 are not expected to be greater that existing noise levels.

As discussed previously, the exterior-to-interior reduction of newer residential buildings is generally more than 30 dBA. This is based on the situation in which new buildings must comply with CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, which requires substantial building insulation and also reduces exterior to interior noise levels. Assuming a 30 dBA exterior to interior noise reduction for new residential uses would provide an interior noise level of less than 45 dBA L_{dn}, which is the state's interior standard for residential uses. Balconies that are six feet or less in depth are not considered to be exterior living environments that are subject to exterior noise standards, so no design features are required to reduce exterior noise levels in these areas of the

Project. The proposed Project would also be subject to all applicable standards of the City's Noise Ordinance for operational noise sources.

The HVAC system that would be installed for the Existing Building would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. This equipment would be installed within the new subterranean parking structure. As such, noise levels associated with the HVAC equipment would not be audible to adjacent sensitive receptors.

Based on this information, the proposed Project would comply with State standards and the City's Noise Ordinance standards for operational noise sources, and the impact of the Project would be less than significant.

Threshold	*Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.*

Impact H-2: Construction and operation of the proposed Project would not expose persons to or generate excessive ground-borne vibration. The impact of the proposed Project would be less than significant.

i) Construction-Related Impacts

Construction activities that would occur at the Project Site have the potential to generate low levels of ground-borne vibration. According to the Final Geotechnical Exploration and Recommendations report prepared for the proposed Project, any new support piles required for the proposed uses would be drilled and cast in place and not driven into the ground.

The buildings adjacent to the Project Site consist of residential structures and commercial buildings of more modern steel and concrete construction. No historic structures are located in close proximity to the Project Site. Based on the criteria identified previously in Table IV.H-3, a significant structural ground-borne vibration impact could occur if the adjacent residential buildings are exposed to vibration levels of 0.3 inches per second PPV, or if the adjacent commercial buildings are exposed to vibration levels of 0.5 inches per second PPV. The potential for nearby residents and commercial workers and students to be annoyed by ground-borne vibration would be significant if vibration levels reach 0.10 inches per second PPV.

Table IV.H-6 (Vibration Levels for Typical Construction Equipment) identifies various vibration velocity levels for the types of construction equipment that would operate at the Project Site during construction. Based on the information presented in Table IV.H-6, vibration levels could reach as high as approximately 0.089 inches per second PPV within 25 feet of the an operating large bulldozer or caisson drill. The maximum vibration level of 0.089 inches per second PPV would be below the thresholds of significance for both potential building damage and human annoyance. Therefore, the potential impacts associated with construction vibration would be less than significant.

Table IV.H-6
Vibration Levels for Typical Construction Equipment

Equipment	Reference PPV at 25 Feet
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Jones & Stokes, 2004.	

ii) Operational Impacts

The proposed Project does not include uses that are expected to generate measurable levels of ground-borne vibration during operation of the proposed Project. Therefore, the greatest regular source of Project-related ground-borne vibration would be from local trucks making deliveries to the Project Site and larger garbage trucks picking-up Project-related refuse material. The vibration levels associated with these trucks would be less than the levels associated with large construction equipment. Therefore, the operational impacts associated with ground-borne vibration would be less than significant at nearby sensitive uses.

Threshold	*A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.*

Impact H-3: Operation of the proposed Project would not generate a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. The impact of the proposed Project would be less than significant.

As discussed in the Transportation/Traffic section of this EIR, the proposed Project would generate 129 fewer daily trips, 48 fewer a.m. peak hour trips, and 37 fewer p.m. peak hour trips than the existing uses at the Project Site. As a result, a slight reduction in roadway traffic volumes would occur on must roadways leading to the Project Site. There would, however be a slight redistribution of local traffic volumes as residents of the proposed townhomes access their properties from Rosewood Avenue.

The expected changes in existing noise levels along the study-area roadway segments in the local vicinity are identified in Table IV.H-7 (Project Roadway Noise Impacts). As shown, the traffic generated by the proposed Project would increase local noise levels by a maximum of 0.4 dBA L_{dn}, which would be imperceptible to most people and would not exceed the applicable thresholds of significance for the affected existing land uses. The maximum increase would occur along Rosewood Avenue between Almont Avenue and Robertson Boulevard. The maximum increase along any other roadway segment would be 0.1 dBA L_{dn}.

Table IV.H-7
Project Roadway Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA L_{dn}				Sig. Impact?
		Existing Traffic Volumes	Existing + Project Traffic Volumes	Increase	Sig. Threshold	
Rosewood Avenue	Almont Ave. to Robertson Bl.	55.3	55.7	0.4	5.0	No
	west of Almont Avenue	53.2	53.3	0.1	5.0	No
Almont Avenue	north of Rosewood Avenue	54.5	54.5	0.0	5.0	No
Beverly Boulevard	west of Almont Avenue	70.0	70.0	0.0	5.0	No
Robertson Bl.	north of Rosewood Avenue	67.2	67.2	0.0	5.0	No
For locations where the resulting noise level would exceed 60 dBA at sensitive uses, the significance threshold established by the City of West Hollywood is a 3.0 dBA increase. For all other locations, the significance threshold is 5.0 dBA.						
Source: Cadence Environmental Consultants, 2013.						

The proposed Project would also result in new activity within the Project Site. However, the Project Site is currently active and noise levels occur as a result of parking activities, rooftop HVAC equipment, landscape maintenance, people talking, and weekly testing of the fire water pressure system. The existing rooftop HVAC equipment would be removed from the Existing Building and new HVAC equipment would be installed within the new subterranean parking structure where it would be inaudible to nearby sensitive receptors. The fire water pressure system would also be relocated to the subterranean parking structure where it would also be inaudible to nearby receptors. The proposed residential uses along Rosewood Avenue would involve parking activities within driveways and garages, landscape maintenance, and people talking. No substantive change in these ambient noise levels is expected with the Project and the resulting change in noise levels in the existing Rosewood Avenue Neighborhood is expected to be the 0.4 dBA L_{dn} increase associated with new vehicle trips.

Therefore, operation of the proposed Project would not generate a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project. The impact of the proposed Project would be less than significant since the increase of 0.4 dBA L_{dn} would be below the 5.0 dBA threshold of significance.

Threshold	*A substantial temporary or periodic increase in ambient noise levels in the project above levels existing without the project.*

Impact H-4: Construction of the proposed Project would generate a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. The short-term construction-related impact of the proposed Project would be significant and unavoidable.

As discussed previously, Project demolition, excavation, and construction activities would generate short-term increases in noise levels at the Project Site. One of the loudest potential noise sources at construction sites is pile driving to provide support for new structures. According to the Final Geotechnical Exploration and Recommendations report prepared for the proposed Project, any new support piles required for the proposed uses would be drilled and cast in place and not driven into the ground.

The U.S. Environmental Protection Agency (U.S. EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment. The data for the types of equipment that are

expected to be used at the Project Site are presented in Table IV.H-8 (Typical Construction Equipment Noise Levels). As shown, construction equipment used for the proposed Project could produce maximum noise levels of 73 to 90 dBA L_{max} at a distance of 50 feet from the source.

The Federal Highway Administration has also compiled data regarding the noise generating characteristics of typical construction activities. These data, which represent composite construction noise, are presented in Table IV.H-9 (Typical Outdoor Construction Noise Levels). As with noise generated by individual construction equipment, these noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance.

As shown in Table IV.H-9, daytime composite construction noise levels associated with the proposed Project could range from 77 to 86 dBA Leq at a distance of 50 feet from the construction activities. As shown previously in Table IV.H-4, existing ambient daytime noise levels in the residential area along Rosewood Avenue average around 60 dBA Leq. Construction activities associated with the proposed Project would increase daytime noise levels at the nearby residential uses by more than 10 dBA. This would be a significant and unavoidable temporary or periodic increase in noise levels.

5. CUMULATIVE IMPACTS

The geographic scope of the cumulative noise analysis would be the 12 related projects identified in Section II, Environmental Setting, of this Draft EIR and in the Transportation Study for the 8899 Beverly Boulevard Project (Appendix G of this Draft EIR).

Development of the proposed Project in conjunction with other related Projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized City of West Hollywood, City of Beverly Hills, and City of Los Angeles areas. The Draft Transportation Study prepared for the proposed Project identifies 12 related projects within the an approximate 0.5-mile radius of the proposed Project Site. Of these projects, 10 are located within the City of West Hollywood and two are in the City of Beverly Hills.

Table IV.H-8
Typical Construction Equipment Noise Levels

Construction Equipment	Noise Level in dBA L_{eq} at 50 feet
Earthmoving	
Backhoe	80
Bulldozer	85
Dump Truck	84
Front End Loader	80
Scraper	85
Tractor	84
Materials Handling	
Concrete Mixer Truck	85
Concrete Pump Truck	82
Crane	85
Impact Equipment	
Compactor	80
Jackhammer	85
Pneumatic Tools	85
Other Equipment	
Compressors	80

Table IV.H-8
Typical Construction Equipment Noise Levels

Construction Equipment	Noise Level in dBA L_{eq} at 50 feet
Concrete Saws	90
Grdall Forklift	85
Pickup Truck	55
Vacuum Street Sweeper	80
Welder/Torch	73
Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.	
Source: Federal highway Administration, 2006.	

Table IV.H-9
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels in dBA L_{eq} at 50 Feet with Mufflers
Excavation/Grading	86
Foundations	77
Structural	83
Finishing	86
Source: City of Los Angeles, 2006.	

A. Construction-Related Cumulative Impacts

The Applicant has no control over the timing or sequencing of the related projects that have been identified within the proposed Project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Construction-period noise and ground-borne vibration for the proposed Project and each related project (that has not yet been built) would be localized. The nearest related project is a new hotel project located approximately one quarter of a mile from the Project Site at 623 La Peer Drive north of Melrose Avenue (related project location number 1). Another project that is a similar distance from the Project Site is a residential/condominium project located at 432 N. Oakhurst Drive in Beverly Hills (related project location number 12). All of the related projects are located far enough away that construction activities at their locations would have no noise effect and no ground-borne vibration effect on the sensitive residential uses in Rosewood Avenue area adjacent to the Project Site. Therefore, the proposed Project would not contribute to significant short-term cumulative construction-related noise impacts in the immediate vicinity of the Project Site.

B. Operational Cumulative Impacts

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the difference between existing roadway noise levels and future noise levels with the proposed Project and cumulative development. The noise levels associated with existing traffic volumes and future year 2015 traffic volumes with the proposed Project are identified in Table IV.H-10 (Year 2015 Cumulative Roadway Noise Impacts). As shown, the traffic generated by the proposed Project and cumulative development would increase local noise levels by a maximum of 0.8 dBA L_{dn}, which is inaudible/imperceptible to most people and would not exceed the

City of West Hollywood thresholds of significance. Therefore, this cumulative impact would be less than significant.

Table IV.H-10
Year 2015 Cumulative Roadway Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA L_{dn}				Sig. Impact?
		Existing Traffic Volumes	Year 2015 + Project Traffic Volumes	Increase	Sig. Threshold	
Rosewood Avenue	Almont Ave. to Robertson Bl.	55.3	55.8	0.5	5.0	No
	west of Almont Avenue	53.2	53.3	0.1	5.0	No
Almont Avenue	north of Rosewood Avenue	54.5	54.5	0.0	5.0	No
Beverly Boulevard	west of Almont Avenue	70.0	70.4	0.4	5.0	No
Robertson Bl.	north of Rosewood Avenue	67.2	68.0	0.8	5.0	No
For locations where the resulting noise level would exceed 60 dBA at sensitive uses, the significance threshold established by the City of West Hollywood is a 3.0 dBA increase. For all other locations, the significance threshold is 5.0 dBA.						
Source: Cadence Environmental Consultants, 2013.						

With respect to stationary operational noise sources, none of the other related projects are located in close proximity to the Project Site. These related projects would not increase stationary operational noise sources in the immediate vicinity of the Project Site. Likewise, the operational activities at the proposed Project Site would not increase stationary operational noise levels in the vicinity of the related project sites. Therefore, cumulative impacts associated with stationary and on site operational noise sources would not be significant.

6. MITIGATION MEASURES

The following mitigation measures are based upon the measures adopted by the City of West Hollywood for all new development projects, but have been modified to directly relate to the proposed Project.

IV.H-1 The Project construction contractors 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).

IV.H-2 The Project construction contractors shall shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.

IV.H-3 The Project construction contractors shall ensure that construction equipment engines are turned off when not in use (i.e., the equipment does not idle for unnecessary lengths of time).

IV.H-4 The Project construction contractors shall locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, cement mixers).

IV.H-5 If feasible, the Project construction contractors shall install a 12-foot high temporary barrier along the northern, eastern, and western property lines. 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 parking structure construction phases of development.

IV.H-6 The Project construction contractors shall ensure that music is not audible at offsite locations.

IV.H-7 Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the owners and tenants of residential properties located along Rosewood Avenue between Almont Avenue and Robertson Boulevard disclosing the planned construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. This notification shall also provide a contact name and phone number for residents to call for construction noise related complaints. All reasonable concerns shall be rectified within 24 hours of receipt.

7. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of mitigation measures IV.H-1 though IV.H-7 would reduce the impacts associated with temporary construction activities. The acoustical barrier required under mitigation measure IV.H-5 would reduce construction-related noise levels by at least 25 dBA, which would reduce the impact during excavation and parking structure construction to less than significant levels. However, construction of the proposed subterranean parking structure is expected to affect most of the northern portion of the Project Site and it is not known if there would be adequate room to erect a temporary barrier within the perimeter of the Project Site. The homes to the immediate east of the Project Site are located only about four feet from the property boundary. Also, the temporary barrier would need to be removed prior to construction of the buildings proposed along Rosewood Avenue. Construction of these buildings would increase daytime noise levels at nearby homes by at lease 10 dBA L_{eq} during various times. This is a significant and unavoidable impact associated with short-term Project-related construction activities.

Operational noise impacts of the Proposed Project would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. POPULATION AND HOUSING

1. INTRODUCTION

This section of the EIR analyzes the proposed Project's effects on population and housing. This section is largely based on information from the Southern California Association of Governments (SCAG) and the *City of West Hollywood General Plan 2035, Housing Element*.

2. ENVIRONMENTAL SETTING

The Project Site is located at 8899 Beverly Boulevard in the City of West Hollywood (City). The Project Site is subject to the applicable policies and requirements of several local and regional plans. At the regional and sub-regional levels, development within the Project Site is subject to the planning guidance of SCAG. SCAG has adopted the 1996 RCPG, the 2012 Regional Housing Needs Assessment (RHNA), the 2008 RTP, the Regional Transportation Improvement Program (RTIP), and the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in an effort to address regional growth and measure progress toward achieving regional planning goals and objectives. Additionally, the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), and the Los Angeles County Metropolitan Transportation Authority's (Metro) Congestion Management Plan for Los Angeles County (CMP) serve as additional regional planning and guidance documents. At the City level, development within the Project Site is subject to the West Hollywood General Plan 2035 and the City of West Hollywood Municipal Code (WHMC). An overview and impact analysis of the applicable land use and planning components is provided in more detail in Section IV.G (Land Use and Planning) of this Draft EIR. The following summarizes the applicable plans and policies associated with population and housing.

A. Applicable Plans, Policies and Regulations

i) SCAG Regional Comprehensive Plan and Guide

Adopted by SCAG in 1994 and amended in 1996, the Regional Comprehensive Plan and Guide served as a framework to guide decision making by local governments until 2008, when the new Regional Comprehensive Plan was adopted. The Regional Comprehensive Plan and Guide assisted local agencies in meeting federal and State mandates for growth management, mobility, and environmental standards while maintaining consistency with regional growth goals. SCAG encouraged local agencies to utilize the prior Regional Comprehensive Plan and Guide as the basis for their own plans and encouraged agencies to discuss consistency between the Regional Comprehensive Plan and Guide and proposed development projects deemed to be of "regional significance." In 2008, SCAG adopted the current Regional Comprehensive Plan, which now serves as the advisory document to local agencies in the Southern California region.

ii) Final 2008 Regional Comprehensive Plan

SCAG prepared and issued the 2008 RCP in response to its Regional Council's directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the

interrelationships between natural resource sustainability, economic prosperity, and quality of life. The 2008 RCP incorporates the principles and goals of the 2004 Compass Growth Vision and addresses the following subject areas: Land Use and Housing, Transportation, Air Quality, Energy, Open Space and Habitat, Water, Solid Waste, Economy, and Security and Emergency Preparedness. The Regional Council accepted the 2008 RCP as a guideline document on October 2, 2008, with direction that the 2008 RCP serve as an advisory document for local governments in developing local plans and addressing local issues of regional significance. Because of its advisory nature, SCAG has concluded that the 2008 RCP shall not be used in the SCAG's Inter-Governmental Review process. Accordingly, a consistency analysis with the RCP is not required for the proposed Project.

iii) 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

For the past three decades, SCAG has prepared Regional Transportation Plans (RTPs) with the primary goal of increasing mobility for the region's residents and visitors. While mobility is a vital component of the quality of life that this region deserves, it is by no means the only component. SCAG has placed a greater emphasis than ever before on sustainability and integrated planning in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), whose vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability.

The 2012–2035 RTP/SCS includes some goals and policies applicable land use projects. Goals and policies relevant to the proposed Project are provided in Table IV.G-1 (Consistency of the proposed Project with the Applicable Goals of the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy) with a consistency analysis in Section IV.G (Land Use and Planning) of this Draft EIR.

With respect to population and housing, the 2012 Regional Housing Needs Assessment (RHNA) set local housing and zoning goals to support future growth, including transit oriented, mixed use and infill development. These local goals are in turn aggregated into a region wide Sustainable Community Strategy to fairly allocate Greenhouse Gas (GHG) emission reduction targets across the region. SB 375 requires that the regional distribution of housing need is consistent with the Sustainable Communities Strategy of a metropolitan area, and that the integrated growth forecast used in the housing distribution is the same as the one used in meeting mobility needs in a RTP. The RHNA also determines the amount and income distribution of housing development capacity that each city and county must zone for during an eight year planning period.

iv) Regional Housing Needs Assessment (RHNA)

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The RHNA planning period of i2013 to 2021 identified the need for 77 new housing units, divided into four income levels as follows[1]:

- Very low income: 19 units (24.6 percent)
- Low income: 12 units (15.6 percent)
- Moderate income: 13units (16.9 percent)
- Above Moderate income: 33 units (42.8 percent)

[1] *West Hollywood General Plan Update, Chapter 10, Housing, June 2013*

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 Housing Element, which prepared in June 2013 and has initiated the next Housing Element cycle. The 5th cycle RHNA Allocation Plan, which covers the planning period from October 2013 to October 2021, was adopted by the Regional Council on October 4, 2012. The City's updated Housing Element was considered by the Planning Commission on November 21, 2013.

Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs.

v) The West Hollywood General Plan 2035 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 developments. 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.

vi) Affordable Housing

Through the enactment of Government Code Section 65915, when a developer of housing proposes a housing development within the jurisdiction of the local government, the city, county or city and county

are required to provide the developer with a density bonus or other incentives or concessions for the production of lower income housing units within the development if the developer meets certain requirements, including a requirement that the applicant agree or propose to construct a specified percentage of the total units for specified income households or qualifying residents.

At the City level, affordable housing is regulated by Chapter 19.22 (Affordable Housing Requirements and Incentives) of the West Hollywood Municipal Code (WHMC). As outlined therein, affordable housing provisions are intended to implement General Plan policies encouraging the production of low and moderate income housing, and housing for disabled and older residents, which is integrated, compatible with and complements adjacent uses, and is located near public and commercial services. The incentives offered in the WHMC are used by the City as one means of meeting its commitment to encourage housing affordable to all economic groups, and to meet its regional fair share requirements for the construction and rehabilitation of housing affordable to low and moderate income persons.

B. Population and Housing Forecast

Table IV.I-1 presents population, households and employment projections through 2035 for the City of West Hollywood. These projections are from the City of West Hollywood General Plan 2035 EIR in which the projections were taken from SCAG's 2008 Regional Transportation Plan (RTP). According to the SCAG projections, the City of West Hollywood will increase to 39,821 persons by 2035. However, under the General Plan 2035, the population could increase to 44,182 under buildout of the plan, which results in a difference of 4,361 over SCAG projections. According to the General plan EIR, the SCAG projections likely do not consider the growth potential of West Hollywood to the level of specificity identified in the General Plan 2035. Development projections in the General Plan 2035 included infill development to occur in five commercial subareas, one of which is the Melrose/Beverly District also known as the West Hollywood Design District. The District is composed of segments of Melrose Avenue, Robertson Boulevard, and Beverly Boulevard and surrounds the landmark Pacific Design Center (PDC), and includes the Project Site along Beverly Boulevard. The General Plan further identified the infill development to occur in the form of mixed-use development on previously commercial, residential, or underutilized land. Finally, existing development throughout the City's planning area has not reached the potential under the General Plan designations, which is included in the City's population growth projection for 2035.

SCAG estimated that the City of West Hollywood had a population of 38,233 persons, 23,718 households with 32,185 persons employed in the year 2010 (see Table IV.I-1 [SCAG Population and Housing Forecasts for the City of West Hollywood]). SCAG forecasted that by the year 2035, there would be a total population of 39,821 persons, 24,940 households and 34,719 people employed in the City; representing an increase by 1,598 of population (4.2 percent), 1,222 of new households (5.1 percent) and 2,534 new jobs (7.9 percent).

Table IV.I-1
SCAG Population and Housing Forecasts for the City of West Hollywood

	2010	2015	2020	2025	2030	2035	Change 2010-2035
Population	38,223	38,515	38,864	39,197	39,515	39,821	1,598 (4.2%)
Households	23,718	24,001	24,298	24,531	24,755	24,940	1,222 (5.1%)
Employment	32,185	32,825	33,233	33,714	34,227	34,719	2,534 (7.9%)

Source: SCAG 2008 Growth Forecast; City of West Hollywood General Plan 2035 EIR, October 2010.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the proposed Project would have a potentially significant effect on the environment if it would:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The Initial Study (included as Appendix A) determined that the proposed Project would result in no impact with respect to Threshold (b) and (c), listed above. As such, no further analyses of these topics are required. The following impact analysis addresses Threshold (a) listed above, which the Initial Study determined to be potentially significant.

B. Project Impacts

Threshold	*Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).*

Impact I-1: While the proposed Project would increase population and housing in the City of West Hollywood, the proposed Project is consistent with population and housing forecasts. The proposed Project would also be consistent with the Housing Element of the General Plan and impacts with respect to substantial population growth would be less than significant.

i) Construction

Construction of the proposed Project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the proposed Project. The construction industry differs from most other industry sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday;
- Many construction workers are highly specialized (e.g., crane operators, steelworkers, masons, etc.) and move from job site to job site as dictated by the demand for their skills; and

- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

As presented in the project description of this Draft EIR, the proposed Project is estimated to require approximately 195 workers for construction and rehabilitation of the Existing Building over the course of approximately 20 months. The Rosewood Avenue development which would include the subterranean parking garage, the 13 Townhomes, the four-unit Apartment Building and the Indoor Pool House would require approximately 120 workers over a 20 month time period. It is likely that the skilled workers anticipated to work on the proposed Project already reside within the region and would not need to relocate as a result of employment. As such, construction activity associated with the proposed Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout not result in an adverse physical change in the environment; and would not introduce unplanned infrastructure that was not previously evaluated in the adopted City General Plan. Therefore, housing, population, and employment impacts associated with the construction of the proposed Project would be less than significant.

ii) Operation

1) Population

The Project consists of the adaptive reuse of an existing building into residential condominiums with street front retail and development of new single-family townhomes and affordable rental housing, along with ancillary structures and improvements, including a subterranean parking garage and indoor pool house, in a mixed use development. A primary objective of the Project is to provide a significant number of affordable rental apartments. Specifically, the Project proposes to include 12 affordable residential units, 69 market-rate residential units, 19,875 square feet of retail uses, 10,562 square feet of office uses, 4,394 square feet of restaurant uses, an ancillary recreation building (indoor pool house), and one level of subterranean parking. The Project would generate approximately 124 residents[2] and approximately 150 employees, which are approximately 170 less than existing conditions (see Table IV.I -2 below).

As the Project Site is currently developed with non-residential uses, the increase in residential population represents a 100 percent increase in population and housing on the Project Site. The direct physical impacts resulting from this increase in population and housing are analyzed under each issue area throughout this Draft EIR (see Sections IV.A through IV. L).

The increase in residential population resulting from implementation of the proposed Project (124 residents) is considered minimal, as it would represent approximately 7.7 percent of the anticipated population growth of 1,598 in West Hollywood from 2010 to 2035[3]. This would not be a substantial increase, because the addition of 124 persons would be within the SCAG's population projection for West Hollywood. As a result, the development of the proposed Project would not directly induce substantial residential population growth not planned or anticipated, and impacts relating to residential population would be less than significant.

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[2] *1.53 residents per household * 81 units = 124 residents, City of West Hollywood 2013 Community Study.*

[3] *Under the General Plan 2035, the population could increase to 44,182 under buildout of the plan, which results in a difference of 4,361 over SCAG projections.*

The proposed Project is anticipated to provide employment to approximately 150 persons as presented in Table IV.I-2. The Project would generate approximately 170 fewer employees than existing conditions; thus, it would not directly induce substantial employment population growth. Therefore, impacts relating to new business, employment growth would be less than significant.

Table IV. I-2
Current and Estimated Project Employees

Land Use	Size (sq.ft)	Net Change From Existing Use	Generation Factor (employees/1,000 sf)[a]	Total Employees
Existing				
Office	85,751	--	3.4965	225
Retail	21,249	--	2.2371	47
Restaurant[b]	3,879	--	--	48
			Existing Subtotal	***320***
Proposed				
Retail	19,875	(1,374)	2.2371	44
Office	10,562	(75,189)	3.4965	37
Restaurant[b]	4,394	515	--	54
Residential[c]	--	--	--	15
			Proposed Total	**150**
			Less Existing	**(320)**
			Total Net Change	**(170)**

a School Fee Justification Studies for the Los Angeles Unified School District, September 2002.
b Restaurant employment numbers were provided by the Project Applicant, Beverly Blvd. Associates, L.P.
c Residential employment numbers were provided by the Project Applicant, Beverly Blvd. Associates, L.P. These employees would include concierge, maintenance, etc.
Source: EcoTierra Consulting, Inc., September 2013

2) Regional Housing Needs Assessment (RHNA)

As noted previously under the RHNA subheading, the City is required to demonstrate the availability of 77 new units across all income categories. With respect to affordable housing, the proposed Specific Plan dictates a minimum of 12 rental-housing units shall be made available to very low, low and moderate income households.[4] These affordable housing units shall be a minimum of one bedroom and contain a minimum interior area of 650 square feet with finishes and appliances of "builders quality" or better. Consistent with the provisions of WHMC §19.22.030 pertaining to the provision of affordable housing, the Project proposes to set aside 20 percent of the gross residential floor area of the market-rate housing to be used for affordable housing. The percentage of affordable unit floor area is based upon the residential floor area prior to the inclusion of any density bonus units. In the case of the Project, the total gross non-residential floor area prior to any density bonus is approximately 111,272 square feet, within which 51 market-rate units could be provided. Therefore, the minimum area of the affordable housing component will be equivalent to 20% of 111,272 square feet, or 22,254 square feet, within which 12 affordable units and related support areas will be provided. In addition, consistent with State law and WHMC §19.22.050(D), projects in the City that provide 11% of the number of pre-density bonus units for very low income households are eligible for a 35% density bonus. Based on the 51

[4] *The Project is not subject to the State and City affordable housing requirements, but uses it as a guide for the Specific Plan.*

market-rate units that can be provided prior to the inclusion of any density bonus, the Project is providing a total of six Very Low Income units, or 11% of the number of pre-density bonus market-rate units, as well as two units reserved for Low Income households and four units reserved for Moderate Income households. The 35% density bonus allows the addition of 18 market-rate units, for a total of 69 market-rate units. A minimum of fifty percent of the affordable housing units required by Section 19.16.020(1)(1) shall be provided within the 8899 Beverly Specific Plan (8899SP) area. In the event that fewer than the number of affordable housing units required by Section 19.16.020 (1)(1) are provided within the 8899SP, the developer may pay a fee in lieu of providing the required affordable housing units within the 8899 Beverly Specific Plan area. The amount of the in-lieu fee shall be calculated based upon the fee per square foot required for 10-unit projects pursuant to the City Council's Fee Schedule, and shall be subject to the provisions of Section 19.22.040(C) through (E) of the WHMC. Thus, based on the above, the proposed Project would provide 12 net new affordable units, or 3.6 percent of the City's RHNA allocation for very low, low, and moderate income levels. Thus, the proposed Project would help the City meet its RHNA allocation for the planning period of January 1, 2006 to June 30, 2014.

While the operation of the proposed Project is expected to generate jobs, although fewer jobs than are presently accommodated on the project site, it is not expected that the new full-time jobs that would occur would increase the demand for housing in the vicinity of the Project Site. Typical skills required for many of the uses proposed by the Project (i.e., retail, restaurant, and commercial) are of the type that are filled by workers and students who are already present in the local labor force. Thus, the proposed Project would not introduce new businesses that would induce substantial population growth or increase housing demand in the Project area.

As illustrated in Table IV.I-3 (Consistency of the Proposed Project with the Applicable Goals and Policies of the Housing Element of the General Plan), implementation of the proposed Project would be consistent with all applicable goals and policies identified in the Housing Element of the City's General Plan, and these impacts would be less than significant.

Table IV. I-3
Consistency of the Proposed Project with the
Applicable Goals and Policies of the Housing Element of the General Plan

Goals/Policies	Evaluation of Project Consistency
Goal H-1: Provide affordable rental housing.	**Consistent.** The Project will result in a meaningful increase in the number of affordable rental units available within the City. The Project will provide 12 units that will be designated for Very Low, Low and Moderate Income households. Therefore, the proposed Project would be consistent with this goal.
Goal H-2: Maintain and enhance the quality of the housing stock and residential neighborhoods. **Policy H-2.4:** Establish and maintain development standards that support housing and mixed-use developments while protecting and enhancing the quality of life goals.	**Consistent.** The Project will enhance the quality of the City's housing stock by providing newly-constructed residential units that comply with current life safety and energy standards. The Project will replace an existing commercial surface parking lot adjoining a residential area with low-density residential uses. The denser residential components of the Project are focused towards Beverly Boulevard where they are accessible to convenient commercial services and mass-transit opportunities. Therefore, the proposed Project would be consistent with this goal and policy.

Table IV. I-3
Consistency of the Proposed Project with the
Applicable Goals and Policies of the Housing Element of the General Plan

Goals/Policies	Evaluation of Project Consistency
Goal H-3: Encourage a diverse housing stock to address the needs of all socioeconomic segments of the community. **Policy H-3.1:** Facilitate the development of a diverse range of housing options including, but not limited to, single-family homes, second/accessory units, multifamily rental housing, condominiums and townhomes, live/work units, and housing in mixed use developments.	**Consistent.** The Project provides for a mix of residential units that are diverse in size, type and income, and will help meet the housing needs of the City. The Project will provide a diverse range of market-rate housing options, including townhomes and condominiums with between one and four bedrooms. Further, the Project will provide multi-family (affordable) rental units, and thus, provide a diverse range of housing options. Therefore, the proposed Project would be consistent with this goal and policy.
Policy 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.	**Consistent.** The Project includes a significant affordable housing component (minimum of 12 units) that will be available to Very Low, Low and Moderate Income households. Therefore, the proposed Project would be consistent with this policy.
Goal H-4: Provide for adequate opportunities for new construction of housing. **Policy H-4.1:** Encourage and provide incentives for the development of housing in mixed use and transit-oriented developments.	**Consistent.** The Project will increase the housing stock available within the City by adding 81 dwelling units to meet the needs of a diverse range of households. The Project is consistent with the goals and objectives of the Mixed-Use Incentive Overlay Zone, and is appropriately situated on a commercial thoroughfare close to retail and commercial businesses and mass-transit services. Therefore, the proposed Project would be consistent with this goal and policy.
Policy H-4.3: Encourage the adaptive reuse of existing structures for residential purposes.	**Consistent.** The Project includes the adaptive reuse of an existing commercial building for primarily residential purposes, and the construction of new housing units on an infill development site that is presently occupied by a commercial parking lot within a residential neighborhood. Therefore, the proposed Project would be consistent with this policy.
Policy 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.	**Consistent.** The Project has utilized the density bonus that is designed to facilitate the inclusion of affordable housing development. These provisions implement General Plan policies encouraging the production of Very Low, Low and Moderate Income housing, which is integrated, compatible with and complements adjacent uses, and is located near public and commercial services. The Project includes a greater number of affordable units than are required under the City's Inclusionary Housing Ordinance and is only able to do so as a result of the density bonus offered by the City. Therefore, the proposed Project would be consistent with this

Table IV. I-3
Consistency of the Proposed Project with the
Applicable Goals and Policies of the Housing Element of the General Plan

Goals/Policies	Evaluation of Project Consistency
	policy.
Goal H-6: Promote equal access to housing for all.	**Consistent.** Occupancy of the residential units will be available to all qualified households, without regard to the actual or perceived race, color, sex, age, family status, marital status, parenthood, pregnancy and pregnancy-related conditions, occupancy by a minor child, ancestry, ethnic origin, national origin, citizenship, religion, source of income, status as a student, sexual orientation, gender identity, disability, political affiliation or opinion, or medical conditions including but not limited to AIDS or AIDS-related conditions of the members of such households. Therefore, the proposed Project would be consistent with this goal.
Note: This table lists only those policies that are applicable to the proposed Project. *Goals/Policies Source: The West Hollywood General Plan 2035, Housing Element, adopted September 2011.*	

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative population and housing analysis is the City of West Hollywood corporate boundaries. The proposed Project would generate a total of 124 residents and approximately 150 employees, which is approximately 170 workers less than existing conditions.

Implementation of the proposed Project in conjunction with the related projects identified in Section III., Environmental Setting, would result in a 100 percent increase in population for the Project Site while the Project would result in a decrease of 170 employees at the site. The combined residential projects with implementation of the proposed Project and related projects would total approximately 321 residents.

The increase in residential population resulting from implementation of the proposed Project combined with the related projects (total of327) is considered minimal, as it would represent approximately 20.4 percent of the anticipated population growth of 1,598 in West Hollywood from 2010 to 2035. This would not be a substantial increase, because the addition of 327 persons would be within the SCAG and City's population projection for West Hollywood. As a result, the development of the proposed Project combined with the related projects would not directly induce substantial residential population growth not planned or anticipated and impacts relating to residential population. Therefore, the Project would not have a cumulatively considerable impact on population growth and housing demand, and cumulative impacts would be less than significant.

The commercial land uses that would be developed with implementation of the proposed Project in combination with the related projects would concurrently increase the number of employees in the City of West Hollywood. The 704,018 sq. ft. of commercial land uses that would be developed with the related projects in combination with the proposed Project's 34,831 sq. ft. of commercial uses would yield a combined employee increase of 1,837employees (see Table IV.I-4).

If every new employee required one new housing unit, then the cumulative employment would indirectly result in 1,837new residences within the West Hollywood area. However, this would be a liberal estimate of new permanent residents and households, as new employment positions are often filled from the existing community and extended City population and typically do not result in relocation into the area to be closer to the workplace. As a result, development of the proposed Project would not indirectly induce substantial cumulative population and housing growth as a result of new employment opportunities. Therefore, the Project would not have a cumulatively considerable impact on employment growth and associated housing demand, and cumulative impacts would be less than significant.

With respect to cumulative population and housing impacts associated with the Regional Housing Needs Assessment (RHNA), RHNA sets local housing and zoning goals to support future growth, including transit oriented, mixed use and infill development. These local goals are in turn aggregated into a region wide Sustainable Community Strategy. SB 375 requires that the regional distribution of housing need is consistent with the Sustainable Communities Strategy of a metropolitan area, and that the integrated growth forecast used in the housing distribution is the same as the one used in meeting mobility needs in a RTP. The RHNA also determines the amount and income distribution of housing development capacity that each city and county must zone for during an eight year planning period. As indicated above in the project-specific analysis, the proposed Project would help the City meet its RHNA requirements and would be consistent with the Housing Element of the City's General Plan. Similarly, all related projects in the SCAG region would be required to demonstrate consistency with the applicable RHNA and Housing Element for each of the related project's planning jurisdiction. Therefore, the Project would not have a cumulatively considerable impact on population growth and housing demand, and cumulative impacts would be less than significant.

Table IV.I-4
Cumulative Employment and Population Increase

					Total	
No.	**Land Use/Description**	**Unit of Measure**	**Employee Gen. Factor (per 1,000 sf)[a]**	**Population Generation Factor[b]**	**Emp.**	**Pop.**
City of West Hollywood						
1.	Hotel	63,000 sf	1.1325	--	71	
	Residential Condominium	8 du	--	1.53	--	12
2.	Retail	6,500 sf	2.2371	--	14	--
3.	Retail/Commercial	28,474 sf	2.2371	--	64	--
4.	Retail/Commercial	9,545 sf	2.2371	--	21	--
5.	Restaurant	9,998 sf	2.2371	--	22	--
6.	Retail	14,571 sf	2.2371	--	32	--
	Apartments	7 du	--	1.53	--	11
7.	Office	400,000 sf	3.4965	--	1,399	--
8.	Commercial	70,259 sf	2.2371	--	157	--
9.	Retail	9,850 sf	2.2371	--	22	--
	Apartments	42 du	--	1.53	--	64
	Restaurant	9,800 sf	2.2371	--	22	--
10.	Retail/Commercial	73,819 sf	2.2371	--	165	
	Apartments	76du	--	1.53	--	116

Table IV.I-4
Cumulative Employment and Population Increase

					Total	
No.	**Land Use/Description**	**Unit of Measure**	**Employee Gen. Factor (per 1,000 sf)[a]**	**Population Generation Factor[b]**	**Emp.**	**Pop.**
	Cafe/Restaurant	8,202sf	2.2371	--	18	--
				City of West Hollywood Related Projects Total	*2,007*	*203*
				Project Total[c]	*(170)*	*124*
				Total Cumulative	**1,837**	**327**
City of Beverly Hills						
11.	Condominiums	35 du	--	2.37[d]	--	83
12.	Condominiums	34 du	--	2.37[d]	--	81
				City of Beverly Hills Related Projects Total		**164**

Note: sf = square feet; du = dwelling units; n/a = information not available at the time of this report.

a Los Angeles Unified School District, School Fee Justification Studies for Los Angeles Unified School District, Table ES-2, September 2002

b City of West Hollywood 2013 Community Study.

c Project would result in 150 jobs. However, the number of jobs is less than existing conditions of an estimated 320 jobs and project implementation results in a net change of 170 less jobs.

d U.S. Census Bureau, City of Beverly Hills, website: http://quickfacts.census.gov/qfd/states/06/0606308.html.
Related Projects within the City of Beverly Hills were not included in the Cumulative Employment and Population numbers as these projects are located outside the geographic scope for this issue area, which was the City of West Hollywood.

5. MITIGATION MEASURES

No significant impacts were identified. Therefore, no mitigation is required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to population and housing would be less than significant.

Cumulative impacts to population and housing would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
1. FIRE

1. INTRODUCTION

This Subsection describes the potential impacts of the proposed Project on fire protection services to the Project area. This section utilizes information from the following resources: the *County of Los Angeles Fire Department 2013 Strategic Fire Plan Update*, June 15, 2013; County of Los Angeles Fire Department website; the 2010 *California Fire Code*; the 2011 *County of Los Angeles Fire Code*; the *City of West Hollywood General Plan 2035, Safety and Noise Element*, adopted on September 6, 2011; an email correspondence from Mike Visnagra, Supervisor, Alarm and Sprinkler Plan Check Unit, County of Los Angeles Fire Department; and a written correspondence from Loretta Bagwell, Planning Division of Los Angeles County Fire Department.

2. ENVIRONMENTAL SETTING

A. Existing Facilities and Personnel

i) Los Angeles County Fire Department

Los Angeles County Fire Department (LACFD) provides fire protection services for the City of West Hollywood on a contractual basis. The LACFD's operations are divided into three regions, nine operational Divisions, which are composed of 22 Battalions serving unincorporated areas of Los Angeles County and 58 contract cities. The LACFD currently has 171 fire stations (including FS55 and FS155 on Catalina Island), 230 fire engines (including 500 series), 5 Light Forces, 25 quints,[1] 94 paramedic squads, 35 patrols, 11 wildland fire suppression camps, 8 bulldozers, 7 helicopters, 3 USAR teams, 1 USAR Task Force, 97 Lifeguards vehicles and rescue boats, 23 Prevention Offices, 12 Forestry Units and numerous other response vehicles and facilities.[2]

ii) Local Fire Stations and Staffing

The Project Site is located within Battalion 1, which includes six fire stations, two of which are located within the City of West Hollywood. The two local West Hollywood fire stations are staffed 24 hours a day, seven days a week and include Station 7 (Battalion 1 Headquarters) located at 864 North San Vicente Boulevard and Station 8 located at 7643 West Santa Monica Boulevard. The stations include 19 firefighters and battalion chief who work 24-hour shifts.[3] There are three shifts for a total of 60 personnel.[4] The closest fire station to the Project Site is Fire Station 7, which is approximately 0.84 miles

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[1] *Quint is a fire service apparatus that serves the dual purpose of an engine and a ladder truck. It has five functions: pump, water tank, fire hose, aerial device and ground ladders.*

[2] *County of Los Angeles Fire Department 2013 Strategic Fire Plan Update, Adopted June 15, 2013.*

[3] *City of West Hollywood General Plan 2035, Safety and Noise Element, September 6, 2011.*

[4] *Email correspondence from Loretta Bagwell, Planning Analyst, Los Angeles County Fire Department, August 20, 2013.*

north of the Site and, thus, serves as first response to emergency calls.[5] Figure IV. J-1 (Fire Station Location Map) shows the locations of the Fire Stations.

Fire Station 7 is staffed with a 4-person Paramedic Engine (1-Captain, 1-Fire Fighter Specialist and 2-Fire Fighters/Paramedics) and a 2-person Paramedic Squad (2-Fire Fighters/Paramedics). Fire Station 8 is staffed with a 5-person Truck (1-Captain, 1-Fire Fighter Specialist and 3-Fire Fighters), a 4-person Engine (1-Captain, 1-Fire Fighter Specialist, 1-Fire Fighter/Paramedic and 1-Fire Fighter), a 2-person Engine (1-Fire Fighter Specialist, 1-Fire Fighter), and a 2-person Paramedic Squad (2-Fire Fighters/Paramedics).[6]

i) Response Distances and Times

Response time relates to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and the ability to successfully navigate the given roadway network. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along the response route can affect the response distance in terms of travel time.

The LACFD uses the National Fire Protection Agency (NFPA) guidelines for urban areas of a five-minute response time for the first arriving unit and an eight-minute response time for advanced life support (paramedics).[7] These times can generally be met in urban areas with a maximum response distance between uses and a LACFD fire station of 1.5 miles. During 2012, Fire Station 7 had an average emergency response time of 3:52 minutes and non-emergency response time of 5:16 minutes and Fire Station 8 had an average emergency response time of 3:52 minutes and non-emergency response time of 5:39 minutes.[8] Table IV.J.1-1 (LACFD 2012 Fire Response Incidents) provides fire incidents that LACFD responded to in 2012.

Table IV.J.1-1
LACFD 2012 Fire Response Incidents

Incident	Fire Station 7	Fire Station 8
Fire	36	60
EMS	1,697	2,310
Other	636	619
Total	**2,369**	**2,989**

Source: Email correspondence from Loretta Bagwell, Planning Analyst, Los Angeles County Fire Department, August 20, 2013.

ii) Fire Flow

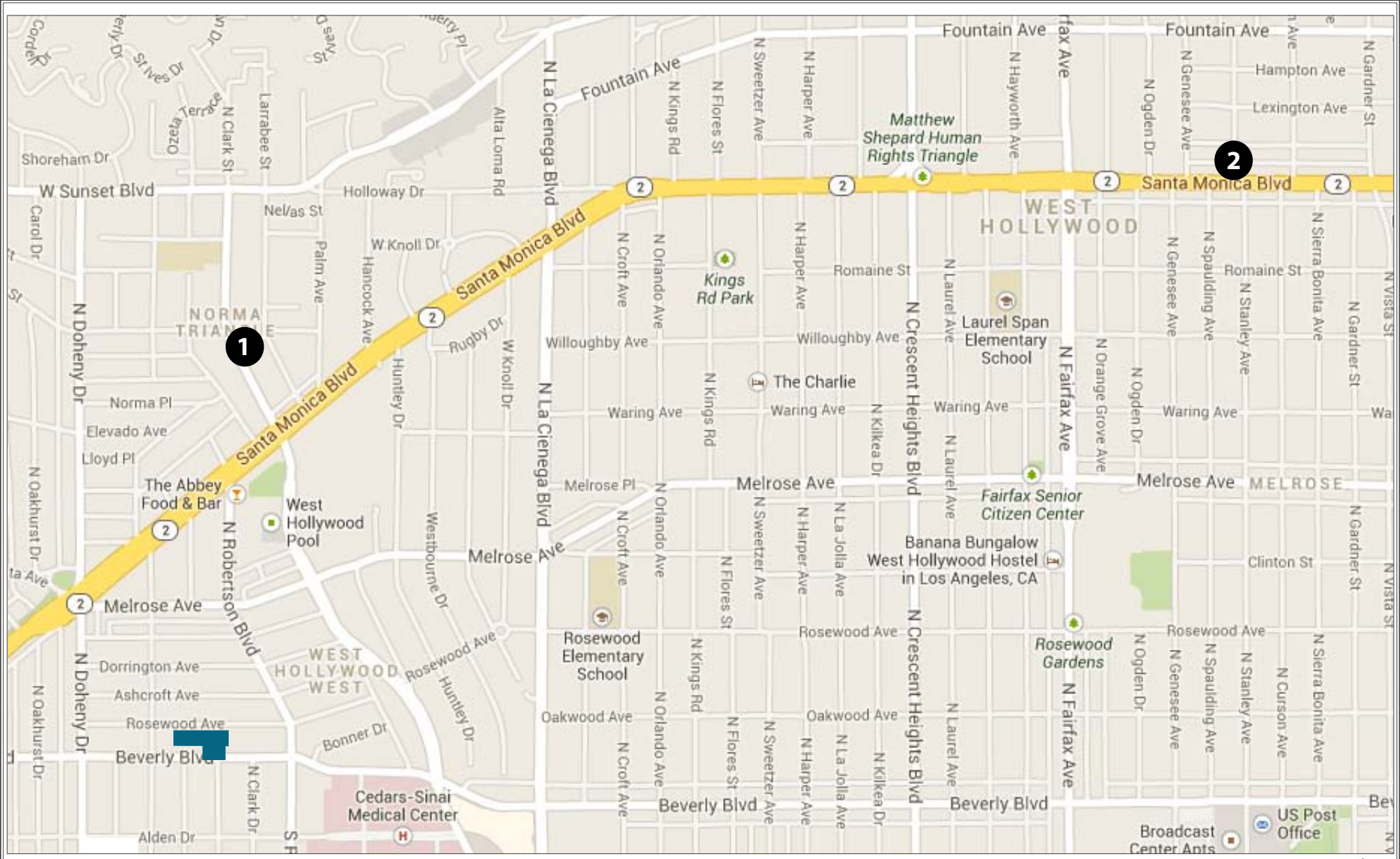
The City of Beverly Hills Public Works Department currently provides water for fire flow to the Project Site. Fire flows are supplied by the same water mains as the domestic water systems including the lines located in the local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). The required fire flow for public fire hydrants at the Project Site is 2,000 gallons

[5] *Ibid.*

[6] *Ibid.*

[7] *Ibid.*

[8] *Ibid.*



1: Fire Station 7, 864 North San Vicente Boulevard
2: Fire Station 8, 7643 West Santa Monica Boulevard
Project Site
Source: GoogleEarth, August 2013.

EcoTierra consulting

Figure IV.J-1
Fire Station Location Map

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per minute at 20 pounds per square inch (PSI) for a duration of 2 hours.[9] A 25 percent reduction can be granted for fully sprinklered buildings and buildings that are constructed as Type I-F.R, Type II-F.R., Type II one-hour, Type II-N, Type III one-hour, Type III-N, Type IV, Type IV one hour, and Type V one-hour.[10] Two-family dwelling uses, or duplexes, are required by LACFD to have a fire flow of 1,500 gallons per minute (gpm) and a residual water pressure of 20 psi is to remain in the water system while the required gpm is flowing for up to two hours.[11]

The City of Beverly Hills Public Works Department also provides water service and water for fire flows to the immediate area surrounding the Project Site. All water mains and lines that are designed and sized according to City of Beverly Hills Public Works Department standards take into account fire flow and pressure requirements. The Project Site is currently served by City of Beverly Hills Public Works Department water mains consisting of an eight-inch water main in Beverly Boulevard and an eight-inch water main in Rosewood Avenue.[12] The City of Beverly Hills indicates that there are no existing water system deficiencies in the area of the Project Site.[13] There are two public fire hydrants at the Project Site: one directly in front of the Site on Beverly Boulevard; and the other is located across from the Project Site on Rosewood Avenue. The City of Beverly Hills Water Division conducted a fire flow availability tests on September 18, 2013 and October 29, 2013 for five public fire hydrants within the Project Site vicinity. The City of Beverly Hills Water Division standard procedure is to flow hydrants up and down stream from a subject property that uses the same water main, but not flow the hydrant directly in front of the subject property. The five tested nearby hydrants are located at Beverly Boulevard at Almont Drive, one Beverly Boulevard at Robertson Boulevard, 9039 Rosewood Avenue, Almont Drive at Rosewood Avenue, and 8859 Rosewood Avenue. The hydrants' water flows and residual water pressure are as follows:

- Beverly Boulevard and Almont Drive flows at 2,500 gpm with a residual water pressure of 39 psi;
- Beverly Boulevard and Robertson Boulevard flows at 2,440 gpm with a residual water pressure of 39 psi;
- 9039 Rosewood Avenue flows at 4,290 gpm with a residual water pressure of 60 psi;
- Almont Drive and Rosewood Avenue flows at 4,130 gpm with a residual water pressure of 60 psi; and
- 8859 Rosewood Avenue flows at 4,140 gpm with a residual water pressure of 62 psi.[14]

Requirements for fire hydrant spacing and type of hydrant also vary by type of land development. There must be a distance of 300 feet between hydrants on roads and fire lanes for a commercial, multi-family, and detached condominiums.[15] Furthermore, no portion of a lot frontage can be more than 200 feet via vehicular access from a public hydrant and no portion of a building can exceed 400 feet via vehicular

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9 *Written correspondence from Nancy Rodeheffer, Los Angeles County Fire Department, Land Development Unit, November 7, 2013.*

10 *Fire Flow and Hydrant Requirements, Fire Prevention Division of the Los Angeles County Fire Department, December 15, 2004.*

11 *Ibid.*

12 *Email correspondence from Kevin Watson, Water Operations Manager, City of Beverly Hills, September 19, 2013.*

13 *Ibid.*

14 *Information on Fire Flow Availability, 8899 Beverly Boulevard, September 18, 2013 and October 29, 2013.*

15 *Fire Flow and Hydrant Requirements, Fire Prevention Division of the Los Angeles County Fire Department, December 15, 2004.*

access from a properly spaced public hydrant. If the development exceeds the allowable distance for public hydrants design modifications, such as sprinklered buildings, can allow for an increase in distance. Sprinklered buildings qualify for the maximum spacing of 600 feet. [16] New construction is also subject to the LACFD development standards and guidelines for on-site hydrants, including a required fire flow of at least 2,500 gallons per minute at 20 psi, flowing from two hydrants simultaneously, and any required hydrant upgrades for public hydrants. Refer to Section IV.L.2 (Utilities – Water) for a discussion of water service infrastructure in the Project area.

B. Regulatory Framework

i) California Fire Code

The California Fire Code (CFC) is Part 9 of the official 2010 triennial compilation and publication of the adoptions, amendments, and repeal of building regulations to the California Code of Regulations, Title 24, also referred to as the California Building Standards Code (CBSC).[17] Part 9 incorporates by adoption the 2009 International Fire Code (IFC) of the International Code Council with necessary California amendments. The CBSC applies to all occupancies throughout the State of California as annotated. The CFC is the minimum state standard for fire code implementation in California, and is based on the content of the IFC and incorporation of the NFPA standards and requirements for fire prevention and suppression activities, training, and equipment.

ii) West Hollywood Municipal Code

The City of West Hollywood has adopted the Los Angeles County Fire Code (Title 32) as the City's Fire Code. The Fire Code (Title 14 of the Municipal Code) establishes requirements with respect to fire protection and prevention.[18] New construction is subject to development standards and guidelines, including the following: installation of sprinkler systems, the installation of fire hydrants that adequately provide water at the required flow rate, flow duration around new development, and the use of building materials that reduce and slow the spread of fires.

The Fire Code also requires occupants of all high-rise buildings to be instructed annually on the procedures to be followed in the event of fire, earthquake or other emergency. Documentation of occupant instruction shall be maintained by the Fire Safety Director of each high-rise building, and shall be available for inspection by the Fire Marshall of the Fire Department. Instruction for all new occupants of each high-rise building is required to occur within 14 days of their assuming occupancy of the building. The owner of each high-rise structure in the City of West Hollywood shall be responsible for having all building staff personnel, including at least one representative from each independent tenant, receive 2 hours of training using a portable fire extinguisher, 2 hours training in high-rise fire survival, and 2 hours training in earthquake preparedness.[19]

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[16] *Ibid.*

[17] *California Code of Regulations, Title 24, Part 9, California Building Standards Commission, 2001 California Fire Code, website: http://osfm.fire.ca.gov/codedevelopment/codedevelopment_codeadoptionprocess.php, August 15, 2013.*

[18] *City of West Hollywood Municipal Code, Title 14, Chapter 14.04.*

[19] *Ibid, Chapter 14.08.010.*

iii) West Hollywood General Plan

The City of West Hollywood has adopted a Safety and Noise Element to its General Plan. The Element includes goals and policies related to fire protection. Listed below are the policies relevant to the proposed Project:[20]

SN-1: Reduce injury and damage from natural hazards.

> ***SN-1.2*****:** Allow the consideration of potential natural or man-made hazards in project review and in City operations, considering best practices in hazard-avoidance and mitigation in the siting, structural engineering, maintenance, and building and landscape design for all development projects.
>
> ***SN-1.7***: Maintain the West Hollywood Emergency Plan (2009), including plans for police and fire services, vulnerable populations, and sensitive facilities, as well as plans for the continuity of the community and important networks following a significant disaster.

SN-6: Maintain adequate levels of law enforcement, fire protection, and emergency medical services.

> ***SN-6.1*****:** Provide sufficient law enforcement, fire protection, and emergency medical services to meet the needs of a changing population.
>
> ***SN-6.2:*** Cooperate and collaborate with neighboring jurisdictions, social services, and internal departments to maximize public safety and emergency services.
>
> ***SN-6.3*****:** Continue to support the County's existing mutual aid and automatic aid agreements for additional fire and police resources needed during an emergency, as feasible.

SN-7**:** Utilize law enforcement, fire protection, and emergency medical services in a proactive and preventative way.

> ***SN-7.3****:* Provided that it serves the best interests of the community, continue to contract with Los Angeles County for the provision of police services and remain part of the Consolidated Fire Protection District of the County of Los Angeles for fire/emergency services, and annually review the services regarding the responsiveness to community needs, effectiveness, and efficient resource allocation.
>
> ***SN-7.4****:* Promote community-based programs in fire safety and emergency preparedness, including neighborhood-level programs and programs with businesses.

SN-8: Provide public safety services in a manner that reflects and is sensitive to the characteristics and needs of the West Hollywood community.

> ***SN-8.1****:* Coordinate the provision of law enforcement and fire protection/emergency medical services with all public safety service providers monitoring their adequacy and responsiveness to community needs.

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[20] *City of West Hollywood General Plan 2035, Safety and Noise Element, September 6, 2011.*

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the proposed Project would have a potentially significant effect on the environment if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

i) Methodology

In accordance with standard LACFD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, and hydrant and access improvements. The LACFD does not determine the adequacy of fire protection based on response times or number of Emergency Medical Services (EMS) or fire-related incidents. The following discussion addresses the proposed Project's potential impacts on fire protection services based on fire flows, response distance, and LACFD review of hydrants and access.

B. Project Impacts

Threshold	*Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the fire department?*

Impact J.1-1 The proposed Project would be within the current fire response distance, provides adequate fire flow and access, and meets building fire safety regulations. Therefore, impacts to fire services would be less than significant.

i) Construction

The proposed Project is a mixed-use development of the adaptive re-use of an existing 10-story (including basement and penthouse), 125-foot tall retail/commercial office building at 8899 Beverly Boulevard (Existing Building) and development of new residential uses to the rear along Rosewood Avenue on an existing surface parking lot serving the Existing Building.[21] Construction of the proposed Project would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment, use of flammable construction materials, and from carelessly discarded cigarettes. In most cases, the implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during construction of the proposed Project include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in

[21] *The Penthouse will be lowered and the overall height of the Existing Building will be 120.5 feet.*

appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

- Construction impacts are temporary in nature and do not cause lasting effects; and

- Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete.

Project construction would not be expected to tax fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives, the construction of which could cause significant environmental impacts. Therefore, construction-related impacts to fire protection services would be less than significant.

ii) Operation

The proposed Project would introduce approximately 124 new residents and approximately 91 employees, which are approximately 170 less employees than existing conditions to the Project Site. As the Project Site is currently developed with non-residential uses, the increase in residential population represents a 100 percent increase in population and housing on the Project Site. Though the Existing Building on the Project Site currently employs approximately 320 persons, a change in the primary use from office to mixed-use residential alters the nature of the Site to a 24-hour use; thus, an increase in the demand for fire protection services is anticipated. The subsequent discussion considers the major criteria for determining the proposed Project's potential impacts on fire protection services, including fire flows, response distance and time, and LACFD's review of hydrants and access.

1) Fire Flows

The required fire flow is closely related to the type and size of land use. As previously discussed, the fire flow requirements for the proposed Project would be up to 5,000 gpm. A 25 percent reduction can be granted for fully sprinklered buildings and buildings that are constructed as Type I-F.R, Type II-F.R., Type II one-hour, Type II-N, Type III one-hour, Type III-N, Type IV, Type IV one hour, and Type V one-hour. [22] The proposed Project would be reviewed as follows: the Existing Building would be Type I, and the Rosewood construction would be Type V over Type I. Further, the Existing Building would be sprinklered. As described by the LACFD, the proposed Project is required to have access to a fire flow of 2,000 gpm and a residual water pressure of 20 psi is to remain in the water system while the required gpm is

[22] *Fire Flow and Hydrant Requirements, Fire Prevention Division of the Los Angeles County Fire Department, December 15, 2004.*

flowing for up to two hours.[23] As previously discussed, five nearby fire hydrants were tested. The hydrants' water flows and residual water pressure are as follows:

- Beverly Boulevard and Almont Drive flows at 2,500 gpm with a residual water pressure of 39 psi;
- Beverly Boulevard and Robertson Boulevard flows at 2,440 gpm with a residual water pressure of 39 psi;
- 9039 Rosewood Avenue flows at 4,290 gpm with a residual water pressure of 60 psi;
- Almont Drive and Rosewood Avenue flows at 4,130 gpm with a residual water pressure of 60 psi; and
- 8859 Rosewood Avenue flows at 4,140 gpm with a residual water pressure of 62 psi.[24]

Therefore, the existing hydrants on Beverly Boulevard and Rosewood Avenue do provide adequate fire flow. However, upon Project review, LACFD has requested the installation of one new public fire hydrant on the south side of Rosewood Avenue. Additionally, to ensure adequate fire protection services to the Project Site, the Applicant would be required to submit Project plans to the LACFD for approval during the City plan check process as a condition of approval. The plans must show all proposed changes to the fire protection water system, such as fire hydrant locations and main sizes.[25] Approval of the Project plans would ensure the requisite fire flow for the Project Site. Should it be determined during the Project plan review that the existing fire-flow at the Project Site is not sufficient to serve the Project, and that the Proposed Project would require the installation of new water lines, meters, private fire hydrants, or other fire safety features, these features would conform to the LACFD Fire Code and be implemented in consultation with the LACFD.[26] Therefore, impacts on fire flow would be less than significant.

2) Response Distances and Times

As previously described, the average emergency response time from Fire Station 7, which serves the Project Site, is 3:52 minutes, which is under the LACFD's response goal time of five minutes. The average non-emergency response time from Fire Station 7 is 5:16 minutes, which is under the LACFD's response goal time of eight minutes. Furthermore, current response times would not be greatly affected by construction or operation of the proposed Project, as emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Also, upon completion of the proposed Project, the LACFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate the LACFD response to the Project Site. Therefore, the proposed Project would not create new impacts related to response times or impede the LAFCD's emergency response to the Site or its immediate vicinity. Thus, Project impact related to response times would be less than significant.

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[23] *Written correspondence from Nancy Rodeheffer, Los Angeles County Fire Department, Land Development Unit, November 7, 2013.*

[24] *Information on Fire Flow Availability, 8899 Beverly Boulevard, September 18, 2013 and October 29, 2013.*

[25] *Written correspondence from Nancy Rodeheffer, Los Angeles County Fire Department, Land Development Unit, November 7, 2013.*

[26] *Written correspondence from Frank Vidales, Acting Chief, Forestry Division, Los Angeles County Fire Department, July 31, 2013.*

The LACFD has stated that emergency and non-emergency response times can be adequately met with a maximum response distance between uses and a LACFD fire station of 1.5 miles.[27] The Project Site is located approximately 0.84 miles from Fire Station 7; therefore, the Project Site is located within the maximum response distance of 1.5 miles. In addition, the Applicant shall be required to submit plans to the LACFD, Building Plan Check Unit. LACFD Building Plan Check Unit at that point makes a determination of fire sprinklers requirements.[28] The proposed Project would include sprinklers within the Existing Building. Conformance with applicable Fire Code and LACFD building requirements would provide adequate on-site fire protection. Therefore, impacts related to response times would be less than significant.

3) Emergency Access

Emergency vehicle access to the Project Site would continue to be from Beverly Boulevard, although the Townhomes would have direct access to their garages from Rosewood Avenue. All circulation improvements, described in Section IV.K (Transportation/Traffic) of this EIR, that are proposed for the Project Site would be in compliance with the Fire Code, including any additional access requirements of the LACFD. Additionally, emergency access to the Project Site would be maintained at all times.

The proposed Project is not anticipated to affect vehicle/capacity ratios and the level of service of roadways in the Project vicinity, based on the City of West Hollywood's established methodology and significance thresholds. Further, increases in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Project's proposed circulation plan, it is anticipated that the LACFD would be able to respond to Project Site emergencies within the established current response time of five minutes. Therefore, impacts related to emergency access would be less than significant.

4) Compliance with Regulatory Framework

The proposed Project would be required to comply with the relevant policies described in the Safety and Noise Element, including adherence to the California Fire Code, being sprinklered adequately, and constructed to be in compliance with established safety standards.

Given that fire protection services are provided through a contract with LACFD, the direct project-related fire protection service costs would be borne by the County. However, this has been evaluated as a City cost impact under the assumption that the cost of the contract would increase by the same amount as the estimated fire protection costs generated by the proposed Project.

As previously discussed, the Project demand on fire service is expected to be less than significant. In addition, the incremental increase in the need for increased fire protection would be partially offset by the increased property tax and sales tax revenues that would fund additional services. Therefore, the proposed Project would not necessitate the construction or expansion of a fire station, the construction of which could cause significant environmental impacts. Therefore, Project impacts would be less than significant.

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[27] *Email correspondence from Loretta Bagwell, Planning Analyst, Los Angeles County Fire Department, August 20, 2013.*

[28] *Email correspondence from Mike Visnagra, Supervisor, Alarm and Sprinkler Plan Check Unit, County of Los Angeles Fire Department, September 5, 2013.*

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative fire protection analysis encompasses the service area for LACFD Fire Stations 7 and 8. The proposed Project, in combination with the construction and operation of the 10 related projects[29], located within the City of West Hollywood, and other planned and approved projects, would result in approximately 327 additional residents and approximately 704,018 sq. ft. of commercial uses. It's anticipated that the additional population and commercial land use would increase the demand for fire protection services in the service area for LACFD Fire Stations 7 and 8. Specifically, there would be increased demands for additional staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes, government funding), to which the proposed Project and related projects would contribute.

Similar to the proposed Project, each of the related projects, and all other planned and approved projects in the City of West Hollywood, would be individually subject to review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LACFD and the City of West Hollywood in order to adequately mitigate fire protection impacts. For example, all related projects and all other planned and approved projects would be required to assure that access remains clear during all demolition and construction activities. Any required upgrades to the water distribution systems serving the related projects and other planned and approved projects would be addressed for each individual project in conjunction with their project approvals. Each of the related projects and other planned and approved projects are also individually subject to review, and would be required to comply with all applicable fire safety requirements, including hydrant and access improvements, if necessary, in order to adequately mitigate fire protection impacts. If any of the related projects or other planned and approved projects would create demands on fire protection staffing, equipment, or facilities such that a new station would be required, potential environmental impacts would be addressed in conjunction with the environmental review for that project.

At present there is no need for, or specific plans to build a new fire station, the construction of which could cause significant environmental impacts. Depending on the facility and staffing decisions, new or physically altered fire protection facilities may be authorized at some time in the future to meet future demands. The decision to construct new or altered facilities is part of the LACFD's and the City's general planning and budgeting process and is outside the scope of this draft EIR. The Project would have less than significant impacts to the fire protection services in West Hollywood. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

5. MITIGATION MEASURES

A. Construction

No significant impacts were identified. Therefore, no mitigation is required.

[29] *The two Beverly Hills related projects (numbers 11 and 12 on Table III-1, Section III, Environmental Setting) are served by the City of Beverly Hills Fire Department.*

B. Operation

Though construction impacts are less than significant, the LACFD has required the following measure, which shall be a condition of approval:

J.1-1 Prior to Construction and Final Map approval, the Applicant shall install one new public fire hydrant on Rosewood Avenue on the same side of the street as the Proposed Project as indicated by LACFD. Once installed, all required fire hydrants shall be tested and accepted or bonded prior to construction and Final Map approval.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed Project would result in less than significant impacts to fire protection services.

Cumulative impacts to fire protection services would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
2. POLICE

1. INTRODUCTION

This Subsection describes the potential impacts of the proposed Project on police protection services in the Project area. This section utilizes information from the following resources: the Los Angeles Sheriff's Police Department website; the City of West Hollywood General Plan 2035, Safety and Noise Element, adopted on September 6, 2011; and an email correspondence with Sergeant Brian J. Lutz, Operations Sergeant, Los Angeles County Sherriff's Department (LACSD).

2. ENVIRONMENTAL SETTING

A. Existing Police Service

Police protection services in the City of West Hollywood are provided by the Los Angeles County Sherriff's Department (LACSD). The LACSD is divided into four Patrol Stations: Central Patrol Division; East Patrol Division; North Patrol Division; and South Patrol Division. Each of the bureaus encompasses several community stations.

i) Existing Police Stations

The West Hollywood Station, which is under the jurisdiction of the North Patrol Division, serves the community area including the Project Site.[30] The West Hollywood Station, located at 780 North San Vicente Boulevard, approximately 0.75 mile north of the Project Site, would provide first-response service to any routine, priority, or emergency calls in the area [see Figure IV.J2 (Police Station Location Map)].

The station currently has 129 sworn officers (one captain, seven lieutenant, 19 sergeants, and 102 deputy sergeants) and 36 civilian staff representing an officer to population ratio of approximately 267 residents per officer.[31] Though there is no official officer-to-citizen standard, based on the current needs of the City of West Hollywood, the LACSD has stated they currently meet the desired service standards.[32]

The West Hollywood Station also has a six-member Community Oriented Policing and Problem Solving (COPPS) Team that are committed to working in a problem-solving partnership with residents, community groups, city officials, and local businesses to fight crime and to improve the quality of life for the people of the City of West Hollywood. The COPPS team focuses on community crime and disorder problems, and work with Neighborhood Watch groups and community organizations addressing

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[30] *Los Angeles County Sheriff's Police Department, website: http://www.wehosheriff.com/patrol.asp, September 12, 2012.*

[31] *Email Correspondence with Sergeant Brian J. Lutz, Operations Sergeant, Los Angeles County Sherriff's Department, dated September 11, 2013.*

[32] *Ibid.*

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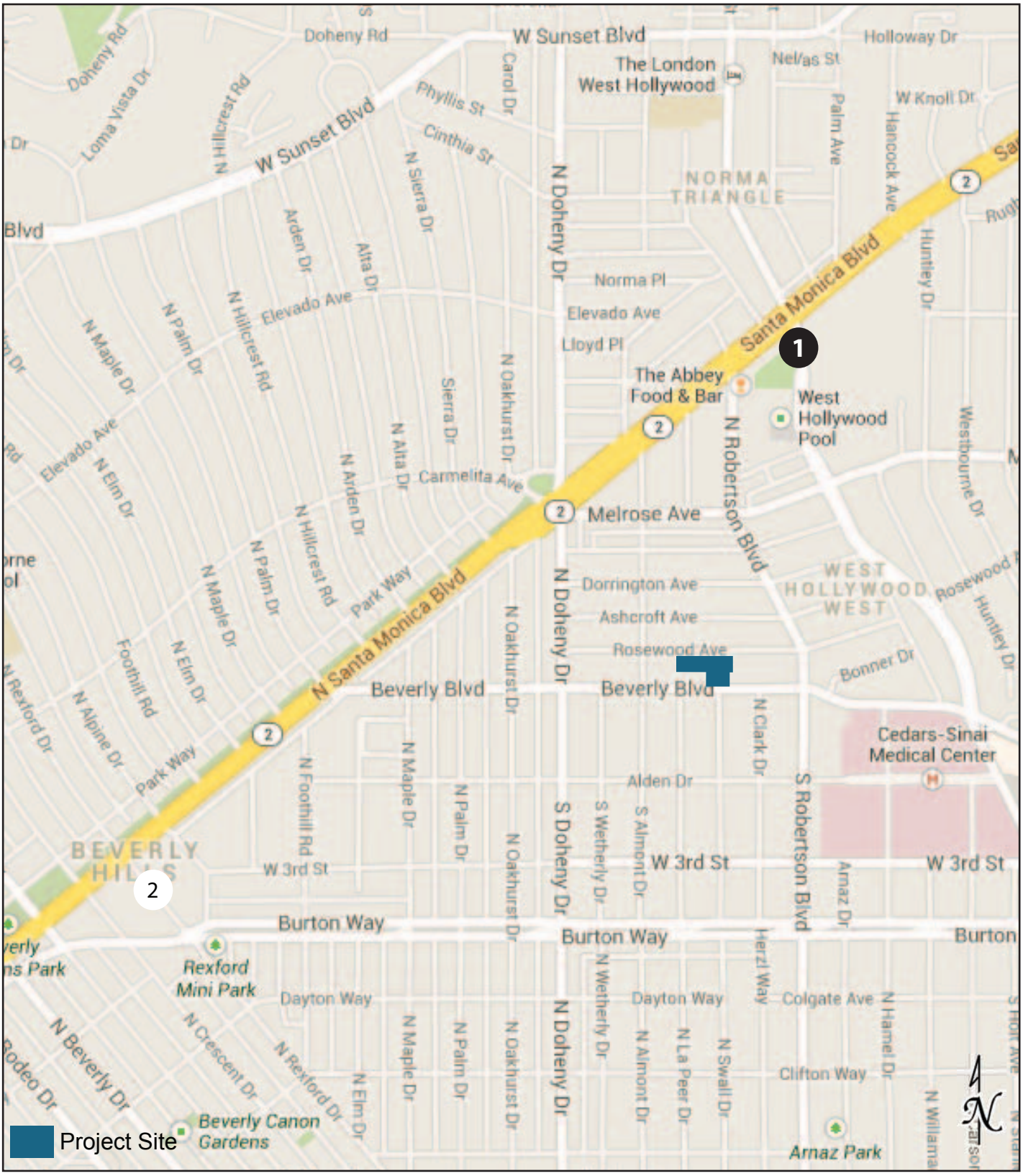

1: West Hollywood Sheriff Station, 780 North San Vicente Boulevard

0 500 1,000
Scale (Feet)

Source: GoogleEarth, August 2013.

EcoTierra consulting

Figure IV.J-2
Police Location Map

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problems and issues that often are overlooked by typical law enforcement. The COPPS Team assists in keeping sidewalks and businesses safe, and free from fraud and aggressive panhandling.[33]

ii) Crime Statistics

The LACSD's operational statistics are generally reported and analyzed in terms of response times and crime rates within specific Reporting Districts (RDs). Within the City of West Hollywood, the Project Site is located in Reporting District (RD) 0972, which is bounded by Santa Monica Boulevard to the north, Beverly Boulevard to the south, La Cienega Boulevard to the east, and Doheny Drive to the west.[34] Table IV.J.2-1 (RD 0972 and West Hollywood Crime Statistics for 2012) provides crime statistics for each jurisdiction.

As shown in Table IV.J.2-1 (RD 0972 and West Hollywood Crime Statistics for 2012), RD 0972 had approximately 442 crimes in 2012, with predominant crimes being burglary from vehicle theft, burglary from vehicle and petty theft. Because the population of RD 0972 is not available, it is not possible to determine the crime rate for RD 0972.[35] As shown in Table IV.J.2-1, the City of West Hollywood had approximately 1,989 crimes in 2012[36], with predominant crimes being vehicle theft, burglary from vehicle and petty theft. Therefore, the crime rate in the City of West Hollywood in 2012 was approximately 58 crimes per 1,000 persons.[37,38]

Table IV.J.2-1
RD 0972 and West Hollywood, Crime Statistics for 2012

Type of Crime	Number of Crimes	
	RD 0972	West Hollywood
Crimes Against Person		
Homicide	0	0
Rape	2	12
Assaults-Aggravated	43	192
Subtotal of Crimes Against Person	***45***	***204***
Crimes Against Property		
Robbery		
Armed	12	53
Other	8	81
Subtotal	***20***	***134***

[33] *The Los Angeles County Sheriff's Department, West Hollywood Station, http://www.lasdhq.org/stations/for2/westh-ucity/aboutus.html#copps, September 12, 2013.*

[34] *Email Correspondence with Sergeant Brian J. Lutz, Operations Sergeant, Los Angeles County Sherriff's Department, dated September 11, 2013.*

[35] *Ibid.*

[36] *Represents the most recent annual crime statistics. Statistics for 2013 were not available at the time of the preparation of this Draft EIR.*

[37] *City of West Hollywood website, Demographics: http://www.weho.org/index.aspx?page=162, August 20, 2013.*

[38] *[(1,989 crimes) ÷ (34,399 residents) x (1,000)]= 58 crimes per 1,000 persons.*

Table IV.J.2-1
RD 0972 and West Hollywood, Crime Statistics for 2012

Type of Crime	Number of Crimes	
	RD 0972	West Hollywood
Burglary		
Residential	36	175
Other	44	156
Subtotal	***80***	***331***
Other Theft		
Grand Theft	97	293
From Vehicle	79	287
Petty Theft	96	614
Subtotal	***272***	***1,194***
Auto Theft	***22***	***117***
Arson	***3***	***9***
Subtotal of Crimes Against Property	***397***	***1,785***
TOTAL	**442**	**1,989**

Source: Email Correspondence with Sergeant Brian J. Lutz, Operations Sergeant, Los Angeles County Sherriff's Department, dated September 11, 2013.

iii) Response Time

The number of crimes reported affects the "needs" projection for staff and equipment for the LACSD. To some extent, it is logical to anticipate that the crime rate in a given area would increase as the level of activity or population, along with the opportunities for crime, increases. Unlike fire protection services, police units are often in a mobile state; hence actual distance between a headquarters facility and the Project Site is often of little relevance. Instead, the number of officers on the street is more directly related to the realized response time. Response time is defined as the total time from when a call requesting assistance is placed, until the time that a police unit responds to the scene. Telephone calls for police assistance are prioritized based on the nature of the call.

Average response times for RD 0972 are 3.2 minutes for an emergency response and 22.7 minutes for a non-emergency response. The average response time to emergency calls in the City of West Hollywood is approximately 4.1 minutes for an emergency response and 23.5 minutes for a non-emergency response.[39] Both the average response times for RD 0972 and the City of West Hollywood are considered acceptable by the West Hollywood Station, which covers a small response area of 1.9 square miles.[40]

[39] *Email Correspondence with Sergeant Brian J. Lutz, Operations Sergeant, Los Angeles County Sherriff's Department, dated September 11, 2013.*

[40] *Ibid.*

B. Regulatory Framework

i) West Hollywood General Plan

The City of West Hollywood has adopted a Safety and Noise Element to its General Plan. The Element includes goals and policies related to police protection. Listed below are the policies relevant to the proposed Project:[41]

SN-6: Maintain adequate levels of law enforcement, fire protection, and emergency medical services.

> ***SN-6.1*:** Provide sufficient law enforcement, fire protection, and emergency medical services to meet the needs of a changing population.
>
> ***SN-6.2:*** Cooperate and collaborate with neighboring jurisdictions, social services, and internal departments to maximize public safety and emergency services.
>
> ***SN-6.3*:** Continue to support the County's existing mutual aid and automatic aid agreements for additional fire and police resources needed during an emergency, as feasible.

***SN-7*:** Utilize law enforcement, fire protection, and emergency medical services in a proactive and preventative way.

> ***SN-7.1:*** As appropriate, utilize urban design features to enhance public safety, to facilitate "eyes on the street" and to create defensible space in project design. As appropriate, utilize best practices in lighting, vegetation, active public spaces, and visual transparency in the urban landscape to achieve improved public safety in project design.
>
> ***SN-7.2:*** Continue to utilize community policing to improve public safety and involve the community in working to improve the overall safety of West Hollywood.
>
> ***SN-7.3**:* Provided that it serves the best interests of the community, continue to contract with Los Angeles County for the provision of police services and remain part of the Consolidated Fire Protection District of the County of Los Angeles for fire/emergency services, and annually review the services regarding the responsiveness to community needs, effectiveness, and efficient resource allocation.
>
> ***SN-7.4**:* Promote community-based programs in fire safety and emergency preparedness, including neighborhood-level programs and programs with businesses.
>
> ***SN-7.5:*** As feasible, require new development to incorporate appropriate safety monitoring features.

SN-8: Provide public safety services in a manner that reflects and is sensitive to the characteristics and needs of the West Hollywood community.

> ***SN-8.1**:* Coordinate the provision of law enforcement and fire protection/emergency medical services with all public safety service providers monitoring their adequacy and responsiveness to community needs.

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[41] *City of West Hollywood General Plan 2035, Safety and Noise Element, September 6, 2011.*

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the proposed Project would have a potentially significant effect on the environment if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

i) Methodology

The environmental impacts of a project with respect to police protection are determined based on a project's need for a new or physically altered or expanded police station. The adequacy of police protection is evaluated using the existing number of police officers in a project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that a project would introduce to the area. Using these statistics, it is possible to estimate the future officer-to-population ratio in the area that would occur and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing level is not considered adequate, the number required to obtain an adequate level of police protection). This need can be reduced through on-site security improvements. This increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station.

B. Project Impacts

Threshold	*Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the police department?*

Impact J.2-1 The proposed Project would be within the police response distance and not result in a substantial incremental contribution to the demand for police protection services. Therefore, Project impacts would be less than significant.

i) Construction

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. As such, it is assumed that temporary fencing would be installed around the construction site to keep out unauthorized persons. Deployment of roving security guards is also an effective strategy in preventing problems from developing. When such common sense precautions are taken, there is less need for local law enforcement at the construction site. The Applicant has advised that it incorporates these and other similar security safeguards as part of its custom and practice for construction sites.

Construction of the proposed Project is not expected to cause significant congestion at the local study intersections. Although minor traffic delays may occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times would be minimal and temporary. Therefore, the proposed Project's construction-related impacts to police protection services would be less than significant.

ii) Operation

While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of request for assistance calls for police response to retail burglaries, home burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the increase in onsite activity, and increased traffic on adjacent streets and arterials. Such calls are typical of problems experienced in existing neighborhoods in the Project area and do not represent unique law enforcement issues specific to the proposed Project. The discussion later in this Subsection considers some of the criteria that may be used to determine the proposed Project's impact on police protection services, including LACSD response time and staffing levels in the Project area.

The proposed Project would include adequate and strategically positioned functional lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security would be controlled to limit public access. The parking garage would have control gates and garage doors to provide security. Likewise the property would be protected with closed circuit security with monitoring from a front desk. The residential Homeowners Association would employ full-time security to monitor all aspects of the Project, including the condominiums, townhomes, the affordable units and the retail component. Egress doors required for fire and life safety would be alarmed to prohibit unauthorized access. All entry points (other than the street front retail) would require keycard access. With these proposed security measures, development of the proposed Project would result in a less than significant operational impact on police protection services.

iii) Officer-to-Population Ratio

The proposed Project would introduce 124 new residents and result in 91 employees to the Project Site, which are approximately 170 less employees than existing conditions. The addition of these new residents at the Project Site would not require any additional officers in order to maintain the current officer-to-population ratio in the West Hollywood area, as 124 additional residents[42] (and fewer employees on-site) would only result in no change of the current ratio of 267 residents per officer.[43] Therefore, Project impacts associated with the officer-to-population ratio would be less than significant.

iv) Response Time

As discussed in Section IV.K (Transportation/Traffic), based on the City of West Hollywood's established methodology and significance thresholds, the proposed Project is not anticipated to affect vehicle/capacity ratios and the level of service of roadways in the Project vicinity. As previously discussed, police units are most often in a mobile state; therefore, it is unknown precisely which route

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[42] *1.53 residents per household * 81 units = 124 residents, City of West Hollywood 2013 Community Study.*

[43] *(34,399 population + 124 new residents) ÷ 129 officers = 267 residents/officer ≈ 0 required officers.*

the LACSD would use to access the Project Site when responding to an emergency call. Response times would not be greatly affected as emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, Project impacts related to response times would be less than significant.

v) Emergency Access

Emergency access to the Project Site would be provided by the existing street system surrounding the Project Site – Beverly Boulevard and Rosewood Avenue. The proposed Project would be designed and constructed in accordance with WHMC requirements to ensure proper emergency access. Emergency vehicle access to the Project Site would continue to be from Beverly Boulevard, although the Townhomes would have direct access to their garages from Rosewood Avenue.

Further, Project traffic would not greatly affect police vehicles, which have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Upon completion of the proposed Project, the LACSD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to the Project Site. Therefore, Project impacts on emergency access would be less than significant.

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative police protection analysis is the LACSD's West Hollywood Station's service area. The combination of the 10 related projects[44] and the proposed Project would result in approximately 327 new residents and approximately 704,018 sq. ft. of commercial uses within a half-mile radius of the Project Site. Its anticipated that the related projects and the Proposed Project combined, would cumulatively increase the demand on LACSD's West Hollywood's Station for police protection services in the Project area. Specifically, there could be increased demands for additional staffing, equipment, and facilities over time. This potential need would be funded via existing mechanisms (i.e., property taxes, government funding), to which the proposed Project and related projects would contribute.

If any of the related and other planned and approved projects would create demands on police protection staffing, equipment, or facilities such that a new station would be required, potential environmental impacts would be addressed in conjunction with the environmental review for that project.

The cumulative increase of police service would require additional officers to maintain the existing ratios of officers to civilians. While the proposed Project's impacts would be reduced to less than significant, the combination of the related and other planned and approved projects and the proposed Project may require additional staffing to the extent that an expanded police station may be required. As previously discussed, any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes) to which the proposed Project and related and other planned and approved projects would contribute. Similar to the proposed Project, each of the related and other planned and approved projects would be individually subject to LACSD review and recommendations regarding project design, and would be required to comply with all applicable safety requirements of the LACSD and the City of

[44] *The two Beverly Hills related projects (numbers 11 and 12 on Table III-1, Section III, Environmental Setting) are served by the City of Beverly Hills Police Department.*

West Hollywood in order to adequately address police protection service demands. Because the proposed Project has a less than significant impact to police protection services, the proposed Project would not result in a substantial incremental contribution to the cumulative demand for police protection services. Therefore, the proposed Project in conjunction with the related would not have a cumulatively considerable impact on police protection, and cumulative impacts would be less than significant.

5. MITIGATION MEASURES

Though construction and operation impacts are less than significant, the following mitigation measures are recommended to ensure that the impacts remain less than significant. These measures shall be conditions of approval:

A. Construction

IV.J.2-1 During construction activities, the Project developer shall hire security guards and have them present at all times during the building phase of the Project.

IV.J.2-2 During construction activities, the Project developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, are secured to prevent trespass.

B. Operation

IV.J.2-3 Prior to issuance of the building permit, the Project developer shall submit the landscape plan to the planning department for final review to ensure that the landscaping does not obstruct the Project buildings.

IV.J.2-4 Prior to issuance of the certificate of occupancy, the Project developer shall review its onsite security system with LACSD to ensure that private security staffing and patrols are adequate.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts for construction and operation are less than significant.

Cumulative impacts to police protection services would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
3. SCHOOLS

1. INTRODUCTION

This Subsection describes the potential impacts of the proposed Project on school services in the Project area. This section utilizes information from the following resources: the Los Angeles Unified School District (LAUSD) website, School Facilities Needs Analysis 2012, Los Angeles Unified School District, the Employment Development Department website, City of West Hollywood General Plan 2035: Human Services Element, adopted on September 6, 2011, and a written correspondence with Rena Perez, Director of Master Planning & Demographics of the LAUSD.

2. ENVIRONMENTAL SETTING

A. Existing Public Schools

The Los Angeles Unified School District (LAUSD) currently provides public education services for the residents of West Hollywood. The LAUSD jurisdiction encompasses an area of 720 square miles and serves approximately 640,000 students[45] and operates over 900 schools and 187 public charter schools. The LAUSD is divided into eight local districts and the Project Site is located within Local District 4. Schools located in the City of West Hollywood that would serve the Project Site are as follows: West Hollywood Elementary School, Burroughs Middle School, and Fairfax Senior High School.[46] Locations of these schools are presented in Figure IV.J-3 (School Location Map). Table IV.J.3-1 (LAUSD School Capacity and Enrollment), presents the location, enrollment capacities, 2012 to 2013 enrollments, and number of students above or below capacity for each of the schools servicing West Hollywood.

As shown in Table IV.J.3-1 (LAUSD School Capacity and Enrollment), all three schools are currently operating under capacity. West Hollywood Elementary is estimated to have a capacity of 394 seats and had a resident enrollment of 143 students in the 2012-2013 school year. Therefore, Westwood Elementary School has a capacity to accommodate 251 additional students and, thus, operates below capacity. Burroughs Middle School is estimated to have a capacity of 2,104 students and had 1,163 resident students enrolled in the 2012-2013 school year. Therefore, Burroughs Middle School operates below capacity and would be able to accommodate 941 additional students. Fairfax High School is estimated to have a capacity of 2,705 seats and had a resident student enrollment of 2,000 for the 2012-2013 school year. Therefore, Fairfax High School operates below capacity and would be able to accommodate an estimated 705 additional students.

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[45] *Los Angeles Unified School District website: http://home.lausd.net/apps/pages/index.jsp?uREC_ID=178745&type=d&pREC_ID=371201, August 16, 2013.*

[46] *Letter Correspondence with Rena Perez, Director, Master Planning and Demographics, LAUSD, August 16, 2013.*

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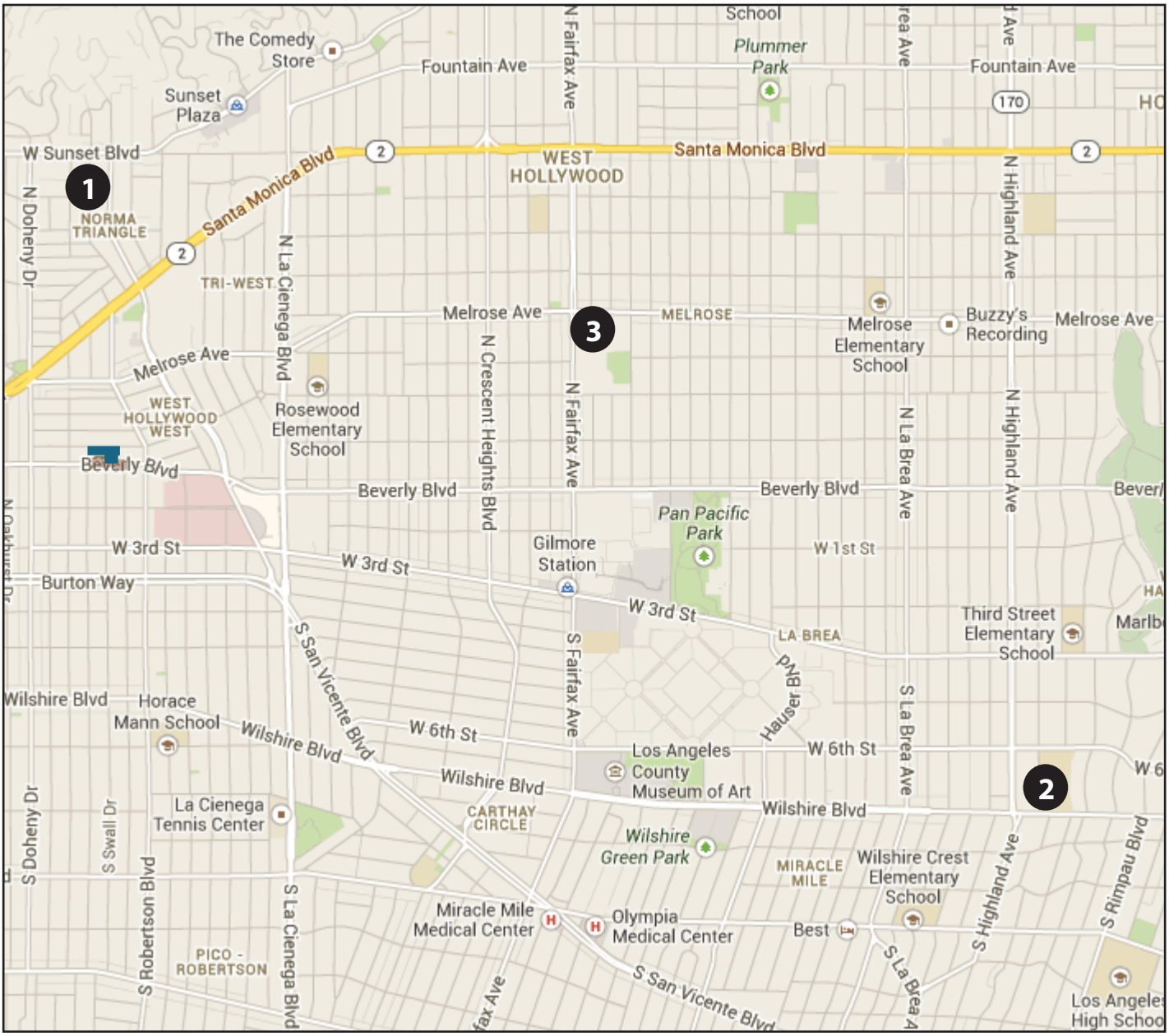

Project Site

1: West Hollywood Elementary School, 970 North Hammond Street
2: Burroughs Middle School, 600 S. McCadden Place
3: Fairfax High School, 7850 Melrose Avenue

0 1,000 2,000
Scale (Feet)

N

Source: GoogleEarth, August 2013.

EcoTierra consulting

Figure IV.J-3
School Location Map

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Table IV.J.3-1
LAUSD School Capacity and Enrollment

School Type (Grade)	School Name	Location	No. of Tracks	Capacity	2012-2013 Resident Enrollment	(-)Under / (+)Over Capacity
Elementary School (Grades K-6)	West Hollywood	970 North Hammond Street	1	394	143	251
Middle School (Grades 7-8)	Burroughs	600 S. McCadden Place	1	2,104	1,163	941
Senior High School (Grades 9-12)	Fairfax	7850 Melrose Avenue	1	2,705	2,000	705

Source: Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 31, 2013.

B. Regulatory Framework

i) Open Enrollment Policy

Pursuant to Assembly Bill (AB) 149 and AB 2071, the State of California mandates an open enrollment policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.[47]

ii) School Facilities Fees

Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan supports the school district's levy of the fees authorized by California Education Code Section 17620.[48]

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts,

[47] *News Release, LAUSD, Office of Communications, April 17, 2000.*

[48] *School Facilities Needs Analysis 2012, Los Angeles Unified School District, September 6, 2012.*

notwithstanding any contrary provisions in CEQA or other state or local laws (Government Code Section 65996).

Pursuant to California Government Code Section 65995.5-7, the LAUSD has imposed Level 2 residential developer fees at a rate of $4.00 per square-foot of new residential construction within the boundaries of the LAUSD.[49]

iii) West Hollywood General Plan

The City of West Hollywood has adopted a Human Services Element to its General Plan. The Element includes goals and policies related to schools and education. Listed below are the goal and policies relevant to the proposed Project:[50]

HS-4: Support and collaborate with LAUSD and other educational providers.

> ***HS-4.1*:** Collaborate with the Los Angeles Unified School District to maximize educational quality.
>
> ***HS-4.2:*** Work with the Los Angeles Unified School District to provide technical expertise, and to provide donated materials from the West Hollywood community such as books, equipment, computers and software for student use, as feasible.
>
> ***HS-4.3:*** Seek to continue the West Hollywood Scholarship program to provide opportunities for local students to continue their education after high school.
>
> ***HS-4.4:*** As appropriate, support local school's efforts at greening of schoolyards, and improvements such as xeriscaping, rainwater retention, and fruit/vegetable gardens.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the proposed Project would have a potentially significant effect on the environment if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives of the school district.

i. Methodology

The environmental impacts of a project with respect to schools are determined based on the enrollment and capacity of existing and reasonably foreseeable proposed schools in a project area, and the number of students that a project would generate on project buildout. Based on these projections, it is

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[49] *School Facilities Needs Analysis 2012, Los Angeles Unified School District, September 6, 2012. These rates are subject to change.*

[50] *City of West Hollywood General Plan 2035, Human Services Element, September 6, 2011.*

determined whether a project would exceed the capacity of any existing or proposed schools such that a new or expanded school would be needed.

B. Project Impacts

Threshold	*Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the school district?*

Impact J.3-1 Implementation of the proposed Project would not result in the need to construct new or physically alter existing school facilities, or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the school district. The Project would potentially result in 29 additional students enrolling within the LAUSD, and impacts to school service would be less than significant.

As shown in Table IV.J.3-2 (Project Estimated Student Generation), the proposed Project would generate a total net increase of approximately 23 students.

It is likely that some of the students generated by the proposed Project would already reside in areas served by LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the proposed Project would be new to LAUSD. As previously discussed, all three schools serving the Project Site are operating under capacity. The addition of 15 new elementary students to West Hollywood Elementary School, 8 new middle school students at Burroughs Middle School, and 10 new high school students at Fairfax Senior High School would not result in the schools surpassing their capacities for students. Therefore, the public schools servicing the Project Site can accommodate the future students generated by the proposed Project. Furthermore, pursuant to the California Government Code Section 17620, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the proposed Project's direct and indirect impacts on schools. Therefore, impacts on the schools identified to serve the proposed Project would be less than significant.

Table IV.J.3-2
Proposed Project Student Generation

Land Use	Size	School Type	Student Generation Factor	Total[b]
Existing Uses				
Office[a]	64,502 sf	Elementary School (K-6)	0.0000373	2
		Middle School (7-8)	0.0000194	1
		High School (9-12)	0.0000192	1
Retail[a]	21,249 sf	Elementary School (K-6)	0.0000238	1
		Middle School (7-8)	0.0000123	1
		High School (9-12)	0.0000123	1
Restaurant[a]	3,879 sf	Elementary School (K-6)	0.0000238	1
		Middle School (7-8)	0.0000123	1
		High School (9-12)	0.0000123	1

Table IV.J.3-2
Proposed Project Student Generation

Land Use	Size	School Type	Student Generation Factor	Total[b]
			Total Existing Students	**10**
Proposed Uses				
Office[a]	10,562 sf	Elementary School (K-6)	0.0000373	1
		Middle School (7-8)	0.0000194	1
		High School (9-12)	0.0000192	1
Retail[a]	19,875 sf	Elementary School (K-6)	0.0000238	1
		Middle School (7-8)	0.0000123	1
		High School (9-12)	0.0000123	1
Restaurant[a]	4,394 sf	Elementary School (K-6)	0.0000238	1
		Middle School (7-8)	0.0000123	1
		High School (9-12)	0.0000123	1
			Subtotal	***9***
Condominiums[c]	56 units	Elementary School (K-6)	0.1649	9
		Middle School (7-8)	0.0450	3
		High School (9-12)	0.0943	5
			Subtotal	***17***
Townhomes	13 units	Elementary School (K-6)	0.0530	1
		Middle School (7-8)	0.0145	1
		High School (9-12)	0.0303	1
			Subtotal	***7***
Apartments	12 unit	Elementary School (K-6)	0.1649	2
		Middle School (7-8)	0.0450	1
		High School (9-12)	0.0943	1
			Subtotal	***4***
			Total Elementary School	*15*
			Total Middle School	*8*
			Total High School	*10*
			Subtotal	***33***
			Less Existing	10
			Total Net New Students Generated	**23**

Note: sf = square feet
[a] Los Angeles Unified School District Justification Study (April 2008).
[b] Rates were rounded up to the nearest whole number.
[c] School Facilities Needs Analysis 2012, Los Angeles Unified School District, September 6, 2012.

4. CUMULATIVE IMPACTS

As previously discussed, pursuant to AB 149 and AB2071, LAUSD has an open enrollment policy. The number of open enrollment seats is determined annually and thereby changes year to year. Thus, it cannot be determined, at the time of the preparation of this Draft EIR, which schools in LASUD will be available in the future for open enrollment. Therefore, for this Draft EIR, the geographic scope of the cumulative school analysis is the LAUSD service area for Project Site and related projects in the City of West Hollywood, which would include West Hollywood Elementary, Burroughs Middle School and Fairfax High School. The proposed Project, in combination with the related and other future projects, would be expected to increase the cumulative demand for schools in LAUSD. Of the 12 related projects,

ten are located within the City of West Hollywood and LAUSD. Two related projects (nos. 11 and 12) are within the City of Beverly Hills and within the Beverly Hills Unified School District boundaries. Therefore, these two related projects are not relevant to the project's cumulative impact on LAUSD. Approximately 133 students would be generated from those ten projects located in the City of West Hollywood and LAUSD.[51] Of that total, approximately 45 students would be generated from residential projects, which presumably would generate new permanent residents to the school district. This presumption would also apply to other approved and planned residential projects in the service area of the LAUSD within the City of West Hollywood. Other related projects would support employees and customers who would not generate new permanent residents that would impact schools. It is likely that the commercial projects (including other planned and approved commercial projects) would draw their employees from existing West Hollywood residents, whose students are already enrolled in the LAUSD.

Due to the various locations of the projects that have the potential to generate elementary, middle, or high school students, not all of the new students generated would attend the same schools as students generated by the proposed Project. The schools serving the Project Site and presumably the 10 related projects located within a half mile-radius of the Project Site operate below capacity. As previously identified, these schools (West Hollywood Elementary, Burroughs Middle School and Fairfax High School) can accommodate additional students at this time. Further, as discussed, the proposed Project would be required to pay development impact fees to the LASUD Developer Fee office. Similarly, the 10 related projects within the City of West Hollywood and LAUSD would be required to pay development fees. Payment of these development fees would offset any potential cumulative impacts that could occur to LAUSD from development of the proposed Project and related projects within the LAUSD service area for the Project Site and related project sites in West Hollywood. The students generated by the proposed Project would not cause a significant impact. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable. Further, the full payment of all applicable school fees would reduce potential cumulative impacts to schools and cumulative impacts would be less than significant.

[51] *The two Beverly Hills related projects (numbers 11 and 12 on Table III-1, Section III, Environmental Setting) are served by the City of Beverly Hills Unified School District.*

Table IV.J.3-3
Cumulative Student Generation

No.	Land Use	Size	School Type	Student Generation Factor	Total
Projects Within Los Angeles Unified School District (LAUSD)					
1.	Hotel[a]	63,000 sf	Elementary School (K-6)	0.000012	1
			Middle School (7-8)	0.0000063	1
			High School (9-12)	0.0000062	1
	Condominiums[b]	8 du	Elementary School (K-6)	0.1649	1
			Middle School (7-8)	0.0450	1
			High School (9-12)	0.0943	1
2.	Retail[a]	6,500 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
3.	Retail/Commercial[a]	28,474 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
4.	Retail/Commercial[a]	9,545 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
5.	Restaurant[a]	9,998 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
6.	Retail[a]	14,571 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
	Apartments[b]	7 du	Elementary School (K-6)	0.1649	1
			Middle School (7-8)	0.0450	1
			High School (9-12)	0.0943	1
7.	Office[a]	400,000 sf	Elementary School (K-6)	0.0000373	15
			Middle School (7-8)	0.0000194	8
			High School (9-12)	0.0000192	8
8.	Commercial[a]	21,565 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
9.	Retail[a]	9,850 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
	Apartments[b]	42 du	Elementary School (K-6)	0.1649	7
			Middle School (7-8)	0.0450	2
			High School (9-12)	0.0943	7
	Restaurant[a]	9,800 sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
10.	Retail/Commercial[a]	73,819sf	Elementary School (K-6)	0.0000238	2
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
	Apartments[b]	76du	Elementary School (K-6)	0.1649	13
			Middle School (7-8)	0.0450	3

Table IV.J.3-3
Cumulative Student Generation

No.	Land Use	Size	School Type	Student Generation Factor	Total
Projects Within Los Angeles Unified School District (LAUSD)					
			High School (9-12)	0.0943	7
	Café/Restaurant[a]	8,202sf	Elementary School (K-6)	0.0000238	1
			Middle School (7-8)	0.0000123	1
			High School (9-12)	0.0000123	1
				Subtotal	110
				Proposed Project Student Generation	*23*
				Total Cumulative for Projects Within LAUSD	**133**
Projects Within Beverly Hills Unified School District					
11.	Condominiums[b]	35 du	Elementary School (K-6)	0.1649	6
			Middle School (7-8)	0.0450	2
			High School (9-12)	0.0943	3
12.	Condominiums[b]	34 du	Elementary School (K-6)	0.1649	6
			Middle School (7-8)	0.0450	2
			High School (9-12)	0.0943	3
				Subtotal	22
				Total Students for Projects Within Beverly Hills Unified School District	**22**[c]

Note: sf. = square feet; du = dwelling unit
[a] *Los Angeles Unified School District Justification Study (April 2008).*
[b] School Facilities Needs Analysis 2012, Los Angeles Unified School District, September 6, 2012.
[c] *Related projects 11 and 12 are not located within LAUSD and are therefore not included in the cumulative student totals.*
Source: Related projects located in the City of West Hollywood were provided by the City of West Hollywood staff in August 2013.
Source (table): EcoTierra Consulting, Inc., September 2013.

5. MITIGATION MEASURES

No significant impacts were identified. Therefore, no mitigation is required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to schools would be less than significant.

Cumulative impacts to school would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
4. RECREATION & PARKS

1. INTRODUCTION

This Subsection describes the potential impacts of the proposed Project on recreation and park services in the Project area. This section utilizes information from the following resources: the City of West Hollywood Recreation Services Division website, City of West Hollywood General Plan 2035: Parks & Recreation Element, adopted on September 6, 2011, and an email correspondence with Steve Campbell, Manager, Facilities and Field Services Division of the City of West Hollywood.

2. ENVIRONMENTAL SETTING

A. Recreational Facilities

The West Hollywood Recreation Services Division operates a total of six parks in the City of West Hollywood, including two large community parks, two neighborhood parks (including a dog area), and two pocket parks. Community parks provide formal and programmed activities and have community-meeting facilities. Neighborhood parks provide a space for recreation and leisure. Pocket parks provide limited recreational space and are usually less than one acre. A seven-member Public Facilities Commission oversees the parks, landscaping, streetscapes, medians, community buildings, and facilities.[52] The City of West Hollywood has developed three "Wellness Walking Routes" along various City streets and sidewalks. These primary walking routes run between West Hollywood Park and Plummer Park. In addition, the City of West Hollywood oversees a Community Garden Program that creates connections between community members and provides open space for residents and local businesses.[53] The parks and recreational facilities operated by the City of West Hollywood are summarized in Table IV.J.4-1 (Parks and Recreational Facilities) and locations shown in Figure IV.J-4 (Park Location Map).

Table IV. J.4-1
Parks and Recreational Facilities

Facility	Location	Type of Park	Size (acres)
Kings Road Park	1000 Kings Road	Neighborhood	0.50
Plummer Park	7377 Santa Monica Boulevard	Community	8.50
West Hollywood Park	647 N. San Vicente Boulevard	Community	5.30
William S. Hart Park	8341 De Longpre Avenue	Neighborhood	0.75
Formosa Pocket Park	1140 Formosa Street	Pocket	0.09
Havenhurst Pocket Park	1351 Havenhurst Drive	Pocket	0.14
		Total	**15.28**

Source: Email Correspondence with Steve Campbell, Manager, Facilities and Field Services Division of the City of West Hollywood, July 30, 2013.

[52] *City of West Hollywood General Plan 2035, Parks and Recreation Element, September 6, 2011.*

[53] *Ibid.*

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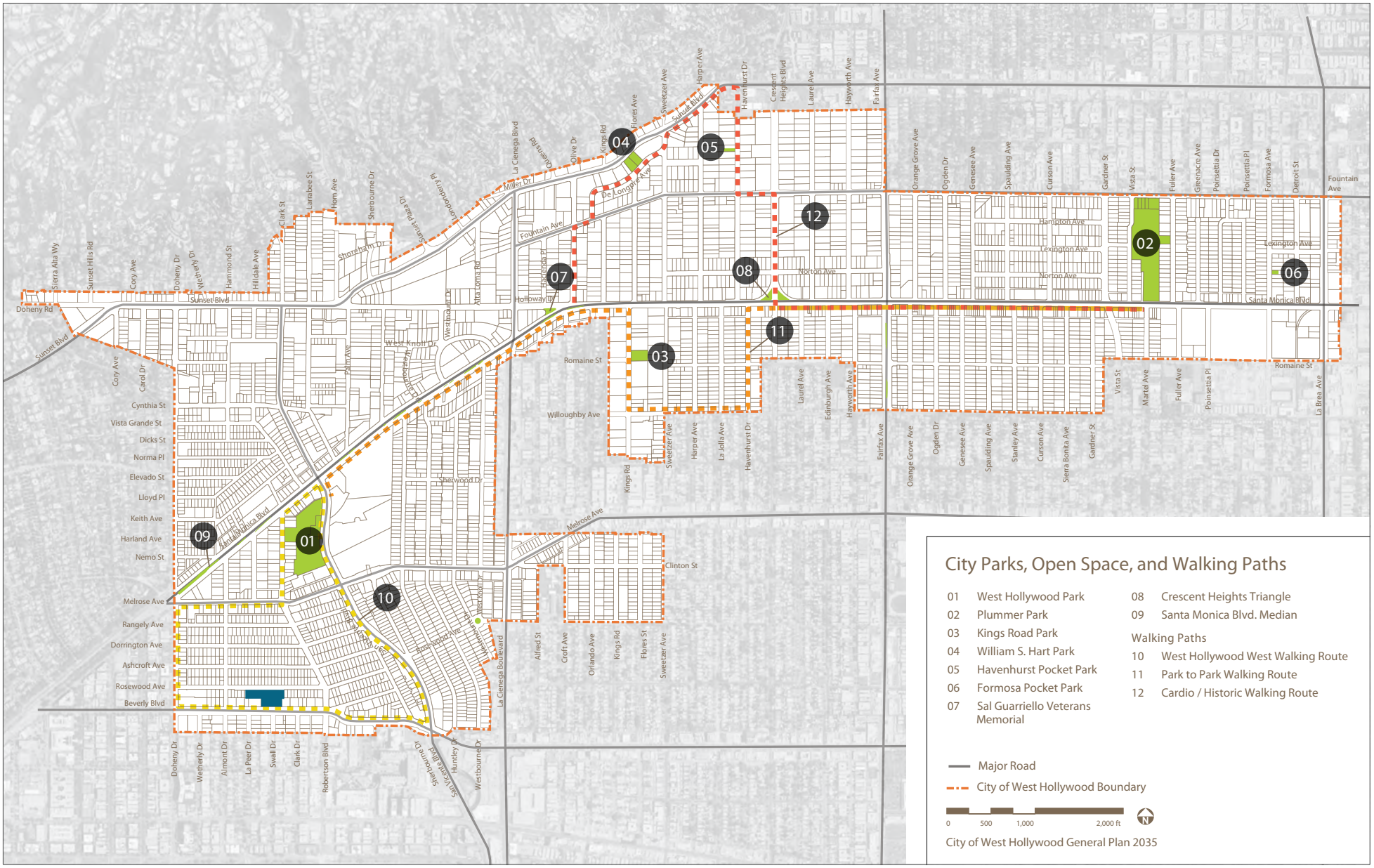

EcoTierra consulting

Figure IV.J-4
City Parks, Open Spaces, and Walking Paths

i) West Hollywood Phase II Parks Master Plan

The City of West Hollywood is currently planning for the Phase II implementation of the West Hollywood Park Master Plan.[54] The Master Plan is anticipated to include additional park space, development of a new recreation and community center with gymnasium and park support facilities, and children's playground areas. The community center would include an aquatic facility, with both a lap pool and a recreational pool, on the rooftop.

B. Surrounding Areas

The surrounding areas offer additional park options to the City of West Hollywood residents, including: Holmby Park and Pan Pacific Regional Park in Los Angeles and La Cienega Park and Beverly Gardens Park in Beverly Hills. Holmby Park is a neighborhood park, offering playgrounds, barbeque pits, picnic tables, and lawn bowling. Pan Pacific Regional Park is a community park, offering an auditorium, barbeque pits, baseball diamond, basketball courts, playgrounds, indoor gym, and picnic tables. Holmby Park is located outside the City's western boundary on Club View Drive, while Pan Pacific Regional Park is located outside the City's southern boundary, on Beverly Boulevard.[55]

La Cienega Park is a community park, offering baseball fields, jogging track, outdoor exercise pavilion, playground, barbeque pits, picnic tables, and a community center. Beverly Gardens Park is a neighborhood park, offering a cactus garden, rose garden, fountains, a jogging and walking path, and arbors. La Cienega Park is located outside the City's southern boundary, on Gregory Way, while Beverly Gardens Park is located outside the City's western boundary on Santa Monica Boulevard.[56]

C. Regulatory Framework

i) *National Recreation and Parks Association*

The National Recreation and Parks Association (NRPA) publish standards for parks and specialized facilities. A commonly accepted minimum is three acres per 1,000 persons**.**

ii) *State of California*

1) State Quimby Act

California Government Code Section 66477 (Quimby Act) authorized cities and counties to enact ordinances that would require the dedication of land or payment of fees in lieu of parkland dedication for park or recreational purposes for projects involving residential projects. Quimby fees do not, however, apply to commercial or industrial developments. The Quimby Act states that the dedication of

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[54] *Email Correspondence with Steve Campbell, Manager, Facilities and Field Services Division of the City of West Hollywood, July 30, 2013.*

[55] *City of Los Angeles Department of Recreation and Parks: http://raponline.lacity.org/maplocator/?lng=-118.38616109999998&lat=34.0773623&radius=10&filter=pa&address=8899%20Beverly%20Boulevard%2C%20Beverly%20Hills%2C%20CA%2090048%2C%20USA, August 21, 2013.*

[56] *City of Beverly Hill, Recreation and Parks website: http://www.beverlyhills.org/living/recreationparks/, August 21, 2013.*

land, the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood or community park area exceeds that limit.

iii) City of West Hollywood

1) Quimby Fees

The Parks and Recreation Element of the City of West Hollywood General Plan 2035 addresses preservation of natural resources and managed protection of resources. Of concern is providing sufficient parkland for residents, the relationship between park space and open space, and compliance with the conditions of use of the Quimby Ordinance. Pursuant to WHMC Title 19.64.020, the City assesses Quimby Act and public open space development fees for new residential development to offset impacts.[57] The Quimby Ordinance (California *Government Code* Section 66477) "require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes…".[58] Quimby fees are used to acquire necessary land and/or develop new neighborhood and community parks or recreation facilities that would reasonably serve each residential project. The City does not exceed the Quimby Act goal of three to five acres per 1,000 residents.[59] According to the 2010 Census, the City West Hollywood's current population is 34,399, which amounts to a park ratio of 0.5 acres per 1,000 residents.[60]

2) Code Required Open Space

The WHMC provides minimum standards for the amount of "open space" that residential development projects should provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards. Pursuant to WHMC Title 19.36.280, new multi-family residential construction in the City shall provide a ratio of 120 sf of private open space per dwelling unit. Common open space shall be provided as follows: 3 to 4 units requires a minimum of 200 sf of usable open space; 5 to 10 units requires a minimum of 500 sf of usable open space; 11 to 30 units requires a minimum of 1,000 sf of usable open space; and 31 or more dwelling units requires a minimum 2,000 sf of usable open space. Usable open space is defined as an area that is designed and intended for active or passive use. Usable open space may consist of private and/or common area open space; however, common open space areas must have a minimum dimension of 15 feet and be open to the sky. Open space does not generally include parking areas, driveways, or required front and side yards. Private open space areas must have a minimum dimension of 7 feet and a configuration that would accommodate a rectangle of 100 sf. Open space does not generally include parking areas, driveways, or required front and side yards.

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[57] *City of West Hollywood Municipal Code, Title 19, Chapter 19.64.*

[58] *California Government Code website: http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=66001-67000&file=66475-66478, August 20, 2013.*

[59] *Email Correspondence with Steve Campbell, Manager, Facilities and Field Services Division of the City of West Hollywood, July 30, 2013.*

[60] *City of West Hollywood website, Demographics: http://www.weho.org/index.aspx?page=162, August 20, 2013.*

3) West Hollywood General Plan

The City of West Hollywood has adopted a Parks and Recreation Element to its General Plan. The Element is an official guide for the identification, preservation, conservation, and acquisition of open space within the City. Listed below is the goal and policy relevant to the proposed Project:[61]

PR-1: Improve, enhance, and expand parks throughout the City.

> ***PR-1.12*****:** Consider incentives or modify development standards to encourage new development to create on- or off-site open space.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if the proposed project would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the parks department;

b) 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

c) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

As discussed in Section VII (Effects Found Not to be Significant) of this EIR, and in the Initial Study (included as Appendix A), the proposed Project would have no impact with respect to Threshold (c) listed above. As such, no further analysis of this topic is required. The following impact analysis addresses Thresholds a) and b) listed above.

i) Methodology

The environmental impacts of a project with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in a project area to accommodate a project's needs for such facilities. This is calculated based on the City's recommended ratios for parkland to population as well as project-specific recommendations of the West Hollywood Facilities and Field Services Division. Based on this evaluation, a determination is made whether a project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed either on-site or off-site.

[61] *City of West Hollywood General Plan 2035, Park and Recreation Element, September 6, 2011.*

B. Project Impacts

Threshold:	*Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the parks department?*

Impact J.4-1 Implementation of the proposed Project would not result in the need to construct new or physically alter existing recreational facilities, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts. Therefore, Project impacts to recreation and park service would be less than significant.

i) Park and/or Recreational Facilities

Open space shall generally be provided in accordance with WHMC Title 19.36.280, which requires 120 sf of private open space per dwelling unit. Common open space shall be provided as follows: 3 to 4 units requires a minimum of 200 sf of usable open space; 5 to 10 units requires a minimum of 500 sf of usable open space; 11 to 30 units requires a minimum of 1,000 sf of usable open space; and 31 or more dwelling units requires a minimum 2,000 sf of usable open space. The proposed Specific Plan includes open space requirements that differ slightly from the WHMC requirements. For example, the Specific Plan proposes an average of 120 sf of private open space per condominium and townhome unit since some units within the Existing Building would not have any private open spaces due to physical constraints associated with the structure. In addition, the 12 affordable apartments would be provided with 750 sf of common open space, but would also have approximately 1,500 sf of indoor recreation space. Usable open space may consist of private and/or common area open space; however, common open space areas must have a minimum dimension of 15 feet and be open to the sky. Open space does not generally include parking areas, driveways, or required front and side yards. Private open space areas must have a minimum dimension of 7 feet and a configuration that would accommodate a rectangle of 100 sf. Open space does not generally include parking areas, driveways, or required front and side yards.

The proposed Project includes up to 81 residential dwelling units, approximately 39,728 sf of office, street front retail and restaurant space, The proposed Condominium and Townhome units would provide an average of 120 sf of open space per unit. In total, the Project provides residential private open space of approximately 22,593 sf for the Condominium units and approximately 16,244 sf in private areas at the front and rear of the Townhome units, or approximately 38,837 sf as shown in Table IV.J.4-2. In addition, the WHMC requires 2,000 sf of common open space for projects containing 31 or more units. The Project includes approximately 2,210 sf of common open space for the Condominiums and Townhomes, which is approximately ten percent higher than the area required by the WHMC. The affordable apartments would provide a minimum of 750 sf of common open space that would be provided on the rooftop of the four-unit apartment building located along Rosewood Avenue. This common space would be accessible to all affordable apartments including the eight units located in the Existing Building. Total common space for the Project would be 2,960 sf. All of the common open space area would exceed the Code minimum dimension of fifteen feet.

The proposed Project also includes an approximately 4,417 square foot Indoor Pool House. The Indoor Pool House would contain an indoor swimming pool, fitness area, lockers and restroom facilities, as well as an outdoor kitchen and barbeque facility and an indoor lounge. The Indoor Pool House would be available for use by residents of the Condominiums and the Townhomes. The proposed Project would also include a 12-foot wide private open space area with landscaped and paved areas, located between the Existing Building and the Townhomes. The Project also includes approximately 1,500 sf of indoor recreation space for the affordable apartments, consisting of a fitness area, lounge and kitchen, and meeting area.

Table IV.J.4-2
Open Space Square Footage Summary

	Common	Private
Condominiums	--	22,593 sf
Townhomes	--	16,244 sf
Combined Condominiums & Townhomes	2,210 sf	--
Apartments	750 sf	--
TOTAL	**2,960 sf**	**38,837 sf**
Source: Beverly Blvd Associates, L.P., June 2013		

Assuming the average of 120 sf of private open space per Condominium and Townhome dwelling unit, the proposed Project provides approximately 29,117 sf of more private open space than required under the WHMC Title 19.36.280.[62] Assuming the minimum required 2,000 sf of common open space for the Condominium and Townhomes, the proposed Project provides 210 sf of more common open space than required under the WHMC Title 19.36.280. Although the common open space and private open space provided for the affordable apartments is less than the standard code requirements, this is offset by the 1,500 sf of indoor recreational space.

The commercial portion of the proposed Project would primarily draw its employees and customers from existing residents, rather than induce new residents into an area. In general, employees are more likely to use parks and recreational facilities near their homes during non-work hours.

The standard minimum parkland-to-resident ratio provided by the City is three acres per 1,000 residents.[63] It is estimated that the development of the proposed Project would result in an increase of approximately 124 residents. Based on the parkland-to-resident ratio, the proposed Project would generate a need for approximately 0.37 additional acre of public parkland in the Project area. However, pursuant to WHMC Title 19.64.020 to alleviate the demand on existing City parks and recreational facilities, the Applicant would be required to pay Quimby fees to the City to satisfy its obligations under the Quimby Act. Therefore, with the fulfillment of the open space proposed under the Specific Plan, on-site and payment of Quimby fees to parks and recreational facilities, Project impacts would be less than significant.

[62] *38,837 sf - (81 units) (120 sf/unit)= 29,117 sf of open space.*

[63] *Email Correspondence with Steve Campbell, Manager, Facilities and Field Services Division of the City of West Hollywood, July 30, 2013.*

Threshold:	*Would the proposed project result 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?*

Impact J.4-2 The proposed Project would not increase the use or deterioration of parks and recreational facilities in the vicinity. Therefore, Project impacts would be less than significant with respect to the deterioration of park or recreational facilities.

i) Increase of Park Use

As previously discussed, the proposed Project is comprised of 81 residential dwelling units and approximately 39,728 sf of commercial space. As previously stated, to alleviate the demand on existing City parks and recreational facilities, the Applicant would be required to pay Quimby fees to the City to satisfy its obligations under the Quimby Act. Therefore, with the fulfillment of the open space proposed under the Specific Plan, on-site and payment of Quimby fees, Project impacts to parks and recreational facilities would be less than significant. Therefore, Project impacts would be less than significant with respect to the deterioration of park or recreational facilities.

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative parks analysis is the West Hollywood Recreation Services Division service area, which encompasses the City of West Hollywood, and the eastern border of the City of Beverly Hills. The proposed Project, in combination with the related projects, would be expected to increase the cumulative demand for parks and recreational facilities in the Project area. Of the 12 related projects, only those that would generate permanent residents were analyzed with respect to parkland demand in the immediate Project area. Other future planned and approved projects in West Hollywood that generate permanent residents would also have an impact on parkland demand; however, those projects most likely would not use the same parks as residential projects in the Project area or the proposed Project. The closest park to the Project Site is West Hollywood Park (see Figure IV.J-4). Related residential projects in the immediate Project Site vicinity that would potentially use West Hollywood Park are related projects numbers 1, 6, 9, 10, 11, and 12 (see Section III, Environmental Setting, Figure III-1, for location of related projects).

In general, the other related projects (as other non-residential approved and planned projects) would generate employees who would not be expected to use local park or recreational facilities to a great extent, as they typically would not have long periods of time during their work or school days to visit parks and recreational facilities, and would be more likely to patronize park and recreational facilities near their homes during non-work hours. The City of West Hollywood imposes a variety of development impact fees based on land use, size, and service impact area. Payment of the Parks and Recreation Fee for single- and multi-family land uses would be required, as appropriate, for each related residential project.

The related projects list includes 321 dwelling units. However, several of the related projects are beyond the planning/proposed stage, and under construction or being occupied (see Table II-1, Related Projects). Therefore, many of these units have been taken into account for population growth and parks service, as each has prepared the appropriate environmental review documents. With payment of the Quimby fees, the Project's impact on parks and recreation services would be less than significant. Consequently, the Project's contribution to potential impacts to parks and recreation services would not be considerable. Further, related projects with residential development would also be required to pay

Quimby fees to off set any impact to public parks and recreation services within the West Hollywood Recreation Services Division service area. Thus, related projects impacts would be less than significant. Therefore, the proposed Project, in conjunction with the related projects (numbers 1, 6, 9, 10, 11, and 12, in particular) would not have a cumulatively considerable impact on parks, and cumulative impacts would be less than significant.

5. MITIGATION MEASURES

No significant impacts were identified. Therefore, no mitigation is required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to parks and recreational services and facilities would be less than significant.

Cumulative impacts to parks and recreational services would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
5. LIBRARIES

1. INTRODUCTION

This Subsection describes the potential impacts of the proposed Project on library services in the project area. This section utilizes information from the following resources: the County of Los Angeles Library website, the City of West Hollywood General Plan 2035: Parks & Recreation Element, adopted on September 6, 2011, and a written correspondence from Yolanda De Ramus, Chief Deputy, County of Los Angeles Library.

2. ENVIRONMENTAL SETTING

A. Existing Library Facilities

The County of Los Angeles Public Library (CLAPL) currently offers library services to over 3.5 million residents living in unincorporated areas of Los Angeles County, along with residents of 51 of the 88 incorporated cities of Los Angeles County, Including the City of West Hollywood. Approximately seven million books and other materials including magazines, newspapers, microfilm, government publications comprise the CLAPL collection. The CLAPL utilizes service level guidelines of a minimum of 0.50 gross sf of library facility space per capita, 2.75 items (books and other library materials) per capita, and 1.0 public access computer per 1,000 people served.[64]

The closest County of Los Angeles Public Library that would serve the Project Site is the West Hollywood Library located at 625 North San Vicente Boulevard in the City of West Hollywood. The location of this library is shown in Figure IV.M-5, (Library Serving the Project Site). One other library that may serve the Project Site includes the municipal Beverly Hills Library located at 444 North Rexford Drive. The Beverly Hills Library includes resources for children and young adults, as well as free access to computer workstations.[65]

i) West Hollywood Library

The West Hollywood Library is located approximately 0.75 mile northeast of the Project Site. At present, the West Hollywood Library is 33,150 sf and serves approximately 35,828 people;

[64] *Written Correspondence with Yolanda De Ramus, Chief Deputy, County of Los Angeles Public Library, July 25, 2013.*

[65] *City of Beverly Hills Library Website: http://www.beverlyhills.org/exploring/beverlyhillspubliclibrary/, August 26, 2013.*

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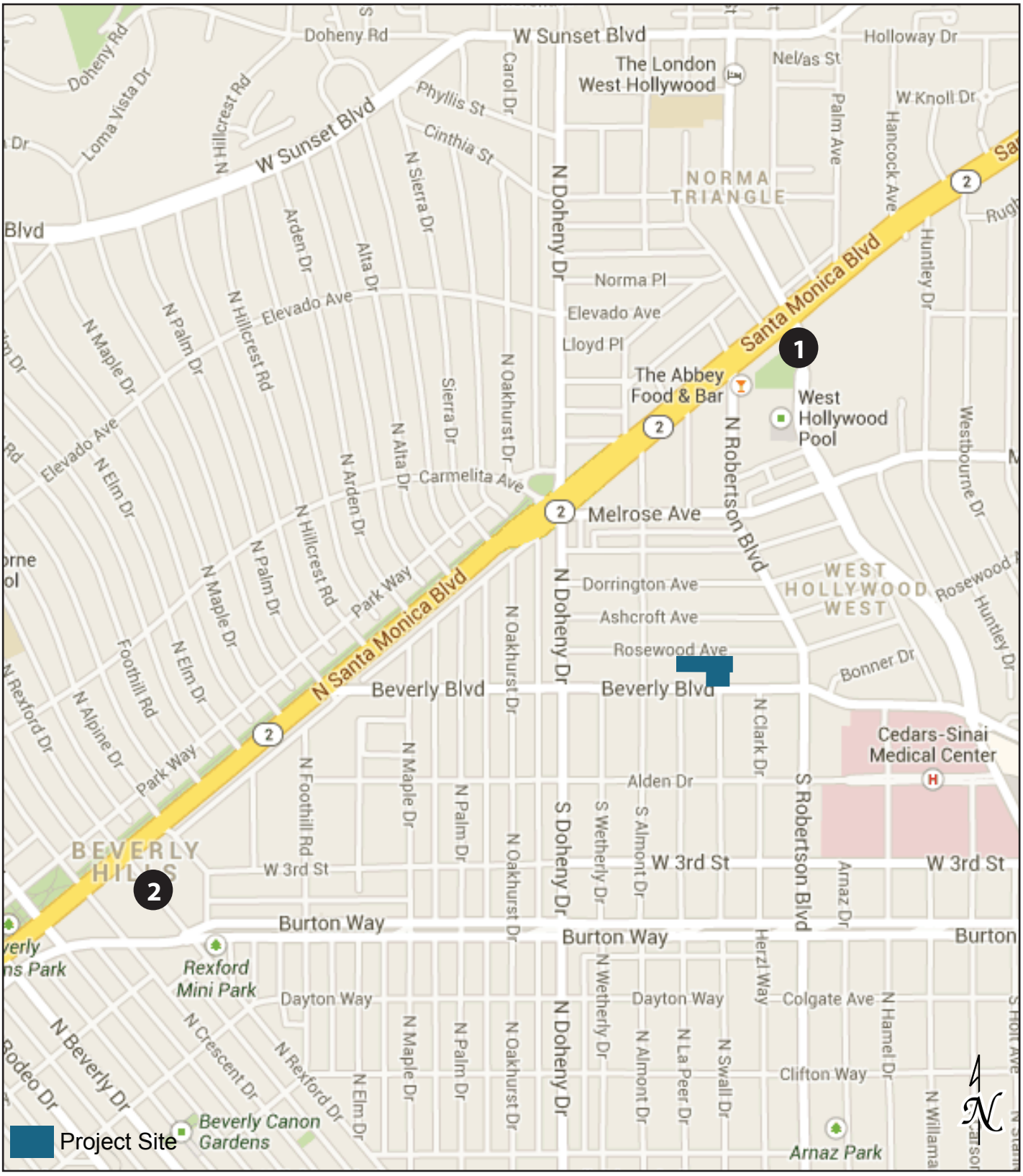

1: West Hollywood Library, 625 North San Vicente Boulevard
2: Beverly Hills Library, 444 North Rexford Drive

0 500 1,000
Scale (Feet)

Source: GoogleEarth, August 2013.

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Figure IV.J-5
Library Location Map

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therefore, meeting and exceeding the current demand for library services in the community.[66] Currently, the West Hollywood Library, which is open six days a week, houses approximately 105,386 items and is staffed with 8 full-time staff positions and 32 part-time staff positions.[67] It presently has resources for children, teens, adults, and Spanish speakers. Similar to every branch of the CLAPL, the West Hollywood Library offers free use of computer workstations that provide access to the CLAPL's information network. These workstations also provide Internet access, the ability to search the CLAPL online catalog, subscription databases, word processing and language learning tools, access to an historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.[68]

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the proposed Project would have a potentially significant effect on the environment if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services.

i. Methodology

The environmental impacts of a project with respect to libraries are determined based on the population of the serving libraries service area and ability for existing libraries to serve a project vicinity based on the number of patrons and residents that a project would generate upon project buildout. Based on these projections, it is determined whether a project would exceed the capacity of any existing or proposed libraries such that a new or expanded library or libraries would be needed.

B. Project Impacts

Threshold	*Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library service?*

[66] *Written Correspondence with Yolanda De Ramus, Chief Deputy, County of Los Angeles Public Library, July 25, 2013.*

[67] *Ibid.*

[68] *County of Los Angeles Library Website: http://www.colapublib.org/aboutus/strategic.html, August 22, 2013.*

Impact J.5-1 Implementation of the proposed Project would not result in the need to construct new or physically alter existing library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Therefore, Project impacts to library service would be less than significant.

The proposed Project would potentially generate approximately 124 residents, which would represent 0.35 percent [(124/35,828) x 100] of the expected change in service capacity for the West Hollywood Library. The expected 0.35 percent increase in service population as a result of the proposed Project is not considered a substantial increase in demand to a library that currently adequately serves the existing population. The proposed Project would also increase the number of employees and customers to the Project Site. However, employees are not likely to have the time to use the library during working hours, as they are more likely to use libraries near their homes during non-work hours. As such, it is reasonable to conclude that the proposed Project would not result in the need for expanded or newly constructed library facilities. Therefore, Project impacts to library facilities would be less than significant.

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative library facilities analysis encompasses the service area for CLAPL West Hollywood Library branch for the related projects (numbers 1 through 10, see Environmental Setting, Table III-1) located in the City of West Hollywood and the Beverly Hills Library for the related projects (number 11 and 12, see Environmental Setting, Table III-1). The proposed Project, in combination with the related projects, would be expected to increase the cumulative demand for library service in the Project area. Of the 12 related projects, only those that would generate permanent residents were analyzed with respect to library service. In general, the other related projects would generate employees who would not be expected to use the library to a great extent, as they typically would not have long periods of time during their work to visit the library.

The related projects list includes 321 dwelling units. However, several of the related projects are beyond the planning/proposed stage, and are under construction or being occupied. Therefore, many of these units have been taken into account for population growth and library service, as each has prepared the appropriate environmental review documents. The Project would have less than significant impacts to the West Hollywood Library branch. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

5. MITIGATION MEASURES

No significant impacts identified. Therefore, no mitigation is required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to library facilities would be less than significant.

Cumulative impacts to library facilities would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
K. TRANSPORTATION AND TRAFFIC

1. INTRODUCTION

The purpose of this section is to address potential traffic and circulation impacts associated with the proposed construction of the 8899 Beverly Boulevard Project. This section is a summary of the Transportation Study for the 8899 Beverly Boulevard Project (Traffic Impact Analysis Report) prepared by Gibson Transportation Consulting, September 2013. This report is included as Appendix L of this EIR.

The report describes the operating conditions of four study intersections and one key roadway segment. Two traffic horizon years were analyzed that include Existing (Year 2013) and Year 2015. The traffic generation rates used in the traffic forecasting are found in the Ninth Edition of *Trip Generation*, published by the Institute of Transportation Engineers (Washington D.C., 2012). The various guidelines, methods, and assumptions mandated by the City of West Hollywood, wherever applicable, were used in the preparation of the Project design features. Operating conditions at the key study intersections were evaluated using the *Highway Capacity Manual (HCM)* Methodology for both signalized and unsignalized intersections.

2. ENVIRONMENTAL SETTING

A. Existing Street System

The existing street system in the Project area consists of a regional roadway system including arterials, secondary/collector and local streets. The arterials, secondary/collectors, and selected local streets in the Study Area offer sub-regional and local access and circulation opportunities. These transportation facilities generally provide two to four travel lanes and generally allow parking on either side of the street. Typically, the speed limits range between 25 and 30 miles per hour (mph) on the arterials, secondary/collector, and local streets.

i) Roadway Descriptions

Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10), which generally runs in the east-west direction south of the Project area and the San Diego Freeway (I-405), which generally runs in the north-south direction west of the Project Area. I-10 is located approximately three miles to the south of the Project Site, with access provided via interchanges at Robertson Boulevard and La Cienega Boulevard. I-405 is located approximately four miles to the west of the Project Site, with access provided via interchanges at Santa Monica Boulevard.

The major arterials providing regional and sub-regional access to the Project Site include Beverly Boulevard and Robertson Boulevard. The street classifications were designated as defined in *West Hollywood General Plan 2035* (City of West Hollywood, 2011). The following is a brief description of the major streets in the Project area:

- Beverly Boulevard – Beverly Boulevard is a designated Arterial that runs in the east-west direction and is located adjacent to the south side of the Project Site. It provides four travel lanes, two in each direction, and left-turn lanes at intersections. It provides both local and

regional access to the Project Site. Daytime two-hour metered parking is generally available on both sides of the street within the Study Area. The posted speed limit is 30 mph.

- Robertson Boulevard – Robertson Boulevard is a designated Secondary/Collector Street that runs in the north-south direction and is located east of the Project Site. It provides two travel lanes, one in each direction, and left turns at signalized intersections. It provides both local and sub-regional access to the Project Site. Daytime two-hour metered parking is generally available on both sides of the street within the Study Area. The posted speed limit is 30 mph.
- Rosewood Avenue – Rosewood Avenue is a designated Local Street that runs in the east-west direction and is located adjacent to the north side of the Project Site. It provides two travel lanes, one in each direction. It provides local access to the Project Site. Daytime two-hour curbside parking is generally permitted on weekdays and Saturdays on both sides of the street within the study Area. Vehicles with permits are exempt from parking restrictions within the permit parking district. The posted speed limit is 25 mph with speed bumps to further control speed.
- Almont Drive – Almont Drive is a designated Local Street that runs in the north-south direction and is located west of the Project Site. It provides two travel lanes, two in each direction. It provides limited local access to the Project Site. Daytime two-hour curbside parking is generally available on weekdays on both sides of the street within the Study Area. Vehicles with permits are exempt from parking restrictions within the permit parking district. The posted speed limit is 25 mph.

B. Existing Transit System

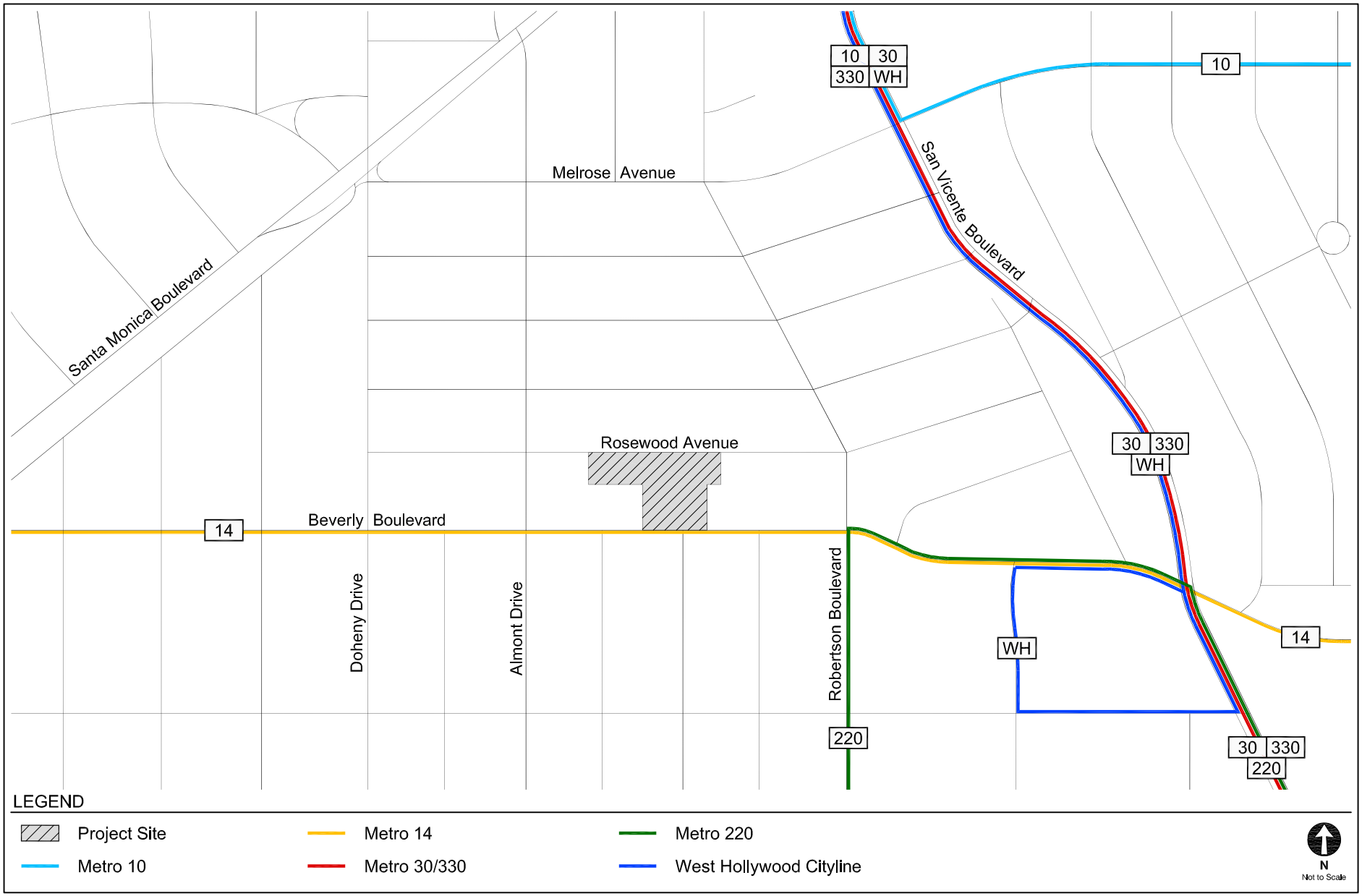
The Project area is served by bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood City line service.

Bus transit service in the Project vicinity is available along the following streets:

- Beverly Boulevard
- San Vicente Boulevard
- Robertson Boulevard
- Santa Monica Boulevard
- La Cienega Boulevard

Figure IV.K-1 (Existing Transit Service), illustrates the existing transit service in the Study Area. Table IV.K-1 (Existing Transit Service), summarizes the various transit lines operating in the Project area for each of the service providers in the region, the type of service (peak vs. off-peak, express vs. local), and frequency of service. The following provides a brief description of the bus lines providing service in Project vicinity:

- Metro Local Line 10 – Line 10 travels north-south on San Vicente Boulevard in the vicinity of the Project Site with average headways of 18 minutes during the morning peak hours and 15 minutes during the afternoon peak hours. The line travels from downtown Los Angeles to West Hollywood and provides service to Pershing Square and Civic Center/Grand Park.



Source: Gibson Transportation Consulting, Inc., September 2013.

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Figure IV.K-1
Existing Transit Service

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Table IV.K-1
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)			
			AM Peak Period		PM Peak Period	
Metro			NB/EB	SB/WB	NB/EB	SB/WB
10 Downtown Los Angeles - West Hollywood via Temple St & Melrose Ave	Local	4:00 AM-1:00 AM	22	13	20	10
14 Downtown Los Angeles - Beverly Hills via Beverly Blvd	Local	24-Hour	8	7	8	8
30 West Hollywood - Downtown Los Angeles - Indiana Station via San Vicente Bl, Pico Bl & E 1st St	Local	9:00 AM-4:30 AM	35	30	20	20
220 Beverly Center - Culver City via Robertson Blvd Local	Local	5:30 AM-6:30 PM	60	60	60	60
330 West Hollywood - Downtown Los Angeles - Indiana Station via San Vicente Bl, Pico Bl & E 1st St	Limited	5:30 AM-7:00 PM	24	26	40	34
West Hollywood City Line						
Orange Robertson Bl to La Brea Ave (Eastbound)	Local	9:00 AM-6:00 PM	30	60	45	36
Blue La Brea Ave to Robertson Blvd (Westbound)	Local	9:00 AM-6:00 PM	30	60	45	36

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes:
Metro: Los Angeles County Metropolitan Transportation Authority
West Hollywood City line Bus: City of West Hollywood
AM Peak from 6-10 AM
PM Peak from 3-7 PM

- Metro Local Line 14 – Line 14 travels east-west on Beverly Boulevard directly south of the Project Site with average headways of eight minutes during the morning and afternoon peak hours. The line travels from downtown Los Angeles to West Hollywood and provides service to Koreatown.

- Metro Local Line 30 – Line 30 travels north-south on San Vicente Boulevard in the vicinity of the Project Site with average headways of 33 minutes during the morning peak hours and 20 minutes during the afternoon peak hours. The line travels from West Hollywood to East Los Angeles and provides service to Civic Center/Grand Park and Little Tokyo/Arts District.

- Metro Local Line 220 – Line 220 travels north-south on Robertson Boulevard and San Vicente Boulevard and east-west on Beverly Boulevard in the vicinity of the Project Site with average headways of 60 minutes during the morning and afternoon peak hours. The line travels from West Hollywood to Culver City and provides service to the Cedars-Sinai Medical Center and the Beverly Center.

- Metro Local Line 330 – Line 5 travels north-south on San Vicente Boulevard in the vicinity of the Project Site with average headways of 25 minutes during the morning peak hours and 37 minutes during the afternoon peak hours. The line travels from West Hollywood to Downtown Los Angeles and provides service to Union Station.

- West Hollywood City line Blue Route – City line Blue Route travels north-south on San Vicente Boulevard in the vicinity of the Project Site with average headways of 30 minutes during the morning and afternoon peak hours. The line serves the City of West Hollywood.
- West Hollywood City line Orange Route – City line Orange Route travels north-south on San Vicente Boulevard in the vicinity of the Project Site with average headways of 30 minutes during the morning and afternoon peak hours. The line serves the City of West Hollywood.

C. Study Area Intersections and Street Segments

The study area generally includes a geographic area approximately one-quarter mile (north-south) by approximately one-quarter mile (east-west). This study area was established in consultation with the City of West Hollywood and by reviewing the existing intersection/corridor operations, Project peak hour vehicle trip generation, the anticipated distribution of Project vehicular trips, and the potential impacts of Project traffic.

A traffic analysis study area generally comprises those locations with the greatest potential to experience significant traffic impacts due to the Project as defined by the lead agency. In the traffic engineering practice, a study area generally includes those intersections that are:

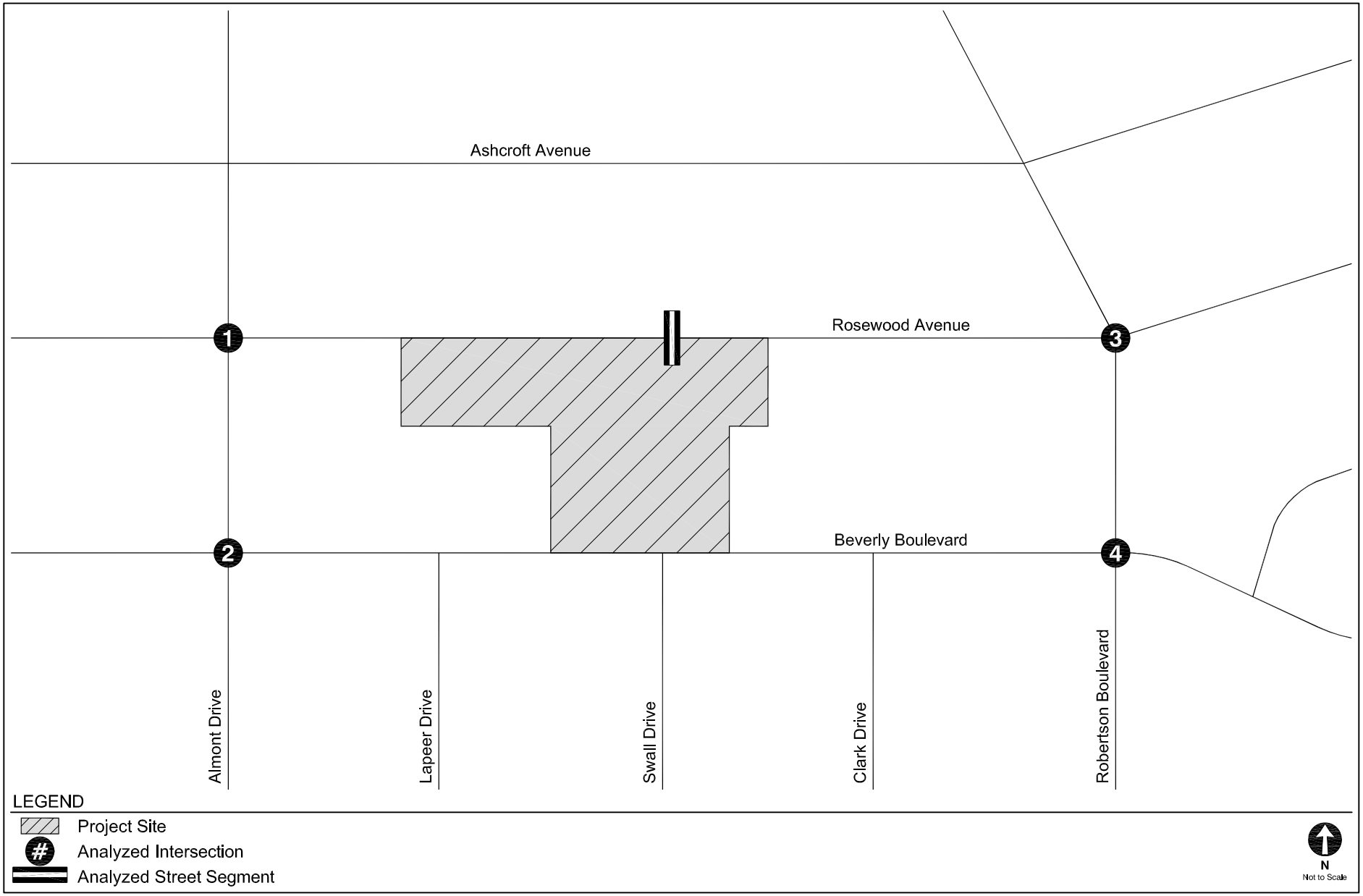
1. Immediately adjacent or in close proximity to the Project Site;
2. In the vicinity of the Project Site that are documented to have current or projected future adverse operational issues; and
3. In the vicinity of the Project Site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

The Project study area was designed to ensure that all potentially significantly impacted intersections, prior to any mitigation, were analyzed, and the boundary of the study area was extended, as necessary, to confirm that there were no significant impacts at or outside the boundary of the study area by reviewing the Project traffic's travel patterns.

The intersections selected for analysis are consistent with the above criteria. The study locations were also selected based on the Project vehicle trip generation, the anticipated distribution of the Project trips, existing intersection/corridor operations, and travel routes/patterns to and from the project. Several additional study locations were considered, including Doheny Drive at Maple Drive, Doheny Drive at Burton Way, Oakhurst Drive between Burton Way and Beverly Boulevard, Wetherly Drive between Wilshire Boulevard and Burton Way, among others. These intersections and street segments, among others, were not selected for analysis as they did not meet the criteria listed above. The study locations not included accommodated little, if any, project-related traffic volumes/vehicular turning movements, were located a farther distance from the Project Site, have relatively lower traffic volumes on the side street and minor approach to the intersections, and no documented existing or projected future adverse operational issues.

i) Study Area Intersections

A total of four intersections, one signalized and three unsignalized, and one street segment in the study area was identified during the scoping process for detailed analysis in the traffic study. Figure IV.K-2 (Study Area and Analyzed Locations) illustrates the location of the Project Site in relation to the surrounding street system, the four study intersections, and one study street segment.



Source: Gibson Transportation Consulting, Inc., September 2013.

EcoTierra consulting

Figure IV.K-2
Study Area Intersections and Roadway Segments Map

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The four intersections selected for evaluation are:

1. Rosewood Avenue & Almont Drive (four-way stop-controlled)
2. Beverly Boulevard & Almont Drive (two-way stop-controlled)
3. Rosewood Avenue & Robertson Boulevard (two-way stop-controlled)
4. Beverly Boulevard & Robertson Boulevard (signalized)

The street segment of Rosewood Avenue between Almont Drive and Robertson Boulevard was also selected for evaluation.

D. Existing Traffic Volumes

Intersection turning movement counts during the typical weekday morning (7:00 AM to 9:00 AM) and afternoon (4:00 PM to 6:00 PM) commuter peak periods were conducted at the four study intersections in September 2013. Public and private schools were in session at the time the traffic counts were conducted.

A figure illustrating the existing peak hour Daily Traffic volumes is provided in Section 2.0 of the Traffic Impact Analysis Report (see Figure 4) and the traffic count data collected at the study intersections and roadway segments are contained in Appendix B of the Traffic Impact Analysis Report.

i) Methodology

The following traffic scenarios were developed and analyzed as part of this study:

- Existing Conditions (Year 2013) – The analysis of existing traffic conditions provides a basis for the assessment of existing and future traffic conditions with the addition of Project traffic. The Existing Conditions analysis includes a description of key area streets and highways, traffic volumes and current operating conditions, and transit service in the Project Site vicinity. Intersection turning movement counts for typical weekday morning (7:00 AM to 9:00 AM) and afternoon (4:00 PM to 6:00 PM) peak periods were collected in September 2013. Fieldwork (lane configurations and signal phasing) for the analyzed intersections was collected in August 2013.
- Existing with Project Conditions (Year 2013) – This scenario projects the potential intersection operating conditions that could be expected if the Project were built given the existing street system and traffic volumes. In this scenario, the Project-generated traffic is added to the Existing Conditions (Year 2013) traffic volumes.
- Future without Project Conditions (Year 2015) – This scenario projects the potential intersection operating conditions that could be expected as a result of regional growth and related Project traffic in the vicinity of the Project Site by year 2015. This analysis provides the baseline conditions by which Project impacts are evaluated in the future at full buildout.
- Future with Project Conditions (Year 2015) – This scenario projects the potential intersection operating conditions that could be expected if the Project were built in the projected buildout year (2015) by adding the Project traffic to the Future without Project Conditions (Year 2015) traffic volumes.

1) Intersection Capacity Analyses

Intersection capacity has been analyzed using the methods prescribed by the City of West Hollywood. In accordance with the City of West Hollywood policy, the intersection capacity analysis was conducted using the Synchro software to implement the *2000 Highway Capacity Manual,* Transportation Research Board*,* 2000 (HCM) signalized and unsignalized methodologies. The HCM signalized methodology calculates the average delay, in seconds, for each vehicle passing through the intersections, while the HCM unsignalized methodology calculates the control delay, in seconds, for the movement with the worst level of service (LOS) at each intersection.

Table IV.K-2 (Level of Service Definitions for Signalized and Unsignalized Intersections), presents a description of the LOS categories, which range from excellent, nearly free-flow traffic at LOS A, to stop-and-go conditions at LOS F, for both signalized and unsignalized intersections.

Table IV.K-2
Level of Service Definitions for Signalized and Unsignalized Intersections

Level of Service (LOS)	Signalized Intersection Delay (seconds)	Unsignalized Intersection Delay (seconds)	Definition
A	0.0 - 10.0	0.0 - 10.0	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	10.1 - 20.0	10.1 - 15.0	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	20.1 - 35.0	15.1 - 25.0	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	35.1 - 55.0	25.1 - 35.0	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	55.1 - 80.0	35.1 - 50.0	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 80.0	> 50.0	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Highway Capacity Manual 2000, Transportation Research Board, 2000.

2) Significant Impact Criteria

The City of West Hollywood has adopted a sliding scale for determining significant traffic impacts to intersections. As shown in Table IV.K-3 (West Hollywood Significant Impact Criteria For Intersections), the West Hollywood significant impact criteria are based on a minimum allowable increase in delay attributable to a Project as the overall LOS of the intersection decreases.

Table IV.K-3
West Hollywood Significant Impact Criteria For Intersections

Intersection Conditions with Project Traffic		Project-Related Increase of Delay (seconds)
Level of Service	Intersection Delay (seconds)	
Signalized Intersection of Two Commercial Corridors		
D	35.1 - 55.0	≥ 12.0
E or F	> 55.0	≥ 8.0
Other Signalized Intersection		
D	35.1 - 55.0	≥ 8.0
E or F	> 55.0	≥ 5.0
Four-Way Stop-Controlled Intersection		
D	25.1 - 35.0	≥ 8.0
E or F	> 35.0	≥ 5.0
Unsignalized (Two-Way/One-Way Stop-Controlled) Intersection		
D, E or F	> 25.0	≥ 5.0

The City of West Hollywood has also developed a similar sliding scale to identify significant impacts on residential street segments. As shown in Table IV.K-4 (West Hollywood Significant Impact Criteria For Residential Street Segments), the criterion is based on the allowable increase in average daily traffic (ADT).

Table IV.K-4
West Hollywood Significant Impact Criteria For Residential Street Segments

Average Daily Traffic (ADT)	Project-Related Increase in ADT
> 2,000	12%
2,001 - 3,000	10%
3,001 - 6,749	8%
≥ 6,750	6.25%

ii) Existing Level of Service Results

Table IV.K-5 (Existing Conditions (Year 2013) Intersection Peak Hour Levels of Service), summarizes the existing weekday morning and afternoon peak hour delay and the corresponding LOS for each of the study intersections. As shown in Table IV.K-5 (Existing Conditions (Year 2013) Intersection Peak Hour Levels of Service), all four study intersections operate at LOS D or better during both the morning and

afternoon peak hours under Existing conditions. The LOS calculation worksheets are provided in Appendix C of the Traffic Impact Analysis Report.

Table IV.K-5
Existing Conditions (Year 2013) Intersection Peak Hour Levels of Service

No.	Intersections	Peak Hour	Existing	
			Delay (sec)	LOS
1. [a]	Almont Drive & Rosewood Avenue	A.M	7.3	A
		P.M.	7.4	A
2. [a]	Almont Drive & Beverly Boulevard	A.M	0.7	A
		P.M.	0.8	A
3. [a]	Robertson Boulevard & Rosewood Avenue	A.M	1.3	A
		P.M.	1.8	A
4. [b]	Robertson Boulevard & Beverly Boulevard (signalized)	A.M	45.1	D
		P.M.	32.2	C

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes:
[a] Unsignalized location analyzed with HCM Unsignalized methodology.
[b] Signalized location analyzed with HCM Signalized methodology.

E. Regulatory Setting

i) Congestion Management Program

An analysis also was conducted according to Los Angeles County (County) Congestion Management Program (CMP) guidelines. The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program (RTIP) and State Transportation Improvement Program (STIP) processes. The CMP requires that a Traffic Impact Analysis (TIA) be performed for all CMP arterial monitoring intersections where a Project would add 50 or more trips during either the morning or afternoon weekday peak hours and all mainline freeway monitoring locations where a Project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours. Additionally, it requires a review of potential impacts to the regional transit system.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with guidance provided by Appendix G to the State CEQA Guidelines, a significant traffic impact would occur if the proposed Project would:

a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections;

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways;

c) 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;

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);

e) Result in inadequate emergency access;

f) Result in inadequate parking capacity; or

g) Conflict with adopted policies, plans, or programs alternative transportation (e.g., bus turnouts, bicycle racks).

The Initial Study (included as Appendix A) determined that the proposed Project would result in no impact with respect to Threshold (c), (d), and (g) listed above. As such, no further analysis of this topic is required. The following impact analysis addresses Thresholds (a), (b), (e), and (f) listed above, which the Initial Study determined to be potentially significant.

i) Traffic Forecasting Methodology

In order to estimate the traffic impact characteristics of the proposed project, a multi step process was utilized. The first step is traffic generation, which estimates the total arriving and departing traffic on a peak hour and daily basis. The traffic generation potential is forecast by applying the appropriate vehicle trip generation equations or rates to the proposed Project development tabulation. The second step of the forecasting process is traffic distribution, which identifies the origins and destinations of inbound and outbound Project traffic. These origins and destinations are typically based on demographics and existing/expected future travel patterns in the study area. The third step is traffic assignment, which involves the allocation of Project traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time, which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds. Traffic distribution patterns are indicated by general percentage orientation, while traffic assignment allocates specific volume forecasts to individual roadway segments and intersection turning movements throughout the study area. With the forecasting process complete and Project traffic assignments developed, the impact of the proposed Project is isolated by comparing operational (LOS) conditions at selected key intersections using expected future traffic volumes with and without forecast Project traffic. The need for site-specific and/or cumulative local area traffic improvements are then evaluated.

B. Project Impacts

Threshold	*Would the project cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections?*

Impact K-1 **Construction could result in a temporary traffic impact at the intersection of Robertson Boulevard & Beverly Boulevard during the morning peak hour. To mitigate the potential temporary traffic impact, a construction mitigation plan would be implemented. Therefore, impacts from the proposed Project during construction would be less than significant.**

i) Construction Impact Analysis

The construction impact analysis relates to the temporary impacts that may result from the construction activities of the proposed project, which may include safety, operational, or capacity impacts. This analysis was performed in accordance with the City of West Hollywood guidelines. Though there is a small chance that Project construction activities could coincide with construction of other projects in the vicinity, the impacts of the proposed Project would not be affected by these activities. Further, the proposed Project would implement a construction traffic management plan that would be coordinated with other construction projects in the vicinity as necessary to minimize conflicts. The construction of the proposed Project is comprised of separate phases for the existing building and the Rosewood Avenue townhomes site, therefore, the construction impact analysis was conducted separately for each site.

1) Existing Building

a) Construction Assumptions

Construction of the Existing Building is proposed to commence in year 2014 and continue through year 2016, an overall duration of 20 active construction months. During this period, the construction would occur in phases, including demolition, structural upgrades, new skin addition, exterior skin, interior rough and finish, site work and miscellaneous tasks.

Construction activities and equipment would be staged on the Project Site building podium, which currently serves as parking. Construction workers parking would predominately be provided on-site, with overflow parking accommodated at approved off-site locations. In compliance with the *West Hollywood Municipal Code* (City of West Hollywood, June 2013), exterior construction activities would occur between 8:00 AM and 7:00 PM Monday through Friday, and interior construction activities would occur between 8:00 AM and 7:00 PM on Saturdays, excluding federal holidays. No construction activity would occur on Sunday. Work hours may be extended to 12-hour days on limited special activities.

The construction of the Existing Building would require a maximum of 80 workers on-site at one time. The major equipment and manpower expected to be used on the construction include the following:

- One tower crane at the exterior of the Existing Building;
- Multiple mobile cranes on rubber tires;
- Rubber tire all terrain forklifts;
- One material hoist at the exterior of the Existing Building;
- 10 cubic yard (CY) dump trucks for hauling demolition debris;
- 14 CY dirt trucks for exporting soil;
- Small equipment for existing footings under the Existing Building including bobcats and excavators on rubber tires; and
- Excavator and loader for the garage excavation.

b) Construction Trip Generation

Project construction would generate traffic from construction worker travel, as well as the arrival and departure of trucks delivering construction materials to the site and removing debris generated by the on-site demolition activities. Both the number of construction workers and trucks would vary throughout the construction process in order to maintain a reasonable schedule of completion. Construction materials and equipment would be stored on-site; therefore, equipment would not travel to and from the Project Site on a daily basis. Construction traffic would use a haul route originating from Beverly Boulevard and progress on La Cienega Boulevard southbound to the I-10 Eastbound. The Truck Haul Route program would be submitted to the City of West Hollywood for review and approval prior to the issuance of a building permit. Based on the assumptions detailed below, construction workers and truck hauls are estimated to generate a maximum of 71 morning and afternoon peak hour trips.

Construction Workers. In compliance with the City of West Hollywood permitted construction hours, construction would occur between 8:00 AM and 7:00 PM. Although in general the majority of the construction workers is expected to arrive at or depart from the Project Site during off-peak hours (i.e., arrive prior to 7:00 AM or leave prior to 4:00 PM), for purposes of providing a conservative analysis, it was assumed that construction workers could arrive and depart the Project Site during the morning and afternoon commuter peak periods. As previously mentioned, a maximum of 80 construction workers is expected to be on-site at one time.

The number of construction worker vehicles was estimated using an average vehicle ridership of 1.135 persons per vehicle, as provided in *CEQA Air Quality Handbook* (South Coast Air Quality Management District, 1993). With no additional reductions for alternative modes of transportation, the construction workers are estimated to generate 70 inbound trips during the morning peak hour and 70 outbound trips during the afternoon peak hour. All construction worker parking would be accommodated on-site with additional parking provided at approved off-site parking facilities.

Haul Trucks. Approximately 2,840 CY of material is anticipated to be exported from the Existing Building. This would require the use of 14 CY dirt trucks to export the soil to an off-site material. Based on the construction schedule, the demolition phase is estimated to occur over a two-month duration, which equals approximately 40 work days, resulting in a total of approximately five trucks per day, or 10 daily truck trips (five inbound, five outbound). For the purposes of this analysis, it was conservatively assumed that haul truck trips would occur evenly throughout the day; therefore, the morning and afternoon peak hours would be affected by an equal number of truck trips.

Transportation Research Circular No. 212, Interim Materials on Highway Capacity, (Transportation Research Board, 1980) defines passenger car equivalency (PCE) for vehicles as the number of passenger cars to which it is equivalent based on the vehicle's headway and delay-credited effects. Table 8 of *Transportation Research Circular No. 212* and Exhibit 16.7 of the HCM suggest a PCE of 2.0 for trucks. Assuming a PCE of 2.0, is it estimated that the trucks will generate 20 daily PCE trips (10 inbound, 10 outbound), including two PCE trips (one inbound, one outbound) during the peak hours.

c) Conclusion

The construction traffic for the Existing Building was distributed based on the proposed truck route, as previously described, and was assessed for temporary construction-related traffic impacts on the street system under a worst-case scenario in which the maximum level of construction traffic were to occur. Based on the significant impact criteria used for Project traffic impacts, construction could result in a

temporary traffic impact at the intersection of Robertson Boulevard & Beverly Boulevard during the morning peak hour, as summarized in Table IV.K-6 (Existing With Construction (Year 2013)-Existing Building). To mitigate the potential temporary traffic impact, a construction mitigation plan would be implemented. It should be noted that the traffic associated with the existing uses of the Project Site were not removed with the addition of construction-related traffic, resulting in a conservative analysis.

Table IV.K-6
Existing With Construction Conditions (Year 2013) - Existing Building
Intersection Peak Hour Levels Of Service

No.	Intersections	Peak Hour	Existing		Existing With Project		Change in Delay (sec)	Impact
			Delay (sec)	LOS	Delay (sec)	LOS		
1. [a]	Almont Drive & Rosewood Avenue	A.M	7.3	A	7.2	A	-0.1	No
		P.M.	7.4	A	7.4	A	0.0	No
2. [a]	Almont Drive & Beverly Boulevard	A.M	0.7	A	0.7	A	0.0	No
		P.M.	0.8	A	0.8	A	0.0	No
3. [a]	Robertson Boulevard & Rosewood Avenue	A.M	1.3	A	1.3	A	0.0	No
		P.M.	1.8	A	1.8	A	0.3	No
4. [b]	Robertson Boulevard & Beverly Boulevard (signalized)	A.M	45.1	D	45.1	E	10.9	**YES**
		P.M.	32.2	C	32.2	D	7.4	No

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes:
[a] Unsignalized location analyzed with HCM Unsignalized methodology.
[b] Signalized location analyzed with HCM Signalized methodology.

2) *Rosewood Avenue Buildings*

a) Construction Assumptions

Construction of the Rosewood Avenue townhomes is proposed to commence in year 2014 and continue through year 2015, an overall duration of 12 active construction months. During this period, the construction would occur in phases, including demolition and excavation, parking garage construction, framing, exterior skin, interior rough and finish, site work and miscellaneous tasks.

As with the Existing Building, construction activities and equipment would be staged on the Project Site building podium, which currently serves as parking. Construction worker parking would predominately be provided on-site, with overflow parking accommodated at approved off-site locations. In compliance with the West Hollywood Municipal Code, exterior construction activities would occur between 8:00 AM and 7:00 PM Monday through Friday, and interior construction activities would occur between 8:00 AM and 7:00 PM on Saturdays, excluding federal holidays. No construction activity would occur on Sunday. Work hours may be extended to 12-hour days on limited special activities.

The construction of the Rosewood Avenue buildings would require a maximum of 30 workers on-site at one time. The major equipment and manpower expected to be used on the construction include the following:

- Multiple mobile cranes on rubber tires;
- Rubber tire all terrain forklifts;
- 10 cubic yard (CY) dump trucks for hauling demolition debris;
- 14 CY dirt trucks for exporting soil; and
- Excavator and loader for the garage excavation.

b) Construction Trip Generation

Similar to the Existing Building, construction materials and equipment would be stored on-site, therefore equipment would not travel to and from the site on a daily basis. Construction traffic will use a haul route originating from Rosewood Avenue and progress on La Cienega Boulevard southbound to the I-10 Eastbound. The Truck Haul Route program would be submitted to the City for review and approval prior to the issuance of a building permit. Based on the assumptions detailed below, construction workers and truck hauls are estimated to generate a maximum of 58 morning and afternoon peak hour trips.

Construction Workers. In compliance with the City of West Hollywood permitted construction hours, construction would occur between 8:00 AM and 4:00 PM. Although in general, the majority of the construction workers is expected to arrive at or depart from the site during off-peak hours (i.e., arrive prior to 7:00 AM or leave prior to 4:00 PM), for purposes of providing a conservative analysis, it was assumed that construction workers could arrive and depart the Project Site during the morning and afternoon commuter peak periods. As previously mentioned, a maximum of 30 construction workers is expected to be on-site at one time.

As stated above, the number of construction worker vehicles was estimated using an average vehicle ridership of 1.135 persons per vehicle, as provided in CEQA Air Quality Handbook. With no additional reductions for alternative modes of transportation, the construction workers are estimated to generate 26 inbound trips during the morning peak hour and 26 outbound trips during the afternoon peak hour. All construction worker parking would be accommodated on-site with additional parking provided at approved off-site parking facilities.

Haul Trucks. Approximately 18,770 CY of material is anticipated to be exported from the Existing Building. This would require the use of 14 CY dirt trucks to export the soil to an off-site material. Based on the construction schedule, the demolition phase is estimated to occur over a one-month duration, which equals approximately 20 work days, resulting in a total of approximately 67 trucks per day, or 134 daily truck trips (67 inbound, 67 outbound). For the purposes of this analysis, it was conservatively assumed that haul truck trips would occur evenly throughout the day, therefore the morning and afternoon peak hours would be affected by an equal number of truck trips.

Assuming a PCE of 2.0, is it estimated that the trucks will generate 268 daily PCE trips (134 inbound, 134 outbound), including 32 PCE trips (16 inbound, 16 outbound) in the peak hours.

c) Conclusion

The construction traffic for the Rosewood Avenue site was distributed based on the proposed truck route, as previously described, and were assessed for temporary construction-related traffic impacts on the street system under a worst-case scenario in which the maximum level of construction traffic were to occur. Based on the significant impact criteria used for Project traffic impacts, construction would not result in a temporary traffic impact at any of the study intersections, as summarized in Table IV.K-7 (Existing With Construction (Year 2013)-Rosewood Avenue Townhomes). However, implementation of a Construction Management Plan is recommended.

Table IV.K-7
Existing With Construction Conditions (Year 2013) –
Rosewood Avenue Townhomes
Intersection Peak Hour Levels Of Service

No.	Intersections	Peak Hour	Existing		Existing With Project		Change in Delay (sec)	Impact
			Delay (sec)	LOS	Delay (sec)	LOS		
1. [a]	Almont Drive & Rosewood Avenue	A.M	7.3	A	7.2	A	-0.1	No
		P.M.	7.4	A	7.4	A	0.0	No
2. [a]	Almont Drive & Beverly Boulevard	A.M	0.7	A	0.7	A	0.0	No
		P.M.	0.8	A	0.9	A	0.1	No
3. [a]	Robertson Boulevard & Rosewood Avenue	A.M	1.3	A	2.2	A	0.9	No
		P.M.	1.8	A	2.6	A	0.8	No
4. [b]	Robertson Boulevard & Beverly Boulevard (signalized)	A.M	45.1	D	52.4	D	7.3	No
		P.M.	32.2	C	32.5	C	0.3	No

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes:
[a] Unsignalized location analyzed with HCM Unsignalized methodology.
[b] Signalized location analyzed with HCM Signalized methodology.

ii) Construction Management Plan

As previously identified, the Project Applicant would be required to prepare a construction management plan that would identify street closures, detour plans, haul routes, and staging plans. The intent would be for the City to coordinate these construction related activities with other projects under construction in the vicinity so any conflicts would be minimized. The construction management plan shall include the following elements as appropriate:

- Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men);

- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Construction-related vehicles shall not park on surrounding public streets;
- Provisions of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Contractors shall be required to participate in a common carpool registry during all periods of contract performance to be monitored and maintained by the general contractor;
- Scheduling of construction-related deliveries, other than concrete and earthwork-related deliveries, to reduce travel during peak travel periods as identified in this study; and
- Obtaining the required permits for truck haul routes from the City of West Hollywood prior to issuance of any permit for the proposed project.

Impact K-2 **The proposed Project is anticipated to result in a net reduction of trips with a total decrease of 129 daily trips, including a net reduction of 48 trips during the morning peak hour and a net reduction of 37 trips during the afternoon peak hour. Therefore, traffic impacts would be less significant.**

iii) Impact Analysis – Intersections/Streets (Project Operation)

1) Future Without Project Traffic Projections

The Future without Project traffic projections reflect growth in traffic over existing conditions from two sources. The first source is the ambient growth in traffic, which reflects increases in traffic due to regional growth and development outside the Study Area. The second source is growth due to traffic generated by projects, which are proposed, approved, or under construction within and in the vicinity of the study area (collectively, the Related Projects).

a) Ambient Growth

Existing traffic is expected to increase as a result of regional growth and development. Based on historic trends, an ambient growth factor of 1.0% per year was used to adjust the existing traffic volumes to reflect the effects of regional growth and development by the year 2015. The total adjustment applied over the two-year period to full buildout of the Project (Year 2015) was therefore 2.0%.

b) Related Projects

In accordance with CEQA requirements, this study considered the effects of the proposed Project in relation to other developments either proposed, approved, or under construction in the study area and expected to be implemented prior to the buildout date of the proposed project. Information about Related Projects was obtained from the City of West Hollywood, City of Beverly Hills, and City of Los

Angeles in year 2013, as well as from recent published reports for other developments.[1] A summary of the related projects information is presented in Appendix D of the Traffic Impact Analysis Report.

The trips associated with these Related Projects have been accounted for in the future traffic forecasts through the following three-step process.

Trip Generation. Trip generation estimates for the Related Projects were either provided by the respective city or calculated using a combination of previous study findings and the trip generation rates contained in Trip Generation, 9th Edition (Institute of Transportation Engineers [ITE], 2012). These projections are conservative in that they do not in every case provide credit for either the existing uses to be removed or the likely use of non-motorized travel modes (mass transit, bicycling, walking, etc.)

Trip Distribution. The geographic distribution of the traffic generated by the Related Projects is dependent on several factors. These factors include the type and density of the proposed land uses, the geographic distribution of population from which the employees/residents and potential patrons of the Related Projects are drawn, and the location of these projects in relation to the surrounding street system.

Trip Assignment. The trip generation estimates for the Related Projects were assigned to the local street system using the trip distribution pattern described above. These volumes were then added to the existing traffic volumes after adjustment for ambient growth through the assumed buildout year of 2015. The trip generation estimates for the Related Projects and the resulting Future without Project intersection traffic volumes are illustrated in the Traffic Impact Analysis Report (refer to Figures 5 and 6).

2) Future Without Project Intersection Operations

This section presents the methodology and results of the intersection operations for the Future without Project conditions that are defined by the traffic volumes, intersection lane configurations, and roadways that would exist in the year 2015.

The projected Future without Project (Year 2015) intersection operating conditions for the weekday morning and afternoon peak hours are shown in Table IV.K-8 (Future Without Project Conditions (Year 2015) Intersection Peak Hour Levels of Service). As shown, three of the four study intersections are projected to operate at LOS A during both the morning and afternoon peak hours. The remaining intersection (Robertson Boulevard & Beverly Boulevard) is projected to operate at LOS E during the morning peak hour and LOS D during the afternoon peak hour.

[1] *Gibson Transportation Consulting staff contacted the Cities of West Hollywood, Beverly Hills and Los Angeles regarding related projects in the Project vicinity. The City of Los Angeles staff indicated that there were no projects within a half-mile radius of the Project Site.*

Table IV.K-8
Future Without Project Conditions (Year 2015) Intersection Peak Hour Levels of Service

No.	Intersections	Peak Hour	Existing	
			Delay (sec)	LOS
1. [a]	Almont Drive & Rosewood Avenue	A.M	7.2	A
		P.M.	7.4	A
2. [a]	Almont Drive & Beverly Boulevard	A.M	0.7	A
		P.M.	0.8	A
3. [a]	Robertson Boulevard & Rosewood Avenue	A.M	1.6	A
		P.M.	2.2	A
4. [b]	Robertson Boulevard & Beverly Boulevard (signalized)	A.M	62.4	E
		P.M.	43.9	D

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes:
[a] Unsignalized location analyzed with HCM Unsignalized methodology.
[b] Signalized location analyzed with HCM Signalized methodology.

3) *Project Traffic Volumes*

The first step of the forecasting process is trip generation, which estimates the total arriving and departing trips generated by the Project on a peak hour and daily basis by applying the appropriate vehicle trip generation equations, or rates, to the size of Project development. For the purposes of this project, trips were also generated for the existing facility at the Project Site to allow for comparison with the proposed project.

The second step of the forecasting process is trip distribution, which identifies the origins and destinations of inbound and outbound Project trips. These origins and destinations are typically based on demographics and existing/anticipated travel patterns in the study area. Localized routes of travel through the study area are developed based on existing traffic patterns and relative travel times on various corridors.

The third step of the forecasting process is traffic assignment. This involves applying the traffic generated by the Project (the trip generation) to the intersections and street segments in the study area according to the projected trip distribution patterns. These traffic volumes can then be added to existing or future background conditions to represent traffic volumes once the Project is complete.

With the forecasting process complete and Project traffic assignments developed, the impact of the proposed Project is isolated by comparing operational (i.e., LOS) conditions at the study intersections using expected future traffic volumes without and with forecast Project traffic. The need for site-specific and/or cumulative local area traffic improvements may then be evaluated and the significance of the project's impacts identified.

a) Project Trip Generation

As shown in Table IV.K-9 (Trip Generation), the proposed Project is estimated to generate 1,873 daily trips, with 53 morning peak hour trips (20 inbound, 33 outbound) and 146 afternoon peak hour trips (78 inbound, 68 outbound). The existing uses of the Project Site generate approximately 2,002 daily trips,

with 101 morning peak hour trips (89 inbound, 12 outbound) and 183 afternoon peak hour trips (61 inbound, 122 outbound). Therefore, the proposed Project is anticipated to result in a net reduction of trips with a total decrease of 129 daily trips, including a net reduction of 48 trips during the morning peak hour (net reduction of 69 inbound trips, 21 outbound trips) and a net reduction of 37 trips during the afternoon peak hour (17 inbound trips, net reduction of 54 outbound trips).

Table IV.K-9
Trip Generation

Trip Generation Rates [a]								
			AM Peak Hour			PM Peak Hour		
Land Use	Size	Daily	Inbound	Outbound	Total	Inbound	Outbound	Total
Apartment (ITE 220)	per du	6.65	20%	80%	0.51	65%	35%	0.62
Residential Condominium/Townhouse (ITE 230)	per du	5.81	17%	83%	0.44	67%	33%	0.52
General Office Building (ITE 710)	per 1,000 sf	11.03	88%	12%	1.56	17%	83%	1.49
Specialty Retail (ITE 826)	per 1,000 sf	44.32	N/A	N/A	N/A	44%	56%	2.71
Quality Restaurant (ITE 931)	per 1,000 sf	89.95	55%	45%	0.81	67%	33%	7.49
Trip Generation Estimates								
Proposed Project								
Apartment	12 du	80	1	5	6	5	2	7
Condominium	56 du	325	4	21	25	19	10	29
Townhomes	13 du	76	1	5	6	5	2	7
Office	10,562 sf	116	14	2	16	3	13	16
Retail [b]	19,875 sf	881	Nom	Nom	Nom	24	30	54
Restaurant [b]	4,394 sf	395	Nom	Nom	Nom	22	11	33
Total Project Trips		***1,873***	***20***	***33***	***53***	***78***	***68***	***146***
Existing Uses								
Office	64,502 sf	*(711)*	*(89)*	*(12)*	*(101)*	*(16)*	*(80)*	*(96)*
Retail	21,249 sf	*(942)*	*Nom*	*Nom*	*Nom*	*(26)*	*(32)*	*(58)*
Restaurant	3,879 sf	*(349)*	*Nom*	*Nom*	*Nom*	*(19)*	*(10)*	*(29)*
Less Existing Trips		***(2,002)***	***(89)***	***(12)***	***(101)***	***(61)***	***(122)***	***(183)***
Total Net New Trips		**(129)**	**(69)**	**21**	**(48)**	**17**	**(54)**	**(37)**

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes
du: dwelling units
sf: square feet
Nom.: nominal amount of trips
[a] Source: Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.
[b] The Retail and Restaurant components are assumed to not operate during the commuter morning peak hours, and therefore will generate a nominal amount of trips during the morning peak hour.

b) Project Trip Distribution

The traffic volumes of both the existing uses and the proposed Project entering and exiting the Project Site have been distributed and assigned to the local street system based on demographics and existing/anticipated travel patterns in the study area. Localized routes of travel through the study area

were developed based on existing traffic patterns and relative travel times on various corridors and the level of accessibility of the route to and from the Project Site. The Project trip distribution was developed to reflect the primary access on Beverly Boulevard and the Townhome access on Rosewood Avenue. The general distribution pattern was reviewed and approved by the City of West Hollywood.

c) Project Trip Assignment

Traffic volumes for both the existing uses and the Project were assigned to the surrounding street system based on the following general distribution pattern: approximately 20% of the traffic was assigned to/from the north, 15% was assigned to/from the east, 35% was assigned to/from the south, and 30% was assigned to/from the west. The trip distribution patterns were applied to the trip generation estimates to develop the Project-only traffic assignments. As previously mentioned, the proposed Project is expected to generate fewer trips than the existing uses; therefore, the proposed Project results in an overall net reduction of trips. The directional traffic distribution patterns, along with Project traffic utilizing driveways, and anticipated traffic volumes at the four study intersections are presented in the Traffic Impact Analysis Report (refer to Figures 7 through 13, following page 29).

4) Existing With Project Intersection Operations

The Existing with Project conditions are defined by the traffic volumes, roadways, and intersection configurations that currently exist in the year 2013. The Project-only traffic volumes, described above, were added to the Existing traffic volumes to obtain the Existing with Project peak hour traffic volumes. None of the ambient or Related Project traffic growth previously described was accounted for since this analysis looks at the existing condition of the study area as of year 2013. The Existing with Project peak hour traffic volumes are presented in the Traffic Impact Analysis Report (refer to Figure 14).

The Existing with Project intersection operating conditions for typical weekday morning and afternoon peak hours are shown in Table IV.K-10 (Existing With Project Conditions (Year 2013) Intersection Peak Hour Levels of Service). As shown, under the Existing with Project conditions, all four study intersections are projected to operate at LOS D or better during both the morning and afternoon peak hours. Detailed LOS worksheets are presented in Appendix C of the Traffic Impact Analysis Report.

Table IV.K-10
Existing With Project Conditions (Year 2013)
Intersection Peak Hour Levels Of Service

No.	Intersections	Peak Hour	Existing		Existing With Project		Change in Delay (sec)	Impact
			Delay (sec)	LOS	Delay (sec)	LOS		
1. [a]	Almont Drive & Rosewood Avenue	A.M	7.3	A	7.2	A	-0.1	No
		P.M.	7.4	A	7.4	A	0.0	No
2. [a]	Almont Drive & Beverly Boulevard	A.M	0.7	A	0.7	A	0.0	No
		P.M.	0.8	A	0.9	A	0.1	No
3. [a]	Robertson Boulevard & Rosewood Avenue	A.M	1.3	A	1.4	A	0.1	No
		P.M.	1.8	A	1.9	A	0.1	No

Table IV.K-10
Existing With Project Conditions (Year 2013)
Intersection Peak Hour Levels Of Service

No.	Intersections	Peak Hour	Existing		Existing With Project		Change in Delay (sec)	Impact
			Delay (sec)	LOS	Delay (sec)	LOS		
4. [b]	Robertson Boulevard & Beverly Boulevard (signalized)	A.M	45.1	D	42.5	D	-2.6	No
		P.M.	32.2	C	30.1	C	-2.1	No

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes:
[a] Unsignalized location analyzed with HCM Unsignalized methodology.
[b] Signalized location analyzed with HCM Signalized methodology.

The Existing with Project (Year 2013) conditions from Table IV.K-11 (Existing With Project Conditions (Year 2013) Intersection Peak Hour Levels of Service) were compared to the Existing (Year 2013) conditions from Table IV.K-5 (Existing Conditions (Year 2013) Intersection Peak Hour Levels of Service. This analysis assesses the impacts of the proposed Project as compared to the Existing (Year 2013) environment without development of the proposed project. Based on the City of West Hollywood's significance criteria, the proposed Project is not anticipated to result in any significant impacts under the Existing with Project (Year 2013) conditions. Impacts would be less than significant.

5) Future With Project (Year 2015) Intersection Operations

The Future with Project (Year 2015) conditions are defined by the traffic volumes, roadways, and intersection configurations that would exist in the year 2015 following full development of the proposed project. The project-only traffic volumes, described previously, were added to the Future without Project (Year 2015) traffic volumes to obtain the Future with Project (Year 2015) peak hour traffic volumes. The Future with Project (Year 2015) peak hour traffic volumes are presented in the Traffic Impact Analysis Report (refer to Figure 15).

The Future with Project (Year 2015) intersection operating conditions for typical weekday morning and afternoon peak hours are shown in Table IV.K-11 (Future With Project Conditions (Year 2015) Intersection Peak Hour Levels of Service). As shown, under the Future with Project (year 2015) conditions, three of the four study intersections are projected to operate at LOS A during both the morning and afternoon peak hours. The remaining intersection (Robertson Boulevard & Beverly Boulevard) is projected to operate at LOS E during the morning peak hour and LOS D during the afternoon peak hour. Detailed LOS worksheets are presented in Appendix C of the Traffic Impact Analysis Report.

Table IV.K-11
Future With Project Conditions (Year 2015)
Intersection Peak Hour Levels Of Service

No.	Intersections	Peak Hour	Future Without Project		Future With Project		Change in Delay (sec)	Impact
			Delay (sec)	LOS	Delay (sec)	LOS		
1. [a]	Almont Drive & Rosewood Avenue	A.M	7.2	A	7.2	A	0.0	No
		P.M.	7.4	A	7.4	A	0.0	No
2. [a]	Almont Drive & Beverly Boulevard	A.M	0.7	A	0.7	A	0.0	No
		P.M.	0.8	A	0.9	A	0.1	No
3. [a]	Robertson Boulevard & Rosewood Avenue	A.M	1.6	A	1.7	A	0.1	No
		P.M.	2.2	A	2.3	A	0.1	No
4. [b]	Robertson Boulevard & Beverly Boulevard (signalized)	A.M	62.4	E	59.9	E	-2.5	No
		43.9	32.2	D	41.6	D	-2.3	No

Source: Gibson Transportation Consulting, Inc., September 2013.
Notes:
[a] Unsignalized location analyzed with HCM Unsignalized methodology.
[b] Signalized location analyzed with HCM Signalized methodology.

The Future with Project (Year 2015) conditions from Table IV.K-11 (Future With Project Conditions (Year 2015) Intersection Peak Hour Levels of Service) were compared to the Future without Project (Year 2015) conditions from Table IV.K-11 (Future Without Project Conditions (Year 2015) Intersection Peak Hour Levels of Service. This analysis assesses the impacts of the proposed Project as compared to the Future (Year 2015) environment without development of the proposed project. Based on the City of West Hollywood's significance criteria, the proposed Project is not anticipated to result in any significant impacts under the Future with Project (Year 2015) conditions. Impacts would be less than significant.

6) Street Segment Analysis

a) Street Segment Traffic Volumes

Street segment ADT counts during the typical weekday were conducted on Rosewood Avenue between Almont Drive and Robertson Boulevard over a 24-hour period (from midnight to midnight) on Tuesday, September 10, 2013.

Future without Project street segment volumes were estimated by applying an ambient growth factor to the anticipated year of Project buildout and the addition of Related Project traffic to the Existing street segment traffic volumes.

Project traffic volumes were added to the Existing and Future without Project ADT volumes to estimate the Existing with Project and Future with Project ADT volumes.

ADT volumes under all conditions are presented in the Traffic Impact Analysis Report (refer to Figure 16). Summary data worksheets of the study street segment ADT volumes are presented in Appendix B of the Traffic Impact Analysis Report.

The analysis of the study street segments is provided in Tables IV.K-12 (Street Segment Analysis Existing With Project Conditions [Year 2013]) and IV.K-13 (Street Segment Analysis Future With Project Conditions [Year 2015]) for Existing with Project and Future with Project conditions, respectively. As shown, application of the City of West Hollywood significant impact criteria to the Existing with Project and Future with Project scenario indicates that the proposed Project is not anticipated to result in any significant impacts at the study street segment. Incremental increases in traffic volume (i.e., 10% or less) that do not rise to the level of significance are noted at the study street segment for each of the analysis conditions. Thus, no improvement measures are required or recommended to reduce impacts to less than significant levels.

Table IV.K-12
Street Segment Analysis
Existing With Project Conditions (Year 2013)

No.	Street Segment	Average Daily Traffic (ADT) Volumes			Increase in ADT	Impact
		Existing	Project	Existing with Project		
A	Rosewood Avenue between Almont Avenue and Robertson Boulevard	760	76	836	10%	NO

Source: Gibson Transportation Consulting, Inc., September 2013.

Notes

The City of West Hollywood deems a transportation impact at an intersection "significant" based on the following criteria:

Projected ADT with Project (Final ADT)	*Increase in ADT*
0 to 1,999	*12% or more of final ADT*
2,000 to 2,999	*10% or more of final ADT*
3,000 or 6,749	*8% or more of final ADT*
6,750 or more	*6.25% or more of final ADT*

Table IV.K-13
Street Segment Analysis
Future With Project Conditions (Year 2015)

No.	Street Segment	Average Daily Traffic (ADT) Volumes						Increase in ADT	Impact
		Existing	Ambient Growth	Related Projects	Future Without Project	Project	Future with project		
A	Rosewood Avenue between Almont Avenue and Robertson Boulevard	760	15	0	775	76	851	10%	NO

Source: Gibson Transportation Consulting, Inc., September 2013.

Notes

The City of West Hollywood deems a transportation impact at an intersection "significant" based on the following criteria:

Projected ADT with Project (Final ADT)	*Increase in ADT*
0 to 1,999	*12% or more of final ADT*
2,000 to 2,999	*10% or more of final ADT*
3,000 or 6,749	*8% or more of final ADT*
6,750 or more	*6.25% or more of final ADT*

7) *Congestion Management Program*

The CMP requires that, when a TIA is prepared for a project, traffic and transit impact analyses be conducted for select regional facilities based on the amount of Project traffic expected to use these facilities. The operating conditions analysis at all CMP arterial and freeway monitoring stations that may be impacted by the Project was performed in accordance with the TIA guidelines referenced in the *2010 Congestion Management Program for Los Angeles County* (Metro, 2010).

a) CMP Significant Traffic Impact Criteria

The CMP guidelines state that a CMP freeway analysis must be conducted if 150 or more trips attributable to the proposed development are added to a mainline freeway monitoring location in either direction during the morning or afternoon weekday peak hours. Similarly, a CMP arterial monitoring station analysis must be conducted if 50 or more peak hour Project trips are added to a CMP arterial monitoring station during the morning or afternoon weekday commuter peak hours.

A significant project-related CMP impact would be identified if the CMP facility is projected to operate at LOS F (V/C > 1.00) and if the Project traffic causes an incremental change in the V/C ratio of 0.02 or greater. The proposed development would not be considered to have a regionally significant impact, regardless of the increase in V/C ratio, if the analyzed facility is projected to operate at LOS E or better after the addition of the Project traffic.

b) CMP Freeway Analysis

Based on the Project trip generation estimates shown in Table IV.K-10 (Trip Generation), the proposed Project is expected to generate a reduction in trips of approximately -48 net new trips in the morning peak hour and -37 net new trips in the afternoon peak hour. There would be fewer than 150 afternoon peak hour trips distributed to the freeways in the study area; therefore, the proposed project's CMP freeway impacts are considered to be less than significant.

c) CMP Arterial Monitoring Station Analysis

The CMP arterial monitoring stations closest to the Project Site is the intersection of:

- Santa Monica Boulevard & Doheny Drive, approximately one-half mile northwest of the Project Site.
- Santa Monica Boulevard & La Cienega Boulevard, approximately one mile northeast of the Project Site.

Because the proposed Project is estimated to generate a net reduction in trips, which is fewer than the 50 peak trips that would trigger further analysis, the project's CMP arterial impacts are considered to be less than significant.

d) Regional Transit Impact Analysis

Section B.8.4 of the CMP provides a methodology for estimating the number of transit trips expected to result from a proposed Project based on the number of vehicle trips. This methodology assumes average vehicle occupancy (AVO) factor of 1.4 in order to estimate the number of person trips to and from the proposed Project. The CMP guidelines estimate that approximately 3.5% of total Project person trips may use public transit to travel to and from the Project Site.

As shown in Table 5 of the Traffic Study, the proposed Project is estimated to generate approximately 53 morning peak hour trips and 146 afternoon peak hour trips. Assuming an AVO of 1.4, the Project's vehicle trips result in an estimated increase of 74 person trips during the morning peak hour and 204 person trips during the afternoon peak hour. Applying the 3.5% mode split suggested in the CMP, the project would generate approximately 3 transit trips during the morning peak hour and 7 transit trips during the afternoon peak hour. Applying the same methodology to the estimated trip generation of the existing uses shown in Table 5, the existing uses generate approximately 5 transit trips during the morning peak hour and 9 transit trips during the afternoon peak hour. Thus, resulting in a net reduction of 2 transit trips during both the morning and afternoon peak hours, and therefore no significant regional transit impact is anticipated.

Threshold	*Would the project result in inadequate emergency access?*

Impact K-3 The proposed Project would not result in inadequate emergency access to the Project Site or surrounding land uses. Therefore, impacts would be less than significant.

i) Site Access and Circulation

The proposed Project includes an adaptive reuse of an existing 10-story retail/commercial office building, as well as a development of new residential uses on an existing surface parking facility fronting Rosewood Avenue. The proposed Project would provide primary vehicular access on Beverly Boulevard. The

Existing Building is currently served by two existing driveways on Beverly Boulevard that provide access to a basement garage on Level 1, a second level of structured parking on Level 3, and a surface parking lot fronting Rosewood Avenue that is accessed through the garage.

As part of the proposed project, the Existing Building's driveways would be consolidated into one driveway that would provide access to the subterranean parking area. Parking would be valet-assisted and served by parking attendants who would staff the garages 24 hours a day, seven days a week, to minimize traffic queuing on Beverly Boulevard. The parking garage would have control gates and garage doors to provide extra security. The proposed Townhomes would have direct access to individual garages from driveways along Rosewood Avenue. The proposed Project does not propose any permanent road closures, lane reductions, or other measures that may adversely affect emergency access in the Project vicinity.

Both the Los Angeles Sheriffs Department and Los Angeles County Fire Department were consulted about the proposed project's impacts on public safety. Neither agency indicated that emergency response would be impaired by the proposed project.[2] Therefore, impacts would be less than significant.

Threshold	*Would the project result in inadequate parking capacity?*

Impact K-4 **With a valet assist program in place, the projected peak parking demand for the proposed Project (247 spaces) results in a surplus of 10 parking spaces when compared to the projected parking supply of 257 parking spaces. Impacts would be less than significant.**

i) Parking Analysis

1) Parking Supply

As proposed, the Project would provide approximately 194 striped parking spaces in an on-site parking structure. The parking structure can accommodate up to 50 additional vehicles when valet-assist is utilized, for a total supply of 244 spaces. Additionally, each of the 13 townhomes will have a private one-car garage capable of storing one vehicle. The townhome driveways will each accommodate parking for one additional vehicle, although these spaces are not counted in the parking supply totals. In total, the Project will provide 257 parking spaces including valet assist and townhome parking spaces. If valet assist is not utilized, the Project will provide a total of 207 parking spaces.

2) Code Requirements

The WHMC has identified the off-street parking requirements of various land uses; in particular, Section 19.28.040 details the required off-street parking ratio for all developments proposed within the City. The following parking rates are indicated in Table 3-6 of the WHMC:

- Duplexes, multi-family dwellings, condominiums, townhouses
    - One bedroom or studio greater than 500 sf – 1.5 spaces per unit

[2] *Email correspondence from Loretta Bagwell, Planning Analyst, Los Angeles County Fire Department, August 20, 2013; and Email Correspondence with Sergeant Brian J. Lutz, Operations Sergeant, Los Angeles County Sherriff's Department, dated September 11, 2013.*

- Two to Three bedrooms – 2 spaces per unit
- Four or more bedrooms – 3 spaces per unit
- Guests – 1 space per 4 units

- Non-Residential Land Uses
  - General Retail Stores – 3.5 spaces per 1,000 sf
  - Office – 3.5 spaces per 1,000 sf for the first 25,000 sf
  - Restaurant – 9 spaces per 1,000 sf

These parking rates were applied to the proposed floor area of the proposed Project to determine the required amount of off-street parking stalls.

The proposed Project consists of the following components:

- Residential
  - Studio/1-bedroom dwelling unit – 26 units
  - 2-3 bedroom dwelling unit – 55 units
- Commercial
  - General Retail – 19,875 sf
  - Office – 10,562 sf
  - Restaurant – 4,394 sf

The aforementioned off-street parking ratios were applied to these components in order to determine the WHMC off-street parking requirement for the proposed project. As detailed in Table IV.K-14 (WHMC Project (Section 19.28.040) Parking Requirements), the residential portion of the proposed Project is required to provide a total of 169 spaces, including 149 residential spaces and 20 guest parking spaces, and the commercial component is required to provide 147 spaces, including 70 retail spaces, 37 office spaces, and 40 restaurant spaces.

Table IV.K-14
WHMC Project (Section 19.28.040) Parking Requirements

Land Use	Off-Street Parking Requirements	
	Parking Code	**Spaces**
Residential- Multi-Family		
26 1 Bedroom	1.5 space/unit	39
55 2 – 3 Bedrooms	2 spaces/unit	110
81 Guest spaces	0.25 space/unit	20
	Subtotal	*169*
Commercial		
19,875 sf General Retail	3.5 space/1,000 sf	70
10,562 sf Office	3.5 space/1,000 sf	37
4,394 sf Restaurant	9 space/1,000 sf	40
	Subtotal	*147*
	Total Required Spaces	***316***

Table IV.K-14
WHMC Project (Section 19.28.040) Parking Requirements

Land Use	Off-Street Parking Requirements	
	Parking Code	**Spaces**
	Provided Spaces	***257***
	Surplus (Deficiency)	**(59)**

Source: Gibson Transportation Consulting, Inc., September 2013.
Source: WHMC Section 19.28.040, Table 3-6 City of West Hollywood, November 2013., .
[1]Includes 50 additional spaces in garage gained with valet assist..

The total off-street parking requirement for the proposed project, as determined by the WHMC, is 316 parking spaces. This parking requirement, when compared to the proposed parking supply of 257 on-site parking spaces with a valet assist program, would not be satisfied by the proposed parking supply. As detailed in Table IV.K-15 (Parking Code Analysis), a deficit of 59 spaces is indicated.

The parking requirements for residential uses that are eligible for a density bonus are set forth in Government Code §65915(p) and WHMC §19.22.050(F). The proposed Project has designated 11 percent of the total units for Very Low Income households, which enables the Project to apply the affordable housing parking requirements. As shown in Table IV.K-15 (WHMC (Section 19.330.050(F) Parking Requirements), the Project's residential component would be required to provide 136 spaces.[3]

Table IV.K-15
WHMC Project (Section 19.330.050(F)) Parking Requirements

Land Use	Off-Street Parking Requirements	
	Parking Code	**Spaces**
WHMC Section 19.22.050(F)		
Residential- Multi-Family		
26 1 Bedroom	1 space/unit	26
55 2 – 3 Bedrooms	2 spaces/unit	110
	Subtotal	*136*
WHMC Section 19.28.040		
Commercial		
19,875 sf General Retail	3.5 space/1,000 sf	70
10,562 sf Office	3.5 space/1,000 sf	37
4,394 sf Restaurant	9 space/1,000 sf	40
	Subtotal	*147*
	Total Required Spaces	***283***
	Provided Spaces	***257***
	Surplus (Deficiency)	**(26)**

Source: WHMC Section 19.28.040, Table 3-6, City of West Hollywood; and WHMC Section 19.22.050(F), November 2013

[3] *WHMC §19.22.050(F) does not require guest parking spaces.*

3) *Code Parking Summary*

As detailed in the analyses above, the analysis indicates a parking deficit of 26 spaces and the proposed parking would not be able to satisfy the WHMC off-street parking requirements as currently proposed.

It should be noted that the parking requirements are not necessarily reflective of the parking demands experienced with a development as a whole. Code parking requirements represent the sum of the peak parking requirements for each individual land use and do not take into account the shared parking concept (i.e., the hourly and/or day of the week variations in parking demand generated by individual land uses), nor for the synergy between uses. The code analysis assumes that the demand for each land use peaks at the same time, which may lead to the provision of more parking than is needed at any given time (i.e., overestimation of required parking). Accordingly, a shared parking analysis was performed to determine the appropriate number of parking spaces to support the proposed project.

ii) Shared Parking Demand Analysis

Gibson Transportation Consulting conducted a shared parking demand analysis of the proposed Project to help determine the appropriate amount of parking needed to adequately serve the peak parking demand generated by the multiple proposed land uses of the proposed Project. Since the proposed Project would consist of a number of different land uses on the Site that would share the parking supply, a shared parking agreement would be incorporated into the Specific Plan for the Project Site.

The parking analysis was performed using the model in Shared Parking, 2nd Edition (Urban Land Institute [ULI] and the International Council of Shopping Centers [ICSC], 2005), which describes shared parking as follows:

> *Shared parking is defined as parking space that can be used to serve two or more individual land uses without conflict or encroachment. The opportunity to implement shared parking is the result of two conditions:*
>
> - *Variations in the peak accumulation of parked vehicles as the result of different activity patterns of adjacent or nearby land uses (by hour, by day, by season)*
> - *Relationships among land use activities that result in people's attraction to two or more land uses on a single auto trip to a given area or development*

Most zoning codes provide peak parking ratios for individual land uses. While this appropriately recognizes that separate land uses generate different parking demands on an individual basis, it does not reflect the fact that the combined peak parking demand, when a mixture of land uses shares the same parking supply, can be substantially less than the sum of the individual demands. For example, retail uses peak in the early to mid-afternoon while restaurant uses peak in the lunchtime and/or evening hours (depending on the type of restaurant).

1) Shared Parking Demand Analysis

The shared parking model utilizes a series of assumptions, in addition to the base ULI/ICSC data, to develop the parking demand model.

Parking Ratio. The ULI/ICSC methodology requires that each land use select parking ratios; that is, the parking ratio for each land use if used independently. The base parking demand ratios were developed through an extensive research and documentation effort by ULI/ICSC; these base rates reflect a national

average. For the purposes of this analysis, the base rates were modified based on the amount of code-required parking for each land use with the exception of weekend rates for the office portion of the development. The standard ULI/ICSC rate of 0.38 spaces per 1,000 sf of development was utilized to more accurately predict weekend office parking demand.

Time of Day. The time of day factor is one of the key assumptions of the shared parking model. This factor reveals the hourly parking pattern of the analyzed land use; essentially, the peak demands are indicated by this factor. The research efforts of ULI/ICSC have yielded a comprehensive data set time of day factors for multiple land uses. As the demand for each land use fluctuates over the course of the day, the ability to implement shared parking emerges. Minor adjustments were made to the base time of day factors for the restaurant and yoga studio. These adjustments were made based on a survey of local characteristics for similar land uses.

Weekday vs. Weekend. Each shared parking analysis measured the parking demand on a weekday as well as on a Saturday. Research has indicated that a source for variation in parking demand can be traced to the difference between weekday and weekend demand.

Seasonal Variation. The shared parking analysis in this report was based on the peak month of the year. The total parking demand of the Project was compared over the course of the year; the peak month's demand is reported.

Mode Split and Captive Market. One factor that affects the overall parking demand at a particular development is the number of visitors and employees that arrive by automobile. It is common that mixed-use projects and districts have patrons/visitors captured within the site itself based on the mixed-use nature of the Project. The mode split accounts for the number of visitors and employees that do not arrive by automobile (that use transit, walk, and other means) or are internally captured. The Project is located in proximity to an existing and future transit corridor; existing express and local bus service is available at the intersection of Beverly Boulevard & Robertson Boulevard, approximately one-quarter mile walking distance to the east. In addition, the Project is surrounded by residential and office developments that are not part of the Project. Due to these factors, the Project may experience higher volumes of walk-in traffic and public transit usage than the base model assumes; therefore, adjustments were made to the mode split for each land use.

Approximately 10% of retail and restaurant customers were assumed to arrive by a means other than a single occupant vehicle (transit, walk, bike, etc.), while an additional 10% were assumed to be internally captured within the development. This represents 20% for transit usage, internal capture and walk-in. The remaining 80% of customers to the retail and restaurant portion were assumed to arrive by single passenger vehicle. Approximately 20% of retail and restaurant employees were assumed to arrive by a means other than a single occupant vehicle; the remaining 80% were assumed to arrive by single passenger vehicle. The retail and restaurant portions of this development are small community-serving facilities as opposed to destinations that will draw consumers from a wide area of the region.

The mode split for employees of the office was reduced to 90%, or 10% transit usage.

Auto Occupancy. The Project's shared parking analysis used the national averages for auto occupancy, i.e., the typical number of passengers in each vehicle parking at the site, for all land uses. No changes were made to the ULI/ICSC average rates.

Reserved Parking. Typically, the residential portions of mixed-use projects offer at least one reserved space per dwelling unit. The remaining spaces are generally shared within the pool of unreserved parking for the rest of the project; guest parking spaces are commonly included within this shared pool

of residential parking. For the purposes of this analysis, one parking space is assumed to be reserved per residential unit.

The shared parking model applies these assumptions/inputs and considers each land use separately, in order to identify the peak parking demands of each Project component (i.e., restaurant was separated from retail). A shared parking model was prepared for the two proposed land use variations.

2) Project Shared Parking Demand

For each land use, the base parking demand ratio for a weekday and a Saturday, the mode adjustment (mode split), the non-captive ratio (internal capture), and the peak hour and peak month adjustment ratios (the shared parking model calculates the peak demand to occur at 7:00 PM on a December weekday, the busiest hour of the year for parking demand). A detail of the input assumptions and summary of the proposed project's shared parking analysis are presented in the Traffic Impact Analysis Report (refer to Tables 14 and 15).

By component, the model estimates that the busiest hour of the year would experience a combined residential parking demand of 168 spaces, retail parking demand of 45 spaces, office parking demand of three spaces, and a restaurant parking demand of 31 spaces. The peak parking demand totals 247 spaces. Compared to the proposed parking supply of 257 parking spaces with a valet assist program, the projected demand can be accommodated and there is a surplus of 10 parking spaces. The peak hour parking demand occurring during each month of the year for the weekday and weekend are presented in the Traffic Impact Analysis Report (refer to Figures 17 and 18).

On weekdays in December, parking demand will exceed the on-site without valet assist supply of 207 parking spaces from approximately 9:00 AM to 11:00 PM. On weekends in December parking demand will exceed the on-site without valet assist supply of 207 parking spaces from 1:00 PM to 2:00 PM and again from approximately 5:00 PM to 11:00 PM. During these hours, the proposed Project must operate a valet assist stack parking program to provide at least 247 spaces on weekdays and 241 on weekends in December. The hourly parking demand pattern for weekdays and weekends during the peak month of December for the proposed Project are presented in the Traffic Impact Analysis Report (refer to Figure 19).

Some form of valet assist program that provides additional parking spaces will be required every day of the year, but will generally be required from 11:00 AM to 11:00 PM on weekdays and from 6:00 PM to 11:00 PM on weekends. A summary of when the valet assist program will be needed throughout the year based on peak parking demands are presented in the Traffic Impact Analysis Report (refer to Table 16).

3) Shared Parking Summary

As illustrated by the shared parking analysis, with a valet assist program in place, the projected peak parking demand for the proposed Project (247 spaces) results in a surplus of 10 parking spaces when compared to the projected parking supply of 257 parking spaces. A reduction from the WHMC (Sections 19.28.040 and 19.22.050(F)) for project parking is supported by the shared parking analysis. Therefore, the proposed Project parking supply would be sufficient to meet project demands with a shared parking agreement for the Project Site.

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative transportation and traffic analysis is the roadway system near the Project Site, and the four study intersections and one roadway segment identified and analyzed in this Transportation and Traffic section. These intersections and roadway segments were evaluated in the previous discussion.

A. Construction Traffic

The related projects are listed in Table III-1, Related Projects List, in Section III, Environmental Setting, of this EIR. As shown in Figure III-1, the nearest related projects are located 1,848 feet west (Related Project No. 12). It is possible that Related Project No. 12 and the proposed Project may be under construction at the same time. Typical construction related effects are lane closures that could inhibit traffic flow and cause undue traffic congestion. The Project does not propose any temporary lane or sidewalk closures associated with construction. As such, the proposed project, in conjunction with the related projects (and Related Project No. 12 in particular), would not have a cumulatively considerable construction impact on streets and roadways serving the Project Site, and impacts would be less than significant.

B. Operational Traffic

The growth in traffic due to the combined effects of continuing development, intensification of development, and related projects in conjunction with the proposed Project is incorporated into the traffic impacts analysis above. The analysis shows that traffic generated by the proposed project, in combination with the related projects, would not result in significant cumulative impacts. Impacts would be less than significant.

5. MITIGATION MEASURES

The following mitigation measure is recommended to improve the temporary impact at the intersection of Robertson Boulevard & Beverly Boulevard during construction; however, the impact would be mitigated to an acceptable level of service, resulting in a less than significant impact:

IV.K-1 A detailed Construction Management Plan, including street closure information, detour plans, haul routes, and staging plans would be prepared and submitted to the City. The construction traffic management plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

- Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men);
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Construction-related vehicles shall not park on surrounding public streets;
- Provisions of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;

- Contractors shall be required to participate in a common carpool registry during all periods of contract performance to be monitored and maintained by the general contractor;
- Scheduling of construction-related deliveries, other than concrete and earthwork-related deliveries, to reduce travel during peak travel periods as identified in this study; and
- Obtaining the required permits for truck haul routes from the City of West Hollywood prior to issuance of any permit for the proposed project.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed Project is anticipated to result in a net reduction of trips with a total decrease of 129 daily trips, including a net reduction of 48 trips during the morning peak hour and a net reduction of 37 trips during the afternoon peak hour.

The traffic impact analysis includes four study intersections. All four study intersections under Existing (Year 2013) and three of the four study intersections under Future without Project (Year 2015) conditions operate at LOS D or better during both the morning and afternoon peak hours. The intersection of Robertson Boulevard & Beverly Boulevard operates at LOS E during the morning peak hours under Future without Project (Year 2015) conditions.

The proposed Project traffic was added to the existing circulation system to develop the Existing with Project traffic condition. Based on the City of West Hollywood significance criteria, impacts were determined to be less than significant under Existing with Project (Year 2013) conditions.

Future traffic conditions in the study area were forecast for the Project buildout year of 2015. Based on the City of West Hollywood significance criteria, impacts were determined to be less than significant under Future with Project (Year 2015) conditions.

A street segment analysis was conducted at Rosewood Avenue between Almont Drive and Robertson Boulevard. The proposed Project is not anticipated to result in a significant impact at the study street segment under either Existing (Year 2013) or Future (Year 2015) conditions.

Project construction for the Existing Building could result in a temporary traffic impact at the intersection of Robertson Boulevard & Beverly Boulevard during the morning peak hour. To mitigate the potential temporary traffic impact, a construction mitigation plan would be implemented. Though Project construction on Rosewood Avenue would not result in a temporary traffic impact at any of the study intersections, a construction management plan has been recommended.

IV. ENVIRONMENTAL IMPACT ANALYSIS
L. UTILITIES
1. WASTEWATER

1. INTRODUCTION

This Subsection describes the potential impacts of the proposed Project on the wastewater infrastructure serving the Project Site. This section utilizes information from the following resources: *Water Quality Control Plan: Los Angeles Region*; the *City of West Hollywood General Plan 2035, Infrastructure, Resources, and Conservation Element*, adopted on September 6, 2011; City of West Hollywood Municipal Code Section 15.08.060; *Sewer Capacity Study for the Proposed Development at 8899 Beverly Boulevard (Rosewood Ave and Beverly Blvd Sewer),* DCI Engineers, November 26, 2013;a written correspondence from Adriana Raza, Customer Service Specialist, Facilities Planning Department, from the County Sanitation Districts; and an email correspondence from Sharon Perstein, City Engineer, City of West Hollywood, August 30, 2013.

2. ENVIRONMENTAL SETTING

A. Existing Wastewater Infrastructure

i) Wastewater Treatment Facilities

The Los Angeles County Sanitation District (LACSD) Number 4 provides sewer trunk infrastructure and wastewater treatment services to the City of West Hollywood, and more specifically, the Project area. The Hyperion Treatment Plant (HTP) provides treatment capacity for all wastewater flows for the City of Los Angeles and 29 contracting cities (including the Cities of West Hollywood, Beverly Hills, Santa Monica and Culver City to name a few).[1] Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 362 mgd, and has capacity to treat 450 mgd.[2] This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

Wastewater conveyed into the HTP initially passes through screens and basins to remove coarse debris and grit. Primary treatment consisting of a physical separation process is then conducted where solids are allowed to either settle to the bottom of tanks or float on the surface. These solids (called sludge) are collected, treated, and recycled. The liquid portion that remains (called primary effluent) is treated through a secondary treatment using a natural biological process. Living microorganisms are added to the primary effluent to consume organic constituents. These microorganisms are later harvested and removed as sludge. After secondary treatment is completed, the treated effluent is conveyed approximately five miles offshore at a depth of approximately 200 feet. As this treated effluent enters the ocean environment, it is diluted at a ratio of over 80 parts seawater to one part treated effluent at

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[1] *Sherrill Bond, Engineer, FOG (Fats, Oils and Grease) Program, Hyperion Treatment Plant, City of Los Angeles, telephone communication, December 6, 2013.*

[2] *Ibid and City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website:www.lacitysan.org/wastewater/factsfigures.htm.*

the discharge point. Monitoring occurs throughout the treatment process and after the treated effluent is discharged into the marine environment.

The sludge that is collected at the plant is also treated. The sludge is anaerobically digested to reduce its volume and to produce reusable methane gas for energy use. Excess water that remains in the digested sludge is separated by centrifuge type dewatering equipment. The resultant material is reused in a variety of beneficial methods. At present, 100 percent of the sludge is beneficially reused, either as an agricultural soil amendment, compost, fuel source in an energy recovery system, or a chemically treated soil substitute for landfill cover. The City of Los Angeles Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to the HTP to 5 mgd. This is applicable to all municipalities utilizing the HTP.

ii) Wastewater Capacity

The Project Site is located in an area that is served by existing wastewater infrastructure. The City of West Hollywood Public Works Department operates and maintains all the local sewage lines in the City, which consists of 39 miles of gravity piping and includes 850 pipe reaches and manholes.[3] From there, the LACSD operates and maintains the major trunk lines. The Project Site is currently serviced with an existing 8-inch sewer mainline in Rosewood Avenue and a 10-inch sewer mainline in Beverly Boulevard, which both flow in an easterly direction.[4] Currently, there are no sewer deficiencies within the City of West Hollywood owned sewer lines in Rosewood Avenue and Beverly Boulevard.[5]

These sewer lines empty into the Sherman Relief Trunk Sewer, located in San Vicente Boulevard at Beverly Boulevard, which ultimately conveys wastewater in the City of West Hollywood to the HTP. This 21-inch diameter trunk line has a design capacity of 6.8 million gallons per day (gpd) and flows at a peak of 5.2 million gpd.[6]

The Project Site is currently developed with an existing 89,630 sf office building, containing an approximately 3,879 square foot restaurant (125 seats) in the basement, approximately 21,249 sf of retail uses on Level 2, plus a total of approximately 64,502 sf of office space on Levels 4 through 9. As such, the Project Site generates wastewater in association with commercial activities. As shown on Table IV.L.1-1 (Existing Average Daily Wastewater Generation), existing uses on the Project Site generate approximately 15,125 gpd of wastewater. Figure IV.L-1, Wastewater Line Location Map, illustrates the location of the existing wastewater collection system in the immediate Project Site area.

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[3] *City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, adopted on September 6, 2011.*

[4] *Email correspondence with Sharon Perlstein, P.E., City Engineer, City of West Hollywood, August 30, 2013.*

[5] *Ibid.*

[6] *Letter correspondence with Adriana Raza, Customer Service Specialist, Los Angeles County Sanitation Districts, July 25, 2013.*

Source: Olson Kundig Architects, May 23, 2013 and EcoTierra Consulting, September 2013.

EcoTierra consulting

Figure IV.L-1
Wastewater Line Location Map

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Table IV.L.1-1
Existing Average Daily Wastewater Generation

Land Use	Size	Average Daily Flow by Type[a]	Average Daily Usage by Type (gpd)
Office	64,502 sf	150 gallons/1,000 sf	9,675.00 gpd
Retail	21,249 sf	80 gallons/1,000 sf	1,700.00 gpd
Restaurant	125 seats	30 gallons/seat	3,750.00 gpd
Total Existing Wastewater Generation			**15,125 gpd**

Notes: sf = square feet; gpd = gallons per day
[a] *Based on County of Los Angeles Sanitation District No. 4, User Categories and Mean Loadings List Source (table): EcoTierra Consulting, November 2013.*

A. Regulatory Setting

i) Los Angeles Regional Water Quality Control Board

The California State Water Resources Control Board (SWRCB) and its regional water board, the Los Angeles Regional Water Quality Control Board (LARWQCB), is the primary State agency responsible for implementing the CWA and the State's Porter-Cologne Water Quality Act of 1969 within State waters.[7] The Porter Cologne Water Quality Act authorized the SWRCB to implement the federal Clean Water Act, which divided the state into nine RWQCB areas. The RWQCB is also responsible for water quality regulation through its work in preparing and adopting the California Ocean Plan. Local agencies also have responsibility for managing wastewater discharges. Each RWQCB must formulate and adopt a water quality control plan for its region. The LARWQCB has adopted and periodically amends a water quality control plan titled *Water Quality Control Plan: Los Angeles Region* (the "LARWQCB Basin Plan"). The LARWQCB Basin Plan must conform to the policies set forth in the Porter-Cologne Act as established by the State Water Quality Control Board in its state water policy. The Porter-Cologne Act also provides the RWQCB with authority to include within its Basin Plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The LARWQCB region includes Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line, as well as drainage of five coastal islands (Anacapa, San Nicolas, Santa Barbara, Santa Catalina, and San Clemente), including the Project Site, and makes critical water quality decisions, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement measures.[8]

ii) City of Los Angeles Integrated Resources Plan

The City of Los Angeles adopted an Integrated Resources Plan (IRP) in 2006, which incorporated a new City-prepared Wastewater Facilities Plan (WFP) that includes the HTP through 2020. The IRP serves to update the information prepared in the original 1991 WFP, while considering the City's recycled water and urban runoff system needs. Specifically, the IRP was developed to accommodate the projected increase in wastewater flow over the next 20 years, while maximizing the beneficial reuse of recycled water and urban runoff and as a result, optimizing the use of the City's existing facilities and water

[7] *California* Water Code*, (1969, as amended), Porter-Cologne Water Quality Control Act.*

[8] *Water Quality Control Plan: Los Angeles Region, June 13, 1994.*

resources.[9] The adopted IRP contains recommendations that would be achieved through a series of projects and policy direction to staff.

In June 2012, the City of Los Angles, Bureau of Sanitation adopted a IRP 5-Year Review document. Since 2006, the Bureau of Sanitation, Bureau of Engineering, the Department of Water and Power and other City departments, have been working on implementing the recommended IRP projects and policies. They have held annual meetings with the IRP Stakeholders to share progress, and have also prepared annual reports to City Council. The City has made progress on many of the IRP recommendations, including implementing wastewater collection and storage projects, implementing conservation and recycled water projects to name a few. For the HTP (that serves the City of West Hollywood), the information below was provided in the 2012 IRP 5-Year Review document.

New Permit Requirements[10]

On November 22, 2010, the Los Angeles Regional Water Quality Control Board (RWQCB) and U.S. EPA reissued the federal NPDES permit for the Hyperion Treatment Plant, which became effective on December 24, 2010. There are no changes from the previous permit other than the inclusion of monitoring requirements for Constituents of Emerging Concern (CES).

IRP – Project Number 4[11]

Construct solids handling and truck loading facility at the Hyperion Treatment Plant.

During the development of the 2006 IRP, it was assumed that there would be an increase of wastewater flow to the treatment plants and therefore an increase in biosolids production at HTP. The project as it was originally conceptualized would incorporate centrifuge dewatering into the design of the new Truck Loading Facility. Due to the continuation of biosolids hauling to Kern County and the fact that biosolids production did not increase, a decision was made by the Bureaus of Sanitation and Engineering to delay the project until the need is met. In the interim, upgrades to the truck loading facility and centrifuges will be made to ensure that these processes are functioning adequately. The project is being deferred to beyond 2020 planning window of the IRP.

IRP Trigger Project Number 4[12]

Design and construction of secondary clarifiers at HTP to provide operational performance at 450 mgd.

The existing 36 secondary clarifiers at Hyperion are performing below their rated capacity of 450 mgd. Staff is currently investigating ways to optimize the existing secondary clarifiers to get them operating up to the 450 mgd. If these options are prove to be unsuccessful, then new secondary clarifiers will be needed to provide operational performance at 450 mgd.

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[9] *City of Los Angeles Integrated Resources Plan, Facilities Plan Review, Wastewater Management Review, p.1-5, June 2012; and City of Los Angeles Integrated Resources Facilities Plan, Final Environmental Impact Report, September 2005, Executive Summary, website: http://www/lacitysan.org/irp/finaleir.htm.*

[10] *City of Los Angeles Integrated Resources Plan, Facilities Plan Review, Wastewater Management Review, p.1-5, June 2012.*

[11] *Ibid, p. I-19.*

[12] *Ibid, p. I-24.*

iii) West Hollywood General Plan

The City of West Hollywood has adopted a Infrastructure, Resources, and Conservation Element to its General Plan. The Element includes goals and policies related to water conservation. Listed below are the policies relevant to the proposed Project:[13]

IRC-3: Reduce water use and ensure a long-term water supply.

***IRC-3.4*:** Educate the public regarding water conservation, greywater use, and water storage and capture strategies.

IRC-8: Provide a wastewater system that protects the health, safety, ecology, and welfare of the community.

***IRC-8.2*:** Require development projects to pay for their share of wastewater system improvements necessitated by that development.

***IRC-8.3*:** Require development projects with a net increase of sewage flow equivalent of 10 dwelling units to prepare a sewer capacity analysis to demonstrate available capacity.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

a) Exceed wastewater treatment requirements by the applicable Regional Water Quality Control Board; or

b) Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it doesn't have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

i) Sewer Design Capacity Study

Based on the criteria set forth by the City of West Hollywood, the sewer capacity analysis was conducted on the design of the sewer pipes for peak flow. For existing sewer conveyances with diameters smaller than 15 inches, the pipes shall be designed to flow at a maximum of 50 percent capacity. For sewer lines with a diameter greater than 15 inches, the pipe design shall be limited to 75 percent of capacity. Based on the City of West Hollywood Standards, the Manning's Roughness Coefficient of n=0.013 was utilized in the analysis. In order to account for the Peak Flow in the sewer lines, a peaking factor of 2.5 was allotted to the average flow for the two conveyances, each of which are less than 15 inches in diameter.

[13] *City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, September 6, 2011.*

ii) Methodology

The environmental impacts of the proposed Project with respect to wastewater are determined based on the proposed increase in wastewater generation and the capacity of existing and proposed wastewater infrastructure. The existing sewer capacity and wastewater generation is compared to the proposed Project's wastewater generation and future sewer capacity, including improvements associated with the proposed Project. Wastewater generation is estimated based on rates provided by the County of Los Angeles Sanitation District.

For the Sewer Design Capacity Study, data was obtained regarding the current condition and flows in each of the sewer lines serving the Project Site. The information was collected and analyzed to produce average flows through the lines, average depth, and average velocity in the sewer system. The Los Angeles County Sanitation District's Mean Loading List was utilized to determine an approximation for the proposed sewer loading from the new development. The maximum design capacity of the sewer was calculated using a factor of 0.5 to ensure that the pipeline run at 50 percent of capacity. Proposed flow was then added to the existing average sewer flow at each of the two pipelines (Beverly Boulevard and Rosewood Avenue sewer lines) and a peaking factor was applied to account for the maximum demand into the system.

B. Project Impacts

Threshold	*Would the proposed project exceed wastewater treatment requirements by the applicable Regional Water Quality Control Board?*

Impact L.1-1: Project site Wastewater from the implementation of the proposed Project would be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB. Therefore, impacts would be less than significant.

This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the Project area. As previously discussed, the Project site is located within the service area of the HTP, which has been designed to treat up to 450 mgd to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB's discharge policies for Santa Monica Bay. Furthermore, the HTP is a public facility, and, therefore, is subject to the state's wastewater treatment requirements. As such, wastewater from the implementation of the proposed Project at the project site would be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB. Therefore, impacts would be less than significant.

Threshold	*Would the proposed project require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Impact L.1-2: The proposed Project would generate net wastewater from the project site. However, the wastewater treatment facilities can accommodate additional sewage flow. As a result, project implementation would not result in the need for new or additional wastewater treatment facilities. Therefore, Project impacts to wastewater treatment capacity would be less than significant.

i) Wastewater Generation

1) Construction

During the Project's construction phase, if temporary dewatering is required to build the subterranean parking garage, the dewatering flows would be discharged to either the local storm drain or the sanitary sewer. If discharged to the local storm drain, the Project would be in compliance with the Construction General Permit, which requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The primary objective of the SWPPP is to identify, construct, implement, and maintain Best Management Practices (BMPs) to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site during construction. If discharged to the sanitary sewer, as part of the construction permit process and as a project design feature, the Applicant would confirm with the City that at the time of Project construction, the existing capacity of the sewer lines serving the site are still sufficient to accommodate the dewatering flows and would implement any upgrades that are necessary.[14] In addition, during construction, the Existing Building on the Project Site would not be generating wastewater. Therefore, Project impacts related to wastewater service during the construction phase would be less than significant.

2) Operation

Implementation of the Project would increase the average and peak daily wastewater flows from the Project Site. As shown in Table IV.L.1-2 (Proposed Project Wastewater Generation), the proposed Project is estimated to generate a net increase total of 5,735 gpd.

ii) Wastewater Treatment Facilities

As previously discussed, the design capacity of the HTP is 450 million gpd and the HTP's current average wastewater flow is 362 million gpd. Therefore, the HTP has a remaining capacity of approximately 88 million gpd. The sewage generation of the proposed Project would be well within the design capacity of the HTP. In addition, the HTP would have sufficient treatment capacity to accommodate the proposed Project's average daily total scenario wastewater generation of 0.0213 million gpd (net increase represents 0.00673 million gpd), which would represent approximately 0.000242 percent of the

[14] *A 7 day sewer flow monitoring study was conducted by ADS Environmental Services (see Appendix J) to analyze the existing flow capacity of the sewer lines serving the Project Site. Based on the results shown in Table IV.L-3, the existing sewer lines serving the Project Site are adequately sized to handle the peak flows generated by the proposed project. Thus, the existing sewer lines have the capacity to accommodate the Project.*

remaining capacity (and the net increase represents 0.0000764 percent of remaining capacity). Since the proposed Project would not exceed the capacity of the HTP, it would not require the construction of additional treatment facilities. Therefore, Project impacts to wastewater treatment capacity would be less than significant.

Table IV.L.1-2
Proposed Project Wastewater Generation

Land Use	Size	Generation Rate[a]	Total (gpd)
Outflow to Beverly Boulevard			
Commercial			
Office	10,562 sf	80 gallons/1,000 sf	1,584.30 gpd
Retail	19,875 sf	150 gallons/1,000 sf	1,590.00 gpd
Restaurant	125 seats	30 gallons/seat	3,750.00gpd
Auto Parking	14,009 sf	20 gallons/1,000 sf	280.18 gpd
		Subtotal	*7,204.48 gpd*
Condominiums			
1 Bedroom	18 units	120 gallons/units	2,160.00 gpd
2 Bedroom	22 units	160 gallons/units	3,520.00 gpd
3 Bedroom	16 units	200 gallons/units	3,200.00 gpd
		Subtotal	*8,880.00 gpd*
Apartments			
Studio	1 unit	80 gallons/units	80.00 gpd
1 Bedroom	7 units	120 gallons/units	840.00 gpd
		Subtotal	*920.00 gpd*
Outflow to Rosewood Avenue			
Townhomes			
2 Bedroom	2 units	180 gallons/units	360.00 gpd
3 Bedroom	11 units	230 gallons/units	2,530.00 gpd
		Subtotal	*2,890.00 gpd*
Apartments			
2 Bedroom	4 units	160 gallons/units	640.00 gpd
		Subtotal	*640.00 gpd*
Parking			
Auto Parking	39,638 sf	20 gallons/1,000 sf	792.76 gpd
		Subtotal	*796.76 gpd*
		Total Outflow to Rosewood Avenue	***4,322.76 gpd***
		Subtotal Proposed Wastewater Generation	*21,327.24 gpd*
		Less Existing Wastewater Generation	*(15,254.00) gpd*
		Total Net Wastewater Generation	**6,073.24 gpd**

sf=square feet, gpd = gallons per day
[a] *Based on County of Los Angeles Sanitation District No.4, User Categories and Mean Loadings List.*
Source: Sewer Capacity Study for the Proposed 8899 Beverly Boulevard (Rosewood Ave and Beverly Blvd (Rosewood Ave and Beverly Blvd Sewer), DCI Engineers, November 26, 2013

Threshold	*Would the proposed project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it doesn't have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Impact L.1-3: The proposed Project would result in a determination by the wastewater treatment provider that serves the project site that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Project impacts would be less than significant.

As discussed previously, the Project Site is currently serviced with an existing 8-inch sewer mainline in Rosewood Avenue and a 10-inch sewer mainline in Beverly Boulevard.[15] The City has stated that it is not currently aware of any existing deficiencies with the sewer lines in Rosewood Avenue and Beverly Boulevard.[16] The existing uses consume approximately 15,254.00 gpd (as shown in Table IV.L-2, above). The Project is expected to use approximately 21,327 gpd, resulting in a net increase of 6,073 gpd. As outlined in the General Plan, the City requires developers to pay a wastewater mitigation fee to offset any net increases in wastewater flow from new construction. In addition, the City has an annual assessment for a sewer service charge, which covers the ongoing operation and maintenance of the City's sewer system.[17] Furthermore, water conservation measures as established by the General Plan (e.g., xeriscaping, improved irrigation systems, public education about conservation, etc.) would be implemented and would help reduce the amount of wastewater generated with respect to sewer service.

The proposed Project will split the sewer flows to each of the existing sewers lines serving the Project Site – 10-inch sewer line running along Beverly Boulevard and the 8-inch line along Rosewood Avenue. The northern half of the Project Site, comprising of the residential townhomes, apartments and indoor pool house would connect to the Rosewood Avenue line and the Existing Building uses (condominiums, apartments, office and retail uses) would connect to the Beverly Boulevard line.

A 7 day flow monitoring study was conducted by ADS Environmental Services (see Appendix J) to analyze the existing flow capacity of the sewer lines serving the Project Site. Separate flow tests were conducted on each of the sewer lines. The testing was conducted between November 7 and November 13, 2013. Doppler Monitors were used at two locations downstream of the potential sewer lateral. The first was conducted at a Sewer Manhole, BevO1, located in Beverly Boulevard, east of N. Swall Drive. The second testing location, Rose02, was located along Rosewood Avenue between N. Almont Drive and Robertson Boulevard.

Based on the number of residential units, the commercial floor-space, and the proposed uses within the Existing Building, the average proposed sewer flow to the Beverly Boulevard is 17,005 gallons per day (see Table IV.L-2, above), or 0.026 cubic feet per second (CFS).[18] The average flow into the Rosewood Avenue sewer line would be 4,323 gallons per day (see Table IV.L-2, above), or 0.007 CFS[19]. The maximum design capacity of the sewer was calculated using a factor of 0.5 to ensure that the pipeline run at 50 percent of capacity.

Based on the results shown in Table IV.L-3, the existing sewer lines serving the Project Site are adequately sized to handle the peak flows generated by the proposed project. Along Rosewood Avenue,

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[15] *Email correspondence with Sharon Perlstein, P.E., City Engineer, City of West Hollywood, August 30, 2013.*

[16] *Ibid.*

[17] *City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, adopted on September 6, 2011.*

[18] *The Sewer Capacity Study analyzed the maximum outflows and not the net increase from the proposed Project. The maximum outflows represented a worst-case scenario.*

[19] *Ibid.*

the Project would slightly increase the current flow in the 8-inch line, reaching a maximum capacity of 12 percent of the design capacity. In Beverly Boulevard, the existing 10-inch line is sufficient to handle the additional sewer outflow from the Project with a maximum utilization of 6 percent of the design capacity. Though the Project would increase outflows to the existing sewer lines serving the Project Site, the existing sewer lines have the capacity to accommodate the Project and impacts to the sewer lines would be less than significant.

Table IV.L-3
Summary of Sewer Capacity Analysis

Sewer Line	Size (in.)	Maximum Capacity (CFS)	Design Capacity	Existing Average Flow (CFS)	Proposed Flow (CFS)	Total Flow-Post Development (CFS)	Peak Flow (Factor 2.5) (CFS)	Percentage of Design Capacity
Beverly Boulevard	10	3.10	1.553	0.013	0.026	0.039	0.098	6 %
Rosewood Avenue	8	1.71	0.857	0.035	0.007	0.042	0.105	12%

Source: Sewer Capacity Study for the Proposed Development at 8899 Beverly Boulevard (Rosewood Ave and Beverly Blvd Sewer), November 26, 2013

4. CUMULATIVE IMPACTS

Related projects are located within the City of West Hollywood and the City of Beverly Hills. The Los Angeles Hyperion Treatment Plant (HTP) provides wastewater disposal and treatment service to the City of West Hollywood, City of Beverly Hills, the City of Los Angeles and other surrounding cities (for a total of 29 contracting cities in addition to the City of Los Angeles). The geographic scope for wastewater disposal and treatment is the HTP and geographic scope for the collection and conveyance system would be the City of West Hollywood, which is the location of the proposed Project.

At buildout, the Project is expected to generate approximately 21,327 gpd, which is a net increase of 6,073 gpd from existing conditions. Project wastewater would be conveyed to the HTP and the net increase would represent approximately 0.0000764 percent of the remaining HTP capacity of 88 million gpd. Table IV.L.1-3 shows the estimated volume of wastewater that would be produced from the buildout of the related projects in the City of West Hollywood and the City of Beverly Hills for the proposed Project. Related projects for the City of West Hollywood are expected to collectively generate approximately 111,796 gpd and the related projects in the City of Beverly Hills would generate approximately 11,040 gpd. The Project's related projects combined total from West Hollywood and Beverly Hills conveyed to and treated at the HTP would be approximately 122,836 gpd. With the proposed Project, the cumulative total of wastewater generated and conveyed to the HTP would be approximately 129,539 gpd. This increase can be accommodated within the remaining capacity of 88 mgd at the HTP. As previously mentioned, the HTP provides service for the City of Los Angeles and 29 contracting cities, which include the Cities of West Hollywood and Beverly Hills (in addition to a number of other nearby cities such as Santa Monica and Culver City). The HTP's remaining capacity of 88 mgd would need to also accommodate growth and development in the City of Los Angeles and the other

contracting cities to the HTP. The HTP is designed to accommodate growth through 2020.[20] The Project, in conjunction with related projects identified in this EIR for the proposed Project and other expected growth within the area served by the HTP would result in cumulative increases in wastewater generation. However, increased wastewater flows through the City of Los Angeles' wastewater conveyance and treatment plants system are addressed in the IRP, which has laid out a plant to ensure that existing wastewater processing facilities (including the HTP) are sufficient to handle projected flows through 2020.[21] If expansion of existing facilities is required, the environmental impacts of this activity already have been addressed in the Draft and Final EIRs prepared for the IRP.[22] Therefore, cumulative impacts to wastewater treatment capacity would be less than significant.

With respect to the local trunk sewer line, the related projects would be required to verify available capacity of the local trunk sewer line prior to development. Therefore, any upgrades required by the proposed Project or any of the related projects would be the responsibility of the respective project applicants. Accordingly, the proposed Project and related projects would be served by adequate wastewater treatment and conveyance. The proposed Project would have a less than significant impact to the local trunk line. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts to the trunk line would be less than significant.

Table IV.L.1-3
Cumulative Wastewater Generation

No.	Land Use	Size	Generation Rate[a]	Total (gpd)
Project Within the City of West Hollywood				
1	Hotel	69 rm	130 gallons/rm	8,970
	Condominiums	8 du[b]	160 gallons/units	1,280
2	Retail	6,500 sf	80 gallons/1,000 sf	520
3	Retail/Commercial	28,474 sf	80 gallons/1,000 sf	2,278
4	Retail/Commercial	9,545 sf	80 gallons/1,000 sf	764
5	Restaurant	9,998 sf	300 gallons/1,000 sf	2,999
6	Retail	14,571 sf	80gallons/1,000 sf	1,166
	Apartments	7 du[b]	160 gallons/units	1,120
7	Office	400,000 sf	150 gallons/1,000 sf	60,000
8	Commercial	21,565 sf	80 gallons/1,000 sf	1,725
9	Retail	9,850 sf	80 gallons/1,000 sf	788
	Apartments	42 du[b]	160 gallons/units	6,720
	Restaurant	9,800 sf	300 gallons/1,000 sf	2,940
10	Retail/Commercial	73,819 sf	80 gallons/1,000 sf	5,905
	Apartments	76 du[b]	160 gallons/units	12,160
	Cafe/Restaurant	8,202sf	300 gallons/1,000 sf	2,461

[20] *City of Los Angeles Integrated Resources Plan, Facilities Plan Review, Wastewater Management Review, p.1-5, June 2012; and City of Los Angeles Integrated Resources Facilities Plan, Final Environmental Impact Report, September 2005, Executive Summary, website: http://www/lacitysan.org/irp/finaleir.htm.*

[21] *Ibid.*

[22] *City of Los Angeles Integrated Resources Facilities Plan, Final Environmental Impact Report, September 2005, Executive Summary, website: http://www/lacitysan.org/irp/finaleir.htm.*

Table IV.L.1-3
Cumulative Wastewater Generation

No.	Land Use	Size	Generation Rate[a]	Total (gpd)
Project Within the City of West Hollywood				
			West Hollywood Related Projects Total Wastewater Generation	*111,796*
			Proposed Project Total Net Wastewater Generation	**6,073**
			West Hollywood Projects Cumulative Total Waste*water Generation*	**118,499**
Projects Within the City of Beverly Hills				
11	Condominiums	35 du[b]	160 gallons/1,000 sf	5,600
12	Condominiums	34 du[b]	160 gallons/1,000 sf	5,440
			Beverly Hills Related Projects Total Wastewater Generation	*11,040*
			West Hollywood Cumulative Total Wastewater Generation	**118,499**
			Cumulative Total Wastewater Generation	**129,539**

sf=square feet, du = dwelling unit, gpd = gallons per day
[a] Based on County of Los Angeles Sanitation District No. 4 User Categories and Mean Loadings List.
b Breakdown by number of bedrooms is unknown. Rate represents 2-bedroom units and is the average rate for 1-bedroom, 2-bedroom and 3-bedroom condominium/apartment rates.
Source (table): EcoTierra Consulting, Inc., September 2013.

5. MITIGATION MEASURES

No significant impacts have been identified. Therefore, no mitigation is required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the proposed Project would result in less than significant impacts to the wastewater conveyance system in the project vicinity.

Cumulative impacts to wastewater would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
L. UTILITIES
2. WATER

1. INTRODUCTION

This Subsection describes the water utility supply and infrastructure that currently serves the Project Site and surrounding area, assesses potential impacts associated with the proposed Project on the supply and infrastructure, and identifies the need for improvements in order to serve the proposed Project and related development, if needed.

This section utilizes information from the following resources: *2010 City of Beverly Hills Urban Water Management Plan*; California *Water Code*; *City of West Hollywood General Plan 2035, Infrastructure, Resources, and Conservation Element*, adopted on September 6, 2011; *City of West Hollywood General Plan* 2035 Final EIR; City of Beverly Hills Department of Public Works website; and email correspondence from Kevin Watson, Water Operations Manager, from the City of Beverly Hills.

2. ENVIRONMENTAL SETTING

A. Local Water Service and Infrastructure

Water in the City of West Hollywood is uniquely supplied by two agencies, the City of Beverly Hills and the Los Angeles Department of Water and Power. Beverly Hills provides water service to approximately 368 acres of the western portion of West Hollywood in which the Project Site is located. The Water Service Division of the City of Beverly Hills and Transportation Department operates the water distribution system of Beverly Hills and the western portion of West Hollywood.

Water service for the Project Site area is provided by an existing 8-inch-diameter water main beneath Beverly Boulevard and an existing 8-inch-diameter water main beneath Rosewood Avenue.[23] Figure IV.L-2, Water Main Location Map, illustrates the location of the water main lines serving the Project Site.

B. Existing Water Consumption

The Project Site is currently developed with an existing 89,630 sf office building, containing an approximately 3,879 square foot restaurant (125 seats) in the basement, approximately 21,249 sf of retail uses on Level 2, plus a total of approximately 64,502 sf of office space on Levels 4 through 9. As such, the Project Site consumes water in association with commercial activities. As shown in Table IV.L.2-1 (Existing Average Daily Water Consumption), existing uses on the Project Site consume approximately 14,517 gpd of water. There are currently no water service problems or deficiencies in the project area.[24]

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[23] *Email correspondence from Kevin Watson, Water Operations Manager, City of Beverly Hills, September 19, 2013.*

[24] *Ibid.*

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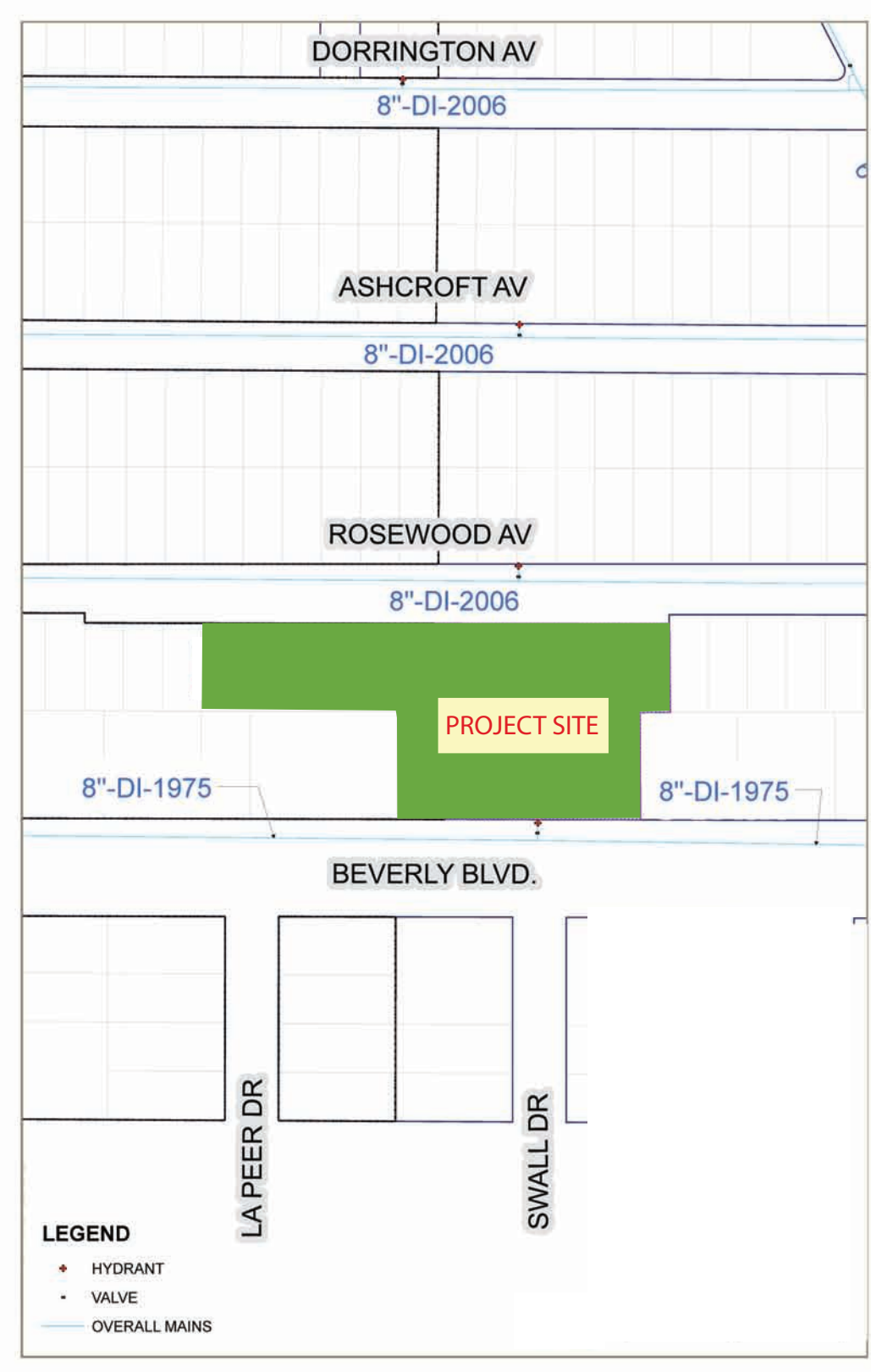

Source: City of Beverly HIlls, Water Division, September 2013.

EcoTierra consulting

Figure IV.L-2
Water Main Location Map

Table IV.L.2-1
Existing Average Daily Water Consumption

Land Use	Size	Average Daily Flow by Type[a]	Average Daily Usage by Type (gpd)
Office	64,502 sf	96 gallons/1,000 sf	6,192 gpd
Retail	21,249 sf	180 gallons/1,000 sf	3,825 gpd
Restaurant	125 seats	36 gallons/seat	4,500 gpd
Total Existing Water Consumption			**14,517 gpd**

Notes: sf = square feet; gpd = gallons per day
[a] *Water Demand Factor is based on 120%of, County of Los Angeles, Sanitation District No.4, User Categories and Mean Loadings List.*
Source (table): EcoTierra Consulting, August 2013.

C. Water Supply

The City of Beverly Hills obtains its water supply from two sources: the Metropolitan Water District (MWD) and local groundwater. Approximately 90 percent of its water source is from MWD and 10 percent from the local groundwater supply.

i) MWD Supply

The MWD, which was established in 1928, supplies water to a six-county region from Ventura County in the north to San Diego County in the south through a conveyance and distribution system consisting of the 242-mile-long Colorado River Aqueduct and its five pumping plants, approximately 820 miles of pipeline, five water treatment plants and nine reservoirs. MWD also operates 16 hydroelectric power recovery plants.[25] Currently, the City of Beverly Hills has two connections (BH-1 and BH-2) to the MWD Santa Monica Feeder System, each with an operating capacity of 40 cubic feet per second (cfs) or approximately 23,000 acre-feet per year (afy).[26] As of 2010, the City of Beverly Hills and the portion of the City of West Hollywood served by Beverly Hills, had a service population of 45,000 and is expected to reach 47,587 by 2035.[27]

ii) Groundwater Supply

The City of Beverly Hills attains local groundwater extracted from the Hollywood Subbasin, which is located within the Coastal Plain of the Los Angeles Groundwater Basin. The Hollywood Subbasin is bounded to the north by the Santa Monica Mountains, on the east by the Elysian Hills, on the west by the Inglewood Fault zone, and on the south by the La Brea High.[28] Historical production has come from deeper aquifers of the San Pedro Formations and the shallower aquifers of the Lakewood Formations. These aquifers are widespread throughout the coastal plain of Los Angeles. Unconfined groundwater conditions exist in the shallow aquifers in the northern and eastern portion of the Hollywood Subbasin.

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[25] *The Metropolitan Water District of Southern California, Annual Report, 2012.*

[26] *City of Beverly Hills, 2010 Urban Water Management Plan, page 2-2.*

[27] *Ibid., page 1-6.*

[28] *City of Beverly Hills, 2010 Urban Water Management Plan, page 2-6.*

In the deeper aquifers and in the remainder of the Hollywood Subbasin, groundwater is confined, and clay members separate the aquifers over much of this subbasin.[29]

Recharge within the Hollywood Subbasin is from direct precipitation and ephemeral stream-flow from higher areas to the north, receiving an average annual precipitation of approximately 14 inches.[30] As the Hollywood Subbasin does not receive artificial recharge, the actual annual pumping limits are equal to the natural safe yield of 3,000 afy. Overall, the Hollywood Subbasin contains a total water storage capacity of nearly 200,000 ac-ft.[31]

iii) Reliability Planning

The California *Water Code* requires an assessment of water supply reliability and vulnerability to seasonal climatic shortage.[32] The assessment must include a comparison of the total projected water demand with the supply available during the following conditions: (1) normal water year; (2) single dry water year; and (3) multiple dry year sequences. The peak annual demand in a normal water year for 2035, without implementation of any demand-management measures, would be 11,353 ac-ft of imported water and 800 ac-ft of groundwater. If there were multiple dry years, the 2035 peak annual demand, without implementation of any demand-management measures, would be 13,134 ac-ft of imported water and 800 ac-ft of groundwater. With implementation of conservation measures (see City of West Hollywood Green Building Program) demand would be dropped. MWD's reliable water supplies would be able to meet the demand without the reductions in demand from water conservation.[33]

iv) Water Shortage Contingency Plan

Water supply reliability efforts would ensure that there would be sufficient supplies to meet current and projected future water demand within the City of West Hollywood. However, water shortages can have a serious economic and environmental impact, and because it is required by the California *Water Code*, West Hollywood has developed a *Water Conservation Plan* for temporary shortage conditions.[34] The *Water Conservation Plan* guides residents on conserving water, including, time frames of when residents can use potable water to irrigate landscaping and lawns; regulations on washing of buildings, facilities, and equipment, and automobiles; and regulations for restaurants and fast food service facilities on handing out water to customers that only ask for water. Any person or firm breaking these rules and regulations would be subject to fines and penalties.[35]

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[29] *California's Groundwater Bulletin, February 27, 2004.*

[30] *City of Beverly Hills, 2010 Urban Water Management Plan, page 2-7.*

[31] *Ibid.*

[32] *California Water Code, Sections 10910 and 10911.*

[33] *City of Beverly Hills, 2010 Urban Water Management Plan, page 5-7.*

[34] *California Water Code, Section 10632 (a).*

[35] *West Hollywood Municipal Code, Chapter 15, Section 15.52.*

D. Regulatory Setting

i) Water Supply Assessments

State of California Senate Bill (SB) 610 and SB 221 became effective January 1, 2002, amending State *Water Code* Sections 10910-10915, and requiring that counties and cities consider the availability of adequate water supplies for certain new large development projects. These statutes require that cities and counties obtain from the local water supplier written assessment or verification of the sufficiency of water supply to serve proposed large development projects in their jurisdiction. Pursuant to SB 610, projects that are required to obtain a Water Supply Assessment (WSA) include the following:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- a proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- a proposed hotel or motel of more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- a mixed-use project that falls in one or more of the above-identified categories; or
- a project not falling in one of the above-identified categories but that would demand water equal or greater to a 500 dwelling-unit project.

ii) California Urban Management Planning Act

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (afy) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years.[36] In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area. The most recent UWMP prepared by the City of Beverly Hills, approved in 2011, addresses water supply needs through 2035. The City of Beverly Hills also provides water utility services to a portion of the City of West Hollywood, including the Project Site, which is bounded on the west by Doheny Drive, on the north by Sunset Boulevard, on the east by Flores Street, and on the south by Beverly Boulevard.[37]

The UWMP includes estimates of past, current, and projected potable and recycled water use, identifies water conservation and reclamation measures currently in practice, describes alternative conservation measures, and provides an urban water shortage contingency plan. The factors forecasting the City's future water demand include Southern California Association of Governments' (SCAG) 2007 Regional

[36] *City of Beverly Hills, 2010 Urban Water Management Plan, page 1-1.*

[37] *Ibid., page 1-5.*

Transportation Plan and from the San Diego County Association of Government's (SANDAG) Series 12: 2050 Regional Growth Forecast.[38]

The City of Beverly Hills *2010 Urban Water Management Plan (2010 UWMP),* adopted in August 2011*,* used a service area-wide method in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the City through the year 2035. The 2010 UWMP is updated every five years as required by California law. This process entails, among other requirements, an update of water supply and water demand projections for water agencies. Water supply planning would be based on meeting these long-term demands.

iii) Municipal Water Conservation

The 2010 UWMP confirmed that water use, as of 2010, has declined beginning in 2005 with an approximate 13 percent decline in total consumption.[39] The recent decline in water use is not yet fully understood, but may be a result of several factors including: several years of cool summers, a statewide drought that forced mandatory water reductions and conservation in many areas, and an economic downturn that has caused many businesses to close, and increased housing vacancies.

To further conservation, the California Urban Water Conservation Council (CUWCC) was formed. As a member of the CUWCC, the City of Beverly Hills implements the most current Best Management Practices (BMPs). The BMPs correspond to the 14 Demand Management Measures (DMMs) listed in the 2010 UWMP, which include, but are not limited to, water system audits, landscape conservation programs, providing public information programs, conservation pricing, and conservation programs for commercial, industrial, and institutional accounts.[40] The DMMs identified in the UWMP are utilized by the City of Beverly Hills to achieve compliance with Senate Bill (SB) X7-7 (Water Conservation Bill of 2009)[41]. SBx7-7 calls for a 20 percent reduction in water use by 2020.

iv) City of West Hollywood

1) City of West Hollywood Green Building Program

The City of West Hollywood adopted one of the nation's first mandatory green building ordinance, on October 1, 2007. The ordinance ensures that new buildings will be healthier for residents, and use energy and resources more efficiently.[42] The guidelines for water conservation are included in the *West Hollywood Green Building Manual*. All applications for projects proposing three (3) or more residential

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[38] *Ibid., page 2-9.*

[39] *Ibid., page 4-2.*

[40] *Ibid., page 1-3.*

[41] *SB X7-7 is one of four policy bills enacted as part of the November 2009 Comprehensive Water Package. SB X7-7 provides regulatory framework to support the statewide reduction in urban per-capita water use described in the 20 by 2020 Water Conservation Plan. Consistent with SB X7-7, each water supplier must determine and report its existing baseline water consumption and establish future water use targets. The goal of SB X7-7 is an overall 20 percent reduction in per-capita water consumption by 2020.*

[42] *City of West Hollywood, Building and Safety, website: http://www.weho.org/index.aspx?page=194, September 23, 2013.*

units, and all applications for new commercial buildings (including mixed-use projects) must comply with the Green Building Point System. A minimum of 60 points is required. A total of 160 points are available. Projects that reach 90 points are eligible for one of the possible incentives. Further, a Green Features manual is required at end of construction to inform future tenants of green features. Listed below are the guidelines relevant to the proposed Project:[43]

- **Use of low-flow showerheads:** Showerheads must flow at a rate less than 2.5 gallons per minute to receive credit in the green building program point system. There are two basic types of low-flow showerheads: aerating and laminar-flow. Aerating showerheads mix air with water, forming a misty spray. Laminar-flow showerheads form individual streams of water.
- **Use of water efficient kitchen and bathroom faucets:** Faucets must flow at rate less than 2.5 gallons per minute to receive this point. All faucets in the building must be installed to this standard.
- **Use of water efficient toilets:** Water efficient toilets must either be dual-flush or less than 1.3 gallons per flush. All toilets in the building must be installed to this standard. Dual-flush toilets use 0.8 gallon per flush for liquid waste and 1.6 gallons (the amount used by a conventional toilet) per flush for solid waste, with an average of less than 1.3 gallons per flush.
- **Use of water efficient urinals:** One point is given for urinals that use less than 0.5 gallon per flush, and two points are given for water free urinals. All urinals must be installed to these standards to receive the points.
- **Tankless water heaters:** Tankless water heaters produce hot water on demand – when it is needed – instead of producing and storing a specified amount of water. Tankless units are 25–40 percent more efficient than tank units and require less space. Venting requirements are often more stringent for tankless units. Some tankless units can be combined with solar water heaters.
- **Use Drought Tolerant and Native Species for Landscaping:** Native and drought tolerant plants use less water than exotic plants and are generally less susceptible to pests and disease. There is a wide variety of native California plants which offer year round color and are attractive. Avoid inadvertently over watering by planting in hydrozones, appropriately grouping plants by their water need. Irrigation systems should be appropriately sized and also have timers to prevent over watering or watering during midday. Water is a scarce resource in Southern California and our growing population is placing enormous strains on our water supply. Reductions in flow from the Sacramento River Delta to the California aqueduct which supplies Southern California will decrease sharply in the coming years.

2) City of West Hollywood General Plan

The City of West Hollywood has adopted an Infrastructure, Resources, and Conservation Element to its General Plan. The Element includes goals and policies related to water conservation. Listed below are the policies relevant to the proposed Project:[44]

IRC-2: Provide citywide access to high-quality water, gas, electricity, and telecommunications services.

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[43] *The West Hollywood Green Building Manual.*

[44] *City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, September 6, 2011.*

***IRC-2.2*:** Require development projects to provide a "will serve" letter or similar proof of the availability of necessary infrastructure and services by outside service providers during the permit review process.

***IRC-2.3*:** Require that development projects pay for their share of the costs of improvements to water, gas, power and other utilities that they necessitate.

IRC-3: Reduce water use and ensure a long-term water supply.

IRC-3.1: Allow for construction of new development only when there is sufficient water to supply that development, as determined by the service provider.

IRC-3.2: Require development projects with the water-use equivalent of 10 dwelling units or more to conduct a long-term water supply analysis as part of the development approval process.

IRC-3.6: Require all new buildings to meet the following standards:

- Achieve a reduction of water use of 40% less than baseline for buildings as calculated by the Energy Policy Act of 1992. Single-family homes are exempted from this requirement but must still meet the other standards of the Green Building Ordinance.
- Reduce water consumption for outdoor landscape irrigation, consistent with the most recent City policy.
- Comply with all prevailing state laws and City regulations regarding indoor and outdoor water conservation and efficiency in new construction.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with guidance provided in Appendix G of the State CEQA Guidelines, the proposed Project would have a potentially significant water impact if it would result in one or more of the following:

a) A project would require or result in the construction of new water facilities or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause a significant environmental effect; or

b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

i) Methodology

The environmental impacts of the proposed Project with respect to water are determined based on the proposed increase in water demand and the capacity of existing and proposed infrastructure. The existing water demand is compared to the proposed Project's water demand and water infrastructure capacity, including improvements associated with the proposed Project.

B. Project Impacts

Threshold	*Would the proposed project* require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause a significant environmental effect*?*

Impact L.2-1 The proposed Project would generate net water consumption from the Project Site. Water supply and infrastructure can accommodate the net increase. Implementation of the proposed Project would not result in the need for new or additional water infrastructure (facilities). Therefore, impacts to water facilities would be less than significant.

Water services for the proposed Project would be provided by the City of Beverly Hills. The Project Site is serviced by an existing 8-inch-diameter water main beneath Beverly Boulevard and an existing 8-inch-diameter water main beneath Rosewood Avenue (see Figure IV.L-2, Water Main Location Map). No new or additional water main infrastructure improvements are necessary to accommodate the proposed Project since the site is already serviced by two water mains. These existing water mains can accommodate the Project's demand for water supply service.[45] Existing laterals to Beverly Boulevard from the Existing Building would continue to be used and new laterals would be required from the Rosewood Avenue to the Project Site uses (i.e., Townhomes, four-unit Apartment Building and the Indoor Pool House). Where estimated water requirements for the proposed Project can be served by the existing Beverly Boulevard and Rosewood Avenue mains, water service would be provided routinely in accordance with the City of Beverly Hills Water Service Division Rules and Regulations. The City of Beverly Hills Water Service Division routinely replaces or repairs lines as needed. The Project Site will be subject to the water system standards and rules set forth by the City of Beverly Hills Water Service Division. Therefore, Project impacts related to water supply facilities would be less than significant.

Threshold	*Would the proposed project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

Impact L.2-2 Sufficient water supplies would be available to serve proposed Project from existing entitlements, and resources and no other new or expanded entitlements would be required. Therefore, Project impacts to water supply would be less than significant.

i) Construction

Project construction would involve excavation of approximately 18,770 cy of earth materials from the existing surface parking lot area of the Project Site along Rosewood Avenue. In addition, approximately 2,840 cy of earth materials will be excavated and exported from the basement of the Existing Building. Water would be used during grading and earthwork primarily to reduce fugitive dust and to aid in earth compaction and, thus, assumed water would be used primarily for the surface parking lot area. From historical usage reports, 0.89 acre-foot per acre is used to calculate water usage during grading.[46] Grading would occur on approximately 1.1 acres of the Project Site. Using the generation factor for dry grading, approximately 0.98 acre-foot of water would be consumed over the course of the grading

[45] *Email correspondence from Kevin Watson, Water Operations Manager, City of Beverly Hills, September 19, 2013.*

[46] *City of West Hollywood, SMB20 Project, Draft EIR, March 2011.*

period of the surface parking lot. The amount of water used would be nominal for such purposes and would be spread over one month during grading of the surface parking lot. As previously discussed, the Beverly Hills Water Division has adequate water supply from MWD and groundwater sources, which can accommodate the nominal consumption of water for grading purposes. Since grading activity is temporary in nature, consumption would spread over a one month during the grading process and given that the City of Beverly Hills Water Division has adequate supply to accommodate the anticipated water demand during construction, the impact of water services on grading during construction of the Project would be less than significant.

ii) Operation

As previously discussed, the Project Site lies within the City of Beverly Hills service area, which receives approximately 90 percent of its supply from imported MWD water and approximately 10 percent from groundwater produced from the Coastal Plain of the Los Angeles Groundwater Basin, Hollywood Subbasin.[47] The Beverly Hills 2010 UWMP confirmed that water use, as of 2010, has declined beginning in 2005 with an approximate 13 percent decline in total consumption. Currently, the City has the ability to attain approximately 23,000 afy from MWD and 3,000 afy from the Hollywood Subbasin. However, the peak annual projected demand in a normal water year for 2035, without implementation of any demand-management measures, would be 11,353 afy of imported water and 800 afy of groundwater. If there were multiple dry years, the 2035 peak annual projected demand, without implementation of any demand-management measures, would be 13,134 afy of imported water and 800 afy of groundwater. The proposed Project is anticipated to consume approximately 24,323 net gallons per day (gpd), or approximately 27 afy, of water [see Table IV.L.2-2 (Proposed Project Water Consumption)]. There would be ample amounts of imported water and groundwater to service the proposed Project. While the water supply availability from local and MWD supplies may fluctuate on an annual basis, the water supply available from the Hollywood Subbasin is not subject to annual and seasonal fluctuations, and therefore has very high water reliability. Based upon the analysis in the Beverly Hills 2010 UWMP, the City of Beverly Hills anticipates that it will have sufficient water supplies to meet the projected water demand for its Water Division service area, which consists of the western portion of West Hollywood including the Project Site. Implementation of the proposed Project would not result in the need for new or additional water facilities. Therefore, Project impacts to water supply would be less than significant.

[47] *City of West Hollywood General Plan, Program EIR, p.3.12-8.*

Table IV.L.2-2
Proposed Project Water Consumption

Land Use	Size	Consumption Rate[a]	Total (gpd)
Commercial			
Office	10,562 sf	96 gallons/1,000 sf	1,014 gpd
Retail	19,875 sf	180 gallons/1,000 sf	3,577 gpd
Restaurant	125 seats[b]	43 gallons/seat	5,375 gpd
		Subtotal	***9,966 gpd***
Pool House	4,417 sf	360 gallons/1,000 sf[c]	1,590 gpd
		Subtotal	***1,590 gpd***
Condominiums			
1 Bedroom	18 units	144 gallons/units	2,592 gpd
2 Bedroom	22 units	192 gallons/units	4,224 gpd
3 Bedroom	16 units	240 gallons/units	3,840 gpd
		Subtotal	***10,656 gpd***
Townhomes			
2 Bedroom	2 units	216 gallons/units	432 gpd
3 Bedroom	11 units	276 gallons/units	3,036 gpd
		Subtotal	***3,468 gpd***
Apartments			
Studio	1 unit	96 gallons/units	96 gpd
1 Bedroom	7 units	144 gallons/units	1,008 gpd
2 Bedroom	4 units	192 gallons/units	768 gpd
		Subtotal	***1,872 gpd***
Parking			
Auto Parking	53,647 sf	24 gallons/1,000 sf	1,288 gpd
		Subtotal	***1,288 gpd***
		Subtotal Proposed Water Consumption	*38,840 gpd*
		Less Existing Water Consumption	***(14,517) gpd***
		Total Net Water Consumption	**24,323 gpd**

sf=square feet, gpd = gallons per day

[a] *Based on 120% of wastewater rates.*

[b] *Under the proposed Project the existing restaurant will increase slightly in square footage but the number of seats will remain the same as under existing conditions.*

[c] *Based on County of Los Angeles Sanitation District Table 1, Loadings for Each Class of Land Use, Health Spa, Without Showers.*

Source (table): EcoTierra Consulting, December 2013.

Nevertheless, because long-term water supply is a significant concern in California, the proposed Project can reduce its demand on water supply through the implementation of water conservation measures. The proposed Project would be required to comply with City and State water conservation programs, including the green building ordinance that ensures new buildings will be healthier for residents, and

use energy and resources more efficiently.[48] In addition, since the Project Site is served by the City of Beverly Hills Water Division for water service, the Project would be required to comply with the City of Beverly Hills BMPs which corresponds to the 2010 UWMP's Demand Management Measures (DMM). These BMPs (and DMM's) include domestic water and landscape conservation programs intended to reduce long-term urban demands from what they would have been without their implementation. Further, the Project Applicant has proposed to include the following conservation measures for the new development:

- Use of low-flow showerheads;
- Use of water efficient kitchen and bathroom faucets;
- Use of water efficient toilets;
- Use of water efficient urinals;
- Tankless water heaters for the Townhomes; and
- Use primarily drought tolerant and native species for landscaping.

These project design features would reduce overall project demand for potable water, and would ensure that long-term water supply impacts are less than significant.

a) Water Supply Assessment

The proposed Project would not be subject to the provision of *Water Code* section 10910 (SB 610 and SB 221) (Water Supply Assessment) because it does not exceed the established thresholds. Thus, preparation of a WSA was not required.

4. CUMULATIVE IMPACTS

The geographic scope of the cumulative water analysis is City of Beverly Hills Water Division service area, which provides water utility services to a portion of the City of West Hollywood, including the Project Site and the 12 related projects.

Costs for new water service and improvements to the existing water system would be determined by the Beverly Hills Water Division on a project-by-project basis. If the Water Division indicates that costs for new water service and improvements are necessary, each project proponent would be responsible for paying for any improvements or new connections to the existing water infrastructure. Thus, each proposed project (including the proposed Project and related projects) would be responsible for improvements to water infrastructure if the Beverly Hills Water Division deems it necessary. Therefore, the proposed Project would have a less than significant impact to water infrastructure. Thus, the Project's contribution to cumulative impacts would not be considerable and cumulative impacts on water infrastructure would be less than significant..

With respect to water supplies, the proposed Project combined with the 12 related projects would be expected to increase regional demand for water supplies. The cumulative projects are anticipated to consume approximately 122,952 gpd of water [see Table IV.L.2-3 (Cumulative Water Consumption]). This is approximately 138 afy, an amount that represents approximately 0.006 percent of the unexercised amount (23,000 afy) in the water supply available to service area from MWD and 0.05 percent of the groundwater available from the Hollywood Subbasin. Based on current and historic water

[48] *City of West Hollywood, Building and Safety, website: http://www.weho.org/index.aspx?page=194, September 23, 2013.*

demand and population growth, the 2010 UWMP projected water demand to 2035. The plan estimated that the Beverly Hills Water Division service area would demand a total of 11,394 afy. The total system including MWD and ground water supply would provide 12,153 afy. As a result, the 2010 UWMP anticipates that it will have sufficient water supplies to meet the projected water demand for the area, including the Project Site and related project sites. Thus, there is sufficient water supply available to the City of Beverly Hills service area to accommodate the proposed Project, as well as the 12 related projects in the project study area. Therefore, the proposed Project would have a less than significant impact to water supply. Accordingly, the Project's contribution to cumulative impacts would not be considerable and cumulative impacts on water supply would be less than significant.

In addition, the City collects a water service fee for multi-family residences. Commercial fees are determined on a case-by-case basis**.** Similar to the proposed Project, each related project would be required to comply with City and State water conservation programs, including the green building ordinance and, for projects that are serviced by the City of Beverly Hills Water Division, the water conservation measures outlined in the Beverly Hills 2010 UWMP.

Table IV.L.2-3
Cumulative Water Consumption

No.	Land Use	Size	Generation Rate[a]	Total (gpd)
1	Hotel	69 rm	156 gallons/rm	10,764
	Condominiums	8 du[b]	192 gallons/units	1,536
2	Retail	6,500 sf	96 gallons/1,000 sf	624
3	Retail/Commercial	28,474 sf	96 gallons/1,000 sf	2,733
4	Retail/Commercial	9,545 sf	96 gallons/1,000 sf	916
5	Restaurant	9,998 sf	360 gallons/1,000 sf	3,599
6	Retail	14,571 sf	96 gallons/1,000 sf	1,399
	Apartments	7 du[b]	192 gallons/units	1,344
7	Office	400,000 sf	180 gallons/1,000 sf	72,000
8	Commercial	21,565 sf	96 gallons/1,000 sf	2,070
9	Retail	9,850 sf	96 gallons/1,000 sf	946
	Apartments	42 du[b]	192 gallons/units	8,064
	Restaurant	9,800 sf	360 gallons/1,000 sf	3,528
10	Retail/Commercial	73,819 sf	96 gallons/1,000 sf	7,087
	Apartments	76 du[b]	192 gallons/units	14,592
	Cafe/Restaurant	8,202 sf	360 gallons/1,000 sf	2,953
11	Residential	35 du[b]	190 gallons/units	6,650
12	Residential	34 du[b]	190gallons/units	6,460
			Related Projects Total Water Consumption	*147,275 gpd*
			Proposed Project Total Net Water Consumption	***24,323 gpd***
			Cumulative Total *Water Consumption*	**122,952gpd**

sf=square feet, du = dwelling unit, gpd = gallons per day

[a] *Based on 120% of rates.*

[b] *Breakdown by number of bedrooms is unknown. Rate represents 2-bedroom units and is the average rate for 1-bedroom, 2-bedroom and 3-bedroom condominium/apartment rates*

Source (table): EcoTierra Consulting, Inc., December 2013.

5. MITIGATION MEASURES

No significant impacts were identified. Therefore, no mitigation is required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to water supply and infrastructure (facilities) would be less than significant..

Cumulative impacts to water supply and infrastructure (facilities) would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
L. UTILITIES
3. SOLID WASTE

1. INTRODUCTION

This Subsection describes the potential impacts of the proposed Project on the solid waste services serving the Project Site.

This section utilizes information from the following resources: California *Public Resources Code*; *California Code of Regulations*; *U.S. EPA, Report No. 530R98010*, June 1998; *City of West Hollywood General Plan 2035, Infrastructure, Resources, and Conservation Element*, adopted on September 6, 2011; City of Beverly Hills Department of Public Works website; City of West Hollywood Department of Public Works website; the Cal Recycle website; California Integrated Waste Management Board (now Cal Recycle), Solid Waste Information System, Facility/Site Summary Details website; and email correspondence from Mary McKenrick, Athens Services.

2. ENVIRONMENTAL SETTING

A. Solid Waste Collection and Disposal

i) Solid Waste Collection

The City of West Hollywood contracts with Athens Services for the pickup and disposal of solid waste. Once collected, the solid waste is transported to the Athens Material Recovery and Transfer Facility, located adjacent to the I-605 and SR-60 freeway interchange in the City of Industry. [49] Figure IV.L.3-1 shows the location of the Athens Material Recovery and Transfer Facility. At the Material Recovery and Transfer Facility, recycable materials are removed from trash collected from commercial properties. Residential properties self separate recycables from the waste stream prior to trash pick up. [50]The Athens facility has a separate facility in Sun Valley for processing construction and demolition debris.[51] The City of Industry facility also includes a transfer station, where trash is transferred to one of the five San Bernardino County Landfills.[52]

ii) Solid Waste Disposal

As of July 1, 2013, Athens Services has a 10-year contract with the County of San Bernardino to manage County's five landfills and nine transfer stations.[53] These five landfills include: Mid-Valley Landfill in Rialto; San Timoteo Landfill in Redlands; Victorville Landfill in Victorville, Barstow Landfill in Barstow;

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[49] *Email correspondence, Mary McKenrick, Athens Services, August 28, 2013.*

[50] *Email correspondence, Mary McKenrick, Athens Services, November 19, 2013.*

[51] *Athens Services, website: http//athensservices.com, September 29, 2013.*

[52] *Written correspondence, Mary McKenrick, Athens Services, November 19, 2013 .*

[53] *Ibid; and The Sun News website: http://www.sbsun.com/general-news/20130426/athens-services-gets-167m-landfill-contract*

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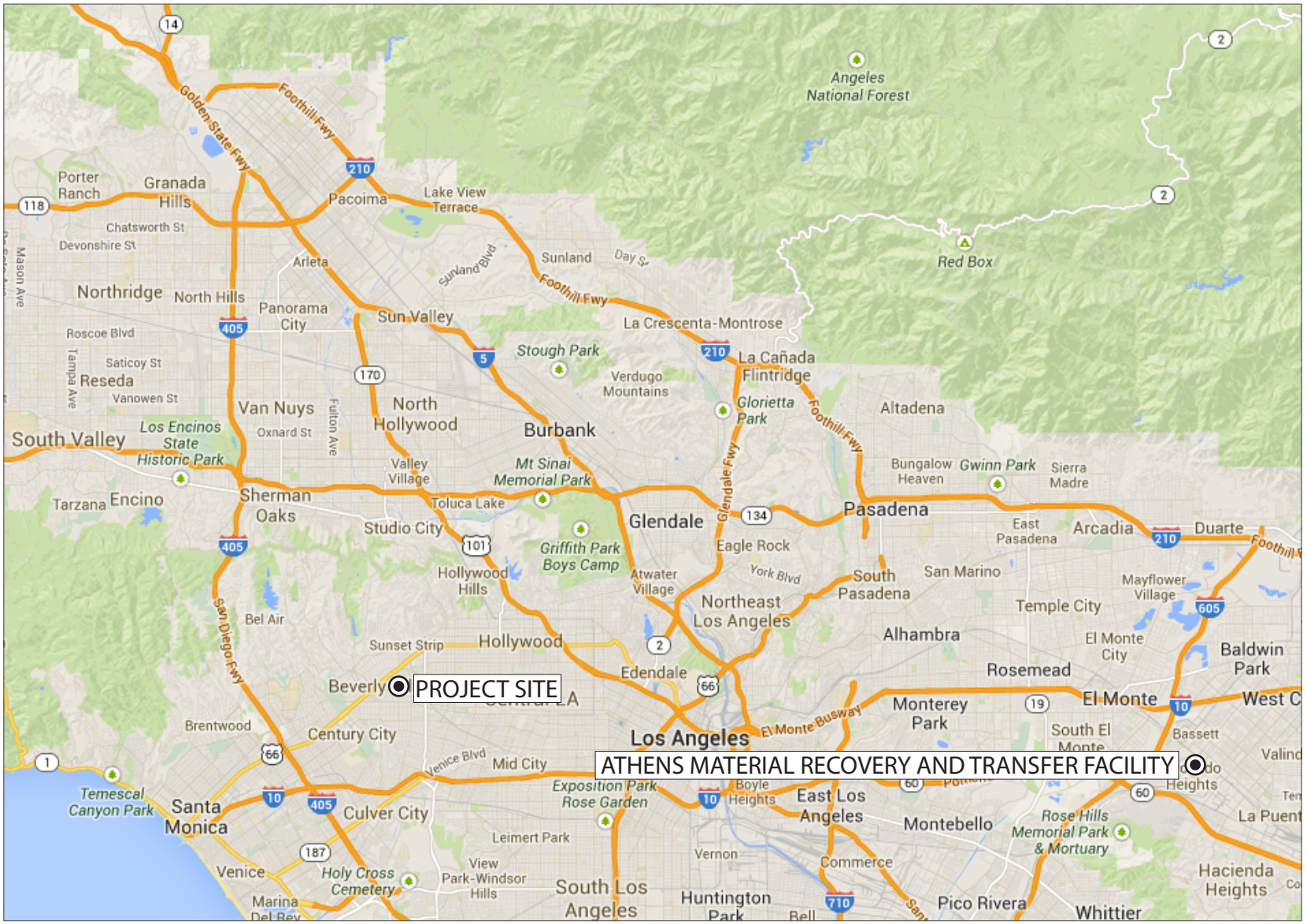

Source: GoogleEarth, September 2013.

EcoTierra consulting

Figure IV.L-3
Athens Material Recovery Facility and Transfer Station Location

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and Landers Landfill in Landers. As shown in Table IV.L.3-1 (San Bernardino County Landfills), these landfills that Athens Services uses for its contract cities, including the City of West Hollywood, can receive approximately 15,200 tons per day of solid waste per day and have a total remaining capacity of 288,338,000 cy.

Table IV.L.3-1
San Bernardino County Landfills

Landfill Name/Location	Maximum Permit Capacity (cubic yards)	Maximum Daily In-Take tons per day (tons/day)	Remaining Capacity/Date (cubic yards)	Estimated Closure Date
Mid-Valley Landfill[1] 2390 N. Alder Avenue Rialto, CA Landfill Class: Type III	101,300,000	7,500	67,520,000	04/01/2033
San Timoteo Landfill[2] 31 Refuse Road Redlands, CA Landfill Class: Type III	20,400,000	2,000	13,605,488	01/01/2043
Victorville Landfill[3] 18600 Stoddard Wells Rd. Victorville, CA Landfill Class: Type III	83,200,000	3,000	81,510,00	10/01/2047
Barstow Landfill[4] 32553 Barstow Road Barstow, CA Landfill Class: Type III	80,354,500	1,500	924,401	05/01/2071
Landers Landfill[5] 59200 Winters Road Landers, CA Landfill Class: Type III	3,083,500	1,200	765,098	08/01/2018
Landfill Totals	288,338,000	15,200	--	--

Source: California Integrated Waste Management Board (CIWMB), Solid Waste Information System, Facility/Sites Information Summaries:
1. http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0055/Detail/
2.Ibid: 36-AA-0087/Detail/
3. Ibid: 36-AA-0045/Detail/
4. Ibid: 36-AA-0046/Detail/
5. Ibid: 36-AA-0057/Detail/

There are additional landfills that can be utilized in Los Angeles County that include but are not limited to the following: Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Lancaster Landfill, Scholl Canyon Landfill.[54] As discussed in the Los Angeles Countywide Integrated Waste Management Plan 2012 Annual Report (published August 2013), the disposal capacity requirements of AB 939 would be met by

[54] *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan 2012 Annual Report, August 2013.*

utilizing available or planned out-of-County disposal capacity and developing the necessary infrastructure to facilitate exportation of waste to out-of-County landfills. In addition to the San Bernardino County landfills that Athens Services manages, other landfills outside of Los Angeles County that may be utilized include Olinda Alpha Sanitary Landfill, Frank R. Bowerman Sanitary Landfill and Prime Deshecha Sanitary Landfill in Orange County, Simi Valley Landfill & Recycling Center in Ventura County, El Sobrante Landfill in Riverside County and Mesquite Regional Landfill in Imperial County.[55]

B. Recycling Facilities

Waste generated in the City may also be diverted from landfills and recycled. As previously discussed, refuse and recycling in the City of West Hollywood is collected by Athens Services and is processed at the Athens Material Recovery and Transfer Facility (MRF), where recyclable materials are removed from the waste. Once recyclables are sorted, each commodity is baled and shipped to foreign and domestic markets. Additionally, the MRF has a separate building for processing construction and demolition debris, as well as other large loads of bulky recyclable material, such as cardboard, carpet, and padding.[56] CalRecycle set an annual target per capita disposal rate of 5.8 pounds of solid waste for residents and 7.7 pounds of solid waste for employees. In 2011, the most recent year that Cal Recycle has an approved a diversion rate, the City of West Hollywood had an annual per capita disposal rate of 4.5 pounds per resident and 5.1 pounds per employee, which is well below CalRecycle's target rate.[57]

C. Existing Solid Waste Generation

The Project Site is currently developed with an existing 89,630 sf commercial building and 48,000 sf of surface parking area. As such, the Project Site generates solid waste in association with commercial uses. As shown on Table IV.L.3-2 (Existing Average Daily Solid Waste Generation), the existing uses on the Project Site generate approximately 440 pounds per day (ppd) (104 tons per year) of solid waste.

Table IV.L.3-2
Existing Average Daily Solid Waste Generation

Land Use	Size	Generation Rate (ppd)[a]	Total Generation (ppd)	Total Generation (tons/yr)
Office	64,502 sf	6.0 lbs/1,000 sf	387	71
Retail	21,249 sf	2.5 lbs/1,000 sf	53	10
Restaurant	125 seats	1.0 lbs/seat	125	23
Total Existing Solid Waste Generation			**440**	**104**

Notes: sf = square feet; ppd = pounds per day; yr = year
[a] calrecycle.ca.gov/wastechar/wastegenrates/commercial.htm
Source (table): EcoTierra Consulting, December 2013

[55] *Ibid.*

[56] *Athens Services website: http://www.athensservices.com/recycling2/material-recovery-facility.html, September 19, 2013.*

[57] *Cal Recycle website: http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPost2006.aspx, September 16, 2013 and City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, September 6, 2011.*

D. Regulatory Setting

i) California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, AB 939 requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 past the year 2000. The City surpassed the state-mandated 50 percent diversion rate for 2000.[58] A per capita disposal rate is used as one of several "factors" in determining a jurisdiction's compliance with the intent of AB 939, and allows the California Department of Resources Recycling and Recovery (CalRecycle) and jurisdictions to set their primary focus on successful implementation of diversion programs. CalRecycle set an annual target per capita disposal rate of 5.8 pounds of solid waste for residents and 7.7 pounds of solid waste for employees. In 2011, the most recent year that Cal Recycle has an approved diversion rate, the City of West Hollywood had an annual per capita disposal rate of 4.5 pounds per resident and 5.1 pounds per employee, which is well below CalRecycle's target rate.[59] AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the goals. The SRRE contains programs and policies for fulfillment of the goals of AB 939, including the previously-noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to Cal Recycle to update it on their progress toward the AB 939 goals (i.e., source reduction, recycling and composting, and environmentally safe land disposal).[60]

ii) City of West Hollywood Municipal Code

The City of West Hollywood requires a project to be designed to incorporate solid waste and recycling operations in a convenient manner. Per Article 19 of the City of West Hollywood Zoning Ordinance the following are required for new developments:[61]

- Each new multi-family and non-residential project shall implement a recycling plan;

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[58] *Cal Recycle website: http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPost2006.aspx, September 16, 2013.*

[59] *Cal Recycle website: http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPost2006.aspx, September 16, 2013 and City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, September 6, 2011.*

[60] *California Public Resources Code, §40050 et seq.*

[61] *City of West Hollywood Municipal Code, Zoning Ordinance, Chapter 19.20.180.*

- Residential (individual dwelling units) and commercial uses shall have sufficient containers as to accommodate the amount of solid waste and recycling generated by the premises; and
- Landscape waste shall be placed in designated green waste bins.

Furthermore, pursuant to the City of West Hollywood Municipal Code (WHMC) Title 19.20.060, the City requires projects to divert a minimum of 80 percent of all construction and demolition waste away from landfills.[62] Prior to the issuance of a Certificate of Occupancy, a project applicant must submit a recycling manifest to the City of West Hollywood Environmental Services Specialist which determines what type of material is accepted and recycled.

iii) City of West Hollywood General Plan

The City of West Hollywood has adopted an Infrastructure, Resources, and Conservation Element to its General Plan. The Element includes goals and policies related to solid waste. Listed below are the policies relevant to the proposed Project:[63]

IRC-10: Use best practices to reduce and manage solid waste.

IRC-10.3: Encourage all construction projects (regardless of size) to divert 80% of the construction waste debris away from landfills.

IRC-10.7: Encourage the use of recycled building materials in public and private development projects.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

In accordance with guidance provided in Appendix G of the State CEQA Guidelines, the proposed Project would have a potentially significant solid waste impact if it would:

a) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

b) Fail to comply with federal, State, and local statutes and regulations related to solid waste.

i. Methodology

The environmental impacts of the proposed Project with respect to solid waste are determined based on the proposed increase in solid waste generation and the capacity of existing and proposed solid waste infrastructure. The existing landfill capacities and solid waste generation is compared to the proposed Project's solid waste generation and future landfill capacities, including a discussion of recycling programs and design features that would be implemented with the proposed Project.

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[62] *City of West Hollywood Municipal Code, Title 19, Chapter 20.060.*

[63] *City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, September 6, 2011.*

B. Project Impacts

Threshold	*Would the proposed project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

Impact L.3-1 The proposed Project would generate a net solid waste stream. The landfill serving the Project Site has sufficient permitted capacity to accommodate the Project's solid waste disposal needs and impacts would be less than significant.

i) Solid Waste Generation

1) Construction

Construction of the Project is anticipated to commence in the end of the third quarter of 2014 with a duration of approximately 20 months. The construction process would involve six phases for the Existing Building and six phases for the Rosewood Avenue Development (13 Townhomes, Four-Plex Apartment Building and Indoor Pool House). Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Construction debris would consist primarily of debris from the conversion of the existing 89,630 sf commercial building into a residential building and the demolition of the 48,000 sf of surface parking area, which would be disposed of as inert waste. As shown in Table IV.L.3-3 (Estimated Construction and Demolition Debris Generation), renovation of the Existing Building and demolition of the surface parking lot would generate an estimated 206 tons of inert waste.

Table IV.L.3-3
Estimated Project Construction and Demolition Debris Generation

Land Use	Size	Generation Rate (ppsf)	Total (ppsf)	Total (tons/yr)
Renovation and Demolition				
Existing Building (renovation)	89,630 sf	3.0[a]	268,890	134
Surface Parking Lot (demolition)	48,000 sf	3.0[a]	144,000	72
Renovation and Demolition Solid Waste Generation Total			**412,890**	**206**
Construction				
Existing Building Expansion	79,123 sf	4.0[b]	316,492	158
Rosewood Avenue Construction	42,592 sf	4.0[b]	170,368	85
Construction Solid Waste Generation Total			**486,860**	**243**

ppsf = pounds per square foot

[a] *U.S. EPA, Report No. 530R98010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, non-residential renovation and demolition debris rate, Table A-14, p.A-12*

[b] *U.S. EPA, Report No. 530R98010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, multi-family construction rate, Table 3, p.2-3.*

Source (table): EcoTierra Consulting, December 2013.

Much of the material would be recycled and salvaged to the maximum extent feasible, at a minimum of 80 percent diversion from the landfill per WHMC Title 19.20.060. The City of West Hollywood requires that demolition debris be hauled away by hauler permitted to operate in the City (i.e., Athens Services). Furthermore, prior to the issuance of a Demolition Permit, a project applicant is required to submit a Demolition and Construction Debris Recycling Plan to the City of West Hollywood Environmental

Services Specialist. The plan must list the materials to be recycled and the name, address, and telephone number of the facility or organization that will accept those materials.

The estimated renovation and demolition debris that would be generated by the proposed Project would be approximately 206 tons per year (see Table IVl.L.3-3, Estimated Project Construction and Demolition Debris Generation). Based on an average of 4.0 pounds of construction debris per square foot of non-residential construction that would need to be disposed of at an inert landfill,[64] construction of the proposed Project would generate approximately 243 tons of construction debris as shown in Table IV.L.3-3. This forecasted solid waste generation is a conservative estimate, as it assumes no reductions in solid waste generation would occur due to recycling and the existing commercial building would be renovated, not demolished. Furthermore, site preparation (vegetation removal and grading activities) would generate construction debris, including wood, paper, glass, plastic, metals, cardboard, and green wastes. The 2012 County of Los Angeles Integrated Waste Management Plan Annual Report concludes that there is current capacity of 64.1 million tons available in the County for the disposal of inert waste.[65] Therefore, project-generated demolition and construction-related waste would represent a very small percentage of the inert waste disposal capacity in the region. Existing solid waste disposal facilities can adequately accommodate project construction debris. Therefore, implementation of the proposed Project would have less than significant impacts on solid waste disposal facilities with regard to construction debris.

2) Operation

Operation of the proposed Project would result in ongoing generation of solid waste. Over the long term, the proposed Project would be expected to generate a net total of 123 pounds of solid waste per day (or 22 tons per year) [see Table IV.L.3-4 (Proposed Project Solid Waste Generation)].

Table IV.L.3-4
Proposed Project Solid Waste Generation

Land Use	Size	Generation Rate (ppd)	Total (ppd)	Total (tons/yr)
Commerical				
Office	10,562 sf	6.0 lbs/1,000 sf[a]	64	12
Retail	19,875 sf	2.5 lbs /1,000 sf[a]	50	9
Restaurant	125 seats	1.0 lbs /seat[a]	125	23
		Commercial Subtotal	***239***	**44**
Residential				
Condominiums	56 units	4.0 lbs /unit[b]	224	41
Townhomes	13 units	4.0 lbs /unit[b]	52	9
Apartments	12 unit	4.0 lbs /unit[b]	48	8
		Residential Subtotal	***324***	***58***
		Combined Commercial and Residential	***563***	***102***
		Less Existing Solid Waste Generation	***440***	***80***

[64] *U.S. EPA, Report No. 530R98010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.*

[65] *Los Angeles County Integrated Waste Management Plan 2012 Annual Report, August 2013, page 25.*

Table IV.L.3-4
Proposed Project Solid Waste Generation

Land Use	Size	Generation Rate (ppd)	Total (ppd)	Total (tons/yr)
Commerical				
		Total Net Solid Waste Generation	**123**	**22**

sf=square feet, gpd = pounds per day; yr = year
[a] calrecycle.ca.gov/wastechar/wastegenrates/commercial.htm.
[b] calrecycle.ca.gov/wastechar/wastegenrates/residential.htm.
Source (table): EcoTierra Consulting, December 2013.

As previously discussed, the AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the total project solid waste (563 pounds per day (ppd), or 123 net ppd) must be recycled rather than disposed of in a landfill. The proposed Project would comply with AB 939 requirements, and approximately 50 percent of the proposed Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation (approximately 281.5 total ppd or 61.5 net ppd) would be disposed in landfills.

The five San Bernardino County landfills can accept up to a combined total of 15,200 tons of municipal solid waste per day (or 83,287 ppd). The Project's total of 281.5 ppd (or 61.5 net ppd) would represent approximately 0.34 percent (or 0.0.7 percent for the net total) of the total daily intake at the five landfills. Though there is adequate landfill space to accommodate the Project's total of 563 ppd (or net increase of 123 ppd), the City of West Hollywood recommends that Best Management Practices be implemented such as the following:

- The Project shall provide adequate storage area for recycling bins;
- Recycling education shall be posted at key locations on the Project Site;
- Tenants of the Project shall receive regularly scheduled education materials to encourage participation in recycling to the maximum possible.

Further, Athens Services would continue to comply with the WHMC regarding solid waste and recycables collection services. Additionally, the Project would comply with the WHMC Title 10.20.060 requirements for new development as previously described. With adequate landfill capacity at the five San Bernardino County landfills, as well as available capacity at other landfills in Los Angeles, Orange and Imperial counties, Project compliance with WHMC recycling requirements and implementation of Best Management Practices (described above), Project impacts on solid waste facilities would be less than significant.

Threshold	*Would the proposed project fail to comply with federal, State, and local statutes and regulations related to solid waste?*

Impact L.3-2 The proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, and impacts would be less than significant.

ii) Consistency with Regulations

1) Consistency with California Integrated Waste Management Act of 1989

As previously discussed, the AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the Project's total sold waste generated 563 ppd (or 123 net ppd) must be

recycled rather than disposed of in a landfill. The proposed Project would comply with AB 939 requirements and approximately 50 percent of the proposed Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation (approximately 281 ppd (or 61.5 net ppd) would disposed in landfills. The Project would comply with West Hollywood Development Conditions to reduce the amount of solid waste being disposed into landfills by promoting diversion techniques that increase recycling of solid waste, consistent with AB 939. Since the Project is not anticipated to substantially increase solid waste generation in the City of West Hollywood, or the amount disposed into the landfills, impacts would be less than significant.

2) Consistency with City of West Hollywood General Plan

The proposed Project would implement strategies to create minimal waste and utilize recycled materials, which in turn would reduce the number of refuse haul trips. The proposed Project would include enclosed trash areas and recycling storage areas and divert 80 percent of the construction waste debris away from landfills. Therefore, the proposed Project would be consistent with the City of West Hollywood General Plan, and impacts would be less than significant.

Furthermore, the City of West Hollywood Zoning Ordinance requires a project to be designed to incorporate solid waste and recycling operations in a convenient manner.[66] The proposed Project shall incorporate a recycling plan, shall have sufficient containers as to accommodate the amount of solid waste and recycling generated by the premises, and landscape waste shall be placed in designated green waste bins. Impacts would be less than significant.

4. CUMULATIVE IMPACTS

A. Construction

Like the proposed Project and the related projects would generate inert demolition and construction waste. Also like the proposed Project, the related projects and other reasonably foreseeable growth would recycle solid waste during construction to the extent feasible. The proposed Project is estimated to generate approximately 206 tons of demolition and renovation debris and 243 tons of construction debris. The 2012 County of Los Angeles Integrated Waste Management Plan Annual Report concludes that there is capacity available in the County for the disposal of inert waste.[67]Thus, the proposed Project would have a less than significant impact with respect to disposal of inert waste. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

B. Operation

The geographic scope of the cumulative solid waste analysis is Athens service collection area for the City of West Hollywood. With respect to solid waste, the proposed Project combined with the 10 related projects, located within the City of West Hollywood, would be expected to increase solid waste generation.[68] The proposed Project and 10 related projects are anticipated to generate approximately

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[66] *City of West Hollywood Municipal Code, Zoning Ordinance, Chapter 19.20.180.*

[67] *2012 County of Los Angeles Integrated Waste Management Plan Annual Report, August 2012, page 25.*

[68] *The two Beverly Hills related projects (numbers 11 and 12 on Table III-1, Section III, Environmental Setting) are served by the City of Beverly Hills Public Works Department for solid waste collection and disposal.*

3,620 ppd (or 660 tons per year) of solid waste per day [see Table IV.L.3-5, (Cumulative Solid Waste Generation)].

Similar to the proposed Project, the related projects would participate in regional source reduction and recycling programs further reducing the amount of solid waste to be disposed of at landfills. As discussed above, the AB 939 requirement to reduce the solid waste stream in landfills by 50 percent of the total cumulative solid waste generated of 3,743 ppd (or 683 tons per year). Thus, the cumulative projects would generate approximately 1,871.5 ppd that would be disposed in local landfills.

The five San Bernardino County landfills can accept up to a combined total of 15,200 tons of municipal solid waste per day (or 83,287 ppd). The amount of solid waste generated by the cumulative projects that would not be diverted or recycled represents 0.12 percent of the daily capacity of the San Bernardino County landfills and could easily be accommodated. As with the proposed Project, each related project would be required to comply with applicable State and local regulations, thus reducing the amount of landfill waste by at least 50 percent.

Development associated with the proposed Project, related projects in the City of West Hollywood (as well as the two related projects in the City of Beverly Hills) would contribute to the reduction of landfill capacity within the Los Angeles Region. The cumulative increase (proposed Project and related projects) in solid waste generation, however, would only be 0.12 percent of the maximum daily permitted intake of the five San Bernardino County landfills. Furthermore, the proposed Project and related projects would be required to meet current recycling goals, reducing the amount of solid waste requiring disposal at landfills. The proposed Project would have a less than significant impact with respect to disposal of solid waste. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

Table IV.L.3-5
Cumulative Solid Waste Generation

No.	Land Use	Size	Generation Rate[a]	Total (ppd)
Projects Within City of West Hollywood (Served by Athens Serivces)				
1	Hotel	69 rm	2 lbs/room	138
	Condominiums	8 du	4 lbs /units	32
2	Retail	6,500 sf	2.5 lbs /1,000 sf	16
3	Retail/Commercial	28,474 sf	2.5 lbs /1,000 sf	71
4	Retail/Commercial	9,545 sf	2.5 lbs /1,000 sf	24
5	Restaurant	9,998 sf	5 lbs /1,000 sf	50
6	Retail	14,571 sf	2.5 lbs /1,000 sf	36
	Apartments	7 du	4 lbs /units	28
7	Office	400,000 sf	6 lbs/1,000 sf	2,400
8	Commercial	21,565 sf	2.5 lbs /1,000 sf	54
9	Retail	9,850 sf	2.5 lbs /1,000 sf	25
	Apartments	42 du	4 lbs /units	168
	Restaurant	9,800 sf	5 lbs /1,000 sf	49
10	Retail/Commercial	73,819 sf	2.5 lbs /1,000 sf	184
	Apartments	76 du	4 lbs /units	304
	Cafe/Restaurant	8,202 sf	5 lbs/1,000 sf	41
			West Hollywood Related Projects Total Solid Waste Generation	*3,620 ppd*
			Proposed Project Total Net Solid Waste Generation	***123 ppd***
			Cumulative Total Solid Waste *Generation*	**3,743 ppd**
Projects Within City of Beverly Hills (Served by the City of Beverly Hills Public Works Department)				
11	Condominiums	35 du	4 lbs /units	140
12	Condominiums	34 du	4 lbs /units	136
			Subtotal	*276ppd*
			Beverly Hills Projects Total Solid Waste *Generation*	**276 ppd**[b]

Notes: sf = square feet; ppd = pounds per day
[a] calrecycle.ca.gov/wastechar/wastegenrates/commercial.htm; calrecycle.ca.gov/wastechar/wastegenrates/residential.htm; and calrecycle.ca.gov/wastechar/wastegenrates/services.htm
[b] *Related projects 11 and 12 are not located within the City of West Hollywood and are therefore not included in the cumulative student totals.*
Source (table): EcoTierra Consulting, December 2013.

5. MITIGATION MEASURES

A. Construction

No significant impacts were identified. Therefore, no mitigation measures are required.

B. Operation

Though no significant impacts were identified, the following Best Management Practices are provided as conditions of approval:

IV.L.3-1 Prior to issuance of Project building occupancy permit, the Applicant shall provide adequate storage area in the Existing Building, Apartment Building and Townhomes for recycling bins; and recycling education shall be posted at key locations on the Project Site. Further, the Project

Applicant shall demonstrate to the City of West Hollywood Public Works Department that tenants of the Project will receive regularly scheduled education materials encouraging participation in recycling to the maximum possible.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Solid waste generation for both construction and operation of the project would be less than significant.

Cumulative solid waste impacts for both construction and operationu8io would be less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
L. UTILITIES
4. ELECTRICITY AND NATURAL GAS

1. INTRODUCTION

This Subsection describes the potential impacts on the electricity supply and natural gas distribution systems serving the Project Site.

This section utilizes information from the following resources: *2012 California Gas Report*; The SoCalGas website; WECC website; California Natural Gas Data and Statistics website; California Public Utilities Commission website; Southern California Edison, Power Generation website; and written correspondence from James Chuang, Southern California Gas Company on August 26, 2013.

2. ENVIRONMENTAL SETTING

A. Electricity

i) Electricity Supply

Southern California Edison (SCE) provides electricity service to the City of West Hollywood. Service is provided by a network of overhead and underground transmission lines. SCE obtains electricity from various generating sources that utilize natural gas, fossil fuels, hydroelectric sources, nuclear energy and renewable resources, such as solar and wind.[69] Southern California Edison is the largest electric utility in California, serving more than 14 million people in a 50,000 square mile area of central and coastal Southern California. The utility has been providing electric service in the region for more than 120 years and has a service territory that includes 180 cities.[70]

ii) Electricity Distribution System and Consumption

SCE supplies power to the Project Site through the City transmission system, which similarly derives power from as many as 25 different electric generation plants located both within and outside Southern California. Figure IV.L-4 (Electricity Distribution Map), illustrates the location of transmission lines serving the Project Site. As shown, the Project Site is currently served by electrical overhead distribution lines, which run east-west through the center of the Project Site. The existing uses on the Project Site consumed an estimated 1,307,284 kilowatt-hours (kWh) of electricity per year (see Table IV.L.4-1 [Existing Electricity Consumption]).

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[69] *Southern California Edison, Power Generation, website: http://www.sce.com, September 27, 2013.*

[70] *Southern California Edison, Who We Are, website: http://www.sce.com, September 27, 2013.*

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Source: Olson Kundig Architects, May 23, 2013 and EcoTierra Consulting, September 2013.

EcoTierra consulting

Figure IV.L-4
Electricity Distribution Map

Table IV.L.4-1
Existing Average Yearly Electricity Consumption

Land Use	Size	Consumption Rate[a]	Total (kWh/year)
Office	64,502 sf	12.95 kwH/sf/yr	835,301 kWh/year
Retail	21,249 sf	13.55 kwH/sf/yr	287,924 kWh/year
Restaurant	3,879 sf	47.45 kwH/sf/yr	184,059 kWh/year
Total Existing Electricity Consumption			**1,307,284 kWh/year**

Notes: sf = square feet; kwH = kilowatt hours, yr = year
[a] *SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.*
Source (table): EcoTierra Consulting, August 2013.

B. Natural Gas

i) Natural Gas Supplies

Southern California Gas Company (SoCalGas) provides natural gas resources to most of Southern and Central California from the United States/Mexico border to the City of Visalia, California and obtains its gas resources from several sedimentary basins including: the San Juan Basin in New Mexico, the Permian Basin in West Texas, Rocky Mountain, western Canada, and local California supplies.[71]

The *2012 California Gas Report* has projections regarding future demand for natural gas in the southern California region. SoCalGas predicts gas demand to grow at an annual average rate of 0.12 percent from 2011 to 2030. This is due to foreclosures clearing, employment recovering, and new housing being built.[72]

1) Southwestern United States Gas Supplies

Natural gas obtained from the Southwestern United States, especially the San Juan Basin in New Mexico, will provide the majority of gas sold by SoCalGas. This gas is delivered to the Southern California region through the El Paso Natural Gas Company and the Transwestern Pipeline Company pipelines. Although the conventionally produced gas supplies from the San Juan Basin peaked in 1999 and have been declining at an annual rate of -1.4 percent, the San Juan Basin continues to be a major supply source for SoCalGas. The Permian Basin also provides an additional source of natural gas.[73]

2) Rocky Mountain Gas Supplies

Natural gas obtained from the Rocky Mountain sources is considered to be a viable alternative to the traditional source of natural gas in the Southwestern United States. These natural gas supplies are delivered to the Southern California region through the Kern River Gas Transmission Company's pipeline. Access to Rocky Mountain gas is also available through pipeline interconnections with the San Juan Basin. Production from the Rocky Mountain region in 2011 has doubled since 2000 due to the

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[71] *2012 California Gas Report, page 80.*

[72] *Ibid., page 66.*

[73] *Ibid., page 80.*

successful applications of new technology to drill for coal-bed methane gas. In recent years, Rocky Mountain gas has increasingly flowed to Midwestern and Pacific Northwest markets.[74]

3) Canadian Gas Supplies

Natural gas obtained from Canada and delivered to Southern California is expected to decline over the next several years as new pipeline capacity to the Midwest and Eastern United States is expected to divert natural gas supplies away from California. An increase in supplies from the Rockies and the Permian Basin is anticipated to replace the diverted Canadian natural gas supplies.[75]

4) Biogas

Biogas is a renewable energy source that contains a mixture of methane and carbon dioxide produced by degradation of organic matter, such as livestock manure, wastewater sewage, food waste, and green waste. Biogas is the byproduct produced from processes such as anaerobic digestion, anaerobic decomposition, and thermo-chemical decomposition under sub-stoichiometric conditions. On April 25, 2012, SoCalGas filed an application to establish a new tariff to offer a Biogas Conditioning/Upgrading Services Tariff in response to customer inquiries and requests. Under the proposed tariff, when a customer expresses interest in the Biogas, SoCalGas will conduct a feasibility analysis to determine the technical and economic feasibility of the design, installation, operation and maintenance of the gas conditioning equipment. SoCalGas will then process the customer's biogas and condition it to the gas quality levels contractually specified in the service agreement. [76]

5) Liquefied Natural Gas Supplies

With the completion of the Costa Azul LNG terminal in Baja California, Mexico in May 2008, Liquefied Natural Gas (LNG) is expected to be an important supply source to California. As for the other gasification facilities currently under the planning and permitting stage, it is uncertain as to how many other re-gasification facilities will actually be built and where they will be located on the West Coast of North America.[77]

ii) Natural Gas Distribution Systems

1) Interstate Distribution System

SoCalGas serves approximately 20.9 million customers in more than 500 communities.[78] In addition, SoCalGas makes available to its customers energy efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption. Natural gas service is provided in accordance with SoCalGas' policies and extension rules on file with the California PUC at the time contractual agreements

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[74] *Ibid., page 80.*

[75] *Ibid., page 81.*

[76] *Ibid., page 81.*

[77] *Ibid., page 83.*

[78] *The SoCalGas, About Us, Company Profile, website: http://www.socalgas.com/about-us/company-info.shtml, September 30, 2013.*

are made. SoCalGas predicts gas demand to grow at an annual average rate of 0.12 percent from 2011 to 2030. Demand is expected be virtually flat for the next 18 years due to modest economic growth, California PUC-mandated energy efficiency goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by customers and savings linked to advanced metering modules.[79]

2) Local Distribution System and Consumption

SoCalGas provides natural gas to the City of West Hollywood and to the Project Site through existing gas mains located under the streets and public right-of-ways. Natural gas services are provided in accordance with SoCalGas' policies and extension rules on file with the California PUC at the time contractual agreements are made. Figure IV.L-5 (Gas Line Location Map), illustrates the location of natural gas lines serving the Project Site and immediate area. As shown, the natural gas line distribution system for the Project Site includes three-inch mains located in both Beverly Boulevard and Rosewood Avenue.[80] These mains are located on the south side of each street.

The existing uses on the Project Site consume an estimated 204,784 cubic feet (cf) of natural gas per month (see Table IV.L.4-2 [Existing Average Yearly Natural Gas Consumption]).

Table IV.L.4-2
Existing Average Yearly Natural Gas Consumption

Land Use	Size	Consumption Rate[a]	Total (cf/month)
Office	64,502 sf	2.0 cf/sf/mo	129,004
Retail	21,249 sf	3.0 cf/sf/mo	63,747
Restaurant	3,879 sf	3.0 cf/sf/mo	11,637
Total Existing Natural Gas Consumption			**204,784 cf/month**

sf =square feet; cf=cubic feet; mo=month
[a] Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.

C. Regulatory Setting

i) California Public Utilities Commission

The California Public Utilities Commission (PUC) regulates investor-owned electric power and natural gas utility companies in the State of California. Assembly Bill 1890, enacted in 1996, deregulated the power generation industry, allowing customers to purchase electricity on the open market. Under deregulation, the production and distribution of power that was under the control of investor-owned utilities was decoupled.

PUC also regulates natural gas utility service for customers that receive natural gas from SoCalGas and other natural gas utilities. Most of California's natural gas customers are residential and small commercial customers (referred to as "core" customers) who accounted for approximately 32 percent of the natural gas delivered by California utilities in 2012. Large consumers like electric generators and

[79] *2012 California Gas Report, page 66.*

[80] *Written correspondence from James Chuang, Southern California Gas Company, August 26, 2013.*

Source: Olson Kundig Architects, May 23, 2013 and EcoTierra Consulting, September 2013.

EcoTierra consulting

Figure IV.L-5
Natural Gas Line Location Map

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industrial customers (referred to as "non-core" customers) accounted for approximately 68 percent of the natural gas delivered by California utilities in 2012. The PUC regulates the California utilities' natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering and billing. SoCalGas owns and operates several natural gas storage fields that are located in northern and southern California. These storage fields, and independently owned storage utilities – Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage, help meet peak seasonal natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently.[81]

ii) California Independent System Operator

The California Independent System Operator (CALISO) is a not-for-profit public-benefit corporation charged with operating the majority of California's high-voltage wholesale power grid. Balancing the demand for electricity and equal supply of megawatts, CALISO is the link between power plants and utilities like SCE, who serve more than 30 million consumers. CALISO was established in 1998 and operates the region's power grid and wholesale electric markets. It is charged with maintaining reliable electric service, improving the efficiency of electric system operations, including the provision of open and non-discriminatory access to the transmission facilities under its control and to identify and promote new investments in transmission infrastructure in a coordinated, open, transparent and participatory manner.[82]

California produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, including the Southwest area, Rocky Mountain area, and Canada. In the last 10 years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. The availability of natural gas is based upon present conditions of gas supply and regulatory policies, as SoCalGas is under the jurisdiction of the California PUC and other federal regulatory agencies. In addition, SoCalGas makes available to its customers energy efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.[83]

SoCalGas, a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas throughout Central and Southern California. SCG obtains its gas resources from several sedimentary basins including: the San Juan Basin in New Mexico, the Permian Basin in West Texas, Rocky Mountain, western Canada, and local California supplies.[84]

iii) California Code of Regulations, Title 24

The California Building Code is contained in Title 24 of the California Code of Regulations, and governs all aspects of building construction. Included in the building code are standards mandating energy efficiency measures for new construction, which are updated every three years to allow new energy

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[81] *California Public Utilities Commission website: http://www.cpuc.ca.gov/puc/Energy/gas/natgasandca.htm, September 27, 2013.*

[82] *Federal Energy Regulatory Commission (FERC), Power Oversight, Electric Power Markets (CALISO) website, http://www.ferc.gov/market-oversight/mkt-electric/california.asp#geo, September 27, 2013.*

[83] *California Natural Gas Data and Statistics, Overview of Natural Gas in California website, http://www.energyalmanac.ca.gov/naturalgas/overview.html, September 27, 2013.*

[84] *2012 California Gas Report, page 80.*

efficiency technologies to be considered. These energy measures are known as the State Building Energy Efficiency Standards. The efficiency standards apply to new construction of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce their own energy standards for new buildings, provided these standards meet or exceed those provided in Title 24 guidelines.

iv) Western Electricity Coordinating Council and the North American Electric Reliability Council

Western Electricity Coordinating Council (WECC) is a voluntary consortium of electrical power providers that is responsible for coordinating and promoting electricity reliability from the Canadian provinces of Alberta and British Columbia to the northern Mexican State of Baja California, and the 14 western states of the United States in between.[85] SCE is a member of WECC. WECC has implemented Standard BAL-STD-002-0 to require reliable operation of the interconnected power system while ensuring adequate generating capacity be available at all times to account for varying demands and avoid loss of firm load following transmission or generation contingencies. As a means of ensuring power system reliability, SCE maintains an extra reserve margin of power generation resources in the event of a power system disturbance. In order to determine how much extra generation reserves are needed, SCE adheres to the WECC Reliability Standard. Specifically, WECC Standard BAL-STD-002-0 requires its providers to:

- Supply requirements for load variations;
- Replace generating capacity and energy lost due to forced outages of generation or transmission equipment;
- Meet on-demand obligations; and
- Replace energy lost due to curtailment of interruptible imports.

v) City of West Hollywood

1) City of West Hollywood Green Building Program

As previously discussed, the City of West Hollywood adopted one of the nation's first mandatory green building ordinance, on October 1, 2007. The ordinance ensures that new buildings will be healthier for residents, and use energy and resources more efficiently.[86] The guidelines for energy conservation are included in the *West Hollywood Green Building Manual*. All applications for projects proposing three (3) or more residential units, and all applications for new commercial buildings (including mixed-use projects) must comply with the Green Building Point System. Listed below are the guidelines relevant to the proposed Project:[87]

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[85] *WECC, About WECC, website: http://www.wecc.biz/About/Pages/default.aspx, accessed September 27, 2013.*

[86] *City of West Hollywood, Building and Safety, website: http://www.weho.org/index.aspx?page=194, September 23, 2013.*

[87] *The West Hollywood Green Building Manual.*

- **Energy Star appliance:** Appliances provided in residential and mixed-use projects, and commercial projects as appropriate, shall be Energy Star qualified appliances.
- **Energy Efficiency:** Projects shall comply with all applicable provisions of the most recent editions of the Title 24 Energy Efficiency Standards, and most recent editions of the West Hollywood Building, Electrical, Mechanical and Plumbing Codes.
- **Tankless water heaters**: Tankless water heaters produce hot water on demand – when it is needed – instead of producing and storing a specified amount of water. Tankless units are 25–40 percent more efficient than tank units and require less space. Venting requirements are often more stringent for tankless units. Some tankless units can be combined with solar water heaters.

2) City of West Hollywood General Plan

The City of West Hollywood has adopted an Infrastructure, Resources, and Conservation Element to its General Plan. The Element includes goals and policies related to electricity conservation. Listed below are the policies relevant to the proposed Project:[88]

IRC-2: Provide citywide access to high-quality water, gas, electricity, and telecommunications services.

***IRC-2.2*:** Require development projects to provide a "will serve" letter or similar proof of the availability of necessary infrastructure and services by outside service providers during the permit review process.

***IRC-2.3*:** Require that development projects pay for their share of the costs of improvements to water, gas, power and other utilities that they necessitate.

3. ENVIRONMENTAL IMPACTS

A. Thresholds of Significance

i) Electricity

Implementation of the proposed Project would create a significant impact on electricity resources if:

a) Demand for electricity cannot be served by existing electricity infrastructure and/or supply.

ii) Natural Gas

Implementation of the proposed Project would create a significant impact on natural gas resources if:

a) Demand for natural gas cannot be served by existing natural gas infrastructure and/or supply.

[88] *City of West Hollywood General Plan, Infrastructure, Resources, and Conservation Element, September 6, 2011.*

iii) Methodology

The environmental impacts of the proposed Project with respect to electricity and natural gas are determined based on the proposed increase in electricity and natural gas demand and the capacity of existing and proposed infrastructure. The existing electricity and natural gas demand are compared to the proposed Project's electricity and natural gas demand and electricity and natural gas infrastructure capacity, including improvements associated with the proposed Project.

B. Project Impacts

Threshold	*Would the proposed project result in a demand for electricity service, which cannot be served by existing electricity infrastructure and/or supply?*

Impact L.4-1 The proposed Project would be served by the existing electricity supply and infrastructure, and would include energy conservation and efficiency features to reduce energy demand. Therefore, impacts would be less than significant.

As indicated in Table IV.L.4-3 (Proposed Project Electricity Consumption), the proposed Project is estimated to consume a net *decrease* of 190,578 kWh per year. This estimation does not take into consideration the effectiveness of the proposed Project's energy conservation features listed in Section II (Project Description) of this EIR, which would result in a lower demand for electricity than is presented on Table IV.L.4-3 (Proposed Project Electricity Consumption). However, to provide for a conservative analysis, this reduction is not accounted for in the analysis. SCE would supply the entire proposed Project from the existing electrical system. SCE already provides electricity supply to the City of West Hollywood and, as previously discussed, derives power from 25 different electric generation plants located both within and outside of Southern California. Implementation of the proposed Project would result in an overall decrease in onsite electricity consumption when compared to the existing uses and would not result in the need for creating additional generation plants to provide supply to the site. Impacts with regard to electricity supply would be less than significant.

As previously shown in Figure IV.L-4, the Project Site is currently served by electrical overhead distribution lines, which run east-west through the center of the Project Site. The proposed Project would be required to comply with the provisions set forth in Section 19.20.230 of the WHMC, which would require the overhead distribution lines be placed underground. Electrical conduits, wiring and associated infrastructure would be brought from existing SCE lines in the surrounding streets to the Project Site during construction. Therefore, the project would not result in the need to build new electricity infrastructure, and the site would be served by existing distribution lines. Impacts would be less than significant.

The proposed Project would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting and illuminated signs. The incorporation of the Title 24 standards into the project would ensure that the project would not result in the inefficient, unnecessary, or wasteful consumption energy. Furthermore, all applications for projects proposing three (3) or more residential units, and all applications for new commercial buildings (including mixed-use projects) must

comply with the Green Building Point System, which ensures that new buildings will be healthier for residents, and use energy and resources more efficiently.[89]

In summary, the proposed Project incorporates energy efficiency measures that will exceed minimum state standards, and therefore, would not result in the inefficient, unnecessary, or wasteful use of energy. Project impacts would be less than significant.

Table IV.L.4-3
Proposed Project Electricity Consumption

Land Use	Size	Consumption Rate[a]	Total (kWh/year)
Non- Residential			
Office	10,562 sf	12.95 kwH/sf/yr	136,778 kwH/sf/yr
Retail	19,875 sf	13.55 kwH/sf/yr	269,306 kwH/sf/yr
Restaurant	4,394 sf	47.45 kwH/sf/yr	208,495 kwH/sf/yr
Pool House	4,417 sf	10.50 kwH/sf/yr	46,379 kwH/sf/yr
		Subtotal	***660,958 kwH/sf/yr***
Condominiums	56 units	5,626.50 kwH/du/yr	315,084 kwH/du/yr
		Subtotal	***315,084 kwH/du/yr***
Townhomes	13 units	5,626.50 kwH/du/yr	73,145 kwH/du/yr
		Subtotal	***73,145 kwH/du/yr***
Apartments	12 unit	5,626.50 kwH/du/yr	67,519 kwH/du/yr
		Subtotal	***67,519 kwH/du/yr***
		Subtotal Proposed Electricity Consumption	*1,116,706 kWh/year*
		Less Existing Electricity Consumption	***(*1,307,284*)* kWh/year**
		Total Net Electricity Consumption	**(190,578) kWh/year**

sf=square feet, kwH = kilowatt hours, yr = year; du = dwelling units
[a] Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.
Source (table): EcoTierra Consulting, August 2013.

Threshold	*Would the proposed project result in a demand for natural gas service, which cannot be served by existing natural gas infrastructure and/or supply?*

Impact L.4-2 The proposed project would be served by the existing natural gas supply and infrastructure, and the project would include energy conservation and efficiency features to reduce energy demand. Therefore, impacts would be less than significant.

i) Natural Gas Supplies

As indicated in Table IV.L.4-4 (Proposed Project Natural Gas Consumption), the proposed Project is estimated to consume a net total of approximately 227,370 cf of natural gas per month.

The 2012 California Gas Report projects that California natural gas demand is expected to increase by just 0.12 percent per year through 2030, and therefore, natural gas supplies are expected to meet Southern California's gas demand. Further, the proposed Project would be subject to the State Energy Conservation Standards contained in Title 24 of the CCR, which is a set of prescriptive standards

[89] *City of West Hollywood, Building and Safety, website: http://www.weho.org/index.aspx?page=194, September 23, 2013.*

establishing mandatory maximum energy consumption levels for buildings. The proposed Project would comply with Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. With modern energy efficient construction materials and compliance with Title 24 standards, the proposed Project would be consistent with the State's energy conservation standards and, therefore, would not conflict with adopted energy conservation plans. The proposed Project would also have several energy efficient design features as described in Section II (Project Description) of this EIR. As such, impacts to natural gas supply would be less than significant.

Table IV.L.4-4
Proposed Project Natural Gas Consumption

Land Use	Size	Consumption Rate[a]	Total (cf/month)
Non-Residential			
Office	10,562 sf	2.0 cf/sf/mo	21,124
Retail	19,875 sf	3.0 cf/sf/mo	59,625
Restaurant	4,394 sf	3.0 cf/sf/mo[b]	13,182
Pool House	4,417 sf	3.0 cf/sf/mo[c]	13,251
		Subtotal	***107,182***
Condominiums	56units	4,012 cf/unit/mo	224,672
		Subtotal	***224,672***
Townhomes	13units	4,012 cf/unit/mo	52,156
		Subtotal	***52,156***
Apartments	12units	4,012 cf/unit/mo	48,144
		Subtotal	***48,144***
		Subtotal Proposed Natural Gas Consumption	*432,154 cf/month*
		Less Existing Natural Gas Consumption	***(204,784) cf/month***
		Total Net Increased Natural Gas Consumption	**227,370 cf/month**

Sf =square feet; cf=cubic feet; mo=month
[a] Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.
[b] Based on Retail Use. No rate was provided for a Restaurant.
[c] Based on Retail Use. No rate was provided for a Pool House.
Source (table): EcoTierra Consulting, August 2013.

ii) Natural Gas Distribution

According to the *2012 California Gas Report*, California has developed additional natural gas storage facilities and pipelines to accommodate demand growth. This additional pipeline capacity has contributed to long-term supply availability.[90] As such, the SoCalGas operates in an environment where interstate pipeline capacity exists in excess of anticipated demand. Therefore, there is adequate

[90] *2012 California Gas Report*.

pipeline capacity to deliver natural gas to the City.[91] SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service and would upgrade the infrastructure as needed. As previously illustrated in Figure IV.L-5 (Gas Line Location Map), the natural gas line distribution system for the site includes facilities in Beverly Boulevard and Rosewood Avenue. Therefore, the project would not result in the need to build new natural gas infrastructure and the site would be served by existing distribution lines. As such, proposed Project impacts related to natural gas infrastructure would be less than significant.

4. CUMULATIVE IMPACTS

A. Electricity

Implementation of the proposed Project in conjunction with the 12 related projects would increase the demand for electricity. As shown in Table IV.L.4-5 (Cumulative Electricity Consumption), the estimated electricity consumption would be approximately 10,004,953 kwH per year. SCE expects that electricity demand would continue to increase annually, and that execution of plans for new distribution resources would maintain their ability to serve customers. Cumulative impacts related to electric power service would be addressed through SCE's long range planning process.

In addition, like the proposed Project, all of the related projects and other planned and approved projects would be required to comply with Title 24 of the CCR, which establishes energy conservation standards for new construction. If new electricity supply facilities, distribution infrastructure, or capacity-enhancing alterations would be needed with implementation of the related projects (as well as other planned and approved projects), as anticipated by SCE, it is expected that SCE would connect such new electricity loads with minimum interruption to existing customers. As such, the proposed Project, in conjunction with related projects and other planned and approved projects, would not have a cumulatively considerable impact on electricity generation or infrastructure, and cumulative impacts would be less than significant.

Table IV.L.4-5
Cumulative Electricity Consumption

No.	Land Use	Size	Consumption Rate[a]	Total (kwH/year)
1	Hotel	63,000 sf	9.95 kwH/sf/yr	626,850
	Condominiums	8 du	5,626.5 kwH/du/yr	45,012
2	Retail	6,500 sf	13.55 kwH/sf/yr	88,075
3	Retail/Commercial	28,474 sf	13.55 kwH/sf/yr	385,823
4	Retail/Commercial	9,545 sf	13.55 kwH/sf/yr	129,335
5	Restaurant	9,998 sf	47.45 kwH/sf/yr	474,405
6	Retail	14,571 sf	13.55 kwH/sf/yr	197,437
	Apartments	7 du	5,626.5 kwH/du/yr	39,386
7	Office	400,000 sf	12.95 kwH/sf/yr	5,180,000
8	Commercial	21,565 sf	13.55 kwH/sf/yr	292,206
9	Retail	9,850 sf	13.55 kwH/sf/yr	133,468
	Apartments	42 du	5,626.5 kwH/du/yr	236,313

[91] *Written correspondence from Kurt Edwards, P.E., Supervising/Engineering, Southwest Gas Corporation, January 27, 2011.*

Table IV.L.4-5
Cumulative Electricity Consumption

No.	Land Use	Size	Consumption Rate[a]	Total (kwH/year)
	Restaurant	9,800 sf	47.45 kwH/sf/yr	465,010
10	Retail/Commercial	73,819 sf	13.55 kwH/sf/yr	1,000,247
	Apartments	76 du	5,626.5 kwH/du/yr	427,614
	Cafe/Restaurant	8,202 sf	10.50 kwH/sf/yr	86,121
11	Residential	35 du	5,626.5 kwH/du/yr	196,928
12	Residential	34 du	5,626.5 kwH/du/yr	191,301
			Related Projects Total Electricity Consumption	***10,195,531****kWh/year*
			Proposed Project Total Net Electricity Consumption	***(190,578) kWh/year***
			Cumulative Total *Electricity Consumption*	**10,004,953kWh/year**

du=dwelling unit; sf=square feet; kwH = kilowatt hours, yr = year
[a] Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.
[b] Based on Miscellaneous Use. No rate was provided for storage.

Source (table): EcoTierra Consulting, September 2013.

B. Natural Gas

Implementation of the proposed Project in conjunction with the eight related projects would increase the demand for natural gas. As shown in Table IV.L.4-6 (Cumulative Natural Gas Consumption), the estimated natural gas consumption would be approximately 2,287,948 cf per month. SoCalGas expects that natural gas demand would continue to increase annually, and that execution of plans for new distribution resources would maintain their ability to serve customers. Cumulative impacts related to natural gas service would be addressed through this process. In addition, like the proposed Project, all of the related projects would be required to comply with Title 24 of the CCR, which establishes energy conservation standards for new construction. Future development projects would be subject to the locally mandated energy conservation programs. Where necessary, natural gas distribution pipelines would be installed or upsized to serve related projects at the expense of the respective project applicants. As such, the proposed Project, in conjunction with the related projects and other planned and approved projects, would not have a cumulatively considerable impact on natural gas supplies, and cumulative impacts to natural gas supply and infrastructure would be less than significant.

Table IV.L.4-6
Cumulative Natural Gas Consumption

No.	Land Use	Size	Consumption Rate[a]	Total (cf/month)
1	Hotel	63,000 sf	5 cf/sf/mo	315,000
	Condominiums	8 du	4,012 cf/du/mo	32,096
2	Retail	6,500 sf	3 cf/sf/mo	19,500
3	Retail/Commercial	28,474 sf	3 cf/sf/mo	85,422
4	Retail/Commercial	9,545 sf	3 cf/sf/mo	28,635
5	Restaurant	9,998 sf	3 cf/sf/mo[b]	29,994
6	Retail	14,571 sf	3 cf/sf/mo	43,713
	Apartments	7 du	4,012 cf/du/mo	28,084
7	Office	400,000 sf	2 cf/sf/mo	800,000
8	Commercial	21,565 sf	3 cf/sf/mo	64,695
9	Retail	9,850 sf	3 cf/sf/mo	29,550
	Apartments	42 du	4,012 cf/du/mo	168,504

Table IV.L.4-6
Cumulative Natural Gas Consumption

No.	Land Use	Size	Consumption Rate[a]	Total (cf/month)
	Restaurant	9,800 sf	3 cf/sf/mo	29,400
10	Retail/Commercial	73,819 sf	3 cf/sf/mo	221,457
	Apartments	76 du	4,012 cf/du/mo	304,912
	Cafe/Restaurant	8,202 sf	2 cf/sf/mo[c]	16,404
11	Residential	35 du	4,012 cf/du/mo	140,420
12	Residential	34 du	4,012 cf/du/mo	136,408
			Related Projects Natural Gas Consumption	*2,494,194 cf/month*
			Proposed Project Total Net Natural Gas Consumption	***206,246 cf/month***
			Cumulative Increased Total *Natural Gas Consumption*	**2,287,948 cf/month**

du=dwelling unit; sf =square feet; cf=cubic feet; mo=month
[a] Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.
[b] Based on Retail Use. No rate was provided for a Restaurant.
[c] Based on Retail Use. No rate was provided for Storage.
Source (table): EcoTierra Consulting, September 2013.

5. MITIGATION MEASURES

A. Electricity

No significant impacts related to electricity supply and infrastructure have been identified. However, the following condition of approval is provided regarding the existing on site electricity lines:

L.4-1 Prior to issuance of construction and demolition permits, the Applicant shall contact Southern California Edison regarding the overhead transmission lines traversing the Project Site to ensure Project construction would not disrupt service for the Project area.

B. Natural Gas

No significant impacts related to natural gas supply and infrastructure have been identified. Therefore, no mitigation is required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to electricity and natural gas service would be less than significant.

Cumulative impacts related to electricity and natural gas service would be less than significant.

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V. GENERAL IMPACT CATEGORIES

1. INTRODUCTION

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

Based on the analysis contained in Section IV (Environmental Impact Analysis) of this Draft EIR, the proposed Project would result in significant unavoidable environmental impacts with respect to noise (short-term construction).

Noise (Construction-Related)

Project demolition, excavation, and construction activities would generate short-term increases in noise levels at the Project site. Construction equipment used for the proposed Project could produce maximum noise levels of 73 to 90 dBA L_{max} at a distance of 50 feet from the source.

Daytime composite construction noise levels associated with the proposed Project could range from 77 to 86 dBA Leq at a distance of 50 feet from the construction activities. Existing ambient daytime noise levels in the residential area along Rosewood Avenue average around 60 dBA Leq. Construction activities associated with the proposed Project would increase daytime noise levels at the nearby residential uses by more than 10 dBA.

Implementation of mitigation measures IV.H-1 though IV.H-7 would reduce the impacts associated with temporary construction activities. The acoustical barrier required under mitigation measure IV.H-5 would reduce construction-related noise levels by at least 25 dBA, which would reduce the impact during excavation and parking structure construction to less than significant levels. However, construction of the proposed subterranean parking structure is expected to affect most of the northern portion of the Project site and it is not known if there would be adequate room to erect a temporary barrier within the perimeter of the Project site. The homes to the immediate east of the Project site are located only about four feet from the property boundary. Also, the temporary barrier would need to be removed prior to construction of the buildings proposed along Rosewood Avenue. Construction of these buildings would increase daytime noise levels at nearby homes by at lease 10 dBA Leq during various times. This is a significant and unavoidable impact associated with short-term Project-related construction activities.

2. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES AND ENERGY CONSERVATION

Section 15126.2(c) of the CEQA Guidelines states that the "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." Section 15126.2(c) further states that "irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The types and level of development associated with the proposed Project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of

the proposed Project and would continue throughout its operational lifetime. The development of the proposed Project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources and (3) the transportation of goods and people to and from the Project site.

Construction of the proposed Project would require consumption of resources that are not replenishable or that may renew slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The consumption of these resources would be spread out through the construction period.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the proposed Project. However, this resource consumption would be consistent with growth and anticipated change in the West Hollywood area.

Energy Conservation

Public Resources Code section 21100(b)(3) and CEQA Guidelines section 15126.4 require environmental impact reports (EIR) to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted AB 1575, which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs; license thermal power plants of 50 megawatts or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, to promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended *Public Resources Code* section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the CEQA Guidelines. Appendix F is an advisory document that assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. For the reasons set forth below, this EIR concludes that the proposed Project will not result in the wasteful, inefficient, and unnecessary consumption of energy and will not cause the need for additional natural gas or electrical-energy producing facilities, and therefore will not create a significant impact on energy resources.

Regulatory Setting

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the United State Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy related research and development projects, and through funding for transportation infrastructure improvements. On the state level, the California Public Utilities Commission (CPUC) and the CEC are two agencies with authority over different aspects of energy. The CPUC regulates privately-owned utilities in the energy, rail, telecommunications, and water fields. As set forth above, the CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy

efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is preempted under federal law from setting state fuel economy standards for new on-road motor vehicles. Some of the more relevant federal and state energy-related laws and plans are discussed below.

Federal Energy Policy and Conservation Act

The Federal Energy Policy and Conservation Act of 1975 sought to ensure that all vehicles sold in the U.S. would meet certain fuel economy goals. Through this Act, Congress established the first fuel economy standards for on-road motor vehicles in the U.S. Pursuant to the Act, the National Highway Traffic and Safety Administration, which is part of the United States Department of Transportation, is responsible for establishing additional vehicle standards and for revising existing standards. Since 1990, the fuel economy standard for new passenger cars has been 27.5 miles per gallon. Since 1996, the fuel economy standard for new light trucks (gross vehicle weight of 8,500 pounds or less) has been 20.7 miles per gallon. Heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model, but rather, compliance is determined on the basis of each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. The Corporate Average Fuel Economy (CAFE) program, which is administered by the United States Environmental Protection Agency, was created to determine vehicle manufacturers' compliance with the fuel economy standards. The United States Environmental Protection Agency calculates a CAFE value for each manufacturer based on city and highway fuel economy test results and vehicle sales. Based on the information generated under the CAFE program, the United States Department of Transportation is authorized to assess penalties for noncompliance. In the course of its over thirty year history, this regulatory program has resulted in vastly improved fuel economy throughout the nation's vehicle fleet.

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs), such as San Bernardino Association of Governments (SANBAG), were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, state, and local energy goals. Through this requirement, energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution.

The Transportation Equity Act for the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example,

deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

State of California Energy Plan

The California Energy Commission (CEC) is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

Title 24, Energy Efficiency Standards

Title 24, which was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, provides energy efficiency standards for residential and nonresidential buildings. The Warren-Alquist Act enacted in 1976, mandated that the CEC create and periodically update the Building Efficiency Standards for the State of California. Since 1977, the Standards have been updated on a three-year cycle. The most recent update, the 2013 Building Efficiency Standards, went into effect on January 1, 2014.[1] Currently, projects that apply for building permits must adhere to the 2008 standards.

A copy of the 2008 Energy Efficiency Standards are not included in the appendices to this Draft EIR, but may be reviewed on-line at www.energy.ca.gov/title24/2008standards/index.html. The 2008 Energy Efficiency Standards may also be reviewed at the Energy Efficiency Division, California Energy Commission, 1516 Ninth Street, MS-29, Sacramento, CA 95814-5512. The 2008 Standards went into effect January 1, 2010.[2]

Because the adoption of Title 24 post-dates the adoption of AB 1575, it has generally been the practice throughout the State that compliance with Title 24 (as well as compliance with the litany of federal and State regulations discussed above) ensures that projects will not result in the inefficient, wasteful and unnecessary consumption of energy. As is the case with other uniform building codes, Title 24 is designed to provide certainty and uniformity throughout the State while at the same time ensuring that the efficient and non-wasteful consumption of energy is achieved through design features. Large infrastructure transportation projects that cannot adhere to Title 24 design-build performance standards may, depending on the circumstances, undertake a more involved assessment of energy conservation measures in accordance with some of the factors set forth in Appendix F to the CEQA Guidelines. As an example, pursuant to the California Department of Transportation CEQA implementation procedures and FHWA Technical Advisory 6640.8A, a detailed energy study is generally only required for large scale infrastructure projects. However, for the vast majority of residential and nonresidential projects, adherence to Title 24 is deemed to ensure that no significant impacts occur with respect to the inefficient, wasteful and unnecessary consumption of energy. As a further example, the adoption of federal vehicle fuel standards, which have been continually improved since their original adoption in 1975, have also protected against the inefficient, wasteful, and unnecessary use of energy.

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[1] *California Energy Commission website: http://energy.ca.gov/title24/2013standards, October 8, 2013.*

In many parts of the world, the wasteful and poorly managed use of energy has led to oil spills, acid rain, smog, and other forms of environmental pollution that have ruined the natural beauty people seek to enjoy. California is not immune to these problems, but the CEC-adopted appliance standards, building standards, and utility programs that promote efficiency and conservation have gone a long way towards maintaining and improving environmental quality. Other benefits include reduced destruction of natural habitats, which in turn helps protect animals, plants, and natural systems.

Many experts believe that burning fossil fuel is a major contributor to global warming; carbon dioxide is being added to an atmosphere already containing 25% more than it did two centuries ago. Carbon dioxide and other greenhouse gases create an insulating layer around the earth that leads to global climate change. CEC research shows that most of the sectors of the State economy face significant risk from climate change including agriculture, forests, and the natural habitats of a number of indigenous plants and animals.

Scientists recommend that actions be taken to reduce emissions of carbon dioxide and other greenhouse gases. While adding scrubbers to power plants and catalytic converters to cars is a step in the right direction (both of which are currently enforced as part of existing regulatory schemes), the use of energy-efficient standards can be effective actions to limit the carbon dioxide that is emitted into the atmosphere. According to the CEC, using energy efficiently in accordance with Title 24 Energy Efficiency standards is a proven, far-reaching strategy that can and does make an important contribution to the significant reduction of greenhouse gasses.

In fact, the National Academy of Sciences has urged the country to follow California's lead on such efforts, and has recommended that nationwide energy efficiency building codes modeled after Title 24 be adopted. The CEC's Title 24 program has played a vital and perhaps one of the most important roles in maximizing energy efficiency and preventing the wasteful, inefficient and unnecessary use of energy throughout the State.

The 2008 Energy Efficiency Standards include the following:[3]

- *Time Dependent Valuation (TDV).* Source energy was replaced with TDV energy. TDV energy values energy savings greater during periods of likely peak demand, such as hot summer weekday afternoons, and values energy savings less during off peak periods. TDV gives more credit to measures such as daylighting and thermal energy storage that are more effective during peak periods.

- *New Federal Standards.* Coincident with the 2005 Standards, new standards for water heaters and air conditioners took effect. These changes affect all residential buildings, but also affect many nonresidential buildings that use water heaters and/or "residential size" air conditioners.

- *Cool Roofs.* The nonresidential prescriptive standards require "cool roofs" (high reflectance, high emittance roof surfaces, or exceptionally high reflectance and low emittance surfaces) in all low-slope applications. The cool roof requirements also apply to roof replacements for existing buildings.

[3] *California Energy Commission website: http://energy.ca.gov/title24/2005standards/2005_STANDARDS_CHANGES_12P.PDF, October 8, 2013.*

- *Acceptance Requirements.* Basic "building commissioning," at least on a component basis, is required for electrical and mechanical equipment that is prone to improper installation.
- *Demand Control Ventilation.* Controls that measure CO_2 concentrations and vary outside air ventilation are required for spaces such as conference rooms, dining rooms, lounges, and gyms.
- *T-bar Ceilings.* Placing insulation directly over suspended ceilings is not permitted as a means of compliance, except for limited applications.
- *Duct Efficiency.* R-8 duct insulation and duct sealing with field verification is required for ducts in unconditioned spaces in new buildings. Duct sealing is also required in existing buildings when the air conditioner is replaced. Performance method may be used to substitute a high efficiency air conditioner in lieu of duct sealing.
- *Indoor Lighting.* The lighting power limits for indoor lighting are reduced in response to advances in lighting technology.
- *Skylights for Daylighting in Buildings.* The prescriptive standards require that skylights with controls to shut off the electric lights are required for the top story of large, open spaces (spaces larger than 25,000 feet with ceilings higher than 15 feet).
- *Natural Ventilation*. Current requirements for natural ventilation will be clarified and the depth of spaces allowed to be naturally ventilated in high-rise residential dwelling units and hotel/motel guest rooms is extended to 25 feet.
- *Efficient Space Conditioning Systems.* A number of measures are required that improve the efficiency of HVAC systems, including variable speed drives for fan and pump motors greater than 10 hp, electronically-commutated motors for series fan boxes, better controls, efficient cooling towers, and water cooled chillers for large systems.
- *Unconditioned Buildings.* New lighting standards-lighting controls and power limits-applies to unconditioned buildings, including warehouses and parking garages. Lighting power tradeoffs are not permitted between conditioned and unconditioned spaces.
- *Compliance Credits.* Procedures are added for gas cooling, under floor ventilation.
- *Lighting Power Limits.* The Standards set limits on the power that can be used for outdoor lighting applications such as parking lots, driveways, pedestrian areas, sales canopies, and car lots. The limits vary by lighting zones or ambient lighting levels. Lighting power tradeoffs are not permitted between outdoor lighting and indoor lighting.
- *Shielding.* Luminaries in hardscape areas larger than 175 W are required to be cutoff luminaries, which will save energy by reducing glare.
- *Bi-level Controls.* In some areas outdoor lighting controls are required, including the capability to reduce lighting levels to 50%.
- *Lighting Power Limits.* Lighting power limits (or alternative equipment efficiency requirements) apply to externally and internally illuminated signs used either indoors or outdoors.
- *Outdoor Air and Demand Control Ventilation*. Demand control ventilation will not be allowed as an alternative to continuous ventilation when operations or processes are present that generate specified pollutants and exhaust ventilation is not provided. With the exception of the above

situation, the current requirements for demand control ventilation will be expanded to include specific occupancies with moderate to high occupant densities, which have an outdoor air economizer. Demand control ventilation devices will have new performance requirements. Acceptance requirements will be established to insure demand control ventilation systems are tested before occupancy to determine that they meet Standards requirements.

- *Space Conditioning Controls Acceptance*. Acceptance requirements also will be established to insure that space conditioning controls are tested before occupancy to determine that they meet Standards requirements.

- *Duct Insulation*. Duct insulation requirements for ducts in unconditioned or indirectly conditioned spaces will be increased to R-8. Flexible ducts having porous inner cores will not be allowed.

- *Mechanical System Acceptance*. Acceptance requirements also will be established to insure mechanical systems are tested before occupancy to determine that they meet Standards requirements, including air distribution system ducts and plenums, economizers, variable air volume systems, and hydronic system controls.

- *Indoor Lighting in High-rise Residential Living Quarters and Hotel/Motel Guest Rooms*. Lighting in these spaces will be required to meet the same new requirements for low-rise residential buildings.

- *Water Piping and Cooling System Line Insulation Thickness and Conductivity*. The method for specifying water piping and cooling system line insulation requirements that has previously been used for nonresidential and high-rise residential buildings, will be applied to low-rise residential buildings while maintaining the overall stringency of the existing low-rise residential requirements.

- *Residential Lighting*. At least 50 percent of the lighting wattage in kitchens will be required to be high efficacy. Lighting in bathrooms, garages, laundry rooms, and utility rooms will be required to be high efficacy or controlled by a "manual on" occupant sensor. Lighting in other indoor spaces will be required to be high efficacy or be controlled by a dimmer switch. Outdoor lighting permanently mounted to a building will be required to be high efficacy or be controlled by a motion sensor with an integral photosensor. Lighting in parking lots and parking garages for eight or more vehicles will be required to meet all applicable mandatory and prescriptive requirements in other sections of the Standards that apply to such lighting. Lighting installed in the common areas of low-rise residential buildings with four or more dwelling units will be required to be high efficacy or be controlled by an occupant sensor.

- *Water Heating Budgets*. The water heating budget for systems serving multiple dwelling units will be based on a central recirculating water heating system with gas water heaters and timer controls. For systems serving individual dwelling units, a single storage type gas water heater meeting the prescriptive and mandatory standards will be the basis of the energy budget. The energy budget for systems serving individual dwelling units will also be met by installation of an instantaneous gas water heater.

Pursuant to the California Building Standards Code and the Title 24 Energy Efficiency Standards, the City Building Department will review the design and construction components of the proposed Project's Title 24 compliance when specific building plans are submitted. Further, as discussed below, the Project design features include many additional energy-saving features.

The Project's Design Standards and Energy Requirements

Energy Conservation Equipment and Design Features, and Energy-conserving Construction Processes

The proposed Project would be designed and constructed to meet the City's Green Building Ordinance. The proposed Project would utilize sustainable planning and building strategies and would incorporate the environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible. Additionally, the Project Applicant would potentially incorporate a number of the following options taken from the City's Green Building Program and LEED checklists, to be determined during the development of the proposed project:

- Use of durable exterior materials such as glass, steel, stone, concrete and other metals;
- Use of operable windows throughout and exterior shading devices on the south and west exposures;
- Surpassing Title 24 requirements by 10%;
- Participating in the Energy Star and / or Savings by Design programs;
- Installing Energy Star rated lighting, exit signs, programmable thermostats and timer and/or photo sensor exterior lighting;
- Installing tankless hot water heaters and low volume showerheads, kitchen and lavatory faucets, toilets and urinals;
- Use of high efficiency air filters (minimum MERV 8) or the mechanical system will be ductless; and
- Use of durable roofing material with recycled content, a long term warranty and with an Energy Star or Cool Roof rating; and
- Use of water efficient landscaping.

3. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed Project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 12126.2(d) of the CEQA Guidelines states:

> *Discuss the ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

Implementation of the proposed Project would involve a mixed-use development of the adaptive re-use of an existing retail/commercial office building and development of new residential uses to the rear along Rosewood Avenue on an existing surface parking lot serving the Existing Building. The total number of units within the proposed Project would be 81, including 69 market-rate units and 12

affordable units. The proposed Project would foster economic growth and revitalize an underutilized area by adding residents and businesses to the Project Site. These residents could, in turn, patronize existing local businesses and services in the area. Additionally, as described in Section IV.I (Population/Housing), short-term and long-term employment opportunities would be provided during construction and operation of the proposed Project.

As discussed in Section IV.I (Population/Housing), the proposed Project would increase the permanent population of the area by approximately 124 persons and generate approximately 91 new employment opportunities. This increased residential and employee population would patronize local businesses and services in the area, and would foster economic growth. As discussed in Section IV.I (Population/Housing), Project-related growth would be within Southern California Association of Governments' projections and would result in a less than significant impact. The development of the proposed Project would serve projected growth in the West Hollywood area. Additionally, the proposed Project, as an in-fill development, would be adequately served by existing public services.

Development of the proposed Project would result in resident and visitor populations that would create demand for goods, services, or facilities not directly provided or satisfied within the proposed Project. However, as discussed in Section IV.I (Population/Housing), the supply and demand for housing and employment are within the region's projected growth. Furthermore, Section IV.J (Public Services), addresses the demand for services created directly by the proposed Project and the proposed Project's impacts.

As also discussed in this EIR, because the Project site is already developed and is located in a highly urbanized setting, the proposed Project would not involve any substantial extension of infrastructure such as roadways, water facilities, electricity transmission lines, natural gas lines, etc., or the construction of excess capacity of public facilities such as parks and recreation, schools, etc. beyond that required for currently anticipated growth. Any infrastructure associated with the proposed Project would not induce growth because it would only serve the proposed Project.

As a whole, the proposed Project would not remove obstacles to population growth, nor would it foster economic or population growth beyond the levels analyzed in this EIR. Accordingly, it is not expected that this Project would induce growth that would result in a significant impact.

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VI. ALTERNATIVES TO THE PROPOSED PROJECT

1. INTRODUCTION

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

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

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

2. ALTERNATIVES TO THE PROPOSED PROJECT

As indicated above, project alternatives should feasibly be able to attain "most of the basic objectives of the project" (Section 15126.6(a) of the State CEQA Guidelines), even though implementation of the project alternatives might, to some degree, impede the attainment of those objectives or be more costly (Section 15126.6(b) of the State CEQA Guidelines). The proposed Project objectives include the following:

- Redevelop an aging commercial structure and under-utilized surface parking lot with a more efficient and economically viable mix of uses, including condominiums, affordable rental apartments, office and retail space;

- Provide housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low and moderate income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock;
- Increase the number of affordable rental housing units in the southwest area of West Hollywood;
- Create a high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area;
- Adaptively reuse the existing office building on the property by converting it into residential condominiums and apartments with redesigned streetfront retail and office space;
- Replace an incompatible commercial surface parking lot along Rosewood Avenue with new single-family townhomes that are in scale with the existing single-family residences on Rosewood Avenue;
- Provide a modern, high-quality design that complements and is sensitive to surrounding uses; and
- Improve site access and provide sufficient parking for residents, patrons, and employees to discourage future parking on surrounding residential streets.

Therefore, for purposes of this alternatives analysis, and to compare the merits of an alternative's ability to reduce environmental impacts and meet the proposed Project's objectives, a No Project Alternative, an Existing Zoning (R1B) Alternative, two Reduced Density Alternatives, and an Alternate Land Use Alternative were defined and analyzed. The alternatives to be analyzed in comparison to the proposed Project include the following:

Alternative 1: No Project Alternative

Alternative 2: Existing Zoning (R1B) Alternative

Alternative 3: Reduced Density Alternative 1

Alternative 4: Reduced Density Alternative 2

Alternative 5: Alternate Land Use Alternative

A. Overview of Alternatives

i) Alternative 1: No Project

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a 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 (State CEQA Guidelines Section 15126.6(e) (1)). Pursuant to State CEQA Guidelines Section 15126.6(e) (2):

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as 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.

In accordance with CEQA Guidelines, the following discussion evaluates the No Project Alternative:

No Build (No Project Alternative). Under this variation of the No Project Alternative, the proposed Project would not be constructed and the Project site would remain in its current condition with the existing 89,630 square foot office building and surface parking lot. The analysis of the No Build/No Project Alternative assumes the continuation of existing conditions, as well as development of the related projects described in Section III. Environmental Setting (Table III-1, List of Related Projects).

ii) Alternative 2: Existing Zoning (R1B) Alternative

The Existing Zoning (R1B) Alternative assumes 24 units in 12 duplexes would be developed along Rosewood Avenue. The existing office uses would be maintained in the Existing Building and there would be no expansion of floor area. There would be 12 two-car garages along Rosewood Avenue and subterranean parking on Rosewood Avenue for the office, retail, and restaurant uses and for the balance of the residential units.

iii) Alternative 3: Reduced Density Alternative 1

This alternative includes 12 single-family units and no affordable units or pool house building on Rosewood Avenue. Renovation and expansion of the Existing Building would include 56 condominium units, 8 affordable units, a commercial component similar to the proposed Project, 12 two-car garages along Rosewood Avenue for the residential units, and subterranean parking on Rosewood Avenue for the office, retail, and restaurant uses.

iv) Alternative 4: Reduced Density Alternative 2

This alternative includes no market rate or affordable units on Rosewood Avenue. Renovation and expansion of the Existing Building would include 56 condominium units, 8 affordable units, a commercial component similar to the proposed Project, and a surface parking area and a one level above-ground parking structure on Rosewood Avenue.

v) Alternative 5: Alternate Land Use Alternative

This alternative would convert the Existing Building into a medical office use with a surface parking area and a one level above-ground parking structure on Rosewood Avenue.

B. Alternatives Rejected as Being Infeasible

As described previously in this EIR section, Section 15126.6(c) of the CEQA Guidelines requires EIRs to 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.

In addition to the five alternatives listed above, another alternative was considered and rejected. Specifically, the alternative would consider an alternate site. This alternative was rejected as being because no other site could accommodate the proposed Project (e.g. with an existing commercial building suitable for adaptive reuse and adjoining surface parking lot) that is owned or under control of

the applicant in the City of West Hollywood. Accordingly, this alternative was considered but rejected as infeasible.

3. ALTERNATIVE ANALYSIS

A. Assumptions and Methodology

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate impacts, but considerations in project design may also afford the opportunity to mitigate or minimize those impacts. It would be unreasonable to consider an alternative, and not also consider that certain levels of standard mitigation would be applied. Therefore, each alternative analysis assumes that a similar level and type of cumulative projects will occur as is evaluated with the proposed Project.

The following alternatives analysis discusses each alternative's impacts relative to each environmental issue, consistent with those addressed in the project analysis. Although the assessment is more general, similar methodologies and assumptions for analysis were employed. Each alternative is evaluated more schematically than the proposed Project, and the potential development assumptions for the alternatives are hypothetical. However, specific conclusions can be drawn for comparative purposes from the detailed analyses of the proposed Project. The analysis also evaluates the relationship of each alternative to the objectives of the proposed Project.

i) Alternative 1: No Project Alternative

In the event the proposed Project is not approved, it is expected that the Project Site will remain in its current condition, with the existing 89,630 square foot office building and surface parking lot. The analysis of the No Project Alternative assumes the continuation of existing conditions, as well as development of the related projects described in Section III.B (Related Projects). The potential environmental impacts associated with the No Project Alternative are described below and are compared to the environmental impacts associated with the proposed Project.

1) Aesthetics

a) Aesthetics/Views

Under the No Project Alternative, the proposed Project would not be constructed. No development would occur on the Project Site. Views of the Project Site from the south, east and west would remain the same, where the Existing Building is consistent with the commercial development on Beverly Boulevard. Modifications to the frontage of the Existing Building that would improve its appearance and connection to the street would not occur under the Alternative. Because any improvements to the Existing Building that may work to improve its existing appearance would not occur under the Alternative, impacts of the Alternative related to visual character would be less beneficial than the proposed Project. However, the Alternative would not include adverse impacts related to visual character, and impacts of both the Alternative and the proposed Project with respect to visual character would be less than significant.

Under the Alternative, along Rosewood Avenue, views of the Project Site would not change under the No Project Alternative. Accordingly, the Alternative would not enhance the views of the project from the residential area to the north to the same degree as the proposed Project. As such, impacts of the

Alternative with respect to visual character north of the Project Site would be less beneficial than the impacts of the proposed Project, although both would be less than significant.

b) Illumination/Glare

Under the No Project Alternative, no new land uses would be developed that would generate increased light and glare on the Project Site. The existing nighttime light environment would not change and no impact would occur. Impacts of the No Project Alternative regarding light and glare would be lower than the proposed Project, although both would be less than significant.

2) Air Quality

No excavation or construction would be required under the No Project Alternative, and no new vehicle trips would be generated. As such, no new air pollutant emissions related to construction or operations would be generated under the Alternative. Therefore, there would be no air quality impacts under the No Project Alternative, which would lower than the less than significant construction and operational air quality impacts of the proposed Project.

3) Cultural Resources

Under the No Project Alternative, the Existing Building and the surface parking lot on the Project Site on Rosewood Avenue would remain unchanged from current conditions. The Existing Building is not a historic resource subject to CEQA. Therefore, both the Alternative and the proposed Project would not cause a substantial adverse change in significance of a historic resource. The No Project Alternative would not include excavation and would have no impacts related to archaeological or paleontological resources. Impacts would be lower than the proposed Project, although the proposed Project impacts would be less than significant with mitigation.

4) Geology and Soils

Under the No Project Alternative, no grading or excavation would occur; thus, there would be no impacts to soils associated with grading or excavation. Therefore, there would be no impacts with respect to geology and soils under the No Project Alternative, and impacts to geology and soils under the No Project Alternative would be lower than the proposed Project, which would be less than significant with mitigation.

5) Greenhouse Gas Emissions

No construction would occur under the No Project Alternative, and no new vehicle trips would be generated. Therefore, no new GHG emissions would be generated in association with the construction or operations at the Project Site, and there would be no GHG impacts under the No Project Alternative, which would be lower than the proposed Project's less than significant impact with respect to GHG emissions.

6) Hydrology and Water Quality

c) Stormwater Runoff and Water Quality

Under the No Project Alternative, the Existing Building and the surface parking lot on the Project Site on Rosewood Avenue would remain unchanged from current conditions. Under the No Project Alternative, runoff from the Project Site would not be subject to the Countywide SUSMP and MS4 permit, which are not applicable to existing development. Therefore, operational impacts of the Alternative would be higher than the proposed Project's impacts, although both would be less than significant.

d) Flood Hazard

The No Project Alternative would occur on the same site as the proposed Project, which has been identified to be outside of the 50, 100 and 500-year flood zones. Impacts of the Alternative with respect to flood hazards would be the same as the proposed Project and less than significant.

7) Land Use and Planning

Under the No Project Alternative, no new development would occur. The Alternative have no effect with respect to implementation of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS**),** policies of the Land Use and Urban Form Element of the General Plan related to the provision of housing within the City and encouragement of mixed use development in the City, provision of affordable housing or encouragement of pedestrian-friendly environments along major streets of the City. The Alternative would not implement the policies of the Mixed Use Incentive Overlay district. Accordingly, the Alternative would be less effective than the proposed Project with respect to implementing relevant policies of the regional and local plans, although both would result in less than significant impacts.

8) Noise

No excavation or construction would occur under the No Project Alternative and no new vehicle trips would be generated. As such, no increase in noise levels at the Project Site or along study area roadways related to construction, or operational activities would occur under this Alternative. Therefore, there would be no construction-related or operational noise impacts under the No Project Alternative. The No Project Alternative would avoid the significant and unavoidable construction noise impact that would occur under the proposed Project. No operational noise impacts would occur under the No Project Alternative, which would be lower than the less than significant impacts of the proposed Project.

9) Population and Housing

Under the No Project Alternative, no new development would occur and no new employment, housing units or population would be created. Impacts of the No Project Alternative would be lower than the proposed Project's less than significant impacts with regard to employment, population and housing.

10) Public Services

a) Fire

Under the No Project Alternative, no demolition or development would occur at the Project Site, and conditions at the site would continue as they are currently. The existing uses on the Project Site would continue to provide approximately 283 jobs.[1] Response distance and times to the Project Site are anticipated to remain unchanged as a result of this alternative, as the existing land use would continue its operation. Fire-flow requirements of 5,000 gallons per minute would continue under the No Project Alternative. The demand on fire protection services under this alternative are accounted for by the existing land use at the Project Site. As such, impacts to fire protection services under the No Project Alternative would be less than the proposed Project's impacts, which are also less than significant.

b) Police

Under the No Project Alternative, no demolition or development would occur at the Project Site, and conditions at the site would continue as they are currently. The existing uses on the Project Site would continue to provide approximately 283 jobs. No additional demand would be made on the Los Angeles County Sheriff's Department (LACSD) current response times and service standards as a result of the No Project Alternative, as the existing land use would continue its operation. As such, impacts to police protection under the No Project Alternative would be less than the proposed Project's impacts, which are also less than significant.

c) Schools

Under the No Project Alternative, no demolition or development would occur at the Project Site, and conditions at the site would continue as they are currently. The existing uses on the Project Site would continue to generate approximately 10 students (four elementary students, three middle school students, and three high school students) under this alternative, a decrease from the approximately 29 net new students (12 elementary students, nine middle school students, and eight high school students) as under the proposed Project. The West Hollywood Elementary School, Burroughs Middle School, and Fairfax Senior High School are all anticipated to continue operating under capacity under the No Project Alternative, similar to their current condition. No new student enrollments would be expected to occur under this alternative, as the existing use would continue its operation. As such, impacts to schools under the No Project Alternative would be less than the proposed Project's impacts, which are also less than significant.

d) Parks and Recreation

Under the No Project Alternative, no demolition or development would occur at the Project Site, and conditions at the site would continue as they are currently. The existing uses on the Project Site would continue to provide approximately 283 jobs. No new demand for parks and recreation services would result from this alternative, and the current ratio of three to five acres of open space per 1,000 residents in the City of West Hollywood would remain the same. As such, impacts to parks and recreation under

[1] *Employees generated utilizing employee rated from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*

the No Project Alternative would be less than the proposed Project's impacts, which are also less than significant.

e) Libraries

Under the No Project Alternative, no demolition or development would occur at the Project Site, and conditions at the site would continue as they are currently. The existing uses on the Project Site would continue to provide approximately 283 jobs. No new demand on library services would result under this alternative, and the West Hollywood Library would continue to adequately serve its service area as under existing conditions. As such, impacts to libraries under the No Project Alternative would be less than the proposed Project's impacts, which are also less than significant.

11) Transportation/Traffic

Under the No Project Alternative, no demolition or development would occur at the Project Site, and conditions at the site would continue as they currently exist. This alternative would not result in any new project-related vehicle trips. In the absence of the proposed Project, growth in traffic due to the combined effects of continuing development, intensification of development, and related projects would not result in significant cumulative traffic impacts. Impacts of the No Project Alternative would be lower than the proposed Project, although both would be less than significant.

12) Utilities

a) Wastewater

Under the No Project Alternative, no new land uses would be developed that would generate additional wastewater and require additional wastewater treatment. Therefore, impacts of the No Project Alternative regarding wastewater would be less than the proposed Project's impacts, which are also less than significant with mitigation.

b) Water

Under the No Project Alternative, no new land uses would be developed that would require additional water supply, water treatment, and fire flow. Therefore, impacts of the No Project Alternative regarding water would be less than the proposed Project's impacts, which are also less than significant.

c) Solid Waste

Under the No Project Alternative, no new land uses would be developed that would generate additional solid waste associated with construction and long-term operation, requiring additional landfill capacity. Therefore, impacts of the No Project Alternative regarding solid waste would be less than the proposed Project's impacts, which are also less than significant.

d) Electricity and Natural Gas

Under the No Project Alternative, no new land uses would be developed that would require additional electricity and natural gas service. Therefore, impacts of the No Project Alternative regarding electricity and natural gas would be less than the proposed Project's impacts, which are also less than significant.

13) Relationship to Project Objectives

The No Project Alternative would reduce the environmental impacts associated with the proposed Project. However, the No Project Alternative would not satisfy any of the project objectives. Specifically, the No Project Alternative would not:

- Redevelop an aging commercial structure and under-utilized surface parking lot with a more efficient and economically viable mix of uses, including condominiums, affordable rental apartments, office and retail space;
- Provide housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low and moderate income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock;
- Increase the number of affordable rental housing units in the southwest area of West Hollywood;
- Create a high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area;
- Adaptively reuse the existing office building on the property by converting it into residential condominiums and apartments with redesigned streetfront retail and office space;
- Replace an incompatible commercial surface parking lot along Rosewood Avenue with new single-family townhomes that are in scale with the existing single-family residences on Rosewood Avenue;
- Provide a modern, high-quality design that complements and is sensitive to surrounding uses; and
- Improve site access and provide sufficient parking for residents, patrons, and employees to discourage future parking on surrounding residential streets.

14) Reduction of Significant Project Impacts

The proposed Project would result in significant and unavoidable construction noise impacts after mitigation, which would be avoided under the No Project Alternative. The No Project Alternative would avoid most of the proposed Project's less than significant impacts as well. The No Project Alternative would not have potentially beneficial impacts that could result from the proposed Project with respect to Aesthetics and Water Quality and would not implement any regional or local planning policies.

ii) Alternative 2: Existing Zoning (R1B) Alternative

The Existing Zoning (R1B) Alternative would consist of 24 residential units in 12 duplexes developed along Rosewood Avenue. This development would be consistent with the existing R1B zoning of this part of the Project Site, which would permit the development of two residential units on each of the 12 lots that comprise this portion of the Project Site. The duplex units would be up to approximately 25 feet in height and similar in appearance and design to the townhouse buildings that would be included in the proposed Project. The four affordable units and associated open space areas that would be constructed on Rosewood Avenue under the proposed Project would not be included in this Alternative.

In addition, the Indoor Pool House and associated amenities would not be constructed under this Alternative. The existing office and commercial uses would be maintained in Existing Building in their current configuration. There would be no expansion of floor area and no residential units included within the Existing Building under this Alternative. Because the Existing Building would not be modified under this Alternative, the residential units included in the Alternative would be physically and functionally separate from the Existing Building. The reconfiguration of subterranean parking for the office, retail, and restaurant uses located in the Existing Building that would occur under the proposed Project, along with the associated reconfiguration of access to the parking areas from Beverly Boulevard, would occur under this Alternative. The inclusion of parking under the Rosewood Avenue site would be consistent with the PK Parking Overlay District that applies to this site. The modifications to the Existing Building to provide street-level access to the retail and restaurant uses in the Existing Building would not occur under this Alternative. Approval of a General Plan Amendment and Specific Plan would not be required for this Alternative, as it would be consistent with the requirements of the existing zoning of the site.

1) Aesthetics

a) Visual Character

Under the Existing Zoning (R1B) Alternative, the Existing Building would remain unchanged from its current condition and the surface parking lot on the Project Site on Rosewood Avenue would be developed with 24 residential units within 12 duplex buildings over a subterranean parking garage. Under the Alternative, the appearance of the Existing Building would not change. Prospective changes to the Existing Building to update its architecture and appearance would not occur and the addition of building mass to the Existing Building as proposed under the Project would not be included under the Alternative. Accordingly, the visual appearance of the Existing Building under the Alternative would not change as viewed from the north, south, east and west of the Project Site and impacts would be less than significant. Modifications to the frontage of the Existing Building that would improve its appearance and connection to the street would not occur under the Alternative. Because any improvements to the Existing Building that may work to improve its existing appearance would not occur under the Alternative, impacts of the Alternative related to visual character would be less beneficial than the proposed Project. However, the Alternative would not include adverse impacts related to visual character, and impacts of both the Alternative and the proposed Project with respect to visual character would be less than significant.

Under the Alternative, along Rosewood Avenue, buildings similar in height, appearance and character to the Townhomes proposed under the Project would be constructed. Similar setbacks and landscaping would be provided for these buildings under the Alternative. As such, the Alternative would improve the visual appearance of the Project Site as viewed from the residential neighborhood to the north by replacing views of the existing surface parking lot, similar to the proposed Project. Building mass along the Rosewood frontage would be slightly less as the proposed 4-unit apartment building and associated amenity space would not be included under the Alternative. Because the residential units that would be constructed under the Alternative would be physically and functionally separate from the Existing Building under the Alternative, the Alternative would not include the design elements, coordinated design, or features such as the Indoor Pool House that would help provide a visual transition between the Existing Building and the neighborhood to the north of the Project Site. Accordingly, the Alternative would not enhance the views of the project from the residential area to the north to the same degree as the proposed Project. As such, impacts of the Alternative with respect to visual character north of the

Project Site would be less beneficial than the impacts of the proposed Project, although both would be less than significant.

b) Light & Glare

Nighttime lighting included under the Existing Zoning (R1B) Alternative would be similar to the proposed Project, with additional street lights, and shielded outdoor building lighting provided, with an associated increase in light levels and glare resulting from the construction of the Alternative. Because less new development would be included under the Alternative, impacts related to light and glare would be lower than the proposed Project, although both would be less than significant.

2) Air Quality

The Existing Zoning (R1B) Alternative would be consistent with the 2012 Air Quality Management Plan (AQMP) since the land uses and associated population and employment of the Alternative have been anticipated in the Southern California Association of Government's (SCAG's) projections for West Hollywood. Mass daily and localized construction-related emissions would be similar to those generated by the proposed Project and less than significant, as the Alternative would include the same excavation, dirt hauling and concrete pour activity as the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. The Alternative would result in a slight net increase in mass daily operational emissions since it would generate approximately 139 new average daily trips (ADT). Emissions from motor vehicles are the primary source of emissions associated with the Existing Building and the proposed Project. Mass daily emission associated with the proposed Project would not exceed the thresholds of significance recommended by the South Coast Air Quality Management District (SCAQMD) even when the emissions from the existing uses at the site are not discounted. The proposed Project would generate approximately 1,873 ADT. Therefore, the generation of 139 new ADT from the site under this Alternative would not result in a net increase in emissions that exceeds the SCAQMD's recommended thresholds of significance. The Alternative would also result in a slight net increase in localized operational emissions from the site, but these emissions also would not approach the applicable thresholds of significance for the project area. Accordingly, impacts of the Alternative related to mass daily and localized operational emissions would be higher than the proposed Project, but impacts of both the Alternative and the proposed Project would be less than significant. Because the construction-related and operational emissions associated with this Alternative would not exceed the thresholds of significance recommended by the SCAQMD, the Alternative also would not contribute a cumulatively considerable increase in emissions of the pollutants for which the South Coast Air Basin (Basin) is in nonattainment. Impacts would be similar to the proposed Project and less than significant.

3) Cultural Resources

a) Historic Resources

Under the Existing Zoning (R1B) Alternative, the Existing Building would remain unchanged from its current condition and the surface parking lot on the Project Site on Rosewood Avenue would be developed with 24 residential units within 12 duplex buildings over a subterranean parking garage. The Existing Building is not a historic resource subject to CEQA. Therefore, both the Alternative and the proposed Project would not cause a substantial adverse change in significance of a historic resource.

b) Archaeological Resources

Under the Existing Zoning (R1B) Alternative, the Rosewood parcel would be excavated to allow for construction of the subterranean parking garage. Although no known archaeological resources are known to exist on this site, the Alternative, like the proposed Project, could potentially encounter archaeological resources during excavation. Both the Alternative and the proposed Project would have less than significant impacts with respect to archaeological resources after implementation of mitigation measures.

c) Paleontological Resources

Under the Existing Zoning (R1B) Alternative, the Rosewood parcel would be excavated to allow for construction of the subterranean parking garage. Although no known paleontological resources are known to exist on this site, the Alternative, like the proposed Project, could potentially encounter paleontological resources or human remains during excavation. Both the Alternative and the proposed Project would have less than significant impacts with respect to paleontological resources and human remains after implementation of mitigation measures.

4) Geology and Soils

Under the Existing Zoning (R1B) Alternative, the Existing Building would remain unchanged from its current condition and the surface parking lot on the Project Site on Rosewood Avenue would be developed with 24 residential units within 12 duplex buildings over a subterranean parking garage. The Alternative would occur within the same site as the proposed Project, which has been identified to have the potential for liquefaction. However, with the implementation of mitigation measures, both the Alternative and the proposed Project would have less than significant impacts with respect to geology and soils. Impacts of the Alternative with respect to all other issues related to geology and soils would be the same as the proposed Project and less than significant.

5) Greenhouse Gas Emissions

Emissions from motor vehicles are the primary source of greenhouse gas (GHG) emissions associated with the proposed Project. The Existing Zoning (R1B) Alternative would result in a slight net increase in annual GHG emissions since it would generate approximately 139 new ADT. As with the proposed Project, however, this Alternative would comply with the applicable measures for new development from the City of West Hollywood Climate Action Plan (CAP) and would implement mitigation measure 3.15-1 from the Final Program EIR for the City of West Hollywood General Plan and Climate Action Plan. Also, the uses included under this Alternative would be designed and constructed in accordance with the City's Green Building Ordinance. Impacts of the Alternative related to GHG emissions would be higher than the proposed Project, although both would result in a less than significant impacts related to GHG emissions.

6) Hydrology and Water Quality

a) Stormwater Runoff and Water Quality

Under the Existing Zoning (R1B) Alternative, the Existing Building would remain unchanged from its current condition and the surface parking lot on the Project Site on Rosewood Avenue would be developed with 24 residential units within 12 duplex buildings over a subterranean parking garage. As

would be the case with the proposed Project, runoff from the Project Site under the Alternative would be subject to the controls of the General Construction Activity Stormwater Permit and Los Angeles County MS4 permit, which would control the quantity and quality of runoff from the site to meet specific standards. Similar to the proposed Project, under this alternative the entire site would be developed; therefore, operational impacts would be similar to the proposed Project's impacts, which would be subject to the Countywide SUSMP and MS4 permit requirements and would be less than significant after implementation of mitigation measures.

b) Flood Hazard

The Existing Zoning (R1B) Alternative would occur on the same site as the proposed Project, which has been identified to be outside of the 50, 100 and 500-year flood zones. Impacts of the Alternative with respect to flood hazards would be the same as the proposed Project and less than significant.

7) Land Use and Planning

Under the Existing Zoning (R1B) Alternative, the Existing Building would remain unchanged from its current condition and the surface parking lot on the Project Site on Rosewood Avenue would be developed with 24 residential units within 12 duplex buildings over a subterranean parking garage. Approval of a General Plan Amendment or Specific Plan would not be required to implement this Alternative. However, a Development Permit to allow for the new construction of (a) 12 market-rate residential units, and (b) one level of subterranean parking; a Vesting Tentative Tract Map for condominium purposes and to vacate a 10-foot easement for public road and highway purposes bordering Rosewood Avenue that is no longer required for public road and highway purposes; and Design Review; would be required. The Alternative would be generally consistent with the policies of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to focus new development in the Southern California region in urbanized areas with established infrastructure. The Alternative would include residential units that would help implement relevant policies of the Land Use and Urban Form Element of the General Plan related to the provision of housing within the City and encouragement of mixed use development in the City. Because the Alternative would include duplex units limited to 25 feet in height, the Alternative would protect existing neighborhoods through the provision of transitional height buildings between the commercial development on Beverly Boulevard and the lower density residential neighborhood to the north of the Project Site. As previously identified, this Alternative would not include any housing including affordable housing and would not improve the pedestrian environment and provide pedestrian connections to the existing commercial uses within the Existing Building and would thus not implement General Plan policies related to these conditions. Moreover, while the Alternative would include residential uses within the Project Site, these uses would not be physically or functionally connected to the commercial uses within the Existing Building. As such, the Alternative would be less consistent with the intent of the Mixed Use Incentive Overlay district than the proposed Project, even though density incentives would not be included in the Alternative. Accordingly, the Alternative would be less effective than the proposed Project with respect to implementing relevant policies of the General Plan and Mixed Use Incentive Overlay District, although both would result in less than significant impacts.

8) Noise

As with the proposed Project, development under the Existing Zoning (R1B) Alternative would be required to comply with the City's Noise Ordinance restrictions for construction days and hours.

Construction-related noise levels would be similar to those generated by the proposed Project, as this Alternative would include the same excavation, dirt hauling and concrete pour activity as the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. Because these activities would increase noise levels at residential uses along Rosewood Avenue by more than 10 dBA, the Alternative would cause a significant and unavoidable short-term impact, same as the proposed Project. Construction-related ground-borne vibration levels would be similar to those generated by the proposed Project because of similar construction activity, and less than significant.

The Alternative would result in a slight net increase in daily roadway noise levels since it would generate approximately 139 new ADT. The addition of all of these trips to Rosewood Avenue between Almont Avenue and Robertson Boulevard would increase localized noise levels by approximately 0.7 dBA L_{dn}. This would not approach the applicable threshold of significance of 5.0 dBA. Any potential increase in noise levels along other roadway segments would also be less than 1 dBA. As with the proposed Project, operation of this Alternative would not generate significant ground-borne vibration levels. Noise levels along Rosewood Avenue are less than 60 dBA L_{dn}, so the new residential uses included under this Alternative would not be exposed to noise levels in excess of City standards. Operational noise impacts of the Alternative would be similar to the proposed Project and less than significant.

9) Population and Housing

a) Employment

Under the Existing Zoning (R1B) Alternative, the Existing Building would remain unchanged from its current condition and the surface parking lot on the Project Site on Rosewood Avenue would be developed with 24 residential units within 12 duplex buildings over a subterranean parking garage. Employment associated with the Alternative would be higher than the proposed Project, which would result in a reduction in employment on the Project Site, however the level of employment of both the Alternative and the proposed Project would be consistent with SCAG forecasts for the City of West Hollywood. Construction employment would be less under the Alternative because of reduced construction activity. Impacts of the proposed Project and the Alternative would be less than significant with respect to employment.

b) Housing and Population

The Existing Zoning (R1B) Alternative would include 24 market rate housing units compared to 69 market rate units and 12 affordable units under the proposed Project. The uses at the Project Site would generate approximately 37 new residents under this Alternative. Housing and population growth under the Alternative would be less than the proposed Project, although both would be within SCAG forecasts for the City of West Hollywood. The Alternative would implement policies of the City's General Plan Housing Element related to the provision of housing stock in the City, although to a lesser degree than the proposed Project. The Alternative would not include any affordable housing units, and would be therefore less effective than the proposed Project in helping the City meet its RHNA goals and would not implement General Plan Housing Element policies related to affordable housing. Impacts of the proposed Project related to housing and population would be similar to those than under the proposed Project, which are less than significant. Impacts related to affordable housing would be higher than the proposed Project, although impacts of both the Alternative and the proposed Project would be less than significant.

10) Public Services

a) Fire

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. The uses at the Project Site would generate approximately 37 new residents under this alternative. The Existing Building on the Project Site would continue to provide approximately 283 jobs.[2] Response distance and times to the Project Site are anticipated to remain unchanged as a result of this alternative, as the size of the on-site population does not affect these factors. Similar to the proposed Project, fire flow requirements of 5,000 gallons per minute for the Existing Building and 1,500 gallons per minute for the duplexes would be required under this alternative. Therefore, as the Existing Zoning (R1B) Alternative would maintain the Existing Building and include additional residential on the Rosewood Avenue portion of the Project Site when compared to the proposed Project, the demand for fire protection under the Existing Zoning (R1B) Alternative would be incrementally higher than the proposed Project's impacts, which would be less than significant.

b) Police

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. The uses at the Project Site would generate approximately 37 new residents under this alternative, compared to 124 residents under the proposed Project. The Existing Building on the Project Site would continue to provide approximately 283 jobs. The Existing Zoning (R1B) Alternative would result in fewer residents than would occur under the proposed Project and would therefore not change the current officer-to-population ratio of 267 residents per officer in the West Hollywood area, similar to the proposed Project.[3] Police units are often in a mobile state; hence actual distance between a headquarters facility and the Project Site is often of little relevance. Instead, the number of officers on the street is more directly related to the realized response time. Response time is defined as the total time from when a call requesting assistance is placed, until the time that a police unit responds to the scene. Telephone calls for police assistance are prioritized based on the nature of the call. Thus, a police unit accessing the Project Site from the surrounding area may or may not pass through at least one of the impacted study intersections. As such, response times would not be greatly affected, as emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Thus, the Existing Zoning (R1B) Alternative's demand on response time would be similar to that of the proposed Project. Similar to the proposed Project, the Existing Zoning (R1B) Alternative would not result in the need for additional officers. Therefore, as the Existing Zoning (R1B) Alternative would maintain the Existing Building and include additional residential on the Rosewood Avenue portion of the Project Site when compared to the proposed Project, the demand for police protection under the Existing Zoning (R1B) Alternative would be incrementally higher than the proposed Project's impacts, which would be less than significant.

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[2] *Employees generated utilizing employee rated from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*

[3] *(34,399 population + 37 new residents) ÷ 129 officers = 267 residents/officer ≈ 0 required officers.*

c) Schools

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. The proposed Project would generate 29 net new students to the district. With the Existing Zoning (R1B) Alternative, the proposed Project would result in nine net new students (four elementary, three middle school, and two high school). Therefore, the uses at the Project Site would generate fewer students under the Existing Zoning (R1B) Alternative. The West Hollywood Elementary School, Burroughs Middle School, and Fairfax Senior High School are all anticipated to continue operating under capacity under the Existing Zoning (R1B) Alternative, similar to their current condition. As such, impacts under the Existing Zoning (R1B) Alternative would be incrementally less than the proposed Project's impacts on school services, which are less than significant.

d) Parks and Recreation

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. The uses at the Project Site would generate approximately 37 new residents under this alternative, compared to 124 residents under the proposed Project. The Existing Building on the Project Site would continue to provide approximately 283 jobs. Just like the proposed Project the standard minimum parkland-to-resident ratio provided by the City is three acres per 1,000 residents. Based on the parkland-to-resident ratio, the Existing Zoning (R1B) Alternative would generate a need for approximately 0.11 additional acre of public parkland in the project area, which is less than the proposed Project's 0.37 additional acre of public parkland. Furthermore, similar to the proposed Project, to alleviate the demand on existing City parks and recreational facilities, the Applicant would be required to pay Quimby fees to the City to satisfy its obligations under the Quimby Act. As such, impacts under the Existing Zoning (R1B) Alternative would be incrementally less than the proposed Project's impacts on parks and recreational facilities, which are less than significant.

e) Libraries

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. The uses at the Project Site would generate approximately 37 new residents under this alternative, compared to 124 residents under the proposed Project. The Existing Building on the Project Site would continue to provide approximately 283 jobs. The Existing Zoning (R1B) Alternative would potentially generate approximately 37 residents, which would represent 0.11 percent [(37/35,828) x 100] of the expected change in service capacity for the West Hollywood Library, compared to the proposed Project's 0.35 percent of expected change in service capacity. Similar to the proposed Project the expected 0.11 percent increase in service population as a result of the Existing Zoning (R1B) Alternative is not considered a substantial increase in demand to a library that currently adequately serves the existing population. As such, impacts under the Existing Zoning (R1B) Alternative would be incrementally less than the proposed Project's impacts on library facilities, which are less than significant.

11) Transportation/Traffic

Under the Existing Zoning (R1B) Alternative, the Existing Building would remain unchanged from its current condition and the surface parking lot on the Project Site on Rosewood Avenue would be developed with 24 residential units within 12 duplex buildings over a subterranean parking garage. Construction traffic impacts of the Alternative would be similar to the proposed Project, as the Alternative would include the same excavation, dirt hauling and concrete pour activity as the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that site. The Alternative would have higher operational trip generation than the proposed Project, because the Existing Building would remain the same under the Alternative and 24 duplex units would be added to the Project Site. Alternative 2 would result in a total of 139 net new daily trips, including 11 morning peak hour trips (two inbound, nine outbound) and 12 afternoon peak hour trips (eight inbound, four outbound). Operational traffic impacts under the Alternative would be slightly higher than the proposed Project but the Alternative would not significantly impact any of the four study intersections under Existing with Alternative 2 (2013) or Future with Alternative 2 (2015) conditions. Similarly, the Alternative would have less than significant impacts on street segments and CMP intersections. The Alternative would be expected to have the same less than significant impact as the proposed Project on emergency access because the access pattern under the Alternative would be the same as the proposed Project. Finally, both the Alternative and the proposed Project would provide adequate parking supply to meet demand and would have similar and less than significant impacts with respect to parking.

12) Utilities

a) Wastewater

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. As the existing office uses, which are high wastewater generators, would remain unchanged, the Existing Zoning (R1B) Alternative would result in the generation of approximately 3,744 gpd of wastewater, compared to the proposed Project net increase of approximately 6,073 gpd of wastewater.[4] The analysis in this EIR concluded that the proposed Project's demand for wastewater treatment could be accommodated by the remaining available treatment capacity at the HTP, which has a current capacity of 450 mgd, and associated impacts would be less than significant. The wastewater generated under this alternative could be accommodated by the HTP and impacts related to wastewater generation would also be less than significant. Furthermore, the proposed Project would not result in a significant impact to local wastewater conveyance infrastructure, because the proposed Project would implement any required upgrades. It is assumed that Existing Zoning (R1B) Alternative would also implement any required upgrades, as would be required of the proposed Project. Therefore, impacts to wastewater under Existing Zoning (R1B) Alternative would be similar to the proposed Project's less than significant impact.

b) Water

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. As the existing office uses, which are high water consumers, would remain unchanged, the

[4] *Refer to Section IV.L (Utilities) of this EIR for the calculations.*

Existing Zoning (R1B) Alternative would be anticipated to consume approximately 4,488 gpd of water, compared to the proposed Project's net increase of approximately 6,877 gpd of water.[5] Therefore, this alternative would consume more water than the proposed Project. The analysis in this EIR concluded that the proposed Project's demand for water supply and treatment could be accommodated by existing water supply and treatment facilities, and associated impacts would be less than significant. Similar to the proposed Project, impacts related to water supply and treatment would also be less than significant under this alternative, as 4,488 gpd or approximately 0.013 acre-feet per year (afy)of water could easily be accommodated by the annual projected demand in a normal water year for 2035 for the Municipal Water District (MWD) and the Hollywood Subbasin, which would be 11,353 afy of imported water and 800 afy of groundwater.[6] Additionally, impacts related to water conveyance infrastructure and fire flow would be less than significant under this alternative because MWD and the Hollywood Subbasin both have adequate supply. The additional water consumed under this alternative can be provided within the existing water supply. Therefore, Existing Zoning (R1B) Alternative impacts to the water supply and infrastructure would be similar to the proposed Project's less than significant impact.

c) Solid Waste

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. The Existing Zoning (R1B) Alternative would be anticipated to generate approximately 17 ppd (or 0.008 tons) of solid waste, which is less when compared to the proposed Project net increase of approximately 38 ppd of solid waste.[7] The EIR concluded that existing capacity at the Puente Hills Landfill which would accept the proposed Project's demolition/construction waste could accommodate the proposed Project's demand, and impacts would be less than significant. Similar to the proposed Project, impacts related to landfill capacity would be less than significant under this alternative, as 0.008 tons of solid waste per day could easily be accommodated the Puente Hills Landfill, which can accept up 13,200 tons of solid waste per day. Therefore, Existing Zoning (R1B) Alternative impacts to the solid waste would be similar to the proposed Project's less than significant impact.

d) Electricity and Natural Gas

i) Electricity

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. The Existing Zoning (R1B) Alternative is anticipated to consume approximately 135,036 kwH/year of electricity, compared to the proposed Project's net *decrease* of approximately 190,578 kwH/year of electricity.[8] Therefore, this alternative would consume more electricity than the proposed Project. Similar to the proposed Project, this alternative would include energy conservation measures and would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The Existing Zoning (R1B) Alternative would also comply with the West Hollywood Green Building Ordinance. Therefore, Existing Zoning (R1B) Alternative electricity

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[5] *Ibid.*

[6] *Ibid.*

[7] *Ibid.*

[8] *Ibid.*

consumption could be accommodated by existing infrastructure, and associated impacts would be less than significant. Therefore, Existing Zoning (R1B) Alternative impacts to electricity would be similar to the proposed Project's less than significant impact.

ii) Natural Gas

Under the Existing Zoning (R1B) Alternative, the Project Site would be developed with 24 residential units within 12 duplexes on Rosewood Avenue. However, the Existing Building would remain unchanged. Existing Zoning (R1B) Alternative would be anticipated to consume approximately 96,288 cf/month of natural gas, compared to the proposed Project net increase of approximately 206,246 cf/month of natural gas.[9] Therefore, this alternative would consume less natural gas than the proposed Project. Similar to the proposed Project, this alternative would be subject to the State Energy Conservation Standards contained in Title 24 of the CCR. Existing Zoning (R1B) Alternative would comply with Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Furthermore, the 2012 California Gas Report projects that California natural gas demand is expected to increase by just 0.12 percent per year through 2030, and therefore, natural gas supplies are expected to meet Southern California's gas demand. Therefore, Existing Zoning (R1B) Alternative impacts to natural gas would be similar to the proposed Project's less than significant impact.

13) Relationship to Project Objectives

The Existing Zoning (R1B) Alternative would reduce some of the environmental impacts associated with the proposed Project. This alternative would achieve the following project objectives to a lesser degree than the proposed Project:

- Redevelop an aging commercial structure and under-utilized surface parking lot with a more efficient and economically viable mix of uses, including condominiums, affordable rental apartments, office and retail space;
- Provide housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low and moderate income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock;
- Replace an incompatible commercial surface parking lot along Rosewood Avenue with new single-family townhomes that are in scale with the existing single-family residences on Rosewood Avenue;
- Provide a modern, high-quality design that complements and is sensitive to surrounding uses; and
- Improve site access and provide sufficient parking for residents, patrons, and employees to discourage future parking on surrounding residential streets.

The Existing Zoning (R1B) Alternative would not achieve the following project objectives:

- Increase the number of affordable rental housing units in the southwest area of West Hollywood;

[9] *Ibid.*

- Create a high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area;
- Adaptively reuse the existing office building on the property by converting it into residential condominiums and apartments with redesigned streetfront retail and office space.

14) Reduction of Significant Project Impacts

The proposed Project would result in significant and unavoidable construction noise impacts after mitigation. The Existing Zoning (R1B) Alternative would have similar construction activity as the proposed Project and would not avoid this impact. Because this Alternative would retain the Existing Building in its current configuration and would add 24 residential units, impacts with respect to traffic, traffic noise, air quality, GHG emissions, public services and utilities would be greater (or higher) than compared to the proposed Project, but would be less than significant. The Existing Zoning (R1B) Alternative would not implement General Plan policies related to affordable housing or encouragement of pedestrian-friendly environments on major City streets. The Existing Zoning (R1B) Alternative would have lower potentially beneficial impacts that could result from the proposed Project with respect to Aesthetics.

iii) Alternative 3: Reduced Density Alternative 1

Reduced Density Alternative 1 would include reduced residential density on the Rosewood Avenue side of the Project Site. Modifications to the Existing Building would be the same as the proposed Project under this Alternative. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. The Indoor Pool House and associated amenities would not be included in this Alternative. The reconfiguration of subterranean parking for the office, retail, and restaurant uses located in the Existing Building that would occur under the proposed Project, along with the associated reconfiguration of access to the parking areas from Beverly Boulevard, would occur under this Alternative.

On Rosewood Avenue, the Alternative would provide 12 single-family units, one on each of the 12 lots located on Rosewood Avenue, one less townhouse unit than would be provided under the proposed Project, and subterranean parking that would be reconfigured to serve the residential, office and retail/restaurant uses that would be included in the Existing Building. The units would be up to approximately 25 feet in height and similar in appearance and design to the Townhomes that would be included in the proposed Project. Setbacks and landscaping provided for the townhouse units would be similar to the proposed Project. The units would be located above the subterranean parking structure under the Alternative. The four affordable units and associated open space areas that would be constructed on Rosewood Avenue under the proposed Project would not be included in this Alternative.

The inclusion of parking under the Rosewood Avenue site would be consistent with the PK Parking Overlay District that applies to this site. Approval of a General Plan Amendment and Specific Plan would be required to implement this Alternative, which would allow for consistent and coherent site and building design, and connection and coordination of the Project buildings within the Project Site.

1) Aesthetics

a) Visual Character

Under Reduced Density Alternative 1, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Changes to the Existing Building to update its architecture and appearance and the addition of building mass to the Existing Building as proposed under the Project would be included under the Alternative. Modifications to the frontage of the Existing Building that would improve its appearance and connection to the street would be included in this Alternative. Accordingly, the visual appearance of the Existing Building under the Alternative would be the same as would occur under the proposed Project. Similar to the proposed Project, impacts associated with visual character of the Existing Building would be the same as the proposed Project and less than significant.

Under the Alternative, along Rosewood Avenue, buildings similar in height, appearance and character to the Townhomes proposed under the Project would be constructed. Similar setbacks and landscaping would be provided for these buildings under the Alternative. As such, the Alternative would improve the visual appearance of the Project Site as viewed from the residential neighborhood to the north by replacing views of the existing surface parking lot with low density residential development, similar to the proposed Project. Building mass along the Rosewood frontage would be slightly less as one fewer townhome unit and the proposed 4-unit apartment building and associated amenity space would not be included under the Alternative. The Alternative would include coordinated design elements, and physical and functional integration that would provide a visual transition between the Existing Building and the neighborhood to the north of the Project Site. Accordingly, the design of the Alternative would work to enhance the views of the Project Site from the residential area to the north to the same degree as the proposed Project. As such, impacts of the Alternative with respect to visual character north of the Project Site would be similar to the proposed Project, and less than significant.

b) Light & Glare

Nighttime lighting included under Reduced Density Alternative 1 would be similar to the proposed Project, with additional street lights, and shielded outdoor building lighting provided, with an associated increase in light levels and glare resulting from the construction of the Alternative. Because less new development would be included under the Alternative, impacts related to light and glare would be lower than the proposed Project, although both would be less than significant.

2) Air Quality

Reduced Density Alternative 1 would be consistent with the 2012 Air Quality Management Plan (AQMP) since the increase in population and employment would not exceed SCAG's projections for West Hollywood. Mass daily and localized construction-related emissions would be similar to those generated by the proposed Project, as this Alternative would include the same excavation, dirt hauling and concrete pour activity as the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. As with the proposed Project, this Alternative would generate fewer mass daily operational emissions than the existing uses at the Project Site since it would generate approximately 162 fewer ADT. Emissions associated with the Alternative would be lower than the proposed Project, since the Alternative would include fewer residential units than the

proposed Project. Similar to the proposed Project, the localized operational emissions associated with this Alternative would not approach the applicable thresholds of significance for the project area. Because the construction-related and operational emissions associated with this Alternative would not exceed the thresholds of significance recommended by the SCAQMD, it also would not contribute a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment, similar to the proposed Project.

3) Cultural Resources

a) Historic Resources

Under Reduced Density Alternative 1, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Changes to the Existing Building to update its architecture and appearance and the addition of building mass to the Existing Building as proposed under the Project would be included under the Alternative. The Existing Building is not a historic resource subject to CEQA. Therefore, both the Alternative and the proposed Project would not cause a substantial adverse change in significance of a historic resource.

b) Archaeological Resources

Under Reduced Density Alternative 1, the Rosewood parcel would be excavated to allow for construction of the subterranean parking garage. Although no known archaeological resources are known to exist on this site, the Alternative, like the proposed Project, could potentially encounter archaeological resources during excavation. Both the Alternative and the proposed Project would have less than significant impacts with respect to archaeological resources after implementation of mitigation measures.

c) Paleontological Resources

Under Reduced Density Alternative 1, the Rosewood parcel would be excavated to allow for construction of the subterranean parking garage. Although no known paleontological resources are known to exist on this site, the Alternative, like the proposed Project, could potentially encounter paleontological resources or human remains during excavation. Both the Alternative and the proposed Project would have less than significant impacts with respect to paleontological resources and human remains after implementation of mitigation measures.

4) Geology and Soils

Under Reduced Density Alternative 1, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Under the Alternative, the surface parking lot on the Project Site on Rosewood Avenue would be developed with 12 single family units over a subterranean parking garage. The Alternative would occur within the same site as the proposed Project, which has been identified to have the potential for liquefaction. However, with the implementation of mitigation

measures, both the Alternative and the proposed Project would have less than significant impacts with respect to geology and soils. Impacts of the Alternative with respect to all other issues related to geology and soils would be the same as the proposed Project and less than significant.

5) Greenhouse Gas Emissions

Under Reduced Density Alternative 1, emissions associated with the Alternative would be lower than the proposed Project, since the Alternative would include fewer residential units than the proposed Project. As with the proposed Project, this Alternative would generate fewer annual GHG emissions than the existing uses at the Project Site. This Alternative would also comply with the applicable measures for new development from the City of West Hollywood CAP and implement mitigation measure 3.15-1 from the Final Program EIR for the City of West Hollywood General Plan and Climate Action Plan. Also, the new uses under this Alternative would be designed and constructed in accordance with the City's Green Building Ordinance. Therefore, this Alternative would result in lower GHG impacts than the proposed Project, although the impacts of the Alternative and the proposed Project regarding GHG emissions would both be less than significant.

6) Hydrology and Water Quality

a) Stormwater Runoff and Water Quality

Under Reduced Density Alternative 1, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Under the Alternative, the surface parking lot on the Project Site on Rosewood Avenue would be developed with 12 single family units over a subterranean parking garage. As would be the case with the proposed Project, runoff from the Project Site under the Alternative would be subject to the controls of the General Construction Activity Stormwater Permit and Los Angeles County MS4 permit, which would control the quantity and quality of runoff from the site to meet specific standards. Similar to the proposed Project, under this Alternative the entire site would be developed; therefore, operational impacts would be similar to the proposed Project's impacts, which would be subject to the Countywide SUSMP and MS4 permit requirements and would be less than significant after implementation of mitigation measures.

b) Flood Hazard

Reduced Density Alternative 1 would occur on the same site as the proposed Project, which has been identified to be outside of the 50, 100 and 500-year flood zones. Impacts of the Alternative with respect to flood hazards would be the same as the proposed Project and less than significant.

7) Land Use and Planning

Under Reduced Density Alternative 1, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Modifications to the frontage of the Existing Building that would improve its appearance and connection to the street would be included in this Alternative.

Approval of a General Plan Amendment and Specific Plan would be required to implement this Alternative. The Development Permit to allow for the new construction, and Design Review; that would be required for the proposed Project, would also be required under this Alternative. The Alternative would be generally consistent with the policies of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to focus new development in the Southern California region in urbanized areas with established infrastructure. The Alternative would include residential units that would help implement relevant policies of the Land Use and Urban Form Element of the General Plan related to the provision of housing within the City and encouragement of mixed-use development in the City. Because the Alternative would include single family units limited to 25 feet in height, and other coordinated design elements located between the Existing Building and the residential area to the north of the Project Site, the Alternative would protect existing neighborhoods through the provision of transitional height buildings between the commercial development on Beverly Boulevard and the lower density residential neighborhood to the north of the Project Site. The Alternative would include design elements that would improve the pedestrian environment and provide pedestrian connections to the existing commercial uses within the Existing Building and would thus implement General Plan policies related to supporting and encouraging pedestrian activity on major streets in the City. However, this Alternative would include fewer affordable housing units than the proposed Project and would thus implement General Plan policies related to affordable housing to a lesser extent than the proposed Project. The Alternative would include residential uses within the Project Site that would be physically and functionally connected to the commercial uses within the Existing Building. As such, the Alternative would be consistent with the intent of the Mixed Use Incentive Overlay district, same as the proposed Project. Accordingly, the Alternative would implement relevant policies of the General Plan and Mixed Use Incentive Overlay District to the same extent as the proposed Project, and both would result in less than significant impacts.

8) Noise

As with the proposed Project, development under Reduced Density Alternative 1 would be required to comply with the City's Noise Ordinance restrictions for construction days and hours. Construction-related noise levels would be similar to those generated by the proposed Project, as this Alternative would include the same construction activity within the Existing Building and the same excavation, dirt hauling and concrete pour activity as the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. Because these activities would increase noise levels at residential uses along Rosewood Avenue by more than 10 dBA, the Alternative would cause a significant and unavoidable short-term impact, same as the proposed Project. Construction-related ground-borne vibration levels would be similar to those generated by the proposed Project because of similar construction activity, and less than significant.

The Alternative would result in a slight net decrease in daily roadway noise levels since it would generate approximately 162 fewer ADT. As with the proposed Project, operation of this Alternative would not generate significant ground-borne vibration levels. Noise levels along Rosewood Avenue are less than 60 dBA L_{dn}, so the new residential uses included under this Alternative would not be exposed to noise levels in excess of City standards. Operational noise impacts of the Alternative would be similar to the proposed Project and less than significant.

9) Population and Housing

a) Employment

Reduced Density Alternative 1 would include a reduction of residential uses on the Project Site compared to the proposed Project. However, the commercial portion of the Alternative would be the same as the proposed Project. Employment associated with the Alternative would be the same as the proposed Project, which would result in a reduction in employment on the Project Site, however the level of employment of both the Alternative and the proposed Project would be consistent with SCAG forecasts for the City of West Hollywood. Construction employment would be the same under the Alternative because the same construction activity would be required as would be needed to construct the proposed Project. Impacts of the proposed Project and the Alternative would be less than significant with respect to employment.

b) Housing and Population

Reduced Density Alternative 1 would include 68 market rate housing units and 8 affordable units compared to 69 market rate units and 12 affordable units under the proposed Project. The uses at the Project Site would generate approximately 116 new residents under this Alternative. Housing and population growth under the Alternative would be less than the proposed Project, although both would be within SCAG forecasts for the City of West Hollywood. The Alternative would implement policies of the City's General Plan Housing Element related to the provision of housing stock and affordable housing in the City, although to a lesser degree than the proposed Project. The Alternative would include fewer affordable housing units, and would be therefore less effective than the proposed Project in helping the City meet its RHNA goals. Impacts of the proposed Project related to housing and population would be similar to those than under the proposed Project, which are less than significant. Impacts related to affordable housing would be higher than the proposed Project, although impacts of both the Alternative and the proposed Project would be less than significant.

10) Public Services

a) Fire

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[10] Under the Reduced Density Alternative 1, the uses at the Project Site would generate approximately 116 new residents, which is less when compared to the proposed Project's 124 residents. Response distance and times to the Project Site are anticipated to remain unchanged as a result of this alternative, as the size of the on-site population does not affect these factors. Similar to the proposed Project, fire flow requirements of 5,000 gallons per minute for the high-density residential and 1,500 gallons per minute for the single-family uses would be required under this alternative. Therefore, as the Reduced Density Alternative 1 would include less intensification of residential uses when compared to the proposed Project, the demand for fire protection under the Reduced Density Alternative 1 would be incrementally less than the proposed Project's impacts, which would be less than significant.

[10] *Employees generated utilizing employee rated from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*

b) Police

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[11] Under the Reduced Density Alternative 1, the uses at the Project Site would generate approximately 116 new residents, which is less when compared to the proposed Project's 124 residents. Therefore, the current officer-to-population ratio of 267 residents per officer in the West Hollywood area would remain unchanged, similar to the proposed Project.[12] Police units are often in a mobile state; hence actual distance between a headquarters facility and the Project Site is often of little relevance. Instead, the number of officers on the street is more directly related to the realized response time. Response time is defined as the total time from when a call requesting assistance is placed, until the time that a police unit responds to the scene. Telephone calls for police assistance are prioritized based on the nature of the call. Thus, a police unit accessing the Project Site from the surrounding area may or may not pass through at least one of the impacted study intersections. As such, response times would not be greatly affected, as emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Thus, the Reduced Density Alternative 1's demand on response time would be similar to that of the proposed Project. Similar to the proposed Project, the E Reduced Density Alternative 1 would not result in the need for additional officers. Therefore, as the Reduced Density Alternative 1 would include less intensification of residential uses when compared to the proposed Project, the demand for police protection under the Reduced Density Alternative 1 would be incrementally less than the proposed Project's impacts, which would be less than significant.

c) Schools

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The proposed Project would generate 29 net new students to the district. With the Reduced Density Alternative 1, the proposed Project would result in 23 net new students (10 elementary, seven middle school, and six high school). Therefore, the uses at the Project Site would generate fewer students under the Reduced Density Alternative 1. The West Hollywood Elementary School, Burroughs Middle School, and Fairfax Senior High School are all anticipated to continue operating under capacity under the Reduced Density Alternative 1, similar to their current condition. As such, impacts under the Reduced Density Alternative 1 would be incrementally less than the proposed Project's impacts on school services, which are less than significant.

d) Parks and Recreation

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[13]

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[11] *Ibid.*

[12] *(34,399 population + 116 new residents) ÷ 129 officers = 267 residents/officer ≈ 0 required officers.*

[13] *Employees generated utilizing employee rated from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*

Under Reduced Density Alternative 1, the uses at the Project Site would generate approximately 116 new residents, which is less when compared to the proposed Project's 124 residents. Just like the proposed Project the standard minimum parkland-to-resident ratio provided by the City is three acres per 1,000 residents. Based on the parkland-to-resident ratio, the Reduced Density Alternative 1 would generate a need for approximately 0.35 additional acre of public parkland in the project area, which is less than the proposed Project's 0.37 additional acre of public parkland. Furthermore, similar to the proposed Project, to alleviate the demand on existing City parks and recreational facilities, the Applicant would be required to pay Quimby fees to the City to satisfy its obligations under the Quimby Act. As such, impacts under the Reduced Density Alternative 1 would be incrementally less than the proposed Project's impacts on parks and recreational facilities, which are less than significant.

e) Libraries

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[14] Under the Reduced Density Alternative 1, the uses at the Project Site would generate approximately 116 new residents, which is less when compared to the proposed Project's 124 residents. The Reduced Density Alternative 1 would potentially generate approximately 116 residents, which would represent 0.33 percent [(116/35,828) x 100] of the expected change in service capacity for the West Hollywood Library, compared to the proposed Project's 0.35 percent of expected change in service capacity. Similar to the proposed Project the expected 0.33 percent increase in service population as a result of the Reduced Density Alternative 1 is not considered a substantial increase in demand to a library that currently adequately serves the existing population. As such, impacts under the Reduced Density Alternative 1 would be incrementally less than the proposed Project's impacts on library facilities, which are less than significant.

11) Transportation/Traffic

Under Reduced Density Alternative 1, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Under the Alternative, the surface parking lot on the Project Site on Rosewood Avenue would be developed with 12 single-family units over a subterranean parking garage. Construction traffic impacts of the Alternative would be similar to the proposed Project, as the Alternative would include the same construction activities in the Existing Building and the same excavation, dirt hauling and concrete pour activity as the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that site. The Alternative would have lower operational trip generation than the proposed Project, because the Alternative would include fewer residential units than the proposed Project. Operational traffic impacts under the Alternative would be lower than the proposed Project and less than significant. Similarly, the Alternative would have less than significant impacts on street segments and CMP intersections because of reduced trip generation compared to the proposed Project. The Alternative would be expected to have the same less than significant impact as the proposed Project on emergency access because the access pattern

[14] *Ibid.*

under the Alternative would be the same as the proposed Project. Finally, both the Alternative and the proposed Project would provide adequate parking supply to meet demand and would have similar and less than significant impacts with respect to parking.

12) Utilities and Service Systems

a) Wastewater

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The Reduced Density Alternative 1 would result in a net increase of approximately 2,771 gpd of wastewater, compared to the proposed Project net increase of approximately 6,073 gpd of wastewater.[15] The analysis in this EIR concluded that the proposed Project's demand for wastewater treatment could be accommodated by the remaining available treatment capacity at the HTP, which has a current capacity of450 mgd, and associated impacts would be less than significant. Under the Reduced Density Alternative 1 there would be a decrease in the amount of wastewater generated when compared to the proposed Project, therefore, the wastewater generated under this alternative could be accommodated by the HTP and impacts related to wastewater generation would also be less than significant. Furthermore, the proposed Project would not result in a significant impact to local wastewater conveyance infrastructure, because the proposed Project would implement any required upgrades. It is assumed that Reduced Density Alternative 1 would also implement any required upgrades, as would be required of the proposed Project. Therefore, impacts to wastewater under Reduced Density Alternative 1 would be incrementally less than the proposed Project's impacts, which are less than significant.

b) Water

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The Reduced Density Alternative 1 would result in a net increase of approximately 3,310 gpd of water, compared to the proposed Project's net increase of approximately 6,877 gpd of water.[16] Therefore, this alternative would consume less water than the proposed Project. The analysis in this EIR concluded that the proposed Project's demand for water supply and treatment could be accommodated by existing water supply and treatment facilities, and associated impacts would be less than significant. Similar to the proposed Project, impacts related to water supply and treatment would also be less than significant under this alternative, as 3,310 gpd or approximately 0.010 afy of water could easily be accommodated by the annual projected demand in a normal water year for 2035 for the MWD and the Hollywood Subbasin, which would be 11,353 afy of imported water and 800 afy of groundwater.[17] Additionally, impacts related to water conveyance infrastructure and fire flow would be less than significant under this alternative. Therefore, Reduced Density Alternative 1 impacts to the water supply and infrastructure would be incrementally less than the proposed Project's impacts, which are less than significant.

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[15] *Refer to Section IV.L (Utilities) of this EIR for the calculations.*

[16] *Ibid.*

[17] *Ibid.*

c) Solid Waste

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The Reduced Density Alternative 1 would result in a net increase of approximately 23 ppd of solid waste, compared to the proposed Project's net increase of approximately 38 ppd of solid waste.[18] The EIR concluded that existing capacity at the Puente Hills Landfill, which would accept the proposed Project's demolition/construction waste could accommodate the proposed Project's demand, and impacts would be less than significant. Similar to the proposed Project, impacts related to landfill capacity would be less than significant under this alternative as there would actually be decrease in solid waste generation. Therefore, Reduced Density Alternative 1 impacts to the solid waste would be incrementally less than the proposed Project's impacts, which are less than significant.

d) Electricity and Natural Gas

i) Electricity

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Reduced Density Alternative 1 is anticipated to consume a net *decrease* of approximately 218,711 kwH/year of electricity, compared to the proposed Project's net *decrease* of approximately 190,578 kwH/year of electricity.[19] Therefore, this alternative would consume less electricity than the proposed Project. Similar to the proposed Project, this alternative would include energy conservation measures and would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The Reduced Density Alternative 1 would also comply with the West Hollywood Green Building Ordinance. Therefore, Reduced Density Alternative 1 electricity consumption could be accommodated by existing infrastructure, and associated impacts would be less than significant. Therefore, Reduced Density Alternative 1 impacts to electricity would be incrementally less than the proposed Project's impacts, which are less than significant.

ii) Natural Gas

Reduced Density Alternative 1 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Reduced Density Alternative 1 would be anticipated to consume approximately 186,186 cf/month of natural gas, compared to the proposed Project net increase of approximately 206,246 cf/month of natural gas.[20] Therefore, this alternative would consume less natural gas than the proposed Project. Similar to the proposed Project, this alternative would be subject to the State Energy Conservation Standards contained in Title 24 of the CCR. Reduced Density Alternative 1 would comply with Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Furthermore, the 2012 California Gas Report projects that California natural gas demand is expected to increase by just 0.12 percent per year through 2030, and therefore, natural gas supplies are expected to meet Southern California's gas demand. Therefore, Reduced Density

[18] *Ibid.*

[19] *Ibid.*

[20] *Ibid.*

Alternative 1 impacts to natural gas would be incrementally less than the proposed Project's impacts, which are less than significant.

13) Relationship to Project Objectives

Reduced Density Alternative 1 would reduce the environmental impacts associated with the proposed Project. This Alternative would achieve the following project objectives:

- Redevelop an aging commercial structure and under-utilized surface parking lot with a more efficient and economically viable mix of uses, including condominiums, affordable rental apartments, office and retail space;
- Provide housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low and moderate income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock;
- Create a high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area;
- Adaptively reuse the existing office building on the property by converting it into residential condominiums and apartments with redesigned streetfront retail and office space;
- Replace an incompatible commercial surface parking lot along Rosewood Avenue with new single-family townhomes that are in scale with the existing single-family residences on Rosewood Avenue;
- Provide a modern, high-quality design that complements and is sensitive to surrounding uses; and
- Improve site access and provide sufficient parking for residents, patrons, and employees to discourage future parking on surrounding residential streets.

Reduced Density Alternative 1 would achieve the following project objectives to a lesser degree than the proposed Project:

- Increase the number of affordable rental housing units in the southwest area of West Hollywood.

14) Reduction of Significant Project Impacts

The proposed Project would result in significant and unavoidable construction noise impacts after mitigation. Reduced Project Alternative 1 would have similar construction activity as the proposed Project and would not avoid this impact. Because this Alternative would reduce the number of residential units, it would have lower less than significant impacts than the proposed Project with respect to traffic, traffic noise, air quality, GHG emissions, public services and utilities. Reduced Density Alternative 1 would implement General Plan policies related to affordable housing to a lesser degree than the proposed Project. Reduced Density Alternative 1 would have similar potentially beneficial impacts as the proposed Project with respect to Aesthetics.

iv) Alternative 4: Reduced Density Alternative 2

Reduced Density Alternative 2 would not include market rate or affordable units on Rosewood Avenue. Modifications to the Existing Building would be the same as the proposed Project under this Alternative. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. The Indoor Pool House and associated amenities would be included in this Alternative. On the Rosewood Avenue portion of the Project site, a one-level, above ground parking structure would be constructed above the existing surface parking lot to provide additional parking supply that would be needed to serve the residential, office and retail/restaurant uses that would be included in the Existing Building. Setbacks and landscaping would be provided for the parking structure to reduce the visual impact of the structure. The 13 townhome units and four affordable units and associated open space areas that would be constructed on Rosewood Avenue under the proposed Project would not be included in this Alternative.

The inclusion of parking on the Rosewood Avenue site that would be included in this Alternative would be consistent with the PK Parking Overlay District that applies to this site. Approval of a General Plan Amendment and Specific Plan would be required to implement this Alternative, which would allow for consistent and coherent site and building design, and connection and coordination of the Project buildings within the Project Site.

1) Aesthetics

a) Visual Character

Under Reduced Density Alternative 2, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Changes to the Existing Building to update its architecture and appearance and the addition of building mass to the Existing Building as proposed under the Project would be included under the Alternative. Modifications to the frontage of the Existing Building that would improve its appearance and connection to the street would be included in this Alternative. Accordingly, the visual appearance of the Existing Building under the Alternative would be the same as would occur under the proposed Project. Similar to the proposed Project, impacts associated with visual character of the Existing Building would be the same as the proposed Project and less than significant.

Under the Alternative, along Rosewood Avenue, a one-level, above ground parking structure would be constructed above the existing surface parking lot to provide additional parking supply that would be needed to serve the residential, office and retail/restaurant uses that would be included in the Existing Building. Setbacks and landscaping would be provided for the parking structure to reduce the visual impact of the structure. As such, the Alternative would provide a different visual appearance of the Project Site as viewed from the residential neighborhood to the north than would occur under the proposed Project. The view of the Project Site from this area would be dominated by a massive concrete structure as compared to a set of residential buildings with landscaping. Building mass along the Rosewood frontage would be increased compared to the proposed Project and the Alternative would be less effective than the proposed Project in providing a visual transition between the Existing Building and the neighborhood to the north of the Project Site. The Alternative would include

coordinated design elements, physical and functional integration, and features such as the Indoor Pool House that would provide some visual contrast between the Existing Building and the residential area to the north. Accordingly, the design of the Alternative would work to enhance the views of the Project Site from the residential area to the north, but to a lesser degree than the proposed Project. As such, impacts of the Alternative with respect to visual character north of the Project Site would be higher than the proposed Project, although both would be less than significant.

b) Light & Glare

Nighttime lighting included under Reduced Density Alternative 2 would be similar to the proposed Project, with additional street lights, and shielded outdoor building lighting provided, with an associated increase in light levels and glare resulting from the construction of the Alternative. However, lighting associated with a parking structure will likely be higher than would be characteristic of a series of residential buildings, because of security and safety requirements. Accordingly, impacts of the Alternative related to light and glare would be higher than the proposed Project, although both would be less than significant.

2) Air Quality

Reduced Alternative 2 would be consistent with the 2012 Air Quality Management Plan (AQMP) since the increase in population and employment would not exceed SCAG's projections for West Hollywood. Mass daily and localized construction-related emissions would be less those generated by the proposed Project since no excavation would occur in the site of the existing parking lot. As with the proposed Project, this Alternative would generate fewer mass daily operational emissions than the existing uses at the Project Site since it would generate approximately 232 fewer ADT. Emissions associated with the Alternative would be lower than the proposed Project, since the Alternative would include fewer residential units than the proposed Project. Similar to the proposed Project, the localized operational emissions associated with this Alternative would not approach the applicable thresholds of significance for the project area. Because the construction-related and operational emissions associated with this Alternative would not exceed the thresholds of significance recommended by the SCAQMD, it also would not contribute a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment.

3) Cultural Resources

a) Historic Resources

Under Reduced Density Alternative 2, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Changes to the Existing Building to update its architecture and appearance and the addition of building mass to the Existing Building as proposed under the Project would be included under the Alternative. The Existing Building is not a historic resource subject to CEQA. Therefore, both the Alternative and the proposed Project would not cause a substantial adverse change in significance of a historic resource.

b) Archaeological Resources

Under Reduced Density Alternative 2, no excavation would occur on the Rosewood parcel. No impacts related to archaeological resources would occur under the Alternative. The proposed Project would have the potential to encounter archaeological resources during excavation. Impacts of the Alternative related to archaeological resources would be lower than the proposed Project, although both would be less than significant (after implementation of mitigation measures in the case of the proposed Project).

c) Paleontological Resources

Under Reduced Density Alternative 2, no excavation would occur on the Rosewood parcel. No impacts related to paleontological resources would occur under the Alternative. The proposed Project would have the potential to encounter paleontological resources during excavation. Impacts of the Alternative related to paleontological resources would be lower than the proposed Project, although both would be less than significant (after implementation of mitigation measures in the case of the proposed Project).

4) Geology and Soils

Under Reduced Density Alternative 2, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Under the Alternative, a one-level, above-ground parking structure would be constructed over the surface parking lot on the Project Site on Rosewood Avenue. The Alternative would occur within the same site as the proposed Project, which has been identified to have the potential for liquefaction. However, with the implementation of mitigation measures, both the Alternative and the proposed Project would have less than significant impacts with respect to geology and soils. Impacts of the Alternative with respect to all other issues related to geology and soils would be the same as the proposed Project and less than significant.

5) Greenhouse Gas Emissions

Under Reduced Density Alternative 2, emissions associated with the Alternative would be lower than the proposed Project, since the Alternative would include fewer residential units than the proposed Project. As with the proposed Project, Reduced Density Alternative 2 would generate fewer annual GHG emissions than the existing uses at the Project Site. The Alternative would also comply with the applicable measures for new development from the City of West Hollywood CAP and implement mitigation measure 3.15-1 from the Final Program EIR for the City of West Hollywood General Plan and Climate Action Plan. Also, the new uses under this Alternative would be designed and constructed in accordance with the City's Green Building Ordinance. Therefore, this Alternative would result in lower GHG impacts than the proposed Project, although the impacts of the Alternative and the proposed Project regarding GHG emissions would both be less than significant.

6) Hydrology and Water Quality

a) Stormwater Runoff and Water Quality

Under Reduced Density Alternative 2, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium

units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Under the Alternative, along Rosewood Avenue, a one-level, above ground parking structure would be constructed above the existing surface parking lot to provide additional parking supply that would be needed to serve the residential, office and retail/restaurant uses that would be included in the Existing Building. As would be the case with the proposed Project, runoff from the Project Site under the Alternative would be subject to the controls of the General Construction Activity Stormwater Permit and Los Angeles County MS4 permit, which would control the quantity and quality of runoff from the site to meet specific standards. Similar to the proposed Project, under this Alternative the entire site would be developed; therefore, operational impacts would be similar to the proposed Project's impacts, which would be subject to the Countywide SUSMP and MS4 permit requirements and would be less than significant after implementation of mitigation measures.

b) Flood Hazard

Reduced Density Alternative 2 would occur on the same site as the proposed Project, which has been identified to be outside of the 50, 100 and 500-year flood zones. Impacts of the Alternative with respect to flood hazards would be the same as the proposed Project and less than significant.

7) Land Use and Planning

Under Reduced Density Alternative 2, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Modifications to the frontage of the Existing Building that would improve its appearance and connection to the street would be included in this Alternative. Approval of a General Plan Amendment and Specific Plan would be required to implement this Alternative. The Development Permit to allow for the new construction, and Design Review; that would be required for the proposed Project, would also be required under this Alternative. The Alternative would be generally consistent with the policies of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to focus new development in the Southern California region in urbanized areas with established infrastructure. The Alternative would include residential units that would help implement relevant policies of the Land Use and Urban Form Element of the General Plan related to the provision of housing within the City and encouragement of mixed use development in the City, although to a lesser degree than the proposed Project because the number of residential units would be reduced under the Alternative. Because the Alternative would include a parking structure, rather than townhome units, and other coordinated design elements located between the Existing Building and the residential area to the north of the Project Site, the Alternative would protect existing neighborhoods to a lesser degree than the proposed Project. The Alternative would include design elements that would improve the pedestrian environment and provide pedestrian connections to the existing commercial uses within the Existing Building and would thus implement General Plan policies related to supporting and encouraging pedestrian activity on major streets in the City. However, this Alternative would include fewer affordable housing units than the proposed Project and would thus implement General Plan policies related to affordable housing to a lesser extent than the proposed Project. The Alternative would include residential uses that would be physically and functionally connected to the commercial uses within the Existing Building. As such, the Alternative would be

consistent with the intent of the Mixed Use Incentive Overlay district, same as the proposed Project. Accordingly, the Alternative would implement relevant policies of the General Plan to a lesser degree than the proposed Project and the Mixed Use Incentive Overlay District to the same extent as the proposed Project, and both would result in less than significant impacts.

8) Noise

As with the proposed Project, development under Reduced Density Alternative 2 would be required to comply with the City's Noise Ordinance restrictions for construction days and hours. Construction-related noise levels would be lower than the proposed Project, as this Alternative would include the same construction activity within the Existing Building and concrete pours to construct the parking structure, but would not include the excavation and dirt hauling activity that would be included in the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. However, because construction activities associated with the Alternative would increase noise levels at residential uses along Rosewood Avenue by more than 10 dBA, the Alternative would cause a significant and unavoidable short-term impact, same as the proposed Project. Construction-related ground-borne vibration levels would be less than the proposed Project because of lower levels of construction activity, although both would be less than significant.

This Alternative would result in a slight decrease in daily roadway noise levels since it would generate approximately 232 fewer ADT than the proposed Project. Trip generation would be lower than the proposed Project because the Alternative includes fewer residential units. No increase in roadway noise levels would be expected along Rosewood Avenue since no new trip-generating uses or new site access would be provided along the northern part of the Project Site. Any potential increase in noise levels along other roadway segments would also be less than 1 dBA. As with the proposed Project, operation of this Alternative would not generate significant ground-borne vibration levels. Noise levels along Rosewood Avenue are less than 60 dBA L_{dn}, so the new residential uses included under this Alternative would not be exposed to noise levels in excess of City standards. Operational noise impacts of the Alternative would be lower than the proposed Project, although both would be less than significant.

9) Population and Housing

a) Employment

Reduced Density Alternative 2 would include a reduction of residential uses on the Project Site compared to the proposed Project. However, the commercial portion of the Alternative would be the same as the proposed Project. Employment associated with the Alternative would be the same as the proposed Project, which would result in a reduction in employment on the Project Site compared to existing conditions. However, the level of employment of both the Alternative and the proposed Project would be consistent with SCAG forecasts for the City of West Hollywood. Construction employment would be the lower under the Alternative because of reduced construction activity. Impacts of the proposed Project and the Alternative would be less than significant with respect to employment.

b) Housing and Population

Reduced Density Alternative 2 would include 56 market rate housing units and 8 affordable units compared to 69 market rate units and 12 affordable units under the proposed Project. The uses at the Project Site would generate approximately 98 new residents under this Alternative. Housing and population growth under the Alternative would be less than the proposed Project, although both would

be within SCAG forecasts for the City of West Hollywood. The Alternative would implement policies of the City's General Plan Housing Element related to the provision of housing stock and affordable housing in the City, although to a lesser degree than the proposed Project. The Alternative would include fewer affordable housing units, and would be therefore less effective than the proposed Project in helping the City meet its RHNA goals. Impacts of the proposed Project related to housing and population would be similar to those than under the proposed Project, which are less than significant. Impacts related to affordable housing would be higher than the proposed Project, although impacts of both the Alternative and the proposed Project would be less than significant.

10) Public Services

a) Fire

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[21] Under the Reduced Density Alternative 2, the uses at the Project Site would generate approximately 98 new residents, which is less when compared to the proposed Project's 124 residents. Response distance and times to the Project Site are anticipated to remain unchanged as a result of this alternative, as the size of the on-site population does not affect these factors. Similar to the proposed Project, fire flow requirements of 5,000 gallons per minute for the high-density residential would be required under this alternative. Therefore, as the Reduced Density Alternative 2 would include less intensification of residential uses when compared to the proposed Project, the demand for fire protection under the Reduced Density Alternative 2 would be incrementally less than the proposed Project's impacts, which would be less than significant.

b) Police

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[22] Under the Reduced Density Alternative 2, the uses at the Project Site would generate approximately 98 new residents, which is less when compared to the proposed Project's 124 residents. Therefore, the current officer-to-population ratio of 267 residents per officer in the West Hollywood area would remain unchanged, similar to the proposed Project.[23] Police units are often in a mobile state; hence actual distance between a headquarters facility and the Project Site is often of little relevance. Instead, the number of officers on the street is more directly related to the realized response time. Response time is defined as the total time from when a call requesting assistance is placed, until the time that a police unit responds to the scene. Telephone calls for police assistance are prioritized based on the nature of the call. Thus, a police unit accessing the Project Site from the surrounding area may or may not pass through at least one of the impacted study intersections. As such, response times would not be greatly

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[21] *Employees generated utilizing employee rated from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*

[22] *Ibid.*

[23] *(34,399 population + 98 new residents) ÷ 129 officers = 267 residents/officer ≈ 0 required officers.*

affected, as emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Thus, the Reduced Density Alternative 2's demand on response time would be similar to that of the proposed Project. Similar to the proposed Project, the Reduced Density Alternative 2 would not result in the need for additional officers. Therefore, as the Reduced Density Alternative 2 would include less intensification of residential uses when compared to the proposed Project, the demand for police protection under the Reduced Density Alternative 2 would be incrementally less than the proposed Project's impacts, which would be less than significant.

c) Schools

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The proposed Project would generate 29 net new students to the district. With the Reduced Density Alternative 2, the proposed Project would result in 19 net new students (eight elementary, six middle school, and five high school). Therefore, the uses at the Project Site would generate fewer students under the Reduced Density Alternative 2. The West Hollywood Elementary School, Burroughs Middle School, and Fairfax Senior High School are all anticipated to continue operating under capacity under the Reduced Density Alternative 2, similar to their current condition. As such, impacts under the Reduced Density Alternative 2 would be incrementally less than the proposed Project's impacts on school services, which are less than significant.

d) Parks and Recreation

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[24] Under Reduced Density Alternative 2, the uses at the Project Site would generate approximately 98 new residents, which is less when compared to the proposed Project's 124 residents. Just like the proposed Project the standard minimum parkland-to-resident ratio provided by the City is three acres per 1,000 residents. Based on the parkland-to-resident ratio, the Reduced Density Alternative 2 would generate a need for approximately 0.29 additional acre of public parkland in the project area, which is less than the proposed Project's 0.37 additional acre of public parkland. Furthermore, similar to the proposed Project, to alleviate the demand on existing City parks and recreational facilities, the Applicant would be required to pay Quimby fees to the City to satisfy its obligations under the Quimby Act. As such, impacts under the Reduced Density Alternative 2 would be incrementally less than the proposed Project's impacts on parks and recreational facilities, which are less than significant.

e) Libraries

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Similar to the proposed Project, the uses at the Project Site would generate 91 employees under this alternative.[25]

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[24] *Employees generated utilizing employee rated from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*

[25] *Ibid.*

Under the Reduced Density Alternative 2, the uses at the Project Site would generate approximately 98 new residents, which is less when compared to the proposed Project's 124 residents. The Reduced Density Alternative 2 would potentially generate approximately 98 residents, which would represent 0.28 percent [(98/35,828) x 100] of the expected change in service capacity for the West Hollywood Library, compared to the proposed Project's 0.35 percent of expected change in service capacity. Similar to the proposed Project the expected 0.28 percent increase in service population as a result of the Reduced Density Alternative 2 is not considered a substantial increase in demand to a library that currently adequately serves the existing population. As such, impacts under the Reduced Density Alternative 2 would be incrementally less than the proposed Project's impacts on library facilities, which are less than significant.

11) Transportation/Traffic

Under Reduced Density Alternative 2, modifications to the Existing Building would be the same as the proposed Project. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would be included in this Alternative, as would the modifications to the commercial uses that are included in the proposed Project to provide street-level access to the retail and restaurant uses in the Existing Building. Under the Alternative, a one-level, above-ground parking structure would be constructed over the surface parking lot on the Project Site on Rosewood Avenue. Construction traffic impacts of the Alternative would be lower than the proposed Project, as this Alternative would include the same construction activity within the Existing Building and concrete pours to construct the parking structure, but would not include the excavation and dirt hauling activity that would be included in the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. The Alternative would have lower operational trip generation than the proposed Project, because the Alternative would include fewer residential units than the proposed Project. Operational traffic impacts under the Alternative would be lower than the proposed Project and less than significant. Similarly, the Alternative would have less than significant impacts on street segments and CMP intersections because of reduced trip generation compared to the proposed Project. The Alternative would be expected to have the same less than significant impact as the proposed Project on emergency access because the access pattern under the Alternative would be the same as the proposed Project. Finally, both the Alternative and the proposed Project would provide adequate parking supply to meet demand and would have similar and less than significant impacts with respect to parking.

12) Utilities and Service Systems

a) Wastewater

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The Reduced Density Alternative 2 would result in a net increase of approximately 899 gpd of wastewater, compared to the proposed Project net increase of approximately 6,073 gpd of wastewater.[26] The analysis in this EIR concluded that the proposed Project's demand for wastewater treatment could be accommodated by the remaining available treatment capacity at the HTP, which has a current capacity of450 mgd, and associated impacts would be less than significant. Under the Reduced Density Alternative 2 there would

[26] *Refer to Section IV.L (Utilities) of this EIR for the calculations.*

be a decrease in the amount of wastewater generated when compared to the proposed Project, therefore, the wastewater generated under this alternative could be accommodated by the HTP and impacts related to wastewater generation would also be less than significant. Furthermore, the proposed Project would not result in a significant impact to local wastewater conveyance infrastructure, because the proposed Project would implement any required upgrades. It is assumed that Reduced Density Alternative 2 would also implement any required upgrades, as would be required of the proposed Project. Therefore, impacts to wastewater under Reduced Density Alternative 2 would be incrementally less than the proposed Project's impacts, which are less than significant.

b) Water

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The Reduced Density Alternative 2 would result in a net increase of approximately 1,066 gpd of water, compared to the proposed Project's net increase of approximately 6,877 gpd of water.[27] Therefore, this alternative would consume less water than the proposed Project. The analysis in this EIR concluded that the proposed Project's demand for water supply and treatment could be accommodated by existing water supply and treatment facilities, and associated impacts would be less than significant. Similar to the proposed Project, impacts related to water supply and treatment would also be less than significant under this alternative, as 1,066 gpd or approximately 0.003 afy of water could easily be accommodated by the annual projected demand in a normal water year for 2035 for the MWD and the Hollywood Subbasin, which would be 11,353 afy of imported water and 800 afy of groundwater.[28] Additionally, impacts related to water conveyance infrastructure and fire flow would be less than significant under this alternative. Therefore, Reduced Density Alternative 2 impacts to the water supply and infrastructure would be incrementally less than the proposed Project's impacts, which are less than significant.

c) Solid Waste

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. The Reduced Density Alternative 2 would result in a net increase of approximately 15 ppd of solid waste, compared to the proposed Project's net increase of approximately 38 ppd of solid waste.[29] The EIR concluded that existing capacity at the Puente Hills Landfill, which would accept the proposed Project's demolition/construction waste could accommodate the proposed Project's demand, and impacts would be less than significant. Similar to the proposed Project, impacts related to landfill capacity would be less than significant under this alternative as there would actually be decrease in solid waste generation. Therefore, Reduced Density Alternative 2 impacts to the solid waste would be incrementally less than the proposed Project's impacts, which are less than significant.

[27] *Ibid.*

[28] *Ibid.*

[29] *Ibid.*

d) Electricity and Natural Gas

i) Electricity

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Reduced Density Alternative 2 is anticipated to consume a net *decrease* of approximately 286,230 kwH/year of electricity, compared to the proposed Project's net *decrease* of approximately 190,578 kwH/year of electricity.[30] Therefore, this alternative would consume less electricity than the proposed Project. Similar to the proposed Project, this alternative would include energy conservation measures and would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The Reduced Density Alternative 2 would also comply with the West Hollywood Green Building Ordinance. Therefore, Reduced Density Alternative 2 electricity consumption could be accommodated by existing infrastructure, and associated impacts would be less than significant. Therefore, Reduced Density Alternative 2 impacts to electricity would be incrementally less than the proposed Project's impacts, which are less than significant.

ii) Natural Gas

Reduced Density Alternative 2 would consist of an overall reduction of residential uses on the Project Site. However, the commercial portion of the proposed Project would remain the same. Reduced Density Alternative 2 would be anticipated to consume approximately 138,042 cf/month of natural gas, compared to the proposed Project net increase of approximately 206,246 cf/month of natural gas.[31] Therefore, this alternative would consume less natural gas than the proposed Project. Similar to the proposed Project, this alternative would be subject to the State Energy Conservation Standards contained in Title 24 of the CCR. Reduced Density Alternative 2 would comply with Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Furthermore, the 2012 California Gas Report projects that California natural gas demand is expected to increase by just 0.12 percent per year through 2030, and therefore, natural gas supplies are expected to meet Southern California's gas demand. Therefore, Reduced Density Alternative 2 impacts to natural gas would be incrementally less than the proposed Project's impacts, which are less than significant.

13) Relationship to Project Objectives

Reduced Density Alternative 2 would reduce some of the environmental impacts associated with the proposed Project. This Alternative would achieve the following project objectives:

- Redevelop an aging commercial structure and under-utilized surface parking lot with a more efficient and economically viable mix of uses, including condominiums, affordable rental apartments, office and retail space;
- Provide housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low and moderate income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock;

[30] *Ibid.*

[31] *Ibid.*

- Create a high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area;
- Adaptively reuse the existing office building on the property by converting it into residential condominiums and apartments with redesigned streetfront retail and office space;
- Provide a modern, high-quality design that complements and is sensitive to surrounding uses; and
- Improve site access and provide sufficient parking for residents, patrons, and employees to discourage future parking on surrounding residential streets.

Reduced Density Alternative 2 would achieve the following project objectives to a lesser degree than the proposed Project:

- Increase the number of affordable rental housing units in the southwest area of West Hollywood.

Reduced Density Alternative 2 would not achieve the following project objective:

- Replace an incompatible commercial surface parking lot along Rosewood Avenue with new single-family townhomes that are in scale with the existing single-family residences on Rosewood Avenue.

14) Reduction of Significant Project Impacts

The proposed Project would result in significant and unavoidable construction noise impacts after mitigation. Reduced Project Alternative 2 would reduce, but not avoid this impact because of lower construction activity than the proposed Project. Because this Alternative would reduce the number of residential units, it would have fewer (or lower) impacts compared to the proposed Project with respect to traffic, traffic noise, air quality, GHG emissions, public services and utilities and impacts would be less than significant. Reduced Density Alternative 2 would implement General Plan policies related to affordable housing to a lesser degree than the proposed Project. Reduced Project Alternative 2 would have higher impacts than the proposed Project with respect to Aesthetics.

v) Alternative 5: Alternate Land Use Alternative

The Alternate Land Use Alternative would convert the Existing Building into a medical office use with a surface parking area and a one level above-ground parking structure on Rosewood Avenue. Some modifications to the Existing Building would occur under this Alternative. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would not be included in this Alternative; however, modifications to the commercial uses that are included in the proposed Project to provide street-level access for the Existing Building would occur. The Indoor Pool House and associated amenities would not be included in this Alternative. The reconfiguration of subterranean parking for the office, retail, and restaurant uses located in the Existing Building that would occur under the proposed Project, along with the associated reconfiguration of access to the parking areas from Beverly Boulevard, would not occur under this Alternative. Rather, on Rosewood Avenue, a one-level, above ground parking structure would be constructed above the existing surface parking lot to provide additional parking supply that would be needed to serve the medical office that would be included in the Existing Building. Setbacks and landscaping would be provided for the parking structure to reduce the visual impact of the structure. The 13 townhome units and four affordable units and associated

open space areas that would be constructed on Rosewood Avenue under the proposed Project would not be included in this Alternative.

The inclusion of parking on the Rosewood Avenue site that would be included in this Alternative would be consistent with the PK Parking Overlay District that applies to this site. Approval of a General Plan Amendment and Specific Plan would not be required to implement this Alternative, which would be consistent with the CC1 zoning on the Existing Building site.

1) Aesthetics

a) Visual Character

Under the Alternate Land Use Alternative, some modifications to the Existing Building would occur, primarily at the street level. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would not be included in this Alternative; however, modifications to the commercial uses that are included in the proposed Project to provide street-level access for the Existing Building would occur. Under the Alternative, the appearance of the Existing Building would be generally the same as currently exists. Prospective changes to the Existing Building to update its architecture and appearance would not occur and the addition of building mass to the Existing Building as proposed under the Project would not be included under the Alternative. Modifications to the frontage of the Existing Building that would improve its appearance and connection to the street would occur under the Alternative. Accordingly, the visual appearance of the Existing Building under the Alternative would be largely the same as viewed from the south, east and west of the Project Site and impacts would be less than significant, same as the proposed Project.

Under the Alternative, along Rosewood Avenue, a one-level, above ground parking structure would be constructed above the existing surface parking lot to provide additional parking supply that would be needed to serve the medical office uses that would be included in the Existing Building. Setbacks and landscaping would be provided for the parking structure to reduce the visual impact of the structure. As such, the Alternative would provide a different visual appearance of the Project Site as viewed from the residential neighborhood to the north than would occur under the proposed Project. The view of the Project Site from this area would be dominated by a massive concrete structure as compared to a set of residential buildings with landscaping. Building mass along the Rosewood frontage would be increased compared to the proposed Project and the Alternative would be less effective than the proposed Project in providing a visual transition between the Existing Building and the neighborhood to the north of the Project Site. The Alternative would not include coordinated design elements, physical and functional integration, and features such as the Indoor Pool building that would provide some visual contrast between the Existing Building and the residential area to the north. As such, impacts of the Alternative with respect to visual character as viewed from north of the Project Site would be higher than the proposed Project, although both would be less than significant.

b) Light & Glare

Nighttime lighting included under Alternate Land Use Alternative would be similar to the proposed Project, with additional street lights, and shielded outdoor building lighting provided, with an associated increase in light levels and glare resulting from the construction of the Alternative. However, lighting associated with a parking structure will likely be higher than would be characteristic of a series of residential buildings, because of security and safety requirements. Accordingly, impacts of the

Alternative related to light and glare would be higher than the proposed Project, although both would be less than significant.

2) Air Quality

The Alternate Land Use Alternative would be consistent with the 2012 Air Quality Management Plan (AQMP) since the site employment would not exceed SCAG's projections for West Hollywood. Mass daily and localized construction-related emissions would be less those generated by the proposed Project since no excavation would occur in the site of the existing parking lot. However, this Alternative would result in an increase in mass daily operational emissions since it would generate approximately 1,616 ADT more than the existing uses at the Project Site. Similar to the proposed Project, the localized operational emissions associated with this Alternative would not approach the applicable thresholds of significance for the project area. Because the construction-related and operational emissions associated with this Alternative would not exceed the thresholds of significance recommended by the SCAQMD, it also would not contribute a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment.

3) Cultural Resources

a) Historic Resources

Under the Alternate Land Use Alternative, some modifications to the Existing Building would occur. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would not be included in this Alternative; however, modifications to the commercial uses that are included in the proposed Project to provide street-level access for the Existing Building would occur. Changes to the Existing Building to update its architecture and appearance and the addition of building mass to the Existing Building as proposed under the Project would not be included under the Alternative. The Existing Building is not a historic resource subject to CEQA. Therefore, both the Alternative and the proposed Project would not cause a substantial adverse change in significance of a historic resource.

b) Archaeological Resources

Under the Alternate Land Use Alternative, no excavation would occur on the Rosewood parcel. No impacts related to archaeological resources would occur under the Alternative. The proposed Project would have the potential to encounter archaeological resources during excavation. Impacts of the Alternative related to archaeological resources would be lower than the proposed Project, although both would be less than significant (after implementation of mitigation measures in the case of the proposed Project).

c) Paleontological Resources

Under the Alternate Land Use Alternative, no excavation would occur on the Rosewood parcel. No impacts related to paleontological resources would occur under the Alternative. The proposed Project would have the potential to encounter paleontological resources during excavation. Impacts of the Alternative related to paleontological resources would be lower than the proposed Project, although both would be less than significant (after implementation of mitigation measures in the case of the proposed Project).

4) Geology and Soils

Under the Alternate Land Use Alternative, some modifications to the Existing Building would occur. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would not be included in this Alternative; however, modifications to the commercial uses that are included in the proposed Project to provide street-level access for the Existing Building would occur. Under the Alternative, a one-level, above-ground parking structure would be constructed over the surface parking lot on the Project Site on Rosewood Avenue. The Alternative would occur within the same site as the proposed Project, which has been identified to have the potential for liquefaction. However, with the implementation of mitigation measures, both the Alternative and the proposed Project would have less than significant impacts with respect to geology and soils. Impacts of the Alternative with respect to all other issues related to geology and soils would be the same as the proposed Project and less than significant.

5) Greenhouse Gas Emissions

The Alternate Land Use Alternative would result in an increase in annual GHG emissions since it would generate approximately 1,236 new ADT. As with the proposed Project, however, this Alternative would comply with the applicable measures for new development from the City of West Hollywood Climate Action Plan (CAP) and implement mitigation measure 3.15-1 from the Final Program EIR for the City of West Hollywood General Plan and Climate Action Plan. Also, the new uses under this Alternative would be designed and constructed in accordance with the City's Green Building Ordinance. Therefore, this Alternative would result in higher GHG impacts than the proposed Project, although the impacts of the Alternative and the proposed Project regarding GHG emissions would both be less than significant.

6) Hydrology and Water Quality

a) Stormwater Runoff and Water Quality

Under the Alternate Land Use Alternative, some modifications to the Existing Building would occur. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would not be included in this Alternative; however, modifications to the commercial uses that are included in the proposed Project to provide street-level access for the Existing Building would occur. Under the Alternative, along Rosewood Avenue, a one-level, above ground parking structure would be constructed above the existing surface parking lot to provide additional parking supply that would be needed to serve the medical office uses that would be included in the Existing Building. As would be the case with the proposed Project, runoff from the Project Site under the Alternative would be subject to the controls of the General Construction Activity Stormwater Permit and Los Angeles County MS4 permit, which would control the quantity and quality of runoff from the site to meet specific standards. Similar to the proposed Project, under this Alternative the entire site would be developed; therefore, operational impacts would be similar to the proposed Project's impacts, which would be subject to the Countywide SUSMP and MS4 permit requirements and would be less than significant after implementation of mitigation measures.

b) Flood Hazard

The Alternate Land Use Alternative would occur on the same site as the proposed Project, which has been identified to be outside of the 50, 100 and 500-year flood zones. Impacts of the Alternative with respect to flood hazards would be the same as the proposed Project and less than significant.

7) Land Use and Planning

Under the Alternate Land Use Alternative, some modifications to the Existing Building would occur. The renovation and expansion of the Existing Building to provide 56 condominium units and 8 affordable units would not be included in this Alternative; however, modifications to the commercial uses that are included in the proposed Project to provide street-level access for the Existing Building would occur. Under the Alternative, along Rosewood Avenue, a one-level, above ground parking structure would be constructed above the existing surface parking lot to provide additional parking supply that would be needed to serve the medical office uses that would be included in the Existing Building. Approval of a General Plan Amendment or Specific Plan would not be required to implement this Alternative. However, a Development Permit to allow for the new construction and Design Review would be required. The Alternative would be generally consistent with the policies of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to focus new development in the Southern California region in urbanized areas with established infrastructure. The Alternative would not include residential units that would help implement relevant policies of the Land Use and Urban Form Element of the General Plan related to the provision of housing within the City and encouragement of mixed use development in the City. Because the Alternative would include a parking structure, rather than townhome units, and other coordinated design elements located between the Existing Building and the residential area to the north of the Project Site, the Alternative would protect existing neighborhoods to a lesser degree than the proposed Project. The Alternative would include design elements that would improve the pedestrian environment and provide pedestrian connections to the existing commercial uses within the Existing Building and would thus implement General Plan policies related to supporting and encouraging pedestrian activity on major streets in the City. However, this Alternative would not include any affordable housing and would thus not implement General Plan policies related to affordable housing. Moreover, because the Alternative would not include residential uses within the Project Site, the Alternative would not implement relevant policies of the General Plan and Mixed Use Incentive Overlay District with respect to mixed use development.

8) Noise

As with the proposed Project, development under the Alternate Land Use Alternative would be required to comply with the City's Noise Ordinance restrictions for construction days and hours. Construction-related noise levels would be lower than the proposed Project, as this Alternative would include the same concrete pours to construct the parking structure, but would include less construction activity to modify the Existing Building and would not include the excavation and dirt hauling activity that would be included in the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. However, because construction activities associated with the Alternative would increase noise levels at residential uses along Rosewood Avenue by more than 10 dBA, the Alternative would cause a significant and unavoidable short-term impact, same as the proposed Project. Construction-related ground-borne vibration levels would be less than the proposed Project because of lower levels of construction activity, although both would be less than significant.

This Alternative would result in a slight net increase in daily roadway noise levels since it would generate higher traffic levels than both the proposed Project and the existing uses within the Existing Building. No increase in roadway noise levels would be expected along Rosewood Avenue since no new trip-generating uses or new site access would be provided along the northern part of the Project Site. Any potential increase in noise levels along other roadway segments would also be less than 1 dBA. As with

the proposed Project, operation of this Alternative would not generate significant ground-borne vibration levels. Noise levels along Rosewood Avenue are less than 60 dBA L_{dn}, so the new residential uses included under this Alternative would not be exposed to noise levels in excess of City standards. Operational noise impacts of the Alternative would be higher than the proposed Project, although both would be less than significant.

9) Population and Housing

a) Employment

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The medical office uses at the Project Site would generate approximately 313 employees under this alternative, which is more than the Proposed Project's reduction of 170 employees. However, the level of employment of both the Alternative and the proposed Project would be consistent with SCAG forecasts for the City of West Hollywood. Construction employment would be the lower under the Alternative because of reduced construction activity. Impacts of the proposed Project and the Alternative would be less than significant with respect to employment.

b) Housing and Population

The Alternate Land Use Alternative would not include housing units or permanent population. The Alternative would not implement policies of the City's General Plan Housing Element related to the provision of housing stock and affordable housing in the City. The Alternative would not include housing units, and would therefore not help the City meet its RHNA goals.

10) Public Services

a) Fire

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The medical office uses at the Project Site would generate approximately 313 employees under this alternative, which is more than the Proposed Project's 91 employees.[32] The Alternate Land Use Alternative would not, however, introduce residents to the Project Site. Under the proposed Project 124 residents would be introduced to the Project Site. Response distance and times to the Project Site are anticipated to remain unchanged as a result of this alternative, as the size of the on-site population does not affect these factors. Similar to the proposed Project, fire flow requirements of 5,000 gallons per minute for commercial uses would be required under this alternative. Therefore, as the Alternate Land Use Alternative would include more intensification of office uses, and no residential, when compared to the proposed Project, the demand for fire protection under the Alternate Land Use Alternative would be similar to the proposed Project's impacts, which would be less than significant.

[32] *Employees generated utilizing employee rated from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, p.ES-2.*

b) Police

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The medical office uses at the Project Site would generate approximately 313 employees under this alternative, which is more than the Proposed Project's 91 employees.[33] The Alternate Land Use Alternative would not, however, introduce residents to the Project Site. Therefore, the current officer-to-population ratio of 267 residents per officer in the West Hollywood area would remain unchanged, similar to the proposed Project. Police units are often in a mobile state; hence actual distance between a headquarters facility and the Project Site is often of little relevance. Instead, the number of officers on the street is more directly related to the realized response time. Response time is defined as the total time from when a call requesting assistance is placed, until the time that a police unit responds to the scene. Telephone calls for police assistance are prioritized based on the nature of the call. Thus, a police unit accessing the Project Site from the surrounding area may or may not pass through at least one of the impacted study intersections. As such, response times would not be greatly affected, as emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Thus, the Alternate Land Use Alternative's demand on response time would be similar to that of the proposed Project. Similar to the proposed Project, the Alternate Land Use Alternative would not result in the need for additional officers. Therefore, as the Alternate Land Use Alternative would include more intensification of office uses, and no residential, when compared to the proposed Project, the demand for fire protection under the Alternate Land Use Alternative would be similar to the proposed Project's impacts, which would be less than significant.

c) Schools

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. Under the Alternate Land Use Alternative, the proposed Project would result in seven new students (three elementary, two middle school, and two high school), this is a decrease compared to the proposed Project's 29 net new students. Therefore, the uses at the Project Site would generate fewer students under the Alternate Land Use Alternative. The West Hollywood Elementary School, Burroughs Middle School, and Fairfax Senior High School are all anticipated to continue operating under capacity under the Alternate Land Use Alternative, similar to their current condition. As such, impacts under the Alternate Land Use Alternative would be incrementally less than the proposed Project's impacts on school services, which are less than significant.

d) Parks and Recreation

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The medical office uses at the Project Site would generate approximately 313 employees under this alternative, which is more than the Proposed Project's 91 employees.[34] However, the Alternate Land Use Alternative would not introduce residents to the Project Site. The Alternate Land Use Alternative would primarily draw its employees and customers from existing residents, rather than induce new residents into an area. In general, employees

[33] *Ibid.*

[34] *Ibid.*

are more likely to use parks and recreational facilities near their homes during non-work hour. As such, impacts under the Alternate Land Use Alternative would be incrementally less than the proposed Project's impacts on parks and recreational facilities, which are less than significant.

e) Libraries

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The medical office uses at the Project Site would generate approximately 313 employees under this alternative, which is more than the Proposed Project's 91 employees.[35] The Alternate Land Use Alternative would increase the number of employees and customers to the Project Site. However, employees are not likely to have the time to use the library during working hours, as they are more likely to use libraries near their homes during non-work hours. Similar to the proposed Project, the Alternate Land Use Alternative is not considered to bring a substantial increase in demand to a library that currently adequately serves the existing population. As such, impacts under the Alternate Land Use Alternative would be incrementally less than the proposed Project's impacts on library facilities, which are less than significant.

11) Transportation/Traffic

Under the Alternate Land Use Alternative, the Existing Building would be converted to medical office use and a one-level, above-ground parking structure would be constructed over the surface parking lot on the Project Site on Rosewood Avenue. Construction traffic impacts of the Alternative would be lower than the proposed Project, as this Alternative would include the same concrete pours to construct the parking structure, but would include less construction within the Existing Building and would not include the excavation and dirt hauling activity that would be included in the proposed Project on the Rosewood Avenue site in order to accommodate the subterranean parking garage on that part of the site. The Alternative would have higher operational trip generation than the proposed Project and the existing uses within the Existing Building, because medical office is a higher trip generator than the existing general office uses within the Existing Building. The Alternative would result in a net increase in trips with a total of 1,616 new daily trips, including 53 morning peak hour trips (33 inbound, 20 outbound) and 134 afternoon peak hour trips (49 inbound, 85 outbound). Operational traffic impacts under the Alternative would be greater (or higher) than the proposed Project, but the Alternative would not significantly impact any of the four study intersections under Existing with Alternative 2 (2013) or Future with Alternative 2 (2015) conditions. Similarly, the Alternative would have less than significant impacts on street segments and CMP intersections, even with higher trip generation compared to the proposed Project. The Alternative would be expected to have the same less than significant impact as the proposed Project on emergency access because the access pattern under the Alternative would be the same as the proposed Project. Finally, both the Alternative and the proposed Project would provide adequate parking supply to meet demand and would have similar and less than significant impacts with respect to parking.

[35] *Ibid.*

12) Utilities and Service Systems

a) Wastewater

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The Alternate Land Use Alternative would result in a net *decrease* of approximately 978 gpd of wastewater, compared to the proposed Project net increase of approximately 6,073 gpd of wastewater.[36] The analysis in this EIR concluded that the proposed Project's demand for wastewater treatment could be accommodated by the remaining available treatment capacity at the HTP, which has a current capacity of450 mgd, and associated impacts would be less than significant. Under the Alternate Land Use Alternative there would be a decrease in the amount of wastewater generated when compared to the proposed Project, therefore, the wastewater generated under this alternative could be accommodated by the HTP and impacts related to wastewater generation would also be less than significant. Furthermore, the proposed Project would not result in a significant impact to local wastewater conveyance infrastructure, because the proposed Project would implement any required upgrades. It is assumed that Alternate Land Use Alternative would also implement any required upgrades, as would be required of the proposed Project. Therefore, impacts to wastewater under Alternate Land Use Alternative would be incrementally less than the proposed Project's impacts, which are less than significant.

b) Water

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The Alternate Land Use Alternative would result in a net *decrease* of approximately 1,174 gpd of water, compared to the proposed Project's net increase of approximately 6,877 gpd of water.[37] Therefore, this alternative would consume less water than the proposed Project. The analysis in this EIR concluded that the proposed Project's demand for water supply and treatment could be accommodated by existing water supply and treatment facilities, and associated impacts would be less than significant. Similar to the proposed Project, impacts related to water supply and treatment would also be less than significant under this alternative. Additionally, impacts related to water conveyance infrastructure and fire flow would be less than significant under this alternative. Therefore, Alternate Land Use Alternative impacts to the water supply and infrastructure would be incrementally less than the proposed Project's impacts, which are less than significant.

c) Solid Waste

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. The Alternate Land Use Alternative would result in a net *decrease* of approximately 52 ppd of solid waste, compared to the proposed Project's net increase of approximately 38 ppd of solid waste.[38] The EIR concluded that existing capacity at the Puente Hills Landfill, which would accept the proposed Project's demolition/construction waste could accommodate the proposed Project's demand, and impacts would be less than significant. Similar to

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[36] *Refer to Section IV.L (Utilities) of this EIR for the calculations.*

[37] *Ibid.*

[38] *Ibid.*

the proposed Project, impacts related to landfill capacity would be less than significant under this alternative as there would actually be decrease in solid waste generation. Therefore, Alternate Land Use Alternative impacts to the solid waste would be incrementally less than the proposed Project's impacts, which are less than significant.

d) Electricity and Natural Gas

i) Electricity

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. Alternate Land Use Alternative is anticipated to consume a net *decrease* of approximately 146,576 kwH/year of electricity, compared to the proposed Project's net *decrease* of approximately 190,578 kwH/year of electricity.[39] Therefore, this alternative would consume more electricity than the proposed Project. Similar to the proposed Project, this alternative would include energy conservation measures and would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The Alternate Land Use Alternative would also comply with the West Hollywood Green Building Ordinance. Therefore, Alternate Land Use Alternative electricity consumption could be accommodated by existing infrastructure, and associated impacts would be less than significant. Therefore, Re Alternate Land Use Alternative impacts to electricity would be incrementally more than the proposed Project's impacts, however, remain less than significant.

ii) Natural Gas

The Alternate Land Use Alternative would convert the Existing Building into a medical office use. No residential uses would be developed on the Project Site. Alternate Land Use Alternative would be anticipated to consume a *decrease* of approximately 25,524 cf/month of natural gas, compared to the proposed Project net increase of approximately 206,246 cf/month of natural gas.[40] Therefore, this alternative would consume less natural gas than the proposed Project. Similar to the proposed Project, this alternative would be subject to the State Energy Conservation Standards contained in Title 24 of the CCR. Alternate Land Use Alternative would comply with Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Furthermore, the 2012 California Gas Report projects that California natural gas demand is expected to increase by just 0.12 percent per year through 2030, and therefore, natural gas supplies are expected to meet Southern California's gas demand. Therefore, Alternate Land Use Alternative impacts to natural gas would be incrementally less than the proposed Project's impacts, which are less than significant.

13) Relationship to Project Objectives

The Alternate Land Use Alternative would replace the uses within the Existing Building with more intense uses and would increase some and reduce some of the environmental impacts associated with the proposed Project. This Alternative would achieve the following project objectives to a lesser extent than the proposed Project:

[39] *Ibid.*

[40] *Ibid.*

- Create a high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area;
- Provide a modern, high-quality design that complements and is sensitive to surrounding uses; and
- Improve site access and provide sufficient parking for residents, patrons, and employees to discourage future parking on surrounding residential streets.

The Alternate Land Use Alternative would not achieve the following project objectives:

- Redevelop an aging commercial structure and under-utilized surface parking lot with a more efficient and economically viable mix of uses, including condominiums, affordable rental apartments, office and retail space;
- Provide housing to satisfy the varying needs and desires of all economic segments of the community, including very low, low and moderate income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock;
- Increase the number of affordable rental housing units in the southwest area of West Hollywood;
- Replace an incompatible commercial surface parking lot along Rosewood Avenue with new single-family townhomes that are in scale with the existing single-family residences on Rosewood Avenue; and
- Adaptively reuse the existing office building on the property by converting it into residential condominiums and apartments with redesigned streetfront retail and office space.

14) Reduction of Significant Project Impacts

The proposed Project would result in significant and unavoidable construction noise impacts after mitigation. The Alternate Land Use Alternative would reduce, but not avoid this impact because of lower construction activity than the proposed Project. Because this Alternative would replace uses in the Existing Building with a higher intensity use, it would have greater (or higher) impacts compared to the proposed Project with respect to traffic, traffic noise, air quality, GHG emissions, public services and utilities, but impacts would be less than significant. The Alternate Land Use Alternative would not implement General Plan policies related to provision of housing supply or affordable housing. The Alternate Land Use Alternative would have higher impacts than the proposed Project with respect to Aesthetics.

4. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In general, the environmentally superior alternative as defined by CEQA should avoid or substantially lessen significant adverse impacts to the Project Site and its surrounding environment. Of the alternatives considered, the "No Project/No Project Alternative" does not create any new impacts; therefore, it is environmentally superior to the Project which proposes to change existing conditions. However, CEQA requires the identification of another environmentally superior alternative when the No Project Alternative is identified to be environmentally superior to the proposed Project.

Except for the No Project Alternative, none of the other Alternatives would avoid the significant and unavoidable construction noise impacts of the proposed Project. Alternative 2 (Existing Zoning), Alternative 4 (Reduced Density Alternative 2), and Alternative 5 (Alternate Land Use), would reduce

construction noise impacts because they would not include excavation and dirt removal, but Alternatives 4 and 5 would have greater (or higher) aesthetic impacts resulting from the above ground parking structure. Alternative 2 (Existing Zoning (R1B)), would have greater (or higher) impacts than the proposed Project because it would retain the Existing Building in its present configuration while adding 24 residential units on the Rosewood Avenue parcels.

Alternative 3 (Reduced Density Alternative 1), would be environmentally superior to the Proposed Project. As shown in Table VI-1, because this Alternative would reduce the number of residential units, it would have fewer (or lower) less than significant impacts than the proposed Project with respect to traffic, traffic noise, air quality, GHG emissions, public services and utilities. Reduced Density Alternative 1 would have similar potentially beneficial impacts as the proposed Project with respect to Aesthetics. Reduced Density Alternative 1 would achieve all of the project objectives, although to a lesser degree than the proposed Project with respect to affordable housing because of the reduction in affordable units that would be included in this Alternative.

Table VI-1

Alternatives Comparison

Impact Area	Proposed Project Impact	Alternative 1: No Project	Alternative 2: Existing Zoning (R1B)	Alternative 3: Reduced Density 1	Alternative 4: Reduced Density 2	Alternative 5: Alternate Land Use
Aesthetics						
Visual Character	Less Than Significant	Higher	Higher	Similar	Higher	Higher
Light & Glare	Less Than Significant	Lower	Lower	Lower	Higher	Higher
Air Quality						
Construction	Less Than Significant With Mitigation	Lower	Similar	Same	Lower	Lower
Operation	Less Than Significant	Lower	Higher	Lower	Lower	Higher
Cultural Resources						
Historic Resources	Less Than Significant	Lower	Same	Same	Same	Same
Archaeological Resources	Less Than Significant With Mitigation	Lower	Same	Same	Lower	Lower
Paleontological Resources	Less Than Significant With Mitigation	Lower	Same	Same	Lower	Lower
Geology and Soils	Less Than Significant With Mitigation	Lower	Same	Same	Same	Same
Greenhouse Gas Emissions	Less Than Significant	Lower	Higher	Lower	Lower	Higher
Hydrology and Water Quality						
Stormwater Runoff and Water Quality	Less Than Significant With Mitigation	Higher	Same	Same	Same	Same
Flood Hazard	Less Than Significant With Mitigation	Same	Same	Same	Same	Same
Land Use and Planning	Less Than Significant	Higher	Similar	Similar	Similar	Higher
Noise						
Construction	Significant and Unavoidable	Lower, Less Than Significant	Similar	Similar	Lower, Significant and Unavoidable	Lower, Significant and Unavoidable
Operation	Less Than Significant	Lower	Higher	Lower	Lower	Higher
Population and Housing						
Employment	Less Than Significant	Lower	Higher	Same	Same	Higher
Housing and Population	Less Than Significant	Lower	Higher	Lower	Lower	Higher
Public Services						
Fire	Less Than Significant	Lower	Higher	Lower	Lower	Similar

Table VI-1

Alternatives Comparison

Impact Area	Proposed Project Impact	Alternative 1: No Project	Alternative 2: Existing Zoning (R1B)	Alternative 3: Reduced Density 1	Alternative 4: Reduced Density 2	Alternative 5: Alternate Land Use
Police	Less Than Significant	Lower	Higher	Lower	Lower	Similar
School	Less Than Significant	Lower	Lower	Lower	Lower	Lower
Parks and Recreation	Less Than Significant	Lower	Lower	Lower	Lower	Lower
Libraries	Less Than Significant	Lower	Lower	Lower	Lower	Lower
Transportation/Traffic	Less Than Significant	Lower	Higher	Lower	Lower	Higher
Utilities and Service Systems						
Wastewater	Less Than Significant	Lower	Similar	Lower	Lower	Lower
Water	Less Than Significant	Lower	Similar	Lower	Lower	Lower
Solid Waste	Less Than Significant	Lower	Similar	Lower	Lower	Lower
Electricity	Less Than Significant	Lower	Similar	Lower	Lower	Lower
Natural Gas	Less Than Significant	Lower	Similar	Lower	Lower	Lower

Lower: Impacts of the alternative are lower as compared to the proposed Project.
Same/Similar: Impacts of the alternative are the same or similar as compared to the proposed Project.
Higher: Impacts of the alternative are higher as compared to the proposed Project.

VII. EFFECTS FOUND NOT TO BE SIGNIFICANT

1. INTRODUCTION

This section addresses potential environmental resources for which the proposed Project would not result in significant impacts related to the environmental topics listed below. California Public Resources Code Section 21003(f) states:

> *"…it is the policy of the State that…all persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment."*

The lead agency, the City of West Hollywood, has determined that the proposed Project would not result in potentially significant impacts related to the environmental topics listed below. Pursuant to Section 15128 of the State CEQA Guidelines:

> *"An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."*

2. EFFECTS FOUND NOT TO BE SIGNIFICANT

It has been determined that there is no substantial evidence that the proposed Project could cause significant environmental effects in the following areas:

- **Aesthetics** - *Scenic Vistas and Resources, Shade/Shadow*
- **Agricultural Resources**
- **Air Quality** - *Objectionable Odors*
- **Biological Resources**
- **Cultural Resources** - *Human Remains*
- **Geology and Soils** - *Fault Rupture, Seismic Ground Shaking, Landslides, Soil Erosion, Expansive Soils, and Septic Tanks*
- **Hazards and Hazardous Materials**
- **Hydrology and Water Quality** - *Alter Existing Drainage Pattern, Water Quality Degradation, Housing in a 100 Year Flood Hazard Area, Expose People to Seiche, Tsunami or Mudflow*
- **Land Use and Planning** - *Physically Divide an Established Community, Conflict with a Habitat or Natural Community Conservation Plan*
- **Mineral Resources**
- **Noise** - *Airport Land Use Plan, Private Airstrip*
- **Population and Housing** - *Displace Housing, Displace People*
- **Recreation** - *Require Expansion of Recreational Facilities*
- **Transportation and Traffic** - *Increase Hazards due to Design Features, Conflict with Adopted Plans Supporting Alternate Transportation*
- **Utilities and Service Systems** - *Require New Storm Drain Facilities*

A. Aesthetics (Scenic Resources, Shade/Shadow)

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

The Project Site is situated on the block bounded by Beverly Boulevard to the south, Almont Drive to the west, Rosewood Avenue to the north and Robertson Boulevard to the east. The site is topographically flat and highly urbanized within an established commercial corridor with residential neighborhoods to the north. The City of West Hollywood lies at the base of the Hollywood Hills that lie just the north of the City. The City of West Hollywood has not designated any vistas as scenic (e.g., the Hollywood Hills, the Los Angeles Basin, etc). From the street and pedestrian level looking north, the Hollywood Hills are obstructed by the Existing Building and adjacent commercial structures. No views of the Hollywood Hills are afforded from the Project Site looking south on Rosewood Avenue.

In addition, there are no tall or topographic features of the Project Site, which may be viewed, or which make up part of the scenic landscape of the surrounding community. Existing views of the Project Site from Beverly Boulevard would remain unaltered as the Existing Building would remain the same height. However, the proposed Project would alter the existing visual character of the Project Site along Rosewood Avenue, as it would replace the existing surface parking lot with three-story uses consisting of townhomes, an apartment building, and a building utilized for recreational uses.

Therefore, the proposed Project would result in greater massing in that area, and current views within the Project vicinity would be altered. However, as no scenic vistas are afforded from, or by, the Project Site, development of the proposed Project would have a less than significant impact to scenic vistas

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

There are no significant natural features (such as rock outcroppings, bodies of water, substantial stands of native vegetation, etc.) on the Project Site. Beverly Boulevard and Rosewood Avenue are not designated state scenic highways.[1] The site is not situated on any designated view corridor or state scenic highway and does not include designated scenic resources, such as rock outcropping, bodies of water or stands of native vegetation.

[1] *California Scenic Highway Mapping System, State of California Department of Transportation. Website: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm, June 2013.*

Threshold	*Create a new source of substantial shade/shadow that would adversely affect sensitive receptors?*

Implementation of the proposed Project would result in expansion of the Existing Building on the north, east and west sides of the structure and result in a slight reduction in the height from 125 feet to 120.5 feet. In addition, along Rosewood Avenue the Project would include 25-foot tall new structures with the exception of the southernmost portion of the apartment (affordable apartments), which would be 28 feet in height. Shade and shadow sensitive receptors are located north of the Project Site along Rosewood Avenue, as well as other residential streets to the north (e.g., Aschcroft Avenue, Dorrington Avenue, etc). The Existing Building casts existing shadows to the north. Under future conditions, the expanded Existing Building shadows would be slightly greater but the new source would not be substantial that would adversely affect sensitive receptors. The new Project structures along Rosewood Avenue would not cast new substantial shadows that would adversely affect sensitive receptors. Thus, the proposed Project's shade/shadow impacts would be less than significant.

B. Agricultural Resources

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

The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland Category.[2] The Project Site does not contain any State-designated agricultural lands. The Project Site is currently zoned CC1 (Community Commercial) and R1B (Two Family Residential). Thus, no impact related to the conversion of prime farmland, unique farmland, or farmland of Statewide importance would occur.

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

The proposed Project would not convert *Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.* The Project Site currently consists of undeveloped land, a Walmart store, associated surface parking lot, and the foundations of several demolished structures. Investigation of the Project Site concluded that no farmland or agricultural activity exists on or in the vicinity of the Project Site. According to the United States Department of Agriculture Resource Conservation Service, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide

[2] *Source: State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: http://redirect.conservation.ca.gov/dlrp/fmmp/product_page.asp.*

Importance.[3] In addition, the Project site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Thus, no impact related to the conversion of prime farmland, unique farmland, or farmland of Statewide importance would occur.

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

The Project Site is presently developed for commercial and retail uses with ancillary surface parking and is not used for agricultural production or zoned for agriculture. Thus, the proposed Project would not involve the conversion of agricultural land to another use. In addition, no surrounding properties are presently designated for agricultural use. Therefore, no impact related to the conversion of farmland to non-agricultural uses would occur.

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

The Project Site is improved with a commercial building and a surface parking lot, and is located in a heavily urbanized area of the City of West Hollywood. No forest land exists on or in the vicinity of the Project Site.

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

The Project Site is improved with a commercial building and a surface parking lot, and is located in a heavily urbanized area of the City of West Hollywood. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the Project Site is not classified in any "Farmland" category designated by the State of California.

C. Air Quality (Objectionable Odors)

Threshold e)	*Would the proposed project create objectionable odors affecting a substantial number of people?*

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the proposed Project involves no elements related to these types of activities, no odors are anticipated.

[3] *United States Department of Agriculture Resource Conservation Service, website: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx , accessed December 1, 2010.*

D. Biological Resources

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

The Project Site is located in a developed urban area within the City of West Hollywood. The 1.73-acre Project Site has no significant biological resources value as it contains an existing, commercial building and associated surface parking. The site is also not located near or adjacent to any natural open space areas. No candidate, sensitive, or special status species identified in local plans, policies, or regulations or by the U.S. Fish and Wildlife Service (USFWS) are expected to occur on the site, and the site supports no habitat for such species. Therefore, impacts associated with habitat modifications affecting species identified as a candidate, sensitive, or special status species are less than significant.

Threshold b)	*Would the proposed project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations by the California department of fish and game or U.S. fish and wildlife service?*

The Project Site is currently developed with a commercial building and an affiliated surface parking lot, and a landscape buffer (with grass, shrubs and non-native trees) and is located in a heavily urbanized area of the City of West Hollywood. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. As previously discussed, no candidate, sensitive, or special status species identified in local plans, policies, or regulations or by the USFWS or the California Department of Fish and Game (CDFG) are expected to occur on the site, and the site supports no habitat for such species.

Threshold c)	*Would the proposed project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No drainage features exist on the Project Site, or are any indicated on the respective USGS topographic map. The Project Site does not support riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, the proposed Project would not impact any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS.

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

Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging. The Project Site is located within, and surrounded by, a developed urban environment. The developed Project Site and Project vicinity preclude wildlife from using the site as a movement corridor. Therefore, the proposed Project would not disrupt an established wildlife corridor or interfere with a migratory pattern or impede the use of a native wildlife nursery site, and no impacts would occur

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

Per the WHMC regulations on the treatment of street trees and trees on public lands, as well as the requirements under the Heritage Tree Program, new development would be required to replace any street trees and vegetation permitted for removal as a result of an individual development Project with another tree or trees, of a type and quality to be determined by the City. Furthermore, policies in the City of West Hollywood's General Plan 2035 and the proposed 'The Avenues District Streetscape Master Plan' (April 17, 2013 Draft) require new development projects to install street trees consistent with the City's street tree specifications along public sidewalks adjacent to the Project Site where such street trees do not currently exist or where replacement is needed.

As previously discussed, the Project Site is located in an area that has been previously developed in a heavily urbanized area of the City of West Hollywood. A Tree Survey was performed at the Project Site on June 11, 2013 (included as Appendix A to this document). The only vegetation on the Project Site consists of the ornamental trees and shrubbery planted throughout the site along Rosewood Avenue, Beverly Boulevard and the surface parking lot to the north of the Existing Building. There are 53 trees in the area of the Project Site that will be redeveloped; all of the trees are ornamental/non-native species. There are no candidate Heritage Trees as defined by the City of West Hollywood Heritage Tree Program (i.e., Southern California Native Trees as listed in Appendix A of the Heritage Tree Program with a diameter at standard height (DSH) of at least eight inches, or non-native trees with a DSH of at least 24 inches, which also meet criteria as having historical or horticultural significance) on the Project Site. As required under WHMC Section 11.36.040, all street trees that are removed will need to be replaced with another tree or trees, of a type and quality to be determined by the City. Following compliance with WHMC, impacts to local policies or ordinances protecting biological resources at the proposed Project Site would be less than significant.

E. Cultural Resources (Human Remains)

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

The Project Site is within a highly urbanized area. In addition, the site has been disturbed to accommodate past and present onsite development and is currently covered with structures and a surface parking lot, which was previously occupied by residential structures. Although no human remains are known to have been interred or previously found on the Project Site, it is possible that hitherto unknown remains could be encountered during Project construction, particularly during ground-disturbing activities such as excavation and grading. However, as required by state law, if human remains are discovered at the Project Site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of West Hollywood Public Works Department and the Los Angeles County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission shall be notified within 24 hours, and the guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains. Compliance with these established procedures and regulatory requirements pertaining to the handling and treatment of such resources would be followed. Therefore, Project impacts to previously interred unknown human remains would be less than significant

F. Geology and Soils (Landslides, Septic Tanks)

Threshold a)	*Would the proposed project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:* *i). Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped proximate to the City of West Hollywood. The criteria for these major groups are based on criteria developed by the California Geologic Survey (CGS)(formerly California Division of Mines and Geology (CDMG)) for the Alquist-Priolo Earthquake Fault Zoning Program.

By definition, an active fault is one that has surface displacement within Holocene time (about 11,000 years). A potentially active fault is a fault that has demonstrated surface displacement of Quaternary age deposits (last 1.6 million years). Inactive faults have not moved in the last 1.6 million years. The Project Site is not located within an Alquist-Priolo earthquake fault zone.[4] The closest active fault to the Project Site capable of surface rupture is the Hollywood fault, approximately one mile north of the site. A state-designated Alquist-Priolo Earthquake Zone is not established for the active Hollywood Fault. For planning purposes, the City of West Hollywood has established a Fault Precaution (FP) zone along the Hollywood Fault zone. FP Zone 1 requires a site-specific surface fault rupture evaluation and FP Zone 2 requires either a site-specific surface fault rupture evaluation or foundation strengthening to mitigate up to 2 inches of ground displacement. The Project Site is not located in FP zone 1 or FP zone 2.[5] Therefore, the Project would not be exposed to hazards associated with surface fault rupture. Therefore, impacts related to ground rupture would be less than significant with implementation of the proposed project.

Threshold a)	*Would the proposed project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:* *ii). Strong seismic ground shaking?*

Earthquakes along the previously mentioned fault would potentially result in strong ground shaking. Implementation of the proposed Project would increase density of human occupancy within the Project Site, increasing the potential for damage or injury during a major earthquake. State mandatory mitigation of ground-shaking effects is provided through enforcement of structural and nonstructural seismic design provisions defined in the UBC/CBC, as well as City requirements. The site is located in Seismic Zone 4 of the latest edition of the UBC/CBC. These codes are updated every three years and through this update process would incorporate new design provisions as needed. Application of these design provisions to the Project (construction of additional square footage) as well will mitigate potential effects of ground shaking to a level considered less than significant.

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[4] *Beverly Hills Quadrangle, California Department of Conservation, 1986, http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm, June 6, 2013.*

[5] *City of West Hollywood General Plan, Seismic Safety Element City of West Hollywood Fault Location and Precaution Zone Map, March 2010.*

The proposed Project would be designed to resist seismic lateral loads, and to comply with all applicable WHMC and regulations. In addition, ground shaking is not expected to be any more intense than that expected at other nearby developments. Impacts relating to ground shaking would be considered less than significant with implementation of the proposed Project.

Threshold a)	*Would the proposed project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:* *iv. Landslides?*

The Project Site is not immediately adjacent to any mountains or steep slopes. The Project Site is flat and free from the potential of landslides. Thus, the site is not located in a landslide hazard area. In addition, the site is not located within any of the earthquake-induced landslide zones mapped on CSG Official Seismic Hazard Maps or the City of West Hollywood.[6] Therefore, no impact would occur with implementation of the proposed project.

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

Implementation of the proposed Project would not constitute a geologic hazard to other properties by causing or accelerating instability from erosion. The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosion processes (e.g., uncontrolled runoff) caused by the proposed project. During construction, the proposed Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a Stormwater Pollution Prevent Program (SWPPP), which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Long-term operation of the proposed Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the structure and paving, while the remaining portions of the Project Site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the proposed project.

Threshold d)	*Would the proposed project 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?*

According to the West Hollywood General Plan the majority of the soil at the Project area consists of alluvial stream sediments, which are comprised of clay, sand and gravel, including gravels and sands of minor stream channels.[7] There is no evidence that the Project Site contains expansive clay soils. Safe construction for additional square footage associated with the proposed Project would be assured through compliance with the UBC/CBC and the City of West Hollywood regulations, which include building foundation requirements appropriate to site conditions.

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6 *Ibid.*

7 *City of West Hollywood General Plan, Seismic Safety Element, Geology Map, March 2010.*

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

The Project Site is located in an area that is served by underground sewer systems and served by municipal wastewater collection and treatment facilities. The Project does not propose the use of septic tanks or alternative disposal systems. Therefore, no impact would occur with implementation of the proposed project.

G. Hazards and Hazardous Materials

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

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

Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include single-family residential uses in the vicinity of the Project Site. Other than typical cleaning solvents used for janitorial purposes, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the proposed project. In addition, there are no Aboveground Storage Tanks (AST's) or evidence of Underground Storage Tanks (UST's) for storing hazardous materials.[8] Construction of the Project would involve renovation of the existing structure, which due its age, may contain asbestos and lead based paints and materials. In addition, demolition of the proposed Project may result in the removal of polychlorinated biphenyls (PCBs). Prior to renovation of the existing structure, a lead-based paint survey and a demolition-level asbestos survey would need to be conducted at the Project Site. The removal of any asbestos containing materials (ACMs) would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities). In addition, the Project would have to comply with California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. The California Code of Regulations, 1532.1, require testing, monitoring, containment and disposal of lead based materials such that exposure levels do not exceed CalOSHA standards. Further, the Project would have to comply with Title 40 of the Code of Federal Regulations (CFR), Part 761 regarding PCBs. Compliance with applicable standards would reduce impacts related to hazardous materials to less than significant.

[8] *Environmental Protection Agency, EnviroMapper, website: http://www.epa.gov/emefdata/em4ef.html?ve=16,34.0776138305664,-118.38606262207&pText=8899%20W%20Beverly%20Blvd,%20Los%20Angeles,%20CA%2090048, June 7, 2013.*

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

There are no schools within 0.25 miles of the Project Site. The closest existing school is the Temple Emanuel of Beverly Hills Day School, located approximately 0.4 miles from the Project Site. Therefore, the proposed Project would not create a significant hazard through hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and a less than significant impact would occur.

Threshold d)	*Would the proposed project be located on a site which 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?*

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. These lists are commonly referred to as the "Cortese List". Agency Cortese database lists were reviewed for known or suspected contaminated sites and for sites that store, generate or use hazardous materials near the Project Site.

The California Environmental Protection Agency (CalEPA) Department of Toxic Substances Control (DTSC) and the State Regional Water Quality Control Board (RWQCB) online databases were reviewed.

The DTSC Envirostor lists Federal Superfund, State Response, Voluntary Clean-ups, School Clean-ups and Investigations, Military Evaluations and GeoTracker LUST/SLIC databases. RWQCB online GeoTracker database mapping system is the RWQCB's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup (i.e., Leaking Underground Storage Tanks (LUSTs), the Department of Defense, Site Cleanup Program, as well as permitted facilities such as operating underground storage tanks (USTs) and land disposal sites).

The Project Site is not listed on the databases researched. Further, no sites within the zip code 90048 are listed on the DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List), or the RWQCB Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) List.[9] Only one site was listed for 90069, which is located at 7141-7155 Santa Monica Boulevard, approximately 2.5 miles east of the Project Site and will be remediated.

Three sites are listed on the GeoTracker LUST/SLIC database. One site is a dry cleaning operation formerly located at 9020 Beverly Blvd. (Weatherly Cleaners), the site has been remediated and the case is closed. One site is a former LUST located at 9039 Beverly Blvd. (RB Case #: 900480116) the

[9] *DTSC Envirostor list website: http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES%2COPEN%2CFUDS%2CCLOSE&status=ACT%2CBKLG%2CCOM&reporttitle=HAZARDOUS%20WASTE%20AND%20SUBSTANCES%20SITE%20LIST accessed July 1, 2013.*

site has been remediated and the case is closed. The final listing is for a currently permitted UST located at 9049 Beverly Blvd. (Permitting Agency: City of Los Angeles, Facility ID: 2050).[10]

It is considered highly unlikely that the soil or groundwater beneath the Project Site was impacted by the releases identified on the government environmental databases. These sites are located cross or down gradient of the Project Site; further, the sites have been remediated and the cases closed by the lead agency responsible for oversight. Thus, the proposed Project would not be located on a site that is included on a Cortese List pursuant to Government Code Section 65962.5 and therefore not create a significant hazard to the public or the environment due to this fact

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

No airport exists within two miles of the Project Site. As such, the Project Site is not located within any Airport Land Use Plan and is not subject to land use regulations within any such plan. Thus, no impact would occur

Threshold f)	*For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

No private airstrips are located in the vicinity of the Project Site. Therefore, implementation of the proposed Project would not result in a safety hazard for people working or living in the area and no impact would occur with regard to private airstrips.

Threshold g)	*Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The City of West Hollywood has developed a Hazard Mitigation Plan to help prevent hazards and emergencies. Policies in the General Plan 2035 include a variety of actions aimed at ensuring emergency response readiness, and which would help provide services in times of disasters such as earthquakes. Implementation of the proposed Project would not substantially impede public access or travel upon public rights-of-way and would not interfere with any adopted emergency response plan or emergency evacuation plan. No impact would occur to emergency response plans with implementation of the proposed project.

Threshold h)	*Would the proposed project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

The Project Site is developed primarily with impervious surfaces in an urban area surrounded by residential and commercial uses. Furthermore, the Project Site is not located in a Wildland Fire Hazard Area, as designated under the City of West Hollywood General Plan.[11] Therefore, the

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[10] *GeoTracker database mapping system website: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=8899+Beverly+blvd%2C+west+Hollywood%2C+CA accessed July 1, 2013.*

[11] *City of West Hollywood General Plan, Safety Background Report, Figure S-3, June 25, 2008.*

proposed Project would not expose people or structures to a greater than average risk of loss, injury or death involving wildland fires, and no impacts would occur

H. Hydrology and Water Quality (*Alter Existing Drainage Pattern, Water Quality Degradation, Housing in a 100 Year Flood Hazard Area, Expose People to Seiche, Tsunami or Mudflow)*

Threshold a)	*Would the proposed project violate any water quality standards or waste discharge requirements?*

The majority of the Project Site contains impervious surfaces and the nature of the proposed Project would result in a final grading of the site that would not differ significantly with the amount of impervious surfaces. The Project does not include any industrial or manufacturing uses that might discharge unusual pollutants. During construction of the proposed project, construction debris, water used to control dust as well as possibly spilled fluids could be carried into local and regional waterways. Operation of the proposed Project may also involve leaking automobile fluids or trash that could be discharged into the stormwater system. However, water quality in the City of West Hollywood is regulated by the Los Angeles Regional Water Quality Control Board, (LARWQCB). Water quality guidelines mandate the implementation of Best Management Practices (BMPs) to mitigate pollution and improve water quality. The County of Los Angeles issues permits to cities to discharge storm water runoff under the National Pollutant Discharge Elimination System (NPDES). The LARWQCB requires all discretionary projects, such as the proposed project, to incorporate features to filter or rain the first 3/4 inch of storm water on site. This requirement would address the primary source of pollutants as most are carried away during the first 3/4 inch of rainfall. Also, the proposed Project includes only covered. Also, the proposed Project would be required to submit a site drainage plan for review and approval by the City prior to issuance of building permits and the plan would include BMPs. The Project would be required to adhere to all applicable water quality requirements during construction, which would include a Storm Water Pollution Prevention Plan (SWPPP). Thus Project impacts would be less than significant.

Threshold b)	*Would the proposed project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*

West Hollywood's existing potable water service is provided entirely by two outside agencies – by the City of Beverly Hills in western portions of the City and by the City of Los Angeles Department of Water and Power (LADWP) in eastern portions of the City. The City of Beverly Hills imports 90 percent of the water used in its service area from Northern California through the Metropolitan Water District (MWD). Based on historic agreements, the City of Beverly Hills has a preferential right to 1.01 percent of all MWD water. The remaining 10 percent of the water it provides is pumped by way of groundwater rights in the Hollywood Basin and the La Brea subarea of the Central Basin.

Although the proposed development on site would potentially increase water demand over current conditions, the increase is not expected to pose a significant impact on local groundwater resources. Therefore the proposed project would not substantially deplete groundwater supplies or interfere with groundwater recharge.

Threshold c)	*Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

There are no natural watercourses on the Project Site, and the site does not drain toward a natural watercourse. Currently runoff from the Project Site is conveyed in a southerly direction to existing storm drains in Beverly Boulevard. Implementation of the proposed Project would not alter the course of a stream or river, in a manner, which would result in a substantial erosion or siltation on or off-site.. Therefore, Project impacts regarding erosion or siltation are would be less than significant.

Threshold d)	*Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

There are no natural watercourses on the Project Site, and the site does not drain toward a natural watercourse. Currently runoff from the Project Site is conveyed in a southerly direction to existing storm drains in Beverly Boulevard. Implementation of the proposed Project would not substantially increase the rate or amount of surface runoff in a manner (due to minimal increase in impervious areas), which could result in flooding on- or off-site. Impacts associated with rate or amount of drainage and surface runoff would be less than significant with implementation of the proposed project.

Threshold f)	*Would the proposed project otherwise substantially degrade water quality?*

There are no natural watercourses on the Project Site, and the site does not drain toward a natural watercourse. Currently existing runoff from the existing Project Site is conveyed in a southerly direction to existing storm drains in Beverly Boulevard. Implementation of the proposed project would not alter the course of a stream or river, nor would it cause additional substantial erosion or siltation on-or off-site. In addition, it would not substantially increase the rate or amount of surface runoff in a manner (due to minimal increase in impervious areas), which could result in flooding on- or off-site. The implementation of the Project Site would not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems and provide substantial additional sources of polluted runoff. Further, the Project is required to implement all applicable wastewater management practices that are required for all developments by the City of West Hollywood. Therefore, implementation of the Project would not substantially degrade water quality. Impacts associated with drainage and surface runoff would be less than significant.

Threshold g)	*Would the proposed project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

The proposed project includes the development of new housing. However, according to Federal Emergency Management Agency, Flood Insurance Rate Map (FIRM) No. No. 06037C1605F, the Project Site is located in an area designated as 1) areas of 0.2 percent annual flood chance; 2) areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage

areas less than 1 square mile; and 3) areas protected by levees from 1 percent annual chance flood. Therefore, impacts associated with flood hazards are less than significant

Threshold h)	*Would the proposed project place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

According to Federal Emergency Management Agency, Flood Insurance Rate Map (FIRM) No. 06037C1605F, the Project Site is located in an area designated as 1) areas of 0.2 percent annual flood chance; 2) areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and 3) areas protected by levees from 1 percent annual chance flood. Further, on September 29, 2008, FEMA issued a Letter of Map Revision for Case No. 08-09-1715P. The flood insurance rate map was revised for the southwest portion of the City (where the Project Site is located) to reflect upgrades to flood protection due to the completion of the Los Angeles County Flood Control District's Holly Hills Storm Drain System. Therefore, impacts associated with flood hazards are less-than-significant.

Threshold j)	*Would the proposed project be inundated by seiche, tsunami, or mudflow?*

The City of West Hollywood is not located along a large body of water such as the ocean or lake in which a seiche or tsunami would occur. The Project Site is located approximately 9 miles from the Pacific Ocean. Thus, no impact would occur as a result of a seiche or tsunami from the Pacific Ocean. In addition, as the Project Site is not located proximate to any hills or slopes, there is no risk of the site being affected by mudflow

I. Land Use and Planning *(Physically Divide an Established Community, Conflict with a Habitat or Natural Community Conservation Plan)*

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

The Project Site is located within a fully developed, urbanized area of the City of West Hollywood. No streets or sidewalks would be permanently closed as a result of the development. No separation of uses or disruption of access between land use types would occur as a result of the proposed project. The proposed use is consistent with land uses adjacent to and in the vicinity of the Project Site. Accordingly, implementation of the proposed Project would not disrupt or divide the physical arrangement of the established community. No impact would occur to an established community with implementation of the proposed project.

Threshold c)	*Would the proposed project conflict with any applicable habitat conservation plan or natural community conservation plan?*

The Project Site is in a highly urbanized area of West Hollywood. No natural habitat community exists on the Project Site. Therefore, no habitat conservation plans or natural conservation plans govern the Project Site. No impact would occur with respect to conservation plans.

J. Mineral Resources

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

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

The Project Site is not delineated as a locally-important mineral resource recovery site on any City plans. [12] There are no known mineral resources beneath the Project Site. No classified or designated mineral deposits of Statewide or regional significance are known to occur in the project area. The Project Site is not within a known source area for aggregate or other mineral resources. Additionally, the Project Site is not located in an area of potential petroleum resources. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State and would not result in the loss of availability of a locally-important mineral resource recovery site. No impact would occur to mineral resources with implementation of the proposed project.

K. Noise (Airport Land Use Plan, Private Airstrip)

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

Threshold f)	*For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

No airport or private airstrip exists within two miles of the Project Site. As such, the Project Site is not located within any airport land use plan and would not be exposed to severe noise levels from airport or aircraft-related activities.

L. Population and Housing *(Displace Housing, Displace People)*

Threshold b)	*Would the proposed project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere ?*

Threshold c)	*Would the proposed project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere ?*

No residential units currently exist within the 1.73 acres of the Project Site. As such, implementation of the proposed Project would not result in displacement of people and housing and would not

[12] *City of West Hollywood General Plan Final EIR, October 2010.*

require the construction of replacement housing elsewhere. Therefore, no impacts associated with displacement of existing housing or people would occur.

M. Recreation *(Recreational Facilities)*

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

The Project includes a 2-story, approximately 30 foot tall, recreation facility (Indoor Pool House) that will contain an indoor swimming pool, fitness area, lockers and restroom facilities. The Indoor Pool House will be available for use by residents of the Condominiums and the Townhomes. The proposed Project does not entail the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, no impacts associated with the construction of recreation facilities would occur.

N. Transportation and Traffic *(Air Traffic Patterns)*

Threshold c)	*Would the proposed project 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?*

The height of the building would not interfere with air traffic patterns and would not cause an increase in traffic levels or change in located that results in substantial safety risks.

Threshold d)	*Would the proposed project 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 not include any major change to current intersections, ingress/egresses, or street segments. In addition, no new circulation would be created as a result of Project implementation. Thus, there would no impact with regard to design feature hazards

Threshold g)	*Would the proposed project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks?*

The proposed Project is not expected to conflict with adopted policies, plans, or programs supporting alternative transportation. Therefore, there would be no impact to adopted policies or existing alternative transportation facilities.

O. Utilities and Service Systems *(Wastewater Treatment Requirements)*

Threshold c)	*Would the proposed project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

As discussed in Section VIII. Hydrology (e), the proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. Therefore, the proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less than significant.

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IX. ACRONYMS AND ABBREVIATIONS

- AB Assembly Bill
- AC alternating current
- ACMs asbestos-containing materials
- ADT average daily traffic
- AES Advanced Engineering Software
- AF acre-feet
- AFY acre-feet per year
- AQAP Air Quality Attainment Plan
- AQMP Air Quality Management Plan
- ASTs above-ground storage tanks
- AWAC Alliance for Water Awareness and Conservation
- bgs below ground surface
- CAA Federal Clean Air Act
- CAO Cleanup and Abatement Orders
- CARB California Air Resources Board
- CAAQS California Ambient Air Quality Standards
- Caltrans California Department of Transportation
- CalEPA California Environmental Protection Agency
- CA FID California Facility Inventory Database
- CALGreen California Green Building Standards
- CALISO California Independent System Operator
- CGS California Geologic Survey
- CalOSHA California Occupational Safety and Health Administration
- CAT Climate Action Team
- CBSC California Building Standards Code
- CCAA California Clean Air Act
- CCAR California Climate Action Registry
- CCR California Code of Regulations
- CDFG California Department of Fish and Game
- CEC California Energy Commission
- CDO Cease and Desist Orders
- CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
- cf cubic feet
- CFL compact fluorescent light
- CEQA California Environmental Quality Act
- CFCs chloroflourocarbons

- CFC California Fire Code
- CFR Code of Federal Regulations
- CH_4 methane
- CHP California Highway Patrol
- CIWMB California Integrated Waste Management Board
- CLAPL County of Los Angeles Public Library
- CMA Critical Movement Analysis
- CMP Congestion Management Plan
- CNDDB California Natural Diversity Database
- CNEL Community Noise Equivalent Level
- CO carbon monoxide
- CO_2 carbon dioxide
- CO_2e equivalent mass of CO_2
- COHb carboxyhemoglobin
- COPPS Community Oriented Policing and Problem Solving
- CPA Community Plan Area
- CSSA Collection System Settlement Agreement
- CTCSP Coastal Transportation Corridor Specific Plan
- CUP Conditional Use Permit
- CUWCC California Urban Water Conservation Council
- CWA Clean Water Act
- CWC California Water Code
- dB decibel
- dBA A-weighted decibel scale
- DC direct current
- DHS Department of Health Services
- DSA-AC Division of State Architect – Access Compliance
- DTSC Department of Toxic Substances Control
- du dwelling unit
- DWR Department of Water Resources
- EE energy efficiency
- EIR Environmental Impact Report
- EMI Emissions Inventory Data
- EMS Emergency Medical Services
- FAR floor area ratio
- FBTA Federal Migratory Bird Treaty Act
- FEMA Federal Emergency Management Agency
- FESA Federal Endangered Species Act
- FHWA Federal highway Administration

- FIRM Flood Insurance Rate Map
- FID Facility Inventory Database
- FINDS Facility Index System
- FPA Free Production Allowance
- FPPP Fire Protection and Prevention Plan
- ft feet
- GCASP General Construction Activity Stormwater Permit
- GHG greenhouse gas
- gpd gallons per day
- gpm gallons per minute
- GSWC Golden State Water Company
- GWP global warming potential
- HAZNET Hazardous Waste Information System
- HCM Highway Capacity Manual
- HCD Department of Housing and Community Development
- HFCs hydrofluorocarbons
- HHDT Heavy Heavy Duty Diesel Truck
- HHW Household Hazardous Waste
- HOV high-occupancy vehicle
- HPC Historic Preservation Commission
- HSA Hyperion Service Area
- HSWA Hazardous and Solid Waste Act
- HTP Hyperion Treatment Plant
- HVAC heating, ventilation, and air conditioning
- HWCL Hazardous Waste Control Law
- IFC International Fire Code
- in/sec inches per second
- IPCC Intergovernmental Panel on Climate Change
- IRP Integrated Resources Plan
- ITE Institute of Transportation Engineers
- ITS Intelligent Transportation Systems
- kV kilovolt
- KW-Hours kilowatt-hours
- LADWP Los Angeles Department of Water and Power
- LACFD Los Angeles County Fire Department
- LACSD Los Angeles County Sanitation District
- LACSD Los Angeles County Sherriff Department
- LARWQCB Los Angeles Regional Water Quality Control Board
- LAUSD Los Angeles Unified School District

- LBP lead-based paint
- LCS lead containing surface
- L_{eq} equivalent energy noise level
- L_{max} maximum instantaneous noise level
- L_{min} minimum instantaneous noise level
- LEA Local Enforcement Agency
- LEED Leadership in Energy and Environmental Design
- LNG liquid natural gas
- LOS Level of Service
- LSTs localized significance thresholds
- LUFT leaking underground fuel tank
- $\mu g/m^3$ micrograms per cubic meter
- MDAQMD Mojave Desert Air Quality Management District
- MDAB Mojave Desert Air Basin
- Mm millimeters
- $MMTCO_2E$ million metric tons of carbon dioxide equivalents
- MOU Memorandum of Understanding
- MPO Metropolitan Planning Organizations
- MRF Material Recovery and Transfer Facility
- msl mean sea level
- MTA Metropolitan Transportation Authority
- MTBA methyl tert butyl ether
- MWD Metropolitan Water District
- MW mega-watt
- NAAQS national ambient air quality standards
- NAHB National Association of Homebuilders
- NAHC Native American Heritage Commission
- NERC North American Electric Reliability Council
- NFPA National Fire Protection Agency
- N_2O nitrous oxide
- NO_2 nitrogen dioxide
- NOAA National Oceanic and Atmospheric Administration's National Marine Fisheries Service
- NOI Notice of Intent
- NOP Notice of Preparation
- NOx nitrogen oxides
- NPPA California Native Plant Protection Act
- NPDES National Pollutant Discharge Elimination System
- NRPA National Recreation and Parks Association
- NRCS Natural Resource Conservation Service

- O_3 ozone
- OSHA Occupational Safety and Health Administration
- Pb lead
- PCBs polychlorinated biphenyls
- pCi/L picoCuries per liter
- PFCs perfluorocarbons
- PLM/ds polarized light microscopy
- PM_{10} respirable particulate matter
- $PM_{2.5}$ fine particulate matter
- Ppb parts per billion
- ppd pounds per day
- ppm parts per million
- PPV peak particle velocity
- PSI pounds per square inch
- PUC Public Utilities Commission
- RCP Regional Comprehensive Plan and Guide
- RCRA Resource Conservation and Recovery Act
- RD Reporting District
- RHNA Regional Housing Needs Assessment
- RMS root mean square
- ROGs reactive organic gases
- RTAC Regional Targets Advisory Committee
- RTIP Regional Transportation Improvement Program
- RTP Regional Transportation plan
- RWMP Regional Water Management Plan
- RWQCB Regional Water Quality Control Board
- SARA Superfund Amendment and Reauthorization Act
- SB Senate Bill
- SCAB South Coast Air Basin
- SCAG Southern California Association of Governments
- SCAQMD South Coast Air Quality Management District
- SCE Southern California Edison
- SCS Sustainable Community Strategies
- sf square feet
- SF_6 sulfur hexafluoride
- SFM State Fire Marshal
- SGC Southwest Gas Corporation
- SIP State Implementation Plan
- SLF Sacred Lands File

- SoCalGas Southern California Gas Company
- SO_2 sulfur dioxide
- SO_4 sulfates
- SOx sulfur oxides
- SRCRD Solid Resources Citywide Recycling Division
- SRRE Source Reduction and Recycling Element
- STIP State Transportation Improvement Program
- SUSMP Standard Urban Stormwater Mitigation Plan
- SWCRB California State Water Resources Control Board
- SWEEPS Statewide Environmental Evaluation and Planning System
- SWIMS Solid Waste Information Management System
- SWPPP Storm Water Pollution Prevention Program
- SWRCB State Water Resources Control Board
- TACs toxic air contaminants
- TBA tert butyl alcohol
- TIA Transportation Impact Assessment
- TMDLs Total Maximum Daily Loads
- TOD Transportation Oriented District
- TRUs transportation refrigeration units
- TPH-g total petroleum hydrocarbons as gasoline
- TSCA Toxic Substances Control Act
- UNFCCC United Nations Framework Convention on Climate Change
- U.S. EPA United States Environmental Protection Agency
- USFWS United States Fish and Wildlife Service
- USGBC United States Green Building Council
- USGS United States Geological Survey
- USTs underground storage tanks
- UWMP Urban Water Management Plan
- V/C volume-to-capacity
- VdB velocity in decibels
- VMT vehicle miles traveled
- VOC volatile organic compound
- WHMC West Hollywood Municipal Code
- WECC Western Electricity Coordinating Council
- WFP Water Facilities Plan
- WSA Water Supply Assessment
- WSO Water Services Organization
- WWTP Waste Water Treatment Plant
- XRF x-ray fluorescence

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