City of West Hollywood

837, 847, 849 and 850 San Vicente Boulevard San Vicente Inn

Draft Initial Study – Negative Declaration

October 2014

rincon

Environmental Scientists Planners Engineers

837, 847, 849 and 850 San Vicente Boulevard
San Vicente Inn

Initial Study – Negative Declaration

Prepared for:

City of West Hollywood
8300 Santa Monica Boulevard West
Hollywood, California 90069-6216
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October 2014

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837, 847, 849 & 850 SAN VICENTE BOULEVARD
SAN VICENTE INN

INITIAL STUDY – NEGATIVE DECLARATION

TABLE OF CONTENTS

List of Tables

List of Figures

Appendix

INITIAL STUDY

1. Project Title:

San Vicente Inn

2. Lead agency name and address:

City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216

3. Contact Person and Phone Number:

Antonio Castillo
Associate Planner
Community Development Department
(323) 848-6854

4. Project location:

The project site is located at 837, 847, 849 and 850 San Vicente Boulevard in the City of West Hollywood. The project site is 16,544 square feet (sf) on the west side of San Vicente Boulevard and 5,500 sf on the east side of San Vicente Boulevard. The project site spans four lots (APNs: 4339-019-022, 4340-007-019, and 4340-006-001, 4340-006-002). Figure 1 shows the location of the site within the region and Figure 2 shows the site location within West Hollywood. Existing conditions and site photographs are illustrated on Figure 3.

5. Project sponsor's name and contact information:

KKHG SVI, LLC - Todd Elliott
626 Wilshire Boulevard, Suite
550
Los Angeles, California
(213) 629-5300

6. General plan designation/zoning:

The project site is zoned as Residential, Multi-Family High Density (R4B) and is within the General Plan's High Density Residential land use designation (R-4). It has a land use sub-category of R4B, which allows for residential buildings that are four stories and forty-five feet tall. The site is currently being used as an urban inn under an existing Conditional Use Permit (CUP).

7. Description of project:

The project would involve the rehabilitation and adaptive reuse of the San Vicente Inn, an urban inn, which currently includes 29 guest rooms and one manager's unit. It is located at 837, 847, 849 and 850 San Vicente Boulevard. Nine existing buildings are being used for the urban inn, four of which have historic significance. The project would involve the demolition of 4,138 sf of existing buildings, the remodeling of 4,727 sf of existing buildings, and the addition of 17,946 sf to include two new guest rooms, recreation rooms, and other auxiliary urban inn uses. See Appendix A for proposed site plans. Each historic building is a separate structure that is a designated cultural resource under the City of West Hollywood's List of Historic and Cultural Resources and all rehabilitation and renovation of the existing designated structures on-site would conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards).*

Table 1
Existing Buildings and Proposed Actions

Building Address	Historical Resource	Proposed Action
837 (A)	Yes	Renovation for use as dining and kitchen space
837 (B)	No	Demolition
837 (C)	No	Demolition
847 (D)	Yes	Renovation for use as dining space
847 (E)	No	Demolition
849 (F)	Yes	Renovation for use as guest rooms
849 (G)	No	Demolition
849 (H)	No	Demolition
850 (I)	Yes	Full rehabilitation

The project also includes approximately 40 vehicle parking spaces at an off-site parking lot located at 815 North Palm Avenue, as well as four required bicycle parking spaces. Table 2 summarizes the project characteristics.

Table 2
Project Characteristics

Project Site Size	22,044 sf (0.51 acres)
Parcel Numbers	4339-019-022 4340-007-019 4340-006-001 4340-006-002

Table 2
Project Characteristics

Proposed Uses	Urban Inn: 32 rooms (11,419 sf) Auxiliary Room: 983 sf Recreation Room: 1,153 sf Lanai: 570 sf Office: 228 sf Reception: 196 sf Dining/Kitchen: 2,199 sf Total: 16,748 sf
Parking Provided	Total Vehicles: 40 spaces Bicycle: 4
Height	45 feet (at tallest point)
Floor Area Ratio (FAR)	0.75

Site Access. Primary commercial access to the project site would be located along San Vicente Boulevard.

Landscaping. Vegetation would include climate-appropriate, drought-tolerant and native plants.

Utilities. Electricity would be provided by Southern California Edison, solid waste and wastewater service would be provided by the City of West Hollywood, water service would be provided by the Los Angeles Department of Water and Power.

Construction. Construction of the proposed project would occur over approximately 14 months.

8. Surrounding land uses and setting:

The portion of the site on the western side of San Vicente Boulevard is bounded by The Desmond Condominiums to the north, single-family residences and condominium buildings to the west, a two-story multi-family apartment building to the south and San Vicente Boulevard to the east.

The eastern portion of the project site is bounded by single and multi-family residences to the north, south and east, and San Vicente Boulevard to the west.

9. Other public agencies whose approval is required:

None.

ENVIRONMENTAL FACTORS AFFECTED

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

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☐ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities/Service Systems	☐ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

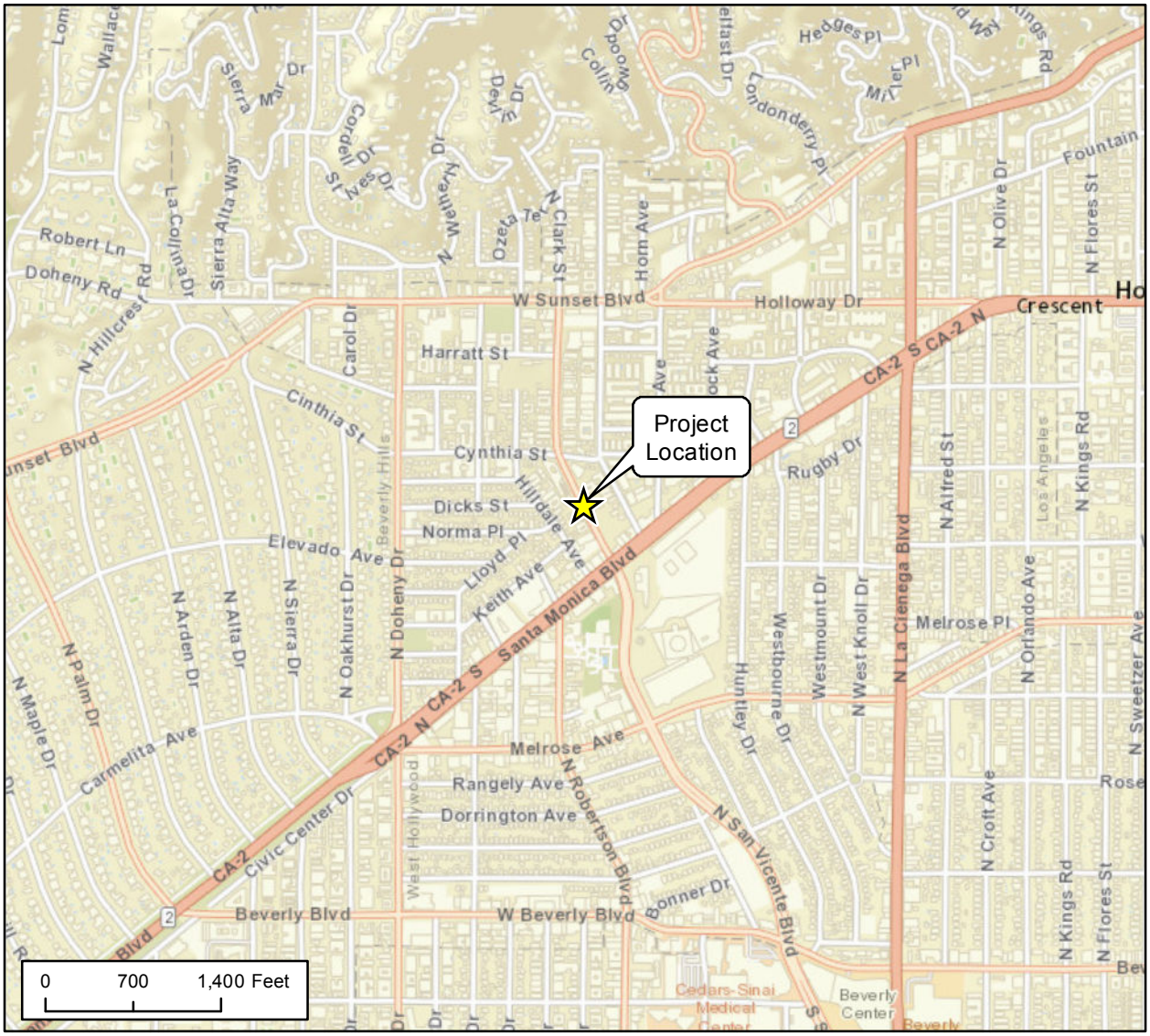
☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

Signature Date

_____ _____

Printed Name For



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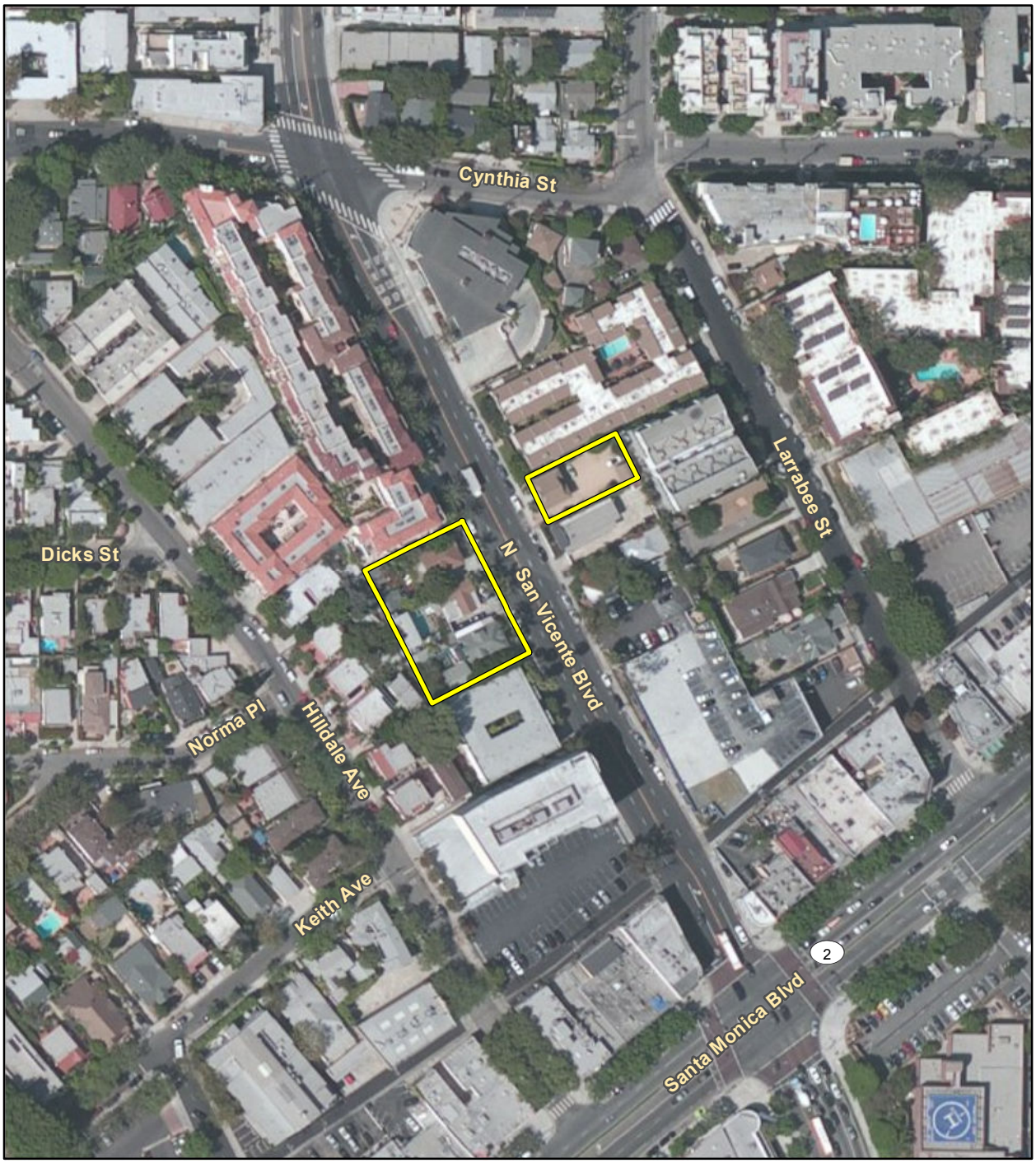
Regional Location

Figure 1



Imagery provided by ESRI and its licensors, 2014.

Project Site

0 80 160 Feet

N

Project Location

Figure 2

Photo 1: 847 San Vicente Blvd.

Photo 2: 849 San Vicente Blvd.

Photo 3: 837 San Vicente Blvd.

Photo 4: 850 San Vicente Blvd.

Site Photos

Figure 3

Environmental Checklist

I. AESTHETICS – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) The West Hollywood 2035 General Plan does not identify any designated scenic vistas. However, the Hollywood Hills lie just to the north of the City and are visible throughout the City. The Los Angeles Basin and buildings in downtown Los Angeles are also visible throughout the City.

The proposed project involves the rehabilitation and adaptive reuse of four (4) one and two-story existing urban inn buildings, which are designated historic resources, and the construction of two to four-story urban inn buildings located behind the cultural resources. Public views of the Hollywood Hills, downtown Los Angeles, and Los Angeles Basin around the project site are limited due to the topography of the area and existing trees and multi-story development. Therefore, the proposed project would not block views of the Los Angeles Basin. Limited public views of the Hollywood Hills are visible for pedestrians and motorists traveling north on San Vicente Boulevard adjacent to the project site. The proposed project would not block views of the Hollywood Hills for motorists or pedestrians traveling along San Vicente Boulevard.

Private views of the Hollywood Hills are largely blocked by existing development. Some windows on the second story of the two-story, multi-family residential buildings north of the project site may have views looking south through the project site. Approximately five of these second story residences may experience interference with their private views. However, the City has not adopted any policy related to protection of private views. There would be an adverse effect to these residences, but this would not be a significant impact under CEQA. Therefore, **impacts would be less than significant.**

b) The project site currently includes 29 guest rooms and one manager's unit, pavement, non-native vegetation, and bushes and trees on four parcels, totaling approximately 22,000 square feet. The trees are non-native ornamental trees and do not contain substantial scenic value. The project site does not contain any scenic resources such as trees or rock outcroppings and is not near any scenic highways (Caltrans, 2014). The proposed project would include the

rehabilitation of four historic resources and would adhere to the *Secretary's Standards* (see Section III, *Cultural Resources*). **Impacts would be less than significant.**

c) The visual character of the area is diverse; the surrounding buildings have varying architectural styles, massing, and heights. The project site is located less than 0.1 miles north of Santa Monica Boulevard in an area known as Santa Monica Boulevard West. Santa Monica Boulevard is West Hollywood's main commercial corridor, running the length of the City. The areas to the north and south of Santa Monica Boulevard are occupied by commercial, office, multi-family residential, and single-family residential uses. The Land Use and Urban Form Element of the City's 2035 General Plan intends for the Santa Monica Boulevard West area to have a vibrant street environment with high pedestrian activity and to include neighborhood-serving uses. The project site is characterized by one and two-story buildings with a pool.

The proposed project is an infill development involving construction of a four-story structure at 850 San Vicente behind an existing historic building on a paved, vacant lot. The proposed new structure at 850 San Vicente would be four stories in height, which would increase the massing and intensity of development on the project site. The proposed structure would be taller than structures immediately to the south and west of the project site, which are all one to two stories. The western portion of the project site would involve construction of one- to two-story structures behind the existing one- to two-story historic buildings. As such, the proposed project would represent a change in the visual character of the project site. However, the proposed new building at 850 San Vicente would be similar in height to the adjacent four-story Desmond Apartment Building across the street from the project site and similar in height to various apartment and condominium complexes immediately surrounding the project site. In addition, the proposed project would convert a paved, vacant lot with low visual quality to a contemporary commercial building with high visual quality. Further, the proposed project implements the City's plan to maintain cultural resources while simultaneously creating a vibrant street environment with neighborhood-serving uses. The proposed project would introduce landscaping to improve the pedestrian environment. Therefore, **impacts would be less than significant.**

d) The project site is located in a highly urbanized area with high levels of existing lighting. Primary sources of light and glare on the project site include lighting associated with the existing commercial and residential buildings including building mounted lighting, headlights from vehicles traveling on the street, windows, and metallic and glass surfaces on vehicles in the offsite parking lot. The sun's reflection from metallic and glass surfaces on vehicles parked in the offsite parking lot on adjacent areas is the primary existing source of glare. The adjacent commercial, residential, and roadway uses also generate light and glare along all sides of the property.

The windows proposed on the exterior elevations could increase the reflected sunlight during certain times of the day. However, the level of glare would be similar to that already experienced at surrounding residences and commercial uses.

The proposed project would involve construction of a new four-story building at 850 San Vicente. The project would incorporate exterior lighting, in the form of pedestrian walkway lighting, building mounted lighting, and other safety-related lighting. These light sources would not have a significant impact on the night sky, as they would only incrementally add to

the existing background light levels already present as a result of the surrounding urban development. Headlights of vehicles entering and exiting from Santa Monica Boulevard at night would not affect nearby light-sensitive receptors as the pattern of vehicle use is similar to what currently occurs on the site.

Because of the existing, relatively high ambient lighting levels in the vicinity of the project site, project development would not substantially alter this condition. In addition, the project would be required to comply with Section 19.20.100 of the West Hollywood Municipal Code (WHMC), which limits the design, intensity and impacts of night lighting. Outdoor lighting must be designed to prevent glare and light trespass as much as possible and must be directed away from adjacent properties and public rights-of-way. The recommended light level is five foot candles for active commercial building entrances, one foot candle for inactive commercial building entrances, and 0.2 to 0.9 foot candles for parking or pedestrian areas. Further, pursuant to Section 19.46.050 of the WHMC, the Planning Commission or the Design Review Subcommittee must review and approve the architectural design, including the lighting plans for proposed development. This section of the WHMC prescribes that specific design elements, such as lighting, must be "incorporated into the project to further ensure the compatibility of the structures with the character of surrounding development."

Finally, the proposed project would be required to comply with West Hollywood Municipal Code Section 19.10.060 regarding the use of reflective materials. Section 19.10.060(D)(3) provides that mirrored, reflective glass or tinted glass must not be used except as a decorative accent.

As noted above, the project site is in an urban environment with numerous existing sources of light and glare. The proposed project would not substantially alter this condition and would be required to adhere to WHMC requirements regarding lighting and the use of reflective materials. Therefore, **impacts related to project light and glare would be less than significant.**

II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the Project:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

a-e) The project site is within a highly urbanized area in the City of West Hollywood. The City does not contain any agricultural land, agriculturally zoned land, or land under Williamson Act contract (2035 General Plan; California Department of Conservation, 2010). The project would have no effect on forestland or the conversion of farmland to non-agricultural uses. **No impact would occur.**

III. AIR QUALITY –Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

The project site is located within the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether or not the standards are met or exceeded, the Basin is classified as being in "attainment" or "nonattainment." The South Coast Air Basin (Basin), in which the project site is located, is a non-attainment area for the federal standards for ozone, $PM_{2.5}$, and lead and the state standards for ozone, PM_{10}, $PM_{2.5}$, NO_2 and lead. Thus, the Basin currently exceeds several state and federal ambient air quality standards and is required to implement strategies to reduce pollutant levels to recognized acceptable standards. This non-attainment status is a result of several factors, the primary ones being the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants, the limited capacity of the local airshed to eliminate air pollutants, and the number, type, and density of emission sources within the Basin. The health effects associated with criteria pollutants upon which attainment of state and federal air quality standards is measured are described in Table 3.

Table 3
Health Effects Associated with Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Carbon monoxide (CO)	(1) Aggravation of angina pectoris and other aspects of coronary heart disease; (2) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (3) impairment of central nervous system functions; and (4) possible increased risk to fetuses.
Nitrogen dioxide (NO_2)	(1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (2) risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (3) contribution to atmospheric discoloration.
Sulfur dioxide (SO_2)	(1) Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[a]
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.[a]

Source: EPA 2008c.
[a] *More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: Office of Environmental Health Hazard Assessment, Particulate Matter Health Effects and Standard Recommendations, www.oehha.ca.gov/air/toxic_contaminants/PM10notice.html#may, May 9, 2002; and EPA, Air Quality Criteria for Particulate Matter, October 2004.*

The SCAQMD has adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of state and federal air quality standards.

The SCAQMD recommends the use of quantitative thresholds to determine the significance of temporary construction-related pollutant emissions and project operations. These thresholds are shown in Table 4.

Table 4
SCAQMD Air Quality Significance Thresholds

Pollutant	Mass Daily Thresholds	
	Operation Thresholds	Construction Thresholds
NO_X	55 lbs/day	100 lbs/day
ROG[1]	55 lbs/day	75 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

[1] Reactive Organic Gases (ROG) are formed during combustion and evaporation of organic solvents. ROG are also referred to as Volatile Organic Compounds (VOC).
Source: SCAQMD, http://www.aqmd.gov/ceqa/handbook/signthres.pdf, March 2011.

The SCAQMD has also developed Localized Significance Thresholds (LSTs). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size, and distance to the sensitive receptor. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation. LSTs have been developed for NO_X, CO, PM_{10} and $PM_{2.5}$. LSTs are not applicable to mobile sources such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003). As such, LSTs for operational emissions do not apply to onsite development as the majority of emissions would be generated by cars on the roadways.

LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. The Project involves 0.51 acres of on-site construction. SCAQMD's *Sample Construction Scenarios for Projects Less than 5 Acres in Size* contains methodology for determining the thresholds for projects that are not exactly 1, 2, or 5 acres in size. This methodology was implemented to determine the thresholds for the proposed project. The project site is located in Source Receptor Area 2 (SRA-2, Northwest Coastal LA County). LSTs for construction on a 0.51 acre site in SRA-2 are shown in Table 5. According to the SCAQMD's publication *Final Localized Significant (LST) Thresholds Methodology*, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 meters. In addition, the use of LSTs is voluntary, to be implemented at the discretion of local agencies.

Table 5
SCAQMD LSTs for Construction

Pollutant	Allowable emissions as a function of receptor distance in feet from a 0.5-acre site (lbs/day) in SRA-2				
	82 Feet	164 Feet	328 Feet	656 Feet	1,640 Feet
Gradual conversion of NO_X to NO_2	85	88	107	144	238
CO	456	681	1,048	2129	7,435
PM_{10}	3	9	24	54	143
$PM_{2.5}$	3	4	7	17	75

Source: http://www.aqmd.gov/CEQA/handbook/LST/appC.pdf, October 2009.

a) Vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. A project may be inconsistent with the AQMP if it would generate population exceeding the forecasts used in the development of the AQMP. The proposed project does not involve residential uses; therefore, it would not increase population in the City of conflict with the population forecasts contained in the AQMP. **No impact would occur.**

b-d) The proposed project would generate temporary construction emissions and long-term operational emissions.

Construction Emissions
Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles, in addition to reactive organic gases (ROG) that would be released during the drying phase upon application of architectural coatings. Construction generally would consist of demolition, grading, building construction, paving and architectural coating.

Emissions associated with the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) version 2013.2.2. Complete CalEEMod results and assumptions can be viewed in Appendix B. The grading phase would involve the greatest amount of heavy equipment and the greatest generation of fugitive dust. For the purposes of modeling, it was assumed that the project would comply with SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located within the South Coast Air Basin. Therefore, the following conditions, which would be required to reduce fugitive dust in compliance with SCAQMD Rule 403, were included in CalEEMod for the grading phase of construction.

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.

2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including

unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.

3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).

5. **Street Sweeping.** Construction contractors should sweep all onsite driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

It was also assumed that the project would comply with SCAQMD Rule 1113 regarding the use of low-volatile organic compound (VOC) architectural coatings. Construction was estimated to occur over approximately 14 months between January 2015 and February 2016 and involve the export of 925 cubic yards of earth material. The proposed project would use no-VOC (< 5 g/L) paint on interior surfaces and it was assumed that painting would take place over approximately 30 days.

Table 6 summarizes the estimated maximum daily emissions of pollutants during construction on the project site. Table 6 also shows the maximum daily on-site emissions (as mentioned previously, LSTs only apply to on-site emissions and not to mobile emissions or off-site emissions). As shown in Table 6, no SCAQMD or LST thresholds would be exceeded. Therefore, **impacts would be less than significant.**

Table 6
Estimated Construction Maximum Daily Air Pollutant Emissions

	Maximum Daily Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Maximum Daily Emissions[a]	12.5	68	48	7.0	4.9	0.07
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Max Daily On-Site Emissions[b]	3.6	29.7	22.1	5.5	2.9	0.02
LSTs[b]	*N/A*	*85*	*456*	*3*	*3*	*N/A*
Exceed LST?	**N/A**	**No**	**No**	**No**	**No**	**N/A**

[a] See Table 2.1 "Overall Construction-Mitigated" of winter emissions CalEEMod worksheets in Appendix B. Calculations were made in CalEEMod and assume adherence to the conditions listed previously that are required by SCAQMD Rule 403 to reduce fugitive dust. Winter emissions were used as a worst-case scenario.
[b] LST's only include on-site emissions. LSTs for a 0.5-acre site in SRA-2, see Table 4
N/A = not applicable

Long-Term Emissions

Long-term emissions associated with project operation of urban inn uses at the proposed project site, as shown in Table 7, would include emissions from vehicle trips (mobile sources), natural gas and electricity use (energy sources), and landscape maintenance equipment, consumer products and architectural coating associated with onsite development (area sources). Emissions would not exceed SCAQMD thresholds. **The impact of the project's operational emissions on regional air quality on sensitive receptors would be less than significant.**

Table 7
Estimated Project Operational Emissions

Sources	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	0.51	<0.01	<0.01	<0.01	<0.01	0.00
Energy	0.02	0.15	0.12	0.01	0.01	<0.01
Mobile	0.92	2.22	9.37	1.4	0.39	0.02
Total Emissions (lbs/day)	**1.45**	**2.37**	**9.50**	**1.41**	**0.41**	**0.02**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Calculations were made in CalEEMod. Emissions were used as a worst-case scenario.
Note: numbers may not add up due to rounding.

e) The proposed commercial development includes an urban inn, including a kitchen. Food service uses have the potential to generate odors associated with cooking and preparing food. However, restaurant uses are not listed on Figure 4-3 of the 1993 *SCAQMD CEQA Air Quality Handbook* as uses that require analysis of odor impacts. Further, restaurant uses are not identified on Figure 5-5, Land Uses Associated with Odor Complaints, of the *Handbook*. Substantial objectionable odors are normally associated with such uses as agriculture, wastewater treatment, industrial facilities, or landfills. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people. **Impacts would be less than significant.**

IV. BIOLOGICAL RESOURCES – Would the Project:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) The project site is located in a highly urbanized area of West Hollywood. The project site is currently occupied by commercial buildings. A 0.13-acre portion of the eastern side of the project site is undeveloped. The proposed project would involve upgrades to the existing commercial buildings and construction of a commercial building. The project site is within an urbanized area and does not contain native biological habitat. The site currently has limited vegetation, and no sensitive or special status species have been observed at the site. Moreover, the site lacks native vegetation that might otherwise provide habitat for any sensitive or special status species identified in any regulations. **No impact would occur.**

b) As described above, the project site is previously developed and although non-native, landscape trees are located on the site, there is no native biological habitat onsite. Therefore, the project would not result in the removal of any riparian habitat or other sensitive natural community. In addition, no federally- or state-listed endangered, threatened, rare, or otherwise sensitive flora or fauna were observed at the project site. **No impact would occur.**

c) The project site is not located on or in the vicinity of a federally-protected wetland (FWS Wetlands Mapper, 2014). **No impact would occur.**

d) The City of West Hollywood is not recognized as an existing or proposed Significant Ecological Area that links migratory wildlife populations, as designated by the County of Los Angeles (2035 General Plan FEIR, 2010).

As described above, there is no native biological habitat on the project site. However, the project site contains mature and non-mature, non-native trees that may be removed or relocated as part of the project and could contain bird nests and birds that are protected under the Migratory Bird Treaty Act. Birds protected include all common songbirds, waterfowl, shorebirds, hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts, martins, swallows and others, including their body parts (feathers, plumes etc.), nests, and eggs. In order to prevent impacts to protected birds in compliance with the MBTA, trees would not be removed during the nesting season (typically February to August). If trees were to be removed during the nesting season, a qualified biologist would survey the site for the presence of nesting birds. If present, a protective buffer would be established to ensure that nests are not disturbed. Compliance with the MBTA would ensure protected birds would not be impacted. **No impact would occur.**

e) No local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, apply to the project site. **No impact would occur.**

f) The project site is not located within an area that is subject to an adopted conservation plan (2035 General Plan FEIR, 2010). **No impact would occur.**

V. CULTURAL RESOURCES – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a) The project site currently consists of an urban inn. A 0.13-acre eastern portion of the project site is partially unpaved and does not currently include any buildings. Four of the nine existing structures at the project site are designated as local historic resources. (See City of West Hollywood Council Resolution No. 99-2191). The applicant is proposing to restore and rehabilitate the designated resources pursuant to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and accordingly, the proposed project would improve and prolong the life of the designated resources, which are currently in a state of significant disrepair. The following table illustrates how the proposed project conforms with the cultural and historic goals of the City of West Hollywood's General Plan.

Table 8
General Plan Cultural and Historic Policy Consistency

Objective or Policy	How the Project Reduces or Avoids Impacts
LU-1.2 Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.	The proposed project would use the historical context of the existing designated structures onsite as the foundation for its redevelopment of the San Vicente Inn, thereby complementing the scale and massing of the existing neighborhood.
LU-1.3 Encourage new development to enhance the pedestrian experience.	The proposed project would preserve and reuse the existing designated structures along San Vicente Boulevard, incorporating the structures into the urban inn use thereby enhancing the pedestrian experience by providing visual stimulation along San Vicente Boulevard.
LU-1.10 Encourage new non-residential land uses that contribute to a strong and diversified local economy.	The proposed project allows adaptive reuse and preservation of underutilized historic structures while broadening the base of hospitality uses, and entertainment and dining options within the City.
HP-5: Promote the preservation of cultural resources through maintenance and rehabilitation incentives and technical assistance.	The proposed project reduces historical resource impacts by allowing adaptive reuse of the San Vicente Inn, which could not be accomplished without rehabilitation incentives.

Table 8
General Plan Cultural and Historic Policy Consistency

Objective or Policy	How the Project Reduces or Avoids Impacts
HP-6: Use historic preservation concepts as tools for economic development.	The proposed project reduces impacts to historical resources by encouraging reuse and conservation of underutilized historic structures while broadening the base of hospitality, entertainment and dining options within the City.
HP-6.2 As feasible, incorporate goals and objectives related to cultural resources into public and private plans for economic development.	The proposed project would use the historical quality of the existing designated structures onsite as the foundation for its redevelopment of the San Vicente Inn, promoting its historic architectural quality and its cultural place in the City.

Chattel, Inc., Historic Preservation Consultants completed a Conformance Review for the proposed project in August 2014. This review was peer reviewed by Architectural Resources Group, Inc., in October 2014 and the peer review was then responded to in a memorandum from Chattel, Inc. In its initial review, Chattel, Inc. found that the proposed project would conform to the required standards for historic resources. This finding was based on the building located at 850 San Vicente Boulevard being part of the Old Sherman Thematic grouping, a City of West Hollywood Cultural Resource. While ARG agreed with the Chattel, Inc. findings, ARG recommended that the building at 850 be considered as an individually eligible historic resource, rather than as part of a grouping. In its October 2014 memo, Chattel, Inc., reported that the building in question had been assessed as a historic resource, effective both as part of the grouping and as an individual historic resource. Therefore, the initial finding was maintained. Based on these reports (see Appendix C for all three documents), it was determined that the applicant is proposing to follow the *Secretary of the Interior's Standards* and follow the recommendations of the local Historic Preservation Commission in order to obtain a Certificate of Appropriateness for all work to be performed, and that **impacts to historical resources would be less than significant**.

b-d) The project site is within a highly urbanized area. A majority of the project site is developed with commercial structures. The portion of the project site that does not contain structures is partially paved and contains evidence of significant prior disturbance. There is no evidence that archaeological or paleontological resources or human remains are present onsite. In the unlikely event that such resources are unearthed during construction, applicable regulatory requirements pertaining to the handling and treatment of such resources would be followed. If archaeological or paleontological resources are identified, as defined by Section 2103.2 of the Public Resources Code, the site would be required to be treated in accordance with the provisions of Section 21083.2 of the California Public Resources Code as appropriate. If human remains are unearthed, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. **Impacts would be less than significant.**

VI. GEOLOGY AND SOILS – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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?	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

a.i) The project site is not located within an Alquist-Priolo earthquake fault zone as defined by the State Geologist (Beverly Hills Quadrangle, California Department of Conservation, 1986), nor is it located within the vicinity of a known fault. **No impact would occur.**

a.ii) As with any site in the southern California region, the project site is susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby active faults include the Hollywood Fault, the Santa Monica Fault, the Newport-Inglewood Fault Zone, the Raymond Fault, the Verdugo Fault, and the San Fernando Fault. These faults are capable of producing strong seismic ground shaking at the project site.

Onsite structures would be required to be constructed to comply with the California Building Code (CBC). With adherence to the CBC, design and construction of the proposed development would be engineered to withstand the expected ground acceleration that may occur at the project site. The calculated design base ground motion for the site would take into consideration the soil type, potential for liquefaction, and the most current and applicable seismic attenuation methods that are available. In addition, project construction would be subject to review and approval by City building and safety officials. **Seismic hazard impacts would be less than significant.**

a.iii) Liquefaction is a condition that occurs when unconsolidated, saturated soils change to a near-liquid state during groundshaking. The project site is within a potential liquefaction zone as identified on the State Hazards map (California Department of Conservation, Beverly Hills Quadrangle, 1999). Therefore, the project would be required to comply with applicable provisions of the most recently adopted version of the CBC and the City's building regulations. **Adherence to these regulations would reduce liquefaction impacts to a less than significant level.**

a.iv) The geologic character of an area determines its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside all contribute to the potential for slope failure and landslide events. Common triggering mechanisms of slope failure include undercutting slopes by erosion or grading, saturation of marginally stable slopes by rainfall or irrigation, and shaking of marginally stable slopes during earthquakes.

The project site is located in a highly urbanized area and is generally flat. The site is not listed or shown as an area prone to slope instability or landslides in the City of West Hollywood 2035 General Plan Safety and Noise Element or the California Department of Conservation Seismic Hazards Map (1999). **Impacts related to landslides would be less than significant.**

b) Temporary erosion could occur during project construction and the grading and excavation phases, when soils are exposed, have the highest potential for erosion. All construction activity would be required to comply with WHMC Section 15.56.090. This Section requires storm water runoff containing sediment, construction materials or other pollutants from a construction site to be reduced to the maximum extent practicable. The following requirements would apply to the site:

- *Sediment, construction wastes, trash and other pollutants from construction activities shall be reduced to the maximum extent practicable.*
- *Structural controls such as sediment barriers, plastic sheeting, detention ponds, filters, berms, and similar controls shall be utilized to the maximum extent practicable in order to minimize the escape of sediment and other pollutants from the site.*
- *Between October 1 and April 15, all excavated soil shall be located on the site in a manner that minimizes the amount of sediment running onto the street, drainage facilities or adjacent properties. Soil piles shall be bermed or covered with plastic or similar materials until the soil is either used or removed from the site.*
- *No washing of construction or other vehicles is permitted adjacent to a construction site. No water from the washing of construction vehicle of equipment on the construction site is permitted to run off the construction site and enter the municipal storm water system.*

- *Trash receptacles must be situated at convenient locations on construction sites and must be maintained in such a manner that trash and litter does not accumulate on the site nor migrate off site.*
- *Erosion from slopes and channels must be controlled through the effective combination of best management practices.*

Compliance with the requirements listed above would reduce temporary erosion-related impacts to less than significant.

c) Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. Lateral spreading is the horizontal movement or spreading of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft and recent alluvial deposits exist. Lateral spreading hazards may also be present in areas with liquefaction risks. The proposed project would be required to comply with CBC requirements related to these areas. **With compliance with CBC requirements, impacts associated with lateral spreading, subsidence, or collapse would be less than significant.**

d) Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. According to the City's 2035 General Plan FEIR (2010), expansive soils exist in the City but are more prevalent in the southern part of the City, south of Santa Monica Boulevard. In addition, CBC Section 1808.6 requires special foundation design for buildings constructed on expansive soils. If the soil is not removed or stabilized, then foundations must be designed to prevent uplift of the supported structure or to resist forces exerted on the foundation due to soil volume changes or shall be isolated from the expansive soil. Compliance with CBC requirements would ensure protection of structures and occupants from expansive soils. **Impacts would be less than significant.**

e) The proposed project would be connected to the local wastewater treatment system. Septic systems would not be used. **No impact would occur.**

VII. GREENHOUSE GAS EMISSIONS – Would the Project:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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

GHGs occur naturally and from human activities. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices. Greenhouse gases produced by human activities include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over by 36%, 148%, and 18% respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CEC, March 2009).

The City of West Hollywood adopted a Climate Action Plan (CAP) in September 2011. The CAP outlines a course of action to reduce municipal and community-wide GHG emissions that contribute to climate change. The plan includes seven emission reductions strategies: 1) community leadership and engagement, 2) land use and community design, 3) transportation and mobility, 4) energy use and efficiency, 5) water use and efficiency, 6) waste reduction and recycling, and 7) green space. The land use and community design strategy and the transportation and mobility strategy encourage development in areas to promote transit use, walking and bicycling to improve health and decrease driving. According to the CAP, a project-specific GHG analysis "must identify the specific CAP measures applicable to the project and how the project incorporates the measures." If the project is not consistent with the CAP measures or if the measures are not otherwise binding, they must be incorporated as mitigation measures applicable to the project.

The adopted *CEQA Guidelines* provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The 2008 SCAQMD threshold considers emissions of over 10,000 metric tons carbon dioxide equivalent (CO_2E) per year to be significant. However, the SCAQMD's threshold applies only to stationary sources and is expressly intended to apply only when the SCAQMD

is the CEQA lead agency. Although not yet adopted, the SCAQMD has a recommended tiered GHG significance threshold (SCAQMD, 2008). Under Tier 2, proposed project impacts would be less than significant if the project is consistent with an approved regional plan. Therefore, GHG emissions associated with the proposed project would be less than significant if it is consistent with the City of West Hollywood CAP.

SCAQMD recommended Tier 3 thresholds are screening level quantitative thresholds. If the proposed project meets the Tier 2 criteria, emissions would be less than significant if they are under the screening level threshold. SCAQMD has a recommended screening level quantitative threshold for all land use types of 3,000 metric tons CO_2E /year (SCAQMD, "Proposed Tier 3 Quantitative Thresholds – Option 1", September 2010).

This analysis is based on the methodologies recommended by the California Air Pollution Control Officers Association [CAPCOA] (January 2008) *CEQA and Climate Change* white paper. The analysis focuses on CO_2, N_2O, and CH_4 as these are the GHG emissions that onsite development would generate in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF_6, were also considered for the analysis. However, because the development potential would only involve commercial development, the quantity of fluorinated gases would not be significant since fluorinated gases are primarily associated with industrial processes. Calculations were based on the methodologies discussed in the CAPCOA white paper (January 2008) and included the use of the California Climate Action Registry General Reporting Protocol (January 2009). Emissions analyzed are for the full construction and operation of the commercial uses associated with the proposed project.

Emissions associated with the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) version 2013.2.2. Complete CalEEMod results and assumptions can be viewed in Appendix B.

a-b) GHG emissions associated with construction emissions and operational emissions from the proposed project are discussed below:

Construction Emissions
As shown in Table 9, emissions of carbon dioxide equivalent (CO_2E) units generated by construction of the proposed project are estimated at 332 metric tons. When amortized over a 30-year period (the assumed life of the project), CO_2E construction emissions would be approximately 11.1 metric tons CO_2E per year.

Table 9
Estimated Construction Emissions of Greenhouse Gases

	Annual Emissions (Carbon Dioxide Equivalent (CO_2E))
Total	332 metric tons
Amortized over 30 years	**11.1 metric tons per year**

See Appendix B for CalEEMod Results.

Operational Indirect and Stationary Direct Emissions

Operational Emissions include area sources (consumer products, landscape maintenance equipment, and painting), energy use (electricity and natural gas), solid waste, electricity to deliver water, and transportation emissions and are shown in Table 10. Operational emissions were calculated using CalEEMod. Full results are shown in Appendix B. Mobile source GHG emissions and total annual VMT were estimated in CalEEMod. CalEEMod does not calculate N_2O emissions related to mobile sources. As such, N_2O emissions were calculated based on the proposed project's VMT using calculation methods provided by the California Climate Action Registry General Reporting Protocol (January 2009). As shown in Table 10, total operational emissions associated with the new urban inn buildings are estimated at 397 metric tons per year.

Table 10
Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2e)
Project Construction	11 metric tons
Project Operational	
Area	<0.01 metric tons
Energy	83 metric tons
Solid Waste	8 metric tons
Water	5 metric tons
Project Mobile	
CO_2 and CH_4	276 metric tons
N_2O	14 metric tons
Project Subtotal	**397 metric tons**

Sources: See Appendix B for calculations and for GHG emission factor assumptions.

The City of West Hollywood adopted a CAP in September 2011. The CAP outlines a course of action to reduce municipal and communitywide GHG emissions that contribute to climate change and includes seven emission reductions strategies: 1) community leadership and engagement, 2) land use and community design, 3) transportation and mobility, 4) energy use and efficiency, 5) water use and efficiency, 6) waste reduction and recycling, and 7) green space. The proposed project would be consistent with the City's CAP if it includes provisions to implement the applicable CAP GHG reduction measures. Table 11 compares the proposed project to applicable CAP measures. As shown, the proposed project would be consistent with the CAP.

Table 11
Consistency with Applicable West Hollywood Climate Action Plan Reduction Measures

Measure	Project Consistency
Land Use and Community Design	
LU-1.1: Facilitate the establishment of mixed-use, pedestrian- and transit-oriented development along the commercial corridors and in Transit Overlay Zones.	**Consistent** The project site is a commercial, pedestrian-friendly development located along a commercial corridor and within the General Plan's Transit Overlay Zone.
Transportation and Mobility	
T-1.1: Increase the pedestrian mode share in West Hollywood with convenient and attractive pedestrian infrastructure and facilities.	**Consistent** The project site is located within walking distance of retail facilities, restaurants, and public transportation.
T-2.1: Increase the bicycle mode share by providing accessible, convenient, and attractive bicycle infrastructure.	**Consistent** The project site is located near a bike lane along Santa Monica Boulevard and includes bicycle parking for employees and customers visiting the commercial uses.
T-2.2: Install bike racks and bike parking in the City where bike parking infrastructure currently does not exist.	**Consistent** The proposed project includes bicycle parking for employees and customers as well as lockers and showers for employees.
Energy Use and Efficiency	
E-2.2: Require all new construction to achieve California Building Code Tier II Energy Efficiency Standards (Section 503.1.2).	**Consistent** The proposed project would comply with Title 24 California Building Code Energy Efficiency standards.
Water Use and Efficiency	
W-1.1: Reduce per capita water consumption by 30% by 2035.	**Consistent** To reduce water use, the proposed project would include low-flow plumbing fixtures consistent with CalGreen building standards.
W-1.2: Encourage all automated irrigation systems installed in the City to include a weather-based control system.	**Consistent** The proposed project would include drought-tolerant, climate appropriate landscaping to reduce the amount of irrigation needed.
Waste Reduction and Recycling	
SW-1.1: Establish a waste reduction target not to exceed 4.0 pounds per person per day.	**Consistent** The City of West Hollywood's Public Works Department is responsible for complying with AB 939. The City has enacted numerous programs to achieve the mandated diversion rates. In 2007 and 2008, the per capita disposal rate per day in West Hollywood was 5.6 pounds per resident. This exceeds CalRecycle's target of 5.8 pounds per capita per day (2035 General Plan FEIR, 2010). The proposed project would include space for the collection and storage of recyclables. In addition, at least 80% of construction and demolition waste would be diverted in accordance with WHMC Section 19.20.060. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.

Table 11
Consistency with Applicable West Hollywood
Climate Action Plan Reduction Measures

Measure	Project Consistency
Urban Forest	
G-1.1: Increase and enhance the City's urban forest to capture and store carbon and reduce building energy consumption.	**Consistent** The proposed project includes landscaping along West San Vicente Boulevard and throughout the project site. The proposed project would also include planters on the existing and proposed buildings to increase the amount of landscaping on site from existing conditions.

Senate Bill 375, signed in August 2008, requires the inclusion of sustainable communities' strategies (SCS) in regional transportation plans (RTPs) for the purpose of reducing GHG emissions. In April 2012, the South Coast Association of Government (SCAG) adopted the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). SCAG's RTP/SCS includes a commitment to reduce emissions from transportation sources by promoting compact and infill development to comply with SB 375. A goal of the SCS is to "promote the development of better places to live and work through measures that encourage more compact development, varied housing options, bike and pedestrian improvements, and efficient transportation infrastructure." The proposed project would be infill development that would also be located within walking distance of commercial and recreational activities as well as public transportation (approximately 400 feet to the Metro Line 4 bus stops at Santa Monica Boulevard and San Vicente Boulevard and approximately 400 feet to the Metro Lines 105 and 705 bus stops on San Vicente Boulevard and Santa Monica Boulevard), thereby reducing vehicle trips. Therefore, it would be consistent with this goal. Another goal of the SCS is to "create more compact neighborhoods and plac[e] everyday destinations closer to homes and closer to one another." The proposed project would place commercial development directly adjacent to residences, thereby meeting this SCS goal.

Executive Order (EO) S-3-05 was issued by the Governor in June 2005. EO S-3-05 sets a GHG emission reduction target of 1990 levels by 2020. Assembly Bill 32, the "California Global Warming Solutions Act of 2006," was signed into law in the fall of 2006. This bill also requires achievement of a statewide GHG emissions limit equivalent to 1990 emissions by 2020 (essentially a 25% reduction below 2005 emission levels) and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006, published the *Climate Action Team Report* (CAT Report) (CalEPA, 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. The strategies include the reduction of passenger and light duty truck emissions, reduction of energy and water use and increased recycling. In addition, in 2008 the California Attorney General published *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level* (Office of the California Attorney General, Global Warming Measures Updated May 21, 2008). This document provides information that may be helpful to local agencies in carrying out their duties under CEQA as they relate to global warming. Included in this document are various measures that may reduce the global warming related impacts of a project such as reducing construction and demolition waste, reducing water use, and encouraging smart land use. At least 80% of construction and demolition waste

generated by the project would be diverted from landfills in accordance with West Hollywood requirements. The proposed project would also include drought-tolerant landscaping and water-efficient faucets and toilets. In addition, the proposed project is a commercial project in close proximity to residential uses and within walking distance to retail, restaurants, jobs, and alternative transportation. The proposed project would be consistent with applicable CAT strategies and 2008 Attorney General Greenhouse Gas Reduction Measures.

According to *The Impacts of Sea-Level Rise on the California Coast*, prepared by the California Climate Change Center (CCCC) (May 2009), climate change has the potential to induce sea level rise in the coming century. The rising sea level increases the likelihood and risk of flooding. However, the project site is approximately nine miles from the coastline and is not at risk for inundation from sea level rise (California Energy Commission, Cal-Adapt website, 2014).

As previously mentioned, according to SCAQMD Tier 2 GHG significance thresholds, a proposed project's GHG emissions would be less than significant if the proposed project is consistent with an adopted regional GHG reduction plan (such as a CAP). The proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and would be consistent with the West Hollywood CAP and objectives of the RTP/SCS, AB 32, SB 97 and SB 375. Therefore, **impacts would be less than significant.**

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous material 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) 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?	☐	☐	☐	☒

a, b) The proposed project would involve upgrades to existing urban inn buildings and construction of new urban inn buildings. The proposed uses would not involve the routine transport, use or disposal of hazardous substances, other than minor amounts typically used for maintenance. In the unlikely scenario that licensed vendors or tenants bring hazardous materials to and from the project site, they would be required to provide all appropriate documentation for all hazardous material that is transported in connection with project-site activities (as required by the WHMC). This would achieve compliance with the existing hazardous materials regulations. In addition, any hazardous wastes produced onsite would be subject to requirements associated with accumulation time limits, proper storage locations and containers, and proper labeling. As part of any removal of any hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company, which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. Compliance with these applicable regulations would ensure that impacts associated with the use, transport, storage, and sale of hazardous materials would not be significant. **Impacts would be less than significant.**

c) The school closest to the project site is West Hollywood Elementary School, which is approximately 0.25 miles north of the site. As mentioned above, operation of the proposed project would not involve the use or transport of hazardous materials. **Therefore, impacts related to hazardous emissions or materials affecting school sites would be less than significant.**

d) The project site does not appear on any hazardous material site list compiled pursuant to California Government Code Section 65962.5. The following databases were checked (September 15, 2014) for known hazardous materials contamination at the project site:

- *GeoTracker (California State Water Resources Control Board): list of leaking underground storage tank sites*

- *EnviroStor (California Department of Toxic Substances Control): list of hazardous waste and substances sites*
- *Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database*
- *Cortese list of Hazardous Waste and Substances Sites*
- *EnviroMapper (U.S. Environmental Protection Agency)*

The closest listings for open cases are two leaking underground storage tank (LUST) cleanup sites located at 8787 Santa Monica Boulevard and 8800 Santa Monica Boulevard. These properties are located approximately 650 and 850 feet east, respectively, from the project site. Several dry cleaners and automotive shops are also within one mile of the project site; however, none have reported hazardous leaks. The project would not involve a change in land use at the site and no new sensitive receptors would be exposed to hazardous materials. **Impacts would be less than significant.**

e, f) The project site is not located in the vicinity of a public or private airstrips. **No impact would occur.**

g) The proposed project involves infill development in an urbanized area of West Hollywood. Project implementation would not interfere with emergency response or evacuation. The project would be required to comply with applicable California Fire Code requirements. **No impact would occur.**

h) The project site is in an urbanized area and is not within a wildland fire hazard area as defined by the City of West Hollywood 2035 General Plan Safety and Noise Element. **No impact would occur.**

IX. HYDROLOGY AND WATER QUALITY – Would the Project:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or 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)?	☐	☐	☒	☐

IX. HYDROLOGY AND WATER QUALITY – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
c) 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?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including 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?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) 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?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

a, c-f) The proposed project would not involve alteration of a stream or river and would not substantially alter drainage patterns in the area. During construction of the project, the drainage pattern could be temporarily altered and erosion could occur. However, as discussed under Section VI, Geology and Soils, Item b, construction activity would be required to comply with WHMC Section 15.56.090. This section requires storm water runoff containing sediment, construction materials or other pollutants from a construction site to be reduced to the maximum extent practicable. This requirement would reduce temporary erosion-related effects.

The proposed project involves development of new buildings for urban inn use. Some existing permeable surfaces would be replaced with impermeable surfaces. Total paved area would be

6,062 sf and total permeable area would be 3,475 sf. The project would be required to comply with the NPDES Multiple Separate Storm Sewer System (MS4) Permit issued by the Los Angeles Regional Water Quality Control Board, which would require implementation of Best Management Practices (BMPs). BMPs would be required to reduce polluted runoff from the project site by retaining, treating, or infiltrating polluted runoff onsite. **Impacts would be less than significant.**

b) The proposed project involves the construction of a commercial development and rehabilitation of existing buildings for continuing use of an existing urban inn. It would incrementally increase water consumption. Water would be provided by the Los Angeles Department of Water and Power, which receives approximately 15% of its water from groundwater sources. However, the water demand associated with the proposed project would not substantially deplete groundwater supply. (Refer to Section XVII, *Utilities and Service Systems*, for further discussion of this impact.) **Impacts would be less than significant.**

g-j) The project site is in Flood Zone X, meaning it is either outside the 100-year flood hazard area or protected by levees from 100-year floods (FEMA FIRM Map No. 06037C1585F, 2008). The project would not involve construction of a structure that would impede flood flows. The site is not located within a potential inundation area (City of West Hollywood, 2035 General Plan Safety and Noise Element). The project site is approximately 8.5 miles from the Pacific Ocean and is not located within a seiche or landslide/mudslide hazard zone (California Department of Conservation, 1999). **No impact would occur.**

X. LAND USE AND PLANNING – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with an applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a) The proposed project involves upgrades to existing urban inn buildings and development of new urban inn buildings on an infill site in an urbanized area. This development would not divide an established community, but rather would blend into the fabric of the community. **No impact would occur.**

b) The project site is zoned and has a General Plan land use designation of R4B, described in the General Plan as Residential High Density (50 units per acre).

An urban inn use is permitted in the R4B zone pursuant to a Conditional Use Permit (CUP), which the applicant currently holds and proposes to amend to comply with its business plan. Assuming approval of an amendment to the CUP, the proposed project would not conflict with applicable land use plans.

The R4B designation allows for a height not to exceed 45 feet and with the CUP, urban inns are permitted up to 39 rooms. The proposed project complies with both the height requirement and the maximum allowable number of urban inn rooms. **Impacts related to conflicts with land use plans would be less than significant.**

c) The project site is located in a highly urbanized area of West Hollywood. There are no adopted habitat conservation plans or natural community conservation plans within the City of West Hollywood (2035 General Plan FEIR, 2010). **No impact would occur.**

XI. MINERAL RESOURCES – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a, b) The project site is in a highly urbanized area of West Hollywood that is not used for mineral resource extraction. No state-designated or locally designated mineral resource zones exist in the City (2035 General Plan FEIR, 2010). The proposed project would not affect mineral resources. **No impact would occur.**

XII. NOISE – Would the Project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels above levels existing without the Project?	☐	☐	☒	☐

XII. NOISE – Would the Project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

Because of the logarithmic scale of the decibel unit, sound levels cannot be added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dBA, regardless of the initial sound level. For example, 60 dBA plus 60 dBA equals 63 dBA.Where ambient noise levels are high in comparison to a new noise source, the change in noise level would be less than 3 dB. For example, 70 dBA ambient noise levels are combined with a 60 dBA noise source the resulting noise level equals 70.4 dBA.

Noise that is experienced at any receptor can be attenuated by distance or the presence of noise barriers or intervening terrain. Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. For acoustically absorptive, or soft, sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receiver, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dBA of noise reduction.

The City of West Hollywood adopted the 2035 General Plan Safety and Noise Element in September 2011. The Noise Element provides a description of existing noise levels and sources and incorporates comprehensive goals, policies, and implementing actions. The Noise Element includes several policies on noise and acceptable noise levels. These policies address unnecessary, excessive, and annoying noise levels and sources such as vehicles, construction, special sources (e.g., radios, musical instrument, animals, etc.), and stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.). The Noise Element also establishes land use compatibility categories for community noise exposure. The maximum "normally acceptable" noise level for the exterior of residential areas is 60 dBA CNEL or Ldn.[1] The maximum "normally acceptable" noise level for commercial and professional uses is 65 dBA CNEL or Ldn.

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

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

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

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. The vibration thresholds established by the Federal Transit Administration (FTA) are 65 VdB for buildings where low ambient vibration is essential for interior operations (such as hospitals and recording studios), 72 VdB for residences and buildings where people normally sleep, including hotels/urban inns, and 75 VdB for institutional land uses with primary daytime use (such as churches and schools). The threshold

[1] The Day-Night average level (Ldn) and the Community Noise Equivalent Level (CNEL) are two commonly used noise metrics. The Ldn is a 24-hour average noise level that adds 10 dBA to actual nighttime (10:00 PM to 7:00 AM) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the Ldn, except it also adds a 5 dBA penalty for noise occurring during the evening (7:00 PM to 10:00 PM).

for the proposed project is 72 VdB for residences and hotels/urban inns during hours when people normally sleep, as these are the only sensitive receptors in the vicinity of the site. In terms of ground-borne vibration impacts on structures, the FTA states that ground-borne vibration levels in excess of 100 VdB would damage fragile buildings and levels in excess of 95 VdB would damage extremely fragile historic buildings.

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

To determine existing noise levels on the project site, one 15-minute noise measurement was taken on the project site near San Vicente Boulevard on September 18, 2014 using an ANSI Type II integrating sound level meter. The on-site noise measurement provides existing sound levels, which are primarily due to noise associated with traffic on San Vicente Boulevard. Figure 1 depicts the on-site noise measurement locations, and Table 1 identifies the measured noise levels. Other sources of roadway noise near the project site are automobiles traveling on Santa Monica Boulevard immediately south of the project site, as well as automobile traffic on Cynthia Street immediately north of the project site.

The proposed project involves upgrades to existing historic buildings and construction of a new commercial building. According to the City's General Plan, ambient noise levels for office buildings, business commercial, and professional uses between 60 and 75 dBA CNEL or Ldn are "conditionally acceptable." In the conditionally acceptable range, new construction should be undertaken only after a detailed noise analysis is made and noise reduction measures are identified and included in the project design. Noise levels at the project site are approximately 71 dBA Leq at the point nearest to San Vicente Boulevard. The ambient noise level in CNEL is typically two to four dBA higher than the peak Leq. Therefore, the urban inn uses facing San Vicente Boulevard may be exposed to noise levels in the conditionally unacceptable range. The project proponent plans to include design features to achieve acceptable interior noise levels. These design features may include but are not limited to the following:

- *Windows and sliding glass doors facing San Vicente Boulevard with a minimum Standard Transmission Class (STC) of 30 that are properly installed, weather stripped, and insulated*
- *Exterior doors facing San Vicente Boulevard a minimum STC of 30 and insulated in conformance with Title 24 of the California Code of Regulations requirements*
- *Exterior wall facing material designed for a minimum STC of 30 (this can typically be achieved by adding absorptive insulation [i.e., fiberglass batts] in the wall cavity)*
- *Air conditioning or a mechanical ventilation system so that windows and doors may remain closed*

With implementation of the design features discussed above, impacts would be less than significant.

b) Operation of the proposed project would not perceptibly increase groundborne vibration or groundborne noise on the project site above existing conditions, due to the proposed commercial nature of the project. Construction of the proposed project could potentially

increase groundborne vibration on the project site, but construction effects would be temporary. Based on the information presented in Table 12, vibration levels could reach approximately 87 VdB at the residences south of the site, which are adjacent to the project site.

Table 12
Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	87	81	79	77	75
Loaded Trucks	86	80	78	76	74
Jackhammer	79	73	71	69	67
Small Bulldozer	58	52	50	48	46

Source: Federal Railroad Administration, 1998

As discussed above, 100 VdB is the general threshold where minor damage can occur in fragile buildings. As vibration levels would not reach 100 VdB, structural damage would not occur as a result of construction activities. This vibration levels at the residential units 25 feet south and north of the project site would exceed the groundborne velocity threshold level of 72 VdB established by the FTA for residences and buildings where people normally sleep. However, as discussed above, the WHMC prohibits construction activities between the hours of 7:00 PM and 8:00 AM on weekdays and Saturdays, and all day Sundays, and on City holidays. Therefore, construction would not occur during recognized sleep hours for residences. As such, **vibration effects would be less than significant.**

c, d) The project could generate temporary noise increases during construction and long-term increases associated with operation of the proposed uses.

Construction Noise

Noise levels from construction of the project would result from upgrading the existing commercial building on-site and grading and trenching for the proposed structure, construction of the structure, and traffic noise from construction vehicles. Nearby noise-sensitive land uses, including the single-family and multi-family residences immediately south, north and west of the project site, would be exposed to temporary construction noise during development of the proposed project. Noise impacts are a function of the type of activity being undertaken and the distance to the receptor location. Construction activity is expected to occur over a period of approximately 14 months. Table 13 shows the typical noise levels at construction sites.

Table 13
Typical Noise Levels at Construction Sites

Equipment Onsite	Typical Level (dBA) 25 Feet from the Source	Typical Level (dBA) 50 Feet from the Source	Typical Level (dBA) 100 Feet from the Source
Air Compressor	87	81	75

Table 13
Typical Noise Levels at Construction Sites

Equipment Onsite	Typical Level (dBA) 25 Feet from the Source	Typical Level (dBA) 50 Feet from the Source	Typical Level (dBA) 100 Feet from the Source
Backhoe	86	80	74
Concrete Mixer	91	85	79
Crane, mobile	89	83	77
Dozer	91	85	79
Jack Hammer	94	88	82
Paver	95	89	83
Saw	82	76	70
Truck	94	88	82

Noise levels assume a noise attenuation rate of 6dBA per doubling of distance.
Source: Federal Transit Administration (FTA), May 2006

Typical construction noise levels at 25 feet from the source range from about 86 to 95 dBA. The grading/excavation phase of project construction tends to create the highest construction noise levels because of the operation of heavy equipment, although only a limited amount of equipment can operate near a given location at a particular time. In addition, construction vehicles traveling on local roadways can generate intermittent noise levels that affect adjacent receptors. However, as discussed above, pursuant to Section 9.08.050 of the City's Municipal Code, construction is prohibited between the hours of 7:00 PM and 8:00 AM on weekdays and Saturdays; or at any time on Sundays or City holidays. Therefore, construction would not occur during recognized sleep hours for residences. In addition, Mitigation Measure 3.9-2 from the West Hollywood 2035 General Plan FEIR (2010) applies to all new construction in the City and would be a Condition of Approval for the proposed project:

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.*

Because construction activity would be required to comply with timing restrictions and with the condition of approval listed above, **impacts related to temporary construction noise would be less than significant.**

Operational Noise

Existing uses near the project site may periodically be subject to noises associated with operation of the proposed project, including noise that is typical of commercial development such as conversations, music, delivery trucks, and noise associated with rooftop ventilation and heating systems. The closest sensitive receptors are the residences located approximately 25 feet south, north and west of the project site.

The proposed project involves an urban inn and restaurant. The main entrances to these uses would be located along San Vicente Boulevard. Therefore, activities would be oriented toward San Vicente Boulevard and noise associated with conversations of patrons entering the commercial structure on San Vicente Boulevard or music playing in the building would not be audible at the sensitive receptors located at the rear of the building.

Noise generated by onsite operations is expected to include noise associated with rooftop ventilation and heating systems. Noise levels from commercial heating, ventilation and air conditioning (HVAC) equipment can reach 100 dBA at a distance of three feet (EPA, 1971). These units usually have noise shielding cabinets placed on the roof or are in mechanical equipment rooms. Typically, the shielding and location of these units reduces noise levels to no greater than 55 dBA at 50 feet from the source. Assuming that the HVAC units are at least 50 feet from the nearest sensitive receptors north of the project site, noise levels at the nearest sensitive receptors would be 55 dBA. This is within ambient noise levels in the area; therefore, operational noise impacts from HVAC equipment would be less than significant.

Operation of the proposed commercial project would involve delivery trucks and trash hauling trucks going to and from the project site. An individual delivery truck can generate noise of up to 85 dB, which could be disruptive if it were to occur at night or in the early morning hours. However, the loading zone for the proposed project would be at the street. However, pursuant to Section 9.08.050 of the City's Municipal Code, commercial deliveries that would cause unreasonable noise disturbance are not permitted between the hours of 10:00 PM and 8:00 AM, except for normal handling of solid waste and recycling containers by a franchised collector. Noise generated by daytime deliveries and trash pickups would not adversely affect nearby sensitive receptors due to their relatively low frequency, the location of the loading zone, and the lower noise level sensitivity of receptors during the day when deliveries would occur.

The proposed project involves offsite parking, which would be used incrementally more often as a result of the proposed project and the increase of two guest rooms. Therefore, noise associated with parking would be less than significant.

Noise levels associated with operation of the proposed project would minimally increase compared to existing onsite and surrounding commercial uses and would generally be within ambient noise levels; therefore, operational noise impacts from would be less than significant.

Permanent project-related increases in noise would be primarily due to increases in traffic volumes on nearby street segments. Several roadway segments near the project are near sensitive receptors. For traffic-related noise, impacts would be significant if project-generated traffic results in exposure of sensitive receptors to unacceptable noise levels. The FTA's May 2006 *Transit Noise and Vibration Impact Assessment* recommendations were used to determine whether or not increases in roadway noise would be considered significant. The allowable noise exposure increase changes with increasing noise exposure, such that lower ambient noise levels have a higher allowable noise exposure increase, as show in Table 14.

Table 14
Significance of Changes in Operational Roadway Noise Exposure

Ldn or Leq in dBA	
Existing Noise Exposure	**Allowable Noise Exposure Increase**
45-50	7
50-55	5
55-60	3
60-65	2
65-75	1
75+	0

Source: Federal Transit Administration (FTA), May 2006

Ambient noise levels along roadway segments in the project range from 65 to 75 dBA Leq (noise contours from general Plan). Therefore, the allowable noise exposure increase would be up to 1 dBA. According to ITE's *Trip Generation*, 9th Edition, which publishes trip generation estimates for specific land uses, the guest rooms would create a maximum of 8.84 trips per day for a total of 18 new daily trips at the project site. Currently, the 29 existing rooms would generate approximately 257 trips per day. The additional trips generated would only be 7% of the existing trips, which would not generate noise increases exceeding the above thresholds. Further, the proposed structures would shield residences immediately east and west of the site from traffic noise associated with San Vicente and Santa Monica Boulevards. **Impacts related to long-term operational noise would be less than significant.**

e, f) The project site is not in the vicinity of any public or private airport. The closest airport is the Santa Monica Airport, located approximately six miles southwest of the project site. Therefore, **no impact** related to aircraft noise would occur.

XIII. POPULATION AND HOUSING – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) The proposed development would not involve new residential units and, therefore, would not directly generate population growth. The proposed project would involve urban inn uses, which would result in the generation of additional employment opportunities. However, the jobs created would likely be filled by existing residents and would not result in the need for new housing units. The proposed project would be located in an urban area and would utilize existing infrastructure. Therefore, the proposed project would not directly or indirectly induce population growth. **The impact would be less than significant**.

b, c) The project site does not contain any residential uses; therefore, no residential uses would be removed as a result of the proposed project. The proposed project would not displace housing or people or necessitate the construction of replacement housing. **No impact would occur.**

XIV. PUBLIC SERVICES	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 any of the public services:				

XIV. PUBLIC SERVICES	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

a.i) The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services for the City of West Hollywood, which is within LACFD's Battalion 1 service area. The LACFD operates six fire stations within the Battalion 1 area, with two fires stations, #7 and #8 located within West Hollywood. The fire station closest to the project site is Fire Station #7, located at 864 N. San Vicente Boulevard, approximately 250 feet north of the project site. The proposed project would involve rehabilitation and construction of urban inn buildings on a site currently occupied by an urban inn. The proposed project would increase density on the project site, which would incrementally increase demand for fire protection services.

As identified in Section 14.04.010 of the WHMC, the City of West Hollywood has adopted the Los Angeles County Title 32 (Fire Code), an amended California Fire Code (2010 edition), and an amended International Fire Code (2009 edition). The City's Fire Code is based on the Los Angeles County Fire Code supplemented by the other fire codes identified. The Fire Code contains regulations related to construction, maintenance and design of buildings and land uses. The project would be required to comply with applicable Fire Codes. With adherence to existing regulations, the proposed project would not result in the need for new or expanded fire facilities (2035 General Plan FEIR, 2010). **Impacts would be less than significant.**

a.ii) Law enforcement services in West Hollywood are provided by contract with the Los Angeles County Sheriff's Department (LACSD). Protection services include emergency and non-emergency police response, routine police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement. The LACSD has established the West Hollywood Sheriff's Department and has mutual aid agreements with the City of Los Angeles and the City of Beverly Hills police departments. According to the City's 2035 General Plan FEIR, the City has a ratio of 3.6 sworn officers per 1,000 residents, which exceeds the average for cities in the Western United States of 1.7 officers per 1,000 residents.

The proposed project involves construction and rehabilitation of an urban inn for continued use as an urban inn. The proposed project does not include the construction of housing and would not generate population growth. Therefore, the need for police protection services would be limited, but would be incrementally increased compared to existing conditions. **Impacts would be less than significant.**

a-iii, iv, v) The proposed project does not include the construction of housing and would not generate population growth. Therefore, it would not increase demand for schools, parks, or other public facilities**. There would be no impact.**

XV. RECREATION	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a, b) The proposed project would not directly affect any recreational facilities and does not involve the construction of housing and would not generate population growth. Therefore, it would not increase demand for recreational facilities. **There would be no impact to recreational facilities.**

XVI. TRANSPORTATION/TRAFFIC – Would the Project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards 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 use (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	☒	☐

a) The proposed project would add two guest rooms to an existing urban inn that currently includes 29 guest rooms and one manager's unit. The addition of two guest rooms would not significantly increase traffic to the project site.

According to ITE's *Trip Generation*, 9th Edition, which publishes trip generation estimates for specific land uses, the guest rooms would create a maximum of 8.84 trips per day for a total of 18 new daily trips at the project site. Currently, the 29 existing rooms would generate approximately 257 trips per day. The additional trips generated would only be 7% of the existing trips; **therefore, impacts would be less than significant.**

b) Construction of the proposed project may require temporary lane detours or closures. However, due to the relatively small size of the project site and the temporary nature of the lane alterations, it would not be expected to result in a change in traffic that is substantial in relation to existing traffic patterns or capacity. **No impact would occur.**

c) No airport or airstrip is located within the City of West Hollywood. The proposed project would not affect air traffic patterns. **No impact would occur.**

d) The proposed project does not include any design features that would increase hazards. In addition, the proposed project is a fairly typical commercial infill project and would not result in vehicles or equipment, such as farm equipment or tractors, that would be incompatible with the existing land uses surrounding the area. **Impacts would be less than significant.**

e) The proposed project would be required to conform to traffic and safety regulations that specify adequate emergency access measures. Access to the project site would be directly from San Vicente Boulevard at the project driveway, which would be in approximately the same location as the existing driveway for the existing urban inn. The site would facilitate infill development that would not be expected to hinder emergency access or evacuation. Adherence to existing state and federal regulations would reduce potential impacts (2035 General Plan FEIR, 2010**). Impacts would be less than significant.**

f) The proposed project involves construction and rehabilitation of commercial buildings on a developed site. The proposed project would be limited to site-specific improvements and would not damage the performance or safety of any public transit, bikeway or pedestrian facilities. Conversely, the proposed project would maintain the quality of the pedestrian environment with landscaping and sidewalks are provided along all key roadways in the project vicinity. The project would have no impact on adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, and would not otherwise substantially reduce the performance or safety of such facilities. **Impacts would be less than significant.**

XVII. UTILITIES AND SERVICE SYSTEMS – Would the Project:	**Potentially Significant Impact**	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

a, b, e) The sewer collection system within West Hollywood contains City-owned local sewers and County-owned trunk sewer links. Within the City, 39 miles of gravity piping provide sewer service to every parcel in the City. None of the regional trunk sewers are at or near capacity (2035 General Plan FEIR, 2010). Wastewater from the City is carried to the Hyperion Treatment Plant (HTP) in Playa Del Rey. This wastewater treatment plant provides full secondary treatment (LADWP website, 2013). The HTP has a dry-weather flow capacity of 450 million gallons per day (MGD) and a wet weather capacity of 850 MGD (2035 General Plan FEIR, 2010).

As shown in Table 15, the proposed project would generate a net increase of approximately 2,459 gallons of wastewater per day. This increase would be less than 0.01% of the existing unused capacity of the HTP. Therefore, the proposed project would not be expected to significantly affect the City's wastewater conveyance system or result in the construction of new treatment facilities. Further, the City requires developers to pay a wastewater mitigation fee to offset any net increases in wastewater flow from new construction. **Impacts would be less than significant.**

Table 15
Estimated Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)	Amount (gallons per day)
New Guest Rooms	2	130 gallons/room	260
Dining	2,199 sf	30 gallons/seat	2,199
Net Increase in Wastewater Demand			**2,459**

Source: City of Los Angeles CEQA Thresholds Guidelines (2006)
Notes: gpd = gallons per day, SF=square feet
** Assuming 116 seats (2,199 SF of restaurant space, 50% of restaurant has seating, and 1 seat per 15 SF) .*

c) Storm drain infrastructure in the City is owned and operated by the City of West Hollywood or the County of Los Angeles. Currently, the project site is a used for a 29 guest room urban inn, one manager's unit, and a partially vacant lot. The proposed project would increase impervious surfaces compared to existing conditions. However, the proposed project involves some permeable surfaces on the front, side, and rear of the building and a landscaping drainage system would filter and store rainfall to reduce runoff. In addition, the proposed project would be required to comply with Chapter 15.56 and Chapter 19.20.190 of the WHMC. These sections require stormwater runoff to be minimized and require Standard Urban Storm Water Mitigation Plans (SUSMP) for new development. The proposed project would be required to implement Best Management Practices to reduce runoff. **With adherence to applicable regulations, impacts would be less than significant.**

d) The Los Angeles Department of Water and Power (LADWP) would provide water service to the project. LADWP provides water service to approximately four million people in the City of Los Angeles, portions of West Hollywood, Culver City, and other areas. The primary sources of water supply for LADWP are the Los Angeles Aqueduct (average of 36% of total water supply), local groundwater (average 12%), and purchased imported water from the Metropolitan Water District (MWD, approximately 52%) (LADWP, 2011). LADWP also delivers recycled water for parkland irrigation.

Assuming water use is 120% of wastewater generation, the proposed project would use an estimated increase of 5,568 gallons of water per day, which equates to 2.04 acre-feet per year (AFY).

The LADWP addresses issues of water supply in its 2010 Urban Water Management Plan (UWMP). According to the UWMP, LADWP has analyzed three different hydrological conditions to determine the reliability of water supplies for the City: average year (50 year average hydrology from FY 1596/57 to 2005/06), single dry- year, and multiple dry-year period. In each of the three hydrological conditions, the projected water demand was calculated taking into account growth in billing data, water conservation efforts, and demographics. The UWMP states that LADWP can reliably meet the projected water demand in each of the hydrological conditions through 2035 (LADWP, 2011). The UWMP states that if a proposed development is consistent with the City's General plan, the projected water demand of the development is accounted for in the most recently adopted UWMP. The UWMP incorporates the projected demographic data from SCAG. As stated in Sections IV, *Land Use and Planning,* and XIII, *Population and Housing,* the proposed project would be consistent with the West Hollywood 2035 General Plan and the SCAG RTP/SCS growth forecast. Thus, the project would not consume water in excess of the water supplies available to the City.

Further, the LADWP, in coordination with the City, would be required to review the proposed project for consistency with water infrastructure requirements established in development plans and agreements, and to ensure that sufficient water infrastructure capacity is available to serve new development prior to approval of the project (2035 General Plan FEIR, 2010). **Therefore, impacts would be less than significant.**

f, g) The City of West Hollywood contracts with Athens Services to collect, transport, and dispose of solid waste for all residential and commercial uses (2035 General Plan FEIR, 2010). Solid waste from West Hollywood is collected by Athens Services and taking to their recycling and sorting facility, the City of Industry Materials Recovery Facility (MRF). Food waste is processed and delivered to their compost facility, American Organics, in Victorville (Athens, 2014). Waste that cannot be recycled is disposed of at a landfill. Following the closure of the Puente Hills landfill in 2013, Athens Services transports waste to the San Bernardino County Landfill system. Athens Services has a contract with County of San Bernardino to import waste. Thus, solid waste from West Hollywood may be delivered to San Bernardino County landfills, including Mid-Valley Landfill (permitted capacity of 7,500 tons/day), San Timoteo Landfill (permitted capacity of 2,000 tons/day), Victorville Landfill (permitted capacity of 3,000 tons/day), Barstow Landfill (permitted capacity of 1,200 tons/day), or Landers Landfill (permitted capacity of 1,200 tons/day) (CalRecycle, 2014).

Senate Bill (SB) 1016 requires that the 50% diversion requirement mandated by Assembly Bill (AB) 939 be measured in terms of pounds per person per day, instead of by volume or as an aggregate measure separate from population. CalRecycle sets a target for resident and employee per capita per day disposal rates. The target for residents is 5.8 and 7.7 for employees. In 2011, the per capita disposal rate per day per resident in West Hollywood was 4.5 for residents and 5.1 for employees; West Hollywood has achieved both the resident and employee targets set by CalRecycle (CalRecycle, 2011).

As shown in Table 16, the proposed project would generate 0.012 tons of solid waste per day. This incremental increase in solid waste would be within the permitted capacities of landfills that accept waste from the project site. **Therefore, impacts would be less than significant.**

Table 16
Estimated Solid Waste Generation

Land Use	Size	Generation Factor*	Total (lbs/day)	Total (tons/day)
Urban Inn (Increase)	2 rooms	4 lbs/day	8	0.004
Dining	2,199 sf	.005 lbs/sf/day	11	0.006
Total Net Solid Waste Generation Increase			**19**	**0.010**
Total Solid Waste Sent to Landfill (Assuming 50% diversion rate)			**9.5**	**0.005**

Notes: SF = square feet, lbs= pounds
** CalRecycle Waste Generation Rates, available at: http://www.calrecycle.ca.gov/wastechar/WasteGenRates/default.htm*

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) As noted under Section V, *Cultural Resources,* implementation of the proposed project would have a less than significant impact on known cultural resources. As noted in Section IV, *Biological Resources*, compliance with the MBTA would ensure protected birds would not be impacted and no impact would occur.

b) As described in the discussion of environmental checklist Sections I through XVII, the project would have no impact, a less than significant impact, or a less than significant impact after mitigation with respect to all environmental issues. There are no other known projects in development or under consideration that would affect the other resource areas. As such, cumulative impacts would also be less than significant (not cumulatively considerable).

c) As detailed in the preceding responses, the proposed project would not result, either directly or indirectly, in adverse hazards related to hazardous materials or air quality. Interior noise reduction features would be implemented to reduce potential noise impacts to a less than significant level.

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Appendix A

Site Plans

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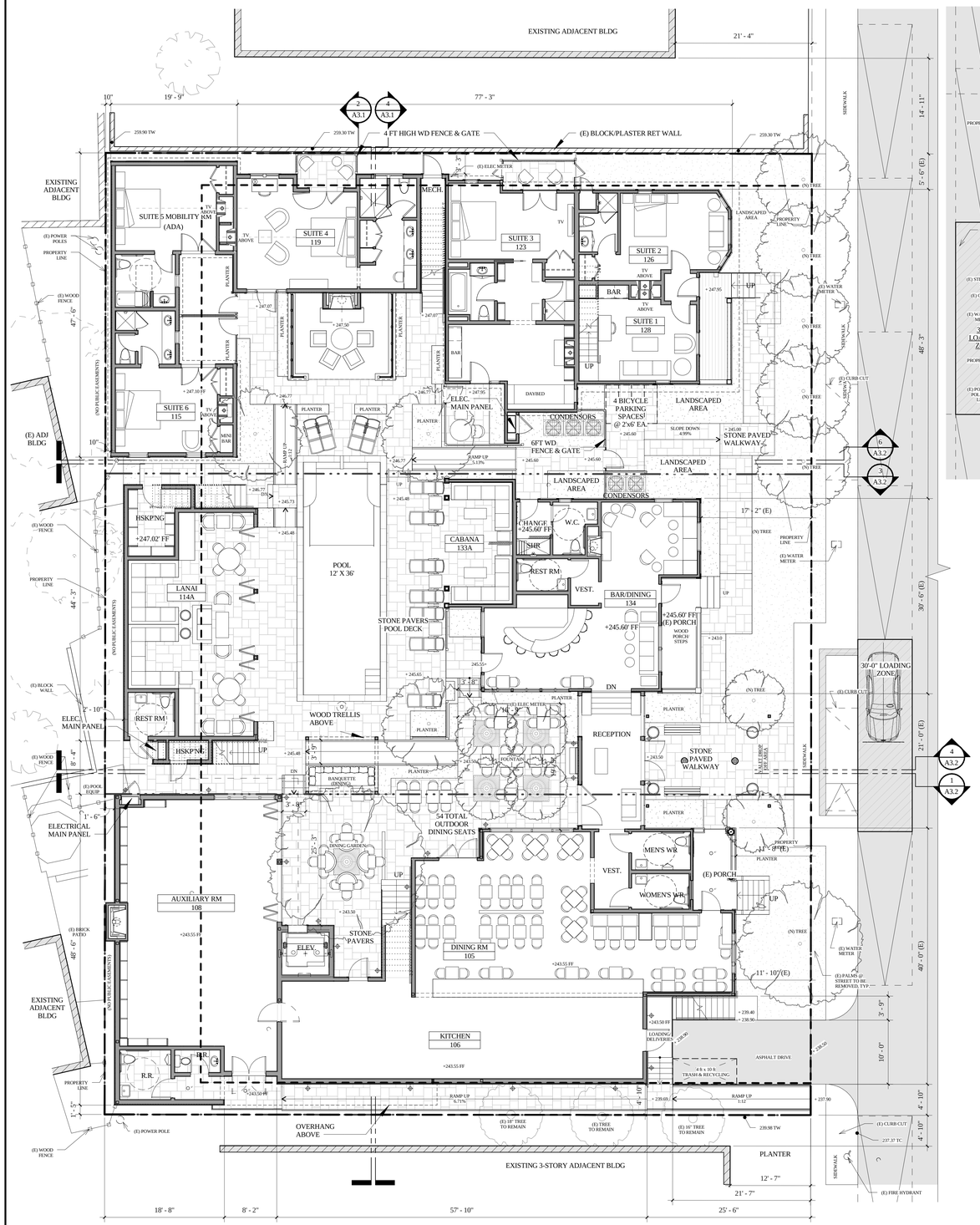
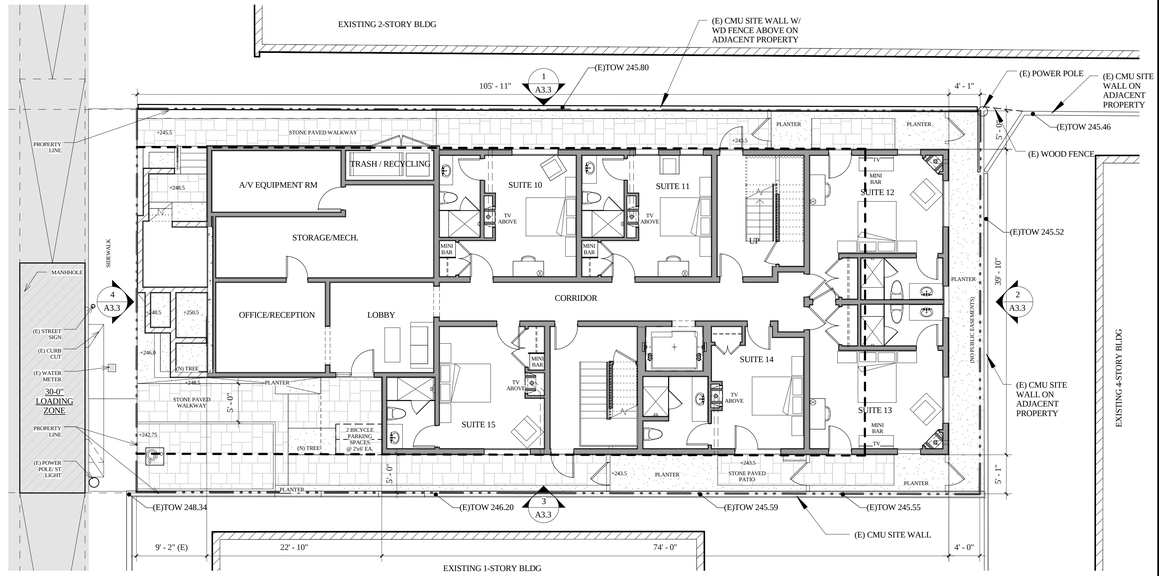


1 PROPOSED SITE PLAN - WEST
1/8" = 1'-0"



2 PROPOSED SITE PLAN - EAST
1/8" = 1'-0"

ISSUE DATES

Δ	DATE	DESCRIPTION
	07/15	Issued for Preliminary Cost Estimate

Appleton & Associates, INC
ARCHITECTS
1556 17th Street
Santa Monica, CA 90404
310 828-1430
FAX 310 828-1631

PROPOSED SITE PLAN

San Vicente Inn
837, 847, 849 & 850 N. San Vicente Blvd , CA
90069

Date: 09/16/14
Scale: 1/8" = 1'-0"
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Appendix B

Air Quality/GHG Modeling Results

San Vicente Inn

South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	33.00	Room	0.50	22,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	9			**Operational Year**	2016
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot acreage 0.51 based on project description and sf from remodel and additional sf

Construction Phase - Phases were adjsuted to reflect planned construction period of January 2015 through February 2016

Demolition - 4138 sf to be demolished per site plans

Grading - Total acres disturbed based on project description. 925 cy of earth material removed

Architectural Coating - Per project description

Vechicle Emission Factors -

Vechicle Emission Factors -

Vechicle Emission Factors -

Area Coating - Per SCAQMD 1113 and project description

Construction Off-road Equipment Mitigation - Per SCAQMD 403

Area Mitigation - Project description states no-VOC paint will be used

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	0.00
tblArchitecturalCoating	EF_Residential_Interior	50.00	0.00
tblAreaMitigation	UseLowVOCPaintNonresidentialInteriorValue	250	0
tblAreaMitigation	UseLowVOCPaintResidentialInteriorValue	50	0
tblConstructionPhase	NumDays	10.00	32.00
tblConstructionPhase	NumDays	200.00	240.00
tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	4.00	6.00
tblConstructionPhase	NumDays	10.00	15.00
tblConstructionPhase	NumDays	2.00	3.00
tblConstructionPhase	PhaseEndDate	3/9/2016	2/15/2016
tblConstructionPhase	PhaseEndDate	3/7/2016	2/15/2016
tblConstructionPhase	PhaseEndDate	2/16/2015	2/13/2015
tblConstructionPhase	PhaseStartDate	1/26/2016	1/1/2016
tblConstructionPhase	PhaseStartDate	2/16/2016	1/26/2016
tblConstructionPhase	PhaseStartDate	2/12/2015	2/11/2015
tblGrading	AcresOfGrading	2.25	0.50
tblGrading	AcresOfGrading	1.50	0.50
tblGrading	MaterialExported	0.00	925.00
tblLandUse	LandUseSquareFeet	47,916.00	22,000.00
tblLandUse	LotAcreage	1.10	0.50
tblProjectCharacteristics	OperationalYear	2014	2016

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2015	0.4787	3.0852	2.3663	3.4600e-003	0.0577	0.2015	0.2592	0.0212	0.1934	0.2147	0.0000	297.1266	297.1266	0.0602	0.0000	298.3908
2016	0.1843	0.3198	0.2516	3.9000e-004	4.0600e-003	0.0209	0.0250	1.0900e-003	0.0200	0.0211	0.0000	33.9277	33.9277	6.9000e-003	0.0000	34.0726
Total	**0.6630**	**3.4050**	**2.6178**	**3.8500e-003**	**0.0618**	**0.2224**	**0.2842**	**0.0223**	**0.2135**	**0.2358**	**0.0000**	**331.0543**	**331.0543**	**0.0671**	**0.0000**	**332.4634**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2015	0.4787	3.0852	2.3663	3.4600e-003	0.0445	0.2015	0.2460	0.0145	0.1934	0.2080	0.0000	297.1263	297.1263	0.0602	0.0000	298.3905
2016	0.1843	0.3198	0.2516	3.9000e-004	4.0600e-003	0.0209	0.0250	1.0900e-003	0.0200	0.0211	0.0000	33.9276	33.9276	6.9000e-003	0.0000	34.0726
Total	**0.6630**	**3.4050**	**2.6178**	**3.8500e-003**	**0.0485**	**0.2224**	**0.2710**	**0.0156**	**0.2135**	**0.2291**	**0.0000**	**331.0539**	**331.0539**	**0.0671**	**0.0000**	**332.4631**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**21.43**	**0.00**	**4.66**	**29.99**	**0.00**	**2.84**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1351	0.0000	4.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.2000e-004	8.2000e-004	0.0000	0.0000	8.7000e-004
Energy	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	82.8868	82.8868	3.0200e-003	1.0500e-003	83.2750
Mobile	0.1587	0.4151	1.6528	3.4600e-003	0.2344	5.4500e-003	0.2398	0.0627	5.0100e-003	0.0677	0.0000	276.0419	276.0419	0.0116	0.0000	276.2851
Waste						0.0000	0.0000		0.0000	0.0000	3.6681	0.0000	3.6681	0.2168	0.0000	8.2203
Water						0.0000	0.0000		0.0000	0.0000	0.2656	3.4149	3.6805	0.0274	6.8000e-004	4.4663
Total	**0.2967**	**0.4421**	**1.6759**	**3.6200e-003**	**0.2344**	**7.5000e-003**	**0.2419**	**0.0627**	**7.0600e-003**	**0.0698**	**3.9336**	**362.3444**	**366.2780**	**0.2588**	**1.7300e-003**	**372.2476**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0934	0.0000	4.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.2000e-004	8.2000e-004	0.0000	0.0000	8.7000e-004
Energy	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	82.8868	82.8868	3.0200e-003	1.0500e-003	83.2750
Mobile	0.1587	0.4151	1.6528	3.4600e-003	0.2344	5.4500e-003	0.2398	0.0627	5.0100e-003	0.0677	0.0000	276.0419	276.0419	0.0116	0.0000	276.2851
Waste						0.0000	0.0000		0.0000	0.0000	3.6681	0.0000	3.6681	0.2168	0.0000	8.2203
Water						0.0000	0.0000		0.0000	0.0000	0.2656	3.4149	3.6805	0.0274	6.8000e-004	4.4659
Total	**0.2551**	**0.4421**	**1.6759**	**3.6200e-003**	**0.2344**	**7.5000e-003**	**0.2419**	**0.0627**	**7.0600e-003**	**0.0698**	**3.9336**	**362.3444**	**366.2780**	**0.2588**	**1.7300e-003**	**372.2472**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**14.03**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2015	2/11/2015	5	30	
2	Site Preparation	Site Preparation	2/11/2015	2/13/2015	5	3	
3	Grading	Grading	2/14/2015	2/23/2015	5	6	
4	Building Construction	Building Construction	2/24/2015	1/25/2016	5	240	
5	Architectural Coating	Architectural Coating	1/1/2016	2/15/2016	5	32	
6	Paving	Paving	1/26/2016	2/15/2016	5	15	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 71,874; Non-Residential Outdoor: 23,958 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	255	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	174	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	255	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	174	0.41
Grading	Rubber Tired Dozers	1	6.00	255	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Cranes	1	6.00	226	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	125	0.42
Paving	Paving Equipment	1	8.00	130	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	19.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	116.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	20.00	8.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	4.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.0400e-003	0.0000	2.0400e-003	3.1000e-004	0.0000	3.1000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0460	0.4452	0.3309	3.7000e-004		0.0280	0.0280		0.0262	0.0262	0.0000	34.1427	34.1427	8.6500e-003	0.0000	34.3244
Total	**0.0460**	**0.4452**	**0.3309**	**3.7000e-004**	**2.0400e-003**	**0.0280**	**0.0300**	**3.1000e-004**	**0.0262**	**0.0265**	**0.0000**	**34.1427**	**34.1427**	**8.6500e-003**	**0.0000**	**34.3244**

3.2 Demolition - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9000e-004	3.1100e-003	2.2200e-003	1.0000e-005	1.6000e-004	5.0000e-005	2.1000e-004	4.0000e-005	5.0000e-005	9.0000e-005	0.0000	0.6471	0.6471	1.0000e-005	0.0000	0.6472
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.7000e-004	1.2800e-003	0.0133	3.0000e-005	2.1400e-003	2.0000e-005	2.1600e-003	5.7000e-004	2.0000e-005	5.9000e-004	0.0000	2.0761	2.0761	1.2000e-004	0.0000	2.0786
Total	**1.0600e-003**	**4.3900e-003**	**0.0155**	**4.0000e-005**	**2.3000e-003**	**7.0000e-005**	**2.3700e-003**	**6.1000e-004**	**7.0000e-005**	**6.8000e-004**	**0.0000**	**2.7232**	**2.7232**	**1.3000e-004**	**0.0000**	**2.7257**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.2000e-004	0.0000	9.2000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0460	0.4452	0.3309	3.7000e-004		0.0280	0.0280		0.0262	0.0262	0.0000	34.1427	34.1427	8.6500e-003	0.0000	34.3243
Total	**0.0460**	**0.4452**	**0.3309**	**3.7000e-004**	**9.2000e-004**	**0.0280**	**0.0289**	**1.4000e-004**	**0.0262**	**0.0263**	**0.0000**	**34.1427**	**34.1427**	**8.6500e-003**	**0.0000**	**34.3243**

3.2 Demolition - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9000e-004	3.1100e-003	2.2200e-003	1.0000e-005	1.6000e-004	5.0000e-005	2.1000e-004	4.0000e-005	5.0000e-005	9.0000e-005	0.0000	0.6471	0.6471	1.0000e-005	0.0000	0.6472
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.7000e-004	1.2800e-003	0.0133	3.0000e-005	2.1400e-003	2.0000e-005	2.1600e-003	5.7000e-004	2.0000e-005	5.9000e-004	0.0000	2.0761	2.0761	1.2000e-004	0.0000	2.0786
Total	**1.0600e-003**	**4.3900e-003**	**0.0155**	**4.0000e-005**	**2.3000e-003**	**7.0000e-005**	**2.3700e-003**	**6.1000e-004**	**7.0000e-005**	**6.8000e-004**	**0.0000**	**2.7232**	**2.7232**	**1.3000e-004**	**0.0000**	**2.7257**

3.3 Site Preparation - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					8.2200e-003	0.0000	8.2200e-003	4.3800e-003	0.0000	4.3800e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8000e-003	0.0403	0.0255	3.0000e-005		2.2000e-003	2.2000e-003		2.0200e-003	2.0200e-003	0.0000	2.4518	2.4518	7.3000e-004	0.0000	2.4671
Total	**3.8000e-003**	**0.0403**	**0.0255**	**3.0000e-005**	**8.2200e-003**	**2.2000e-003**	**0.0104**	**4.3800e-003**	**2.0200e-003**	**6.4000e-003**	**0.0000**	**2.4518**	**2.4518**	**7.3000e-004**	**0.0000**	**2.4671**

3.3 Site Preparation - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.1700e-003	0.0190	0.0136	4.0000e-005	9.9000e-004	3.1000e-004	1.3100e-003	2.7000e-004	2.9000e-004	5.6000e-004	0.0000	3.9506	3.9506	3.0000e-005	0.0000	3.9512
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	8.0000e-005	8.2000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	4.0000e-005	0.0000	0.1278	0.1278	1.0000e-005	0.0000	0.1279
Total	**1.2200e-003**	**0.0191**	**0.0144**	**4.0000e-005**	**1.1200e-003**	**3.1000e-004**	**1.4400e-003**	**3.0000e-004**	**2.9000e-004**	**6.0000e-004**	**0.0000**	**4.0783**	**4.0783**	**4.0000e-005**	**0.0000**	**4.0791**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.7000e-003	0.0000	3.7000e-003	1.9700e-003	0.0000	1.9700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.8000e-003	0.0403	0.0255	3.0000e-005		2.2000e-003	2.2000e-003		2.0200e-003	2.0200e-003	0.0000	2.4518	2.4518	7.3000e-004	0.0000	2.4671
Total	**3.8000e-003**	**0.0403**	**0.0255**	**3.0000e-005**	**3.7000e-003**	**2.2000e-003**	**5.9000e-003**	**1.9700e-003**	**2.0200e-003**	**3.9900e-003**	**0.0000**	**2.4518**	**2.4518**	**7.3000e-004**	**0.0000**	**2.4671**

3.3 Site Preparation - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.1700e-003	0.0190	0.0136	4.0000e-005	9.9000e-004	3.1000e-004	1.3100e-003	2.7000e-004	2.9000e-004	5.6000e-004	0.0000	3.9506	3.9506	3.0000e-005	0.0000	3.9512
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	8.0000e-005	8.2000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	4.0000e-005	0.0000	0.1278	0.1278	1.0000e-005	0.0000	0.1279
Total	**1.2200e-003**	**0.0191**	**0.0144**	**4.0000e-005**	**1.1200e-003**	**3.1000e-004**	**1.4400e-003**	**3.0000e-004**	**2.9000e-004**	**6.0000e-004**	**0.0000**	**4.0783**	**4.0783**	**4.0000e-005**	**0.0000**	**4.0791**

3.4 Grading - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0138	0.0000	0.0138	7.4800e-003	0.0000	7.4800e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.2000e-003	0.0658	0.0423	4.0000e-005		3.5900e-003	3.5900e-003		3.3000e-003	3.3000e-003	0.0000	4.0274	4.0274	1.2000e-003	0.0000	4.0526
Total	**6.2000e-003**	**0.0658**	**0.0423**	**4.0000e-005**	**0.0138**	**3.5900e-003**	**0.0174**	**7.4800e-003**	**3.3000e-003**	**0.0108**	**0.0000**	**4.0274**	**4.0274**	**1.2000e-003**	**0.0000**	**4.0526**

3.4 Grading - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	1.6000e-004	1.6300e-003	0.0000	2.6000e-004	0.0000	2.7000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2555	0.2555	1.0000e-005	0.0000	0.2558
Total	**1.1000e-004**	**1.6000e-004**	**1.6300e-003**	**0.0000**	**2.6000e-004**	**0.0000**	**2.7000e-004**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**0.2555**	**0.2555**	**1.0000e-005**	**0.0000**	**0.2558**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					6.2200e-003	0.0000	6.2200e-003	3.3600e-003	0.0000	3.3600e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.2000e-003	0.0658	0.0423	4.0000e-005		3.5900e-003	3.5900e-003		3.3000e-003	3.3000e-003	0.0000	4.0274	4.0274	1.2000e-003	0.0000	4.0526
Total	**6.2000e-003**	**0.0658**	**0.0423**	**4.0000e-005**	**6.2200e-003**	**3.5900e-003**	**9.8100e-003**	**3.3600e-003**	**3.3000e-003**	**6.6600e-003**	**0.0000**	**4.0274**	**4.0274**	**1.2000e-003**	**0.0000**	**4.0526**

3.4 Grading - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-004	1.6000e-004	1.6300e-003	0.0000	2.6000e-004	0.0000	2.7000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2555	0.2555	1.0000e-005	0.0000	0.2558
Total	**1.1000e-004**	**1.6000e-004**	**1.6300e-003**	**0.0000**	**2.6000e-004**	**0.0000**	**2.7000e-004**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**0.2555**	**0.2555**	**1.0000e-005**	**0.0000**	**0.2558**

3.5 Building Construction - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.4014	2.4044	1.6730	2.4500e-003		0.1656	0.1656		0.1599	0.1599	0.0000	207.9287	207.9287	0.0480	0.0000	208.9358
Total	**0.4014**	**2.4044**	**1.6730**	**2.4500e-003**		**0.1656**	**0.1656**		**0.1599**	**0.1599**	**0.0000**	**207.9287**	**207.9287**	**0.0480**	**0.0000**	**208.9358**

3.5 Building Construction - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	8.9600e-003	0.0913	0.1117	1.9000e-004	5.4900e-003	1.5300e-003	7.0200e-003	1.5700e-003	1.4100e-003	2.9800e-003	0.0000	17.7770	17.7770	1.4000e-004	0.0000	17.7800
Worker	9.9600e-003	0.0146	0.1515	3.0000e-004	0.0245	2.2000e-004	0.0247	6.5000e-003	2.0000e-004	6.7000e-003	0.0000	23.7420	23.7420	1.3400e-003	0.0000	23.7702
Total	**0.0189**	**0.1059**	**0.2632**	**4.9000e-004**	**0.0300**	**1.7500e-003**	**0.0317**	**8.0700e-003**	**1.6100e-003**	**9.6800e-003**	**0.0000**	**41.5191**	**41.5191**	**1.4800e-003**	**0.0000**	**41.5502**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.4014	2.4044	1.6730	2.4500e-003		0.1656	0.1656		0.1599	0.1599	0.0000	207.9285	207.9285	0.0480	0.0000	208.9356
Total	**0.4014**	**2.4044**	**1.6730**	**2.4500e-003**		**0.1656**	**0.1656**		**0.1599**	**0.1599**	**0.0000**	**207.9285**	**207.9285**	**0.0480**	**0.0000**	**208.9356**

3.5 Building Construction - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	8.9600e-003	0.0913	0.1117	1.9000e-004	5.4900e-003	1.5300e-003	7.0200e-003	1.5700e-003	1.4100e-003	2.9800e-003	0.0000	17.7770	17.7770	1.4000e-004	0.0000	17.7800
Worker	9.9600e-003	0.0146	0.1515	3.0000e-004	0.0245	2.2000e-004	0.0247	6.5000e-003	2.0000e-004	6.7000e-003	0.0000	23.7420	23.7420	1.3400e-003	0.0000	23.7702
Total	**0.0189**	**0.1059**	**0.2632**	**4.9000e-004**	**0.0300**	**1.7500e-003**	**0.0317**	**8.0700e-003**	**1.6100e-003**	**9.6800e-003**	**0.0000**	**41.5191**	**41.5191**	**1.4800e-003**	**0.0000**	**41.5502**

3.5 Building Construction - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0280	0.1746	0.1250	1.9000e-004		0.0116	0.0116		0.0112	0.0112	0.0000	15.7841	15.7841	3.4700e-003	0.0000	15.8570
Total	**0.0280**	**0.1746**	**0.1250**	**1.9000e-004**		**0.0116**	**0.0116**		**0.0112**	**0.0112**	**0.0000**	**15.7841**	**15.7841**	**3.4700e-003**	**0.0000**	**15.8570**

3.5 Building Construction - 2016

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.0000e-004	6.1400e-003	7.9100e-003	1.0000e-005	4.2000e-004	1.0000e-004	5.2000e-004	1.2000e-004	9.0000e-005	2.1000e-004	0.0000	1.3403	1.3403	1.0000e-005	0.0000	1.3405
Worker	6.8000e-004	1.0000e-003	0.0104	2.0000e-005	1.8700e-003	2.0000e-005	1.8800e-003	5.0000e-004	1.0000e-005	5.1000e-004	0.0000	1.7474	1.7474	9.0000e-005	0.0000	1.7494
Total	**1.2800e-003**	**7.1400e-003**	**0.0183**	**3.0000e-005**	**2.2900e-003**	**1.2000e-004**	**2.4000e-003**	**6.2000e-004**	**1.0000e-004**	**7.2000e-004**	**0.0000**	**3.0876**	**3.0876**	**1.0000e-004**	**0.0000**	**3.0898**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0280	0.1746	0.1250	1.9000e-004		0.0116	0.0116		0.0112	0.0112	0.0000	15.7841	15.7841	3.4700e-003	0.0000	15.8570
Total	**0.0280**	**0.1746**	**0.1250**	**1.9000e-004**		**0.0116**	**0.0116**		**0.0112**	**0.0112**	**0.0000**	**15.7841**	**15.7841**	**3.4700e-003**	**0.0000**	**15.8570**

3.5 Building Construction - 2016

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.0000e-004	6.1400e-003	7.9100e-003	1.0000e-005	4.2000e-004	1.0000e-004	5.2000e-004	1.2000e-004	9.0000e-005	2.1000e-004	0.0000	1.3403	1.3403	1.0000e-005	0.0000	1.3405
Worker	6.8000e-004	1.0000e-003	0.0104	2.0000e-005	1.8700e-003	2.0000e-005	1.8800e-003	5.0000e-004	1.0000e-005	5.1000e-004	0.0000	1.7474	1.7474	9.0000e-005	0.0000	1.7494
Total	**1.2800e-003**	**7.1400e-003**	**0.0183**	**3.0000e-005**	**2.2900e-003**	**1.2000e-004**	**2.4000e-003**	**6.2000e-004**	**1.0000e-004**	**7.2000e-004**	**0.0000**	**3.0876**	**3.0876**	**1.0000e-004**	**0.0000**	**3.0898**

3.6 Architectural Coating - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.1388					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.9000e-003	0.0380	0.0301	5.0000e-005		3.1500e-003	3.1500e-003		3.1500e-003	3.1500e-003	0.0000	4.0852	4.0852	4.8000e-004	0.0000	4.0953
Total	**0.1447**	**0.0380**	**0.0301**	**5.0000e-005**		**3.1500e-003**	**3.1500e-003**		**3.1500e-003**	**3.1500e-003**	**0.0000**	**4.0852**	**4.0852**	**4.8000e-004**	**0.0000**	**4.0953**

3.6 Architectural Coating - 2016

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.6000e-004	3.8000e-004	3.9300e-003	1.0000e-005	7.0000e-004	1.0000e-005	7.1000e-004	1.9000e-004	1.0000e-005	1.9000e-004	0.0000	0.6578	0.6578	4.0000e-005	0.0000	0.6586
Total	**2.6000e-004**	**3.8000e-004**	**3.9300e-003**	**1.0000e-005**	**7.0000e-004**	**1.0000e-005**	**7.1000e-004**	**1.9000e-004**	**1.0000e-005**	**1.9000e-004**	**0.0000**	**0.6578**	**0.6578**	**4.0000e-005**	**0.0000**	**0.6586**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.1388					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.9000e-003	0.0380	0.0301	5.0000e-005		3.1500e-003	3.1500e-003		3.1500e-003	3.1500e-003	0.0000	4.0852	4.0852	4.8000e-004	0.0000	4.0953
Total	**0.1447**	**0.0380**	**0.0301**	**5.0000e-005**		**3.1500e-003**	**3.1500e-003**		**3.1500e-003**	**3.1500e-003**	**0.0000**	**4.0852**	**4.0852**	**4.8000e-004**	**0.0000**	**4.0953**

3.6 Architectural Coating - 2016

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.6000e-004	3.8000e-004	3.9300e-003	1.0000e-005	7.0000e-004	1.0000e-005	7.1000e-004	1.9000e-004	1.0000e-005	1.9000e-004	0.0000	0.6578	0.6578	4.0000e-005	0.0000	0.6586
Total	**2.6000e-004**	**3.8000e-004**	**3.9300e-003**	**1.0000e-005**	**7.0000e-004**	**1.0000e-005**	**7.1000e-004**	**1.9000e-004**	**1.0000e-005**	**1.9000e-004**	**0.0000**	**0.6578**	**0.6578**	**4.0000e-005**	**0.0000**	**0.6586**

3.7 Paving - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.6500e-003	0.0991	0.0682	1.0000e-004		6.0600e-003	6.0600e-003		5.5800e-003	5.5800e-003	0.0000	9.3107	9.3107	2.7600e-003	0.0000	9.3686
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.6500e-003**	**0.0991**	**0.0682**	**1.0000e-004**		**6.0600e-003**	**6.0600e-003**		**5.5800e-003**	**5.5800e-003**	**0.0000**	**9.3107**	**9.3107**	**2.7600e-003**	**0.0000**	**9.3686**

3.7 Paving - 2016

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.9000e-004	5.8000e-004	5.9800e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	1.0022	1.0022	5.0000e-005	0.0000	1.0033
Total	**3.9000e-004**	**5.8000e-004**	**5.9800e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**1.0022**	**1.0022**	**5.0000e-005**	**0.0000**	**1.0033**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.6500e-003	0.0991	0.0682	1.0000e-004		6.0600e-003	6.0600e-003		5.5800e-003	5.5800e-003	0.0000	9.3107	9.3107	2.7600e-003	0.0000	9.3686
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.6500e-003**	**0.0991**	**0.0682**	**1.0000e-004**		**6.0600e-003**	**6.0600e-003**		**5.5800e-003**	**5.5800e-003**	**0.0000**	**9.3107**	**9.3107**	**2.7600e-003**	**0.0000**	**9.3686**

3.7 Paving - 2016

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.9000e-004	5.8000e-004	5.9800e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	1.0022	1.0022	5.0000e-005	0.0000	1.0033
Total	**3.9000e-004**	**5.8000e-004**	**5.9800e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**1.0022**	**1.0022**	**5.0000e-005**	**0.0000**	**1.0033**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1587	0.4151	1.6528	3.4600e-003	0.2344	5.4500e-003	0.2398	0.0627	5.0100e-003	0.0677	0.0000	276.0419	276.0419	0.0116	0.0000	276.2851
Unmitigated	0.1587	0.4151	1.6528	3.4600e-003	0.2344	5.4500e-003	0.2398	0.0627	5.0100e-003	0.0677	0.0000	276.0419	276.0419	0.0116	0.0000	276.2851

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Hotel	269.61	270.27	196.35	618,588	618,588
Total	269.61	270.27	196.35	618,588	618,588

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.513363	0.060352	0.180146	0.139338	0.042155	0.006672	0.015739	0.030749	0.001928	0.002503	0.004351	0.000593	0.002111

4.4 Fleet Mix

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	53.5132	53.5132	2.4600e-003	5.1000e-004	53.7226
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	53.5132	53.5132	2.4600e-003	5.1000e-004	53.7226
NaturalGas Mitigated	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	29.3736	29.3736	5.6000e-004	5.4000e-004	29.5523
NaturalGas Unmitigated	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	29.3736	29.3736	5.6000e-004	5.4000e-004	29.5523

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Hotel	550440	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	29.3736	29.3736	5.6000e-004	5.4000e-004	29.5523
Total		**2.9700e-003**	**0.0270**	**0.0227**	**1.6000e-004**		**2.0500e-003**	**2.0500e-003**		**2.0500e-003**	**2.0500e-003**	**0.0000**	**29.3736**	**29.3736**	**5.6000e-004**	**5.4000e-004**	**29.5523**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Hotel	550440	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	29.3736	29.3736	5.6000e-004	5.4000e-004	29.5523
Total		**2.9700e-003**	**0.0270**	**0.0227**	**1.6000e-004**		**2.0500e-003**	**2.0500e-003**		**2.0500e-003**	**2.0500e-003**	**0.0000**	**29.3736**	**29.3736**	**5.6000e-004**	**5.4000e-004**	**29.5523**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Hotel	187000	53.5132	2.4600e-003	5.1000e-004	53.7226
Total		**53.5132**	**2.4600e-003**	**5.1000e-004**	**53.7226**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Hotel	187000	53.5132	2.4600e-003	5.1000e-004	53.7226
Total		**53.5132**	**2.4600e-003**	**5.1000e-004**	**53.7226**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Non-Residential Interior

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0934	0.0000	4.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.2000e-004	8.2000e-004	0.0000	0.0000	8.7000e-004
Unmitigated	0.1351	0.0000	4.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.2000e-004	8.2000e-004	0.0000	0.0000	8.7000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0555					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0795					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.0000e-005	0.0000	4.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.2000e-004	8.2000e-004	0.0000	0.0000	8.7000e-004
Total	**0.1351**	**0.0000**	**4.3000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**8.2000e-004**	**8.2000e-004**	**0.0000**	**0.0000**	**8.7000e-004**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0139					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0795					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.0000e-005	0.0000	4.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.2000e-004	8.2000e-004	0.0000	0.0000	8.7000e-004
Total	**0.0934**	**0.0000**	**4.3000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**8.2000e-004**	**8.2000e-004**	**0.0000**	**0.0000**	**8.7000e-004**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	3.6805	0.0274	6.8000e-004	4.4659
Unmitigated	3.6805	0.0274	6.8000e-004	4.4663

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Hotel	0.837103 / 0.0930115	3.6805	0.0274	6.8000e-004	4.4663
Total		**3.6805**	**0.0274**	**6.8000e-004**	**4.4663**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Hotel	0.837103 / 0.0930115	3.6805	0.0274	6.8000e-004	4.4659
Total		**3.6805**	**0.0274**	**6.8000e-004**	**4.4659**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	3.6681	0.2168	0.0000	8.2203
Unmitigated	3.6681	0.2168	0.0000	8.2203

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Hotel	18.07	3.6681	0.2168	0.0000	8.2203
Total		**3.6681**	**0.2168**	**0.0000**	**8.2203**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Hotel	18.07	3.6681	0.2168	0.0000	8.2203
Total		**3.6681**	**0.2168**	**0.0000**	**8.2203**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

San Vicente Inn

South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	33.00	Room	0.50	22,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	9			**Operational Year**	2016
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot acreage 0.51 based on project description and sf from remodel and additional sf

Construction Phase - Phases were adjsuted to reflect planned construction period of January 2015 through February 2016

Demolition - 4138 sf to be demolished per site plans

Grading - Total acres disturbed based on project description. 925 cy of earth material removed

Architectural Coating - Per project description

Vechicle Emission Factors -

Vechicle Emission Factors -

Vechicle Emission Factors -

Area Coating - Per SCAQMD 1113 and project description

Construction Off-road Equipment Mitigation - Per SCAQMD 403

Area Mitigation - Project description states no-VOC paint will be used

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	0.00
tblArchitecturalCoating	EF_Residential_Interior	50.00	0.00
tblAreaMitigation	UseLowVOCPaintNonresidentialInteriorValue	250	0
tblAreaMitigation	UseLowVOCPaintResidentialInteriorValue	50	0
tblConstructionPhase	NumDays	10.00	32.00
tblConstructionPhase	NumDays	200.00	240.00
tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	4.00	6.00
tblConstructionPhase	NumDays	10.00	15.00
tblConstructionPhase	NumDays	2.00	3.00
tblConstructionPhase	PhaseEndDate	3/9/2016	2/15/2016
tblConstructionPhase	PhaseEndDate	3/7/2016	2/15/2016
tblConstructionPhase	PhaseEndDate	2/16/2015	2/13/2015
tblConstructionPhase	PhaseStartDate	1/26/2016	1/1/2016
tblConstructionPhase	PhaseStartDate	2/16/2016	1/26/2016
tblConstructionPhase	PhaseStartDate	2/12/2015	2/11/2015
tblGrading	AcresOfGrading	2.25	0.50
tblGrading	AcresOfGrading	1.50	0.50
tblGrading	MaterialExported	0.00	925.00
tblLandUse	LandUseSquareFeet	47,916.00	22,000.00
tblLandUse	LotAcreage	1.10	0.50
tblProjectCharacteristics	OperationalYear	2014	2016

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2015	6.5086	69.3665	49.8073	0.0734	6.5361	3.5480	10.0841	3.1911	3.2951	6.4862	0.0000	7,500.1487	7,500.1487	1.2110	0.0000	7,525.5793
2016	12.5108	23.7641	18.9852	0.0298	0.3183	1.5760	1.8942	0.0854	1.5268	1.6122	0.0000	2,769.1233	2,769.1233	0.4990	0.0000	2,779.6026
Total	**19.0194**	**93.1305**	**68.7925**	**0.1032**	**6.8544**	**5.1239**	**11.9783**	**3.2765**	**4.8219**	**8.0984**	**0.0000**	**10,269.2719**	**10,269.2719**	**1.7100**	**0.0000**	**10,305.1819**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2015	6.5086	69.3665	49.8073	0.0734	3.4469	3.5480	6.9949	1.5734	3.2951	4.8685	0.0000	7,500.1487	7,500.1487	1.2110	0.0000	7,525.5793
2016	12.5108	23.7641	18.9852	0.0298	0.3183	1.5760	1.8942	0.0854	1.5268	1.6122	0.0000	2,769.1233	2,769.1233	0.4990	0.0000	2,779.6026
Total	**19.0194**	**93.1305**	**68.7925**	**0.1032**	**3.7652**	**5.1239**	**8.8891**	**1.6587**	**4.8219**	**6.4807**	**0.0000**	**10,269.2719**	**10,269.2719**	**1.7100**	**0.0000**	**10,305.1819**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**45.07**	**0.00**	**25.79**	**49.37**	**0.00**	**19.98**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.7402	3.0000e-005	3.4600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		7.2200e-003	7.2200e-003	2.0000e-005		7.6500e-003
Energy	0.0163	0.1479	0.1242	8.9000e-004		0.0112	0.0112		0.0112	0.0112		177.4182	177.4182	3.4000e-003	3.2500e-003	178.4980
Mobile	0.9619	2.3323	9.4037	0.0196	1.3674	0.0314	1.3988	0.3653	0.0289	0.3942		1,723.7737	1,723.7737	0.0733		1,725.3125
Total	**1.7183**	**2.4802**	**9.5313**	**0.0205**	**1.3674**	**0.0426**	**1.4101**	**0.3653**	**0.0401**	**0.4054**		**1,901.1992**	**1,901.1992**	**0.0767**	**3.2500e-003**	**1,903.8181**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.5120	3.0000e-005	3.4600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		7.2200e-003	7.2200e-003	2.0000e-005		7.6500e-003
Energy	0.0163	0.1479	0.1242	8.9000e-004		0.0112	0.0112		0.0112	0.0112		177.4182	177.4182	3.4000e-003	3.2500e-003	178.4980
Mobile	0.9619	2.3323	9.4037	0.0196	1.3674	0.0314	1.3988	0.3653	0.0289	0.3942		1,723.7737	1,723.7737	0.0733		1,725.3125
Total	**1.4901**	**2.4802**	**9.5313**	**0.0205**	**1.3674**	**0.0426**	**1.4101**	**0.3653**	**0.0401**	**0.4054**		**1,901.1992**	**1,901.1992**	**0.0767**	**3.2500e-003**	**1,903.8181**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	13.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2015	2/11/2015	5	30	
2	Site Preparation	Site Preparation	2/11/2015	2/13/2015	5	3	
3	Grading	Grading	2/14/2015	2/23/2015	5	6	
4	Building Construction	Building Construction	2/24/2015	1/25/2016	5	240	
5	Architectural Coating	Architectural Coating	1/1/2016	2/15/2016	5	32	
6	Paving	Paving	1/26/2016	2/15/2016	5	15	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 71,874; Non-Residential Outdoor: 23,958 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	255	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	174	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	255	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	174	0.41
Grading	Rubber Tired Dozers	1	6.00	255	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Cranes	1	6.00	226	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	125	0.42
Paving	Paving Equipment	1	8.00	130	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	19.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	116.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	20.00	8.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	4.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.1358	0.0000	0.1358	0.0206	0.0000	0.0206			0.0000			0.0000
Off-Road	3.0666	29.6778	22.0566	0.0245		1.8651	1.8651		1.7469	1.7469		2,509.0599	2,509.0599	0.6357		2,522.4104
Total	**3.0666**	**29.6778**	**22.0566**	**0.0245**	**0.1358**	**1.8651**	**2.0009**	**0.0206**	**1.7469**	**1.7675**		**2,509.0599**	**2,509.0599**	**0.6357**		**2,522.4104**

3.2 Demolition - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0130	0.2041	0.1506	4.7000e-004	0.0110	3.4400e-003	0.0145	3.0200e-003	3.1700e-003	6.1900e-003		47.4864	47.4864	3.8000e-004		47.4943
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0616	0.0826	0.8627	1.7300e-003	0.1453	1.2800e-003	0.1466	0.0385	1.1700e-003	0.0397		150.2359	150.2359	8.6200e-003		150.4170
Total	**0.0746**	**0.2868**	**1.0133**	**2.2000e-003**	**0.1563**	**4.7200e-003**	**0.1611**	**0.0416**	**4.3400e-003**	**0.0459**		**197.7223**	**197.7223**	**9.0000e-003**		**197.9113**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0611	0.0000	0.0611	9.2500e-003	0.0000	9.2500e-003			0.0000			0.0000
Off-Road	3.0666	29.6778	22.0566	0.0245		1.8651	1.8651		1.7469	1.7469	0.0000	2,509.0599	2,509.0599	0.6357		2,522.4104
Total	**3.0666**	**29.6778**	**22.0566**	**0.0245**	**0.0611**	**1.8651**	**1.9262**	**9.2500e-003**	**1.7469**	**1.7562**	**0.0000**	**2,509.0599**	**2,509.0599**	**0.6357**		**2,522.4104**

3.2 Demolition - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0130	0.2041	0.1506	4.7000e-004	0.0110	3.4400e-003	0.0145	3.0200e-003	3.1700e-003	6.1900e-003		47.4864	47.4864	3.8000e-004		47.4943
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0616	0.0826	0.8627	1.7300e-003	0.1453	1.2800e-003	0.1466	0.0385	1.1700e-003	0.0397		150.2359	150.2359	8.6200e-003		150.4170
Total	**0.0746**	**0.2868**	**1.0133**	**2.2000e-003**	**0.1563**	**4.7200e-003**	**0.1611**	**0.0416**	**4.3400e-003**	**0.0459**		**197.7223**	**197.7223**	**9.0000e-003**		**197.9113**

3.3 Site Preparation - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.4809	0.0000	5.4809	2.9208	0.0000	2.9208			0.0000			0.0000
Off-Road	2.5362	26.8886	17.0107	0.0171		1.4671	1.4671		1.3497	1.3497		1,801.7440	1,801.7440	0.5379		1,813.0398
Total	**2.5362**	**26.8886**	**17.0107**	**0.0171**	**5.4809**	**1.4671**	**6.9480**	**2.9208**	**1.3497**	**4.2705**		**1,801.7440**	**1,801.7440**	**0.5379**		**1,813.0398**

3.3 Site Preparation - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.7934	12.4625	9.1958	0.0285	0.6736	0.2103	0.8839	0.1845	0.1935	0.3779		2,899.1696	2,899.1696	0.0230		2,899.6534
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0379	0.0509	0.5309	1.0600e-003	0.0894	7.9000e-004	0.0902	0.0237	7.2000e-004	0.0244		92.4529	92.4529	5.3100e-003		92.5643
Total	**0.8313**	**12.5133**	**9.7267**	**0.0296**	**0.7630**	**0.2111**	**0.9741**	**0.2082**	**0.1942**	**0.4023**		**2,991.6225**	**2,991.6225**	**0.0284**		**2,992.2177**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.4664	0.0000	2.4664	1.3144	0.0000	1.3144			0.0000			0.0000
Off-Road	2.5362	26.8886	17.0107	0.0171		1.4671	1.4671		1.3497	1.3497	0.0000	1,801.7440	1,801.7440	0.5379		1,813.0398
Total	**2.5362**	**26.8886**	**17.0107**	**0.0171**	**2.4664**	**1.4671**	**3.9335**	**1.3144**	**1.3497**	**2.6641**	**0.0000**	**1,801.7440**	**1,801.7440**	**0.5379**		**1,813.0398**

3.3 Site Preparation - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.7934	12.4625	9.1958	0.0285	0.6736	0.2103	0.8839	0.1845	0.1935	0.3779		2,899.1696	2,899.1696	0.0230		2,899.6534
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0379	0.0509	0.5309	1.0600e-003	0.0894	7.9000e-004	0.0902	0.0237	7.2000e-004	0.0244		92.4529	92.4529	5.3100e-003		92.5643
Total	**0.8313**	**12.5133**	**9.7267**	**0.0296**	**0.7630**	**0.2111**	**0.9741**	**0.2082**	**0.1942**	**0.4023**		**2,991.6225**	**2,991.6225**	**0.0284**		**2,992.2177**

3.4 Grading - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.6049	0.0000	4.6049	2.4922	0.0000	2.4922			0.0000			0.0000
Off-Road	2.0666	21.9443	14.0902	0.0141		1.1968	1.1968		1.1011	1.1011		1,479.8000	1,479.8000	0.4418		1,489.0774
Total	**2.0666**	**21.9443**	**14.0902**	**0.0141**	**4.6049**	**1.1968**	**5.8017**	**2.4922**	**1.1011**	**3.5933**		**1,479.8000**	**1,479.8000**	**0.4418**		**1,489.0774**

3.4 Grading - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0379	0.0509	0.5309	1.0600e-003	0.0894	7.9000e-004	0.0902	0.0237	7.2000e-004	0.0244		92.4529	92.4529	5.3100e-003		92.5643
Total	**0.0379**	**0.0509**	**0.5309**	**1.0600e-003**	**0.0894**	**7.9000e-004**	**0.0902**	**0.0237**	**7.2000e-004**	**0.0244**		**92.4529**	**92.4529**	**5.3100e-003**		**92.5643**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.0722	0.0000	2.0722	1.1215	0.0000	1.1215			0.0000			0.0000
Off-Road	2.0666	21.9443	14.0902	0.0141		1.1968	1.1968		1.1011	1.1011	0.0000	1,479.8000	1,479.8000	0.4418		1,489.0774
Total	**2.0666**	**21.9443**	**14.0902**	**0.0141**	**2.0722**	**1.1968**	**3.2690**	**1.1215**	**1.1011**	**2.2226**	**0.0000**	**1,479.8000**	**1,479.8000**	**0.4418**		**1,489.0774**

3.4 Grading - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0379	0.0509	0.5309	1.0600e-003	0.0894	7.9000e-004	0.0902	0.0237	7.2000e-004	0.0244		92.4529	92.4529	5.3100e-003		92.5643
Total	**0.0379**	**0.0509**	**0.5309**	**1.0600e-003**	**0.0894**	**7.9000e-004**	**0.0902**	**0.0237**	**7.2000e-004**	**0.0244**		**92.4529**	**92.4529**	**5.3100e-003**		**92.5643**

3.5 Building Construction - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6000	21.5642	15.0041	0.0220		1.4851	1.4851		1.4344	1.4344		2,055.6247	2,055.6247	0.4741		2,065.5812
Total	**3.6000**	**21.5642**	**15.0041**	**0.0220**		**1.4851**	**1.4851**		**1.4344**	**1.4344**		**2,055.6247**	**2,055.6247**	**0.4741**		**2,065.5812**

3.5 Building Construction - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0828	0.8026	1.0270	1.7300e-003	0.0500	0.0139	0.0638	0.0142	0.0127	0.0270		174.8935	174.8935	1.4200e-003		174.9233
Worker	0.0947	0.1271	1.3272	2.6600e-003	0.2236	1.9700e-003	0.2255	0.0593	1.8000e-003	0.0611		231.1322	231.1322	0.0133		231.4108
Total	**0.1775**	**0.9298**	**2.3543**	**4.3900e-003**	**0.2735**	**0.0158**	**0.2894**	**0.0735**	**0.0145**	**0.0881**		**406.0257**	**406.0257**	**0.0147**		**406.3340**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6000	21.5642	15.0041	0.0220		1.4851	1.4851		1.4344	1.4344	0.0000	2,055.6247	2,055.6247	0.4741		2,065.5812
Total	**3.6000**	**21.5642**	**15.0041**	**0.0220**		**1.4851**	**1.4851**		**1.4344**	**1.4344**	**0.0000**	**2,055.6247**	**2,055.6247**	**0.4741**		**2,065.5812**

3.5 Building Construction - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0828	0.8026	1.0270	1.7300e-003	0.0500	0.0139	0.0638	0.0142	0.0127	0.0270		174.8935	174.8935	1.4200e-003		174.9233
Worker	0.0947	0.1271	1.3272	2.6600e-003	0.2236	1.9700e-003	0.2255	0.0593	1.8000e-003	0.0611		231.1322	231.1322	0.0133		231.4108
Total	**0.1775**	**0.9298**	**2.3543**	**4.3900e-003**	**0.2735**	**0.0158**	**0.2894**	**0.0735**	**0.0145**	**0.0881**		**406.0257**	**406.0257**	**0.0147**		**406.3340**

3.5 Building Construction - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.2915	20.5459	14.7074	0.0220		1.3656	1.3656		1.3176	1.3176		2,046.9432	2,046.9432	0.4499		2,056.3913
Total	**3.2915**	**20.5459**	**14.7074**	**0.0220**		**1.3656**	**1.3656**		**1.3176**	**1.3176**		**2,046.9432**	**2,046.9432**	**0.4499**		**2,056.3913**

3.5 Building Construction - 2016

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0730	0.7084	0.9565	1.7300e-003	0.0500	0.0115	0.0615	0.0142	0.0106	0.0248		172.9603	172.9603	1.2800e-003		172.9873
Worker	0.0853	0.1147	1.1978	2.6500e-003	0.2236	1.8700e-003	0.2254	0.0593	1.7200e-003	0.0610		223.1431	223.1431	0.0122		223.3994
Total	**0.1583**	**0.8230**	**2.1543**	**4.3800e-003**	**0.2736**	**0.0134**	**0.2869**	**0.0735**	**0.0123**	**0.0858**		**396.1034**	**396.1034**	**0.0135**		**396.3866**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.2915	20.5459	14.7074	0.0220		1.3656	1.3656		1.3176	1.3176	0.0000	2,046.9432	2,046.9432	0.4499		2,056.3913
Total	**3.2915**	**20.5459**	**14.7074**	**0.0220**		**1.3656**	**1.3656**		**1.3176**	**1.3176**	**0.0000**	**2,046.9432**	**2,046.9432**	**0.4499**		**2,056.3913**

3.5 Building Construction - 2016

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0730	0.7084	0.9565	1.7300e-003	0.0500	0.0115	0.0615	0.0142	0.0106	0.0248		172.9603	172.9603	1.2800e-003		172.9873
Worker	0.0853	0.1147	1.1978	2.6500e-003	0.2236	1.8700e-003	0.2254	0.0593	1.7200e-003	0.0610		223.1431	223.1431	0.0122		223.3994
Total	**0.1583**	**0.8230**	**2.1543**	**4.3800e-003**	**0.2736**	**0.0134**	**0.2869**	**0.0735**	**0.0123**	**0.0858**		**396.1034**	**396.1034**	**0.0135**		**396.3866**

3.6 Architectural Coating - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	8.6754					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.3685	2.3722	1.8839	2.9700e-003		0.1966	0.1966		0.1966	0.1966		281.4481	281.4481	0.0332		282.1449
Total	**9.0439**	**2.3722**	**1.8839**	**2.9700e-003**		**0.1966**	**0.1966**		**0.1966**	**0.1966**		**281.4481**	**281.4481**	**0.0332**		**282.1449**

3.6 Architectural Coating - 2016

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0171	0.0229	0.2396	5.3000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		44.6286	44.6286	2.4400e-003		44.6799
Total	**0.0171**	**0.0229**	**0.2396**	**5.3000e-004**	**0.0447**	**3.7000e-004**	**0.0451**	**0.0119**	**3.4000e-004**	**0.0122**		**44.6286**	**44.6286**	**2.4400e-003**		**44.6799**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	8.6754					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.3685	2.3722	1.8839	2.9700e-003		0.1966	0.1966		0.1966	0.1966	0.0000	281.4481	281.4481	0.0332		282.1449
Total	**9.0439**	**2.3722**	**1.8839**	**2.9700e-003**		**0.1966**	**0.1966**		**0.1966**	**0.1966**	**0.0000**	**281.4481**	**281.4481**	**0.0332**		**282.1449**

3.6 Architectural Coating - 2016

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0171	0.0229	0.2396	5.3000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		44.6286	44.6286	2.4400e-003		44.6799
Total	**0.0171**	**0.0229**	**0.2396**	**5.3000e-004**	**0.0447**	**3.7000e-004**	**0.0451**	**0.0119**	**3.4000e-004**	**0.0122**		**44.6286**	**44.6286**	**2.4400e-003**		**44.6799**

3.7 Paving - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2872	13.2076	9.0880	0.0133		0.8075	0.8075		0.7438	0.7438		1,368.4366	1,368.4366	0.4053		1,376.9473
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.2872**	**13.2076**	**9.0880**	**0.0133**		**0.8075**	**0.8075**		**0.7438**	**0.7438**		**1,368.4366**	**1,368.4366**	**0.4053**		**1,376.9473**

3.7 Paving - 2016

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0555	0.0745	0.7786	1.7300e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		145.0430	145.0430	7.9300e-003		145.2096
Total	**0.0555**	**0.0745**	**0.7786**	**1.7300e-003**	**0.1453**	**1.2100e-003**	**0.1465**	**0.0385**	**1.1200e-003**	**0.0397**		**145.0430**	**145.0430**	**7.9300e-003**		**145.2096**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2872	13.2076	9.0880	0.0133		0.8075	0.8075		0.7438	0.7438	0.0000	1,368.4366	1,368.4366	0.4053		1,376.9473
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.2872**	**13.2076**	**9.0880**	**0.0133**		**0.8075**	**0.8075**		**0.7438**	**0.7438**	**0.0000**	**1,368.4366**	**1,368.4366**	**0.4053**		**1,376.9473**

3.7 Paving - 2016

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0555	0.0745	0.7786	1.7300e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		145.0430	145.0430	7.9300e-003		145.2096
Total	**0.0555**	**0.0745**	**0.7786**	**1.7300e-003**	**0.1453**	**1.2100e-003**	**0.1465**	**0.0385**	**1.1200e-003**	**0.0397**		**145.0430**	**145.0430**	**7.9300e-003**		**145.2096**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.9619	2.3323	9.4037	0.0196	1.3674	0.0314	1.3988	0.3653	0.0289	0.3942		1,723.7737	1,723.7737	0.0733		1,725.3125
Unmitigated	0.9619	2.3323	9.4037	0.0196	1.3674	0.0314	1.3988	0.3653	0.0289	0.3942		1,723.7737	1,723.7737	0.0733		1,725.3125

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Hotel	269.61	270.27	196.35	618,588	618,588
Total	269.61	270.27	196.35	618,588	618,588

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.513363	0.060352	0.180146	0.139338	0.042155	0.006672	0.015739	0.030749	0.001928	0.002503	0.004351	0.000593	0.002111

4.4 Fleet Mix

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0163	0.1479	0.1242	8.9000e-004		0.0112	0.0112		0.0112	0.0112		177.4182	177.4182	3.4000e-003	3.2500e-003	178.4980
NaturalGas Unmitigated	0.0163	0.1479	0.1242	8.9000e-004		0.0112	0.0112		0.0112	0.0112		177.4182	177.4182	3.4000e-003	3.2500e-003	178.4980

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Hotel	1508.05	0.0163	0.1479	0.1242	8.9000e-004		0.0112	0.0112		0.0112	0.0112		177.4182	177.4182	3.4000e-003	3.2500e-003	178.4980
Total		**0.0163**	**0.1479**	**0.1242**	**8.9000e-004**		**0.0112**	**0.0112**		**0.0112**	**0.0112**		**177.4182**	**177.4182**	**3.4000e-003**	**3.2500e-003**	**178.4980**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Hotel	1.50805	0.0163	0.1479	0.1242	8.9000e-004		0.0112	0.0112		0.0112	0.0112		177.4182	177.4182	3.4000e-003	3.2500e-003	178.4980
Total		**0.0163**	**0.1479**	**0.1242**	**8.9000e-004**		**0.0112**	**0.0112**		**0.0112**	**0.0112**		**177.4182**	**177.4182**	**3.4000e-003**	**3.2500e-003**	**178.4980**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Non-Residential Interior

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.5120	3.0000e-005	3.4600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		7.2200e-003	7.2200e-003	2.0000e-005		7.6500e-003
Unmitigated	0.7402	3.0000e-005	3.4600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		7.2200e-003	7.2200e-003	2.0000e-005		7.6500e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.3042					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.4356					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	3.4000e-004	3.0000e-005	3.4600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		7.2200e-003	7.2200e-003	2.0000e-005		7.6500e-003
Total	**0.7402**	**3.0000e-005**	**3.4600e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**		**7.2200e-003**	**7.2200e-003**	**2.0000e-005**		**7.6500e-003**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Consumer Products	0.4356					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	3.4000e-004	3.0000e-005	3.4600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		7.2200e-003	7.2200e-003	2.0000e-005		7.6500e-003
Architectural Coating	0.0761					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.5120**	**3.0000e-005**	**3.4600e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**		**7.2200e-003**	**7.2200e-003**	**2.0000e-005**		**7.6500e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

Appendix C

Historic Resource Reports

SAN VICENTE INN
837-849 AND 850 SAN VICENTE BOULEVARD
WEST HOLLYWOOD, CA 90069

SECRETARY'S STANDARDS CONFORMANCE REVIEW FOR PROPOSED REHABILITATION PROJECT

AUGUST 5, 2014

PREPARED FOR:
JK HOTEL GROUP
8358 W. SUNSET BOULEVARD
WEST HOLLYWOOD, CA 90069

PREPARED BY:
CHATTEL, INC. HISTORIC PRESERVATION CONSULTANTS
13417 VENTURA BOULEVARD
SHERMAN OAKS, CA 91423

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TABLE OF CONTENTS

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INTRODUCTION AND EXECUTIVE SUMMARY

Located at 837-849 and 850 San Vicente Boulevard in the City of West Hollywood, California, San Vicente Inn contains nine buildings on the east and west sides of the street (Assessor Parcel Numbers 4340-006-002; 4340-006-001; 4340-007-019; and 4339-019-022, collectively referred to as subject property or San Vicente Inn). Each parcel contains one building locally designated as contributing to the Old Sherman Thematic Grouping (OSTG), a City of West Hollywood Cultural Resource (Cultural Resource). Thus each parcel is a historical resource for purposes of California Environmental Quality Act (CEQA) review and eligible to receive the City of West Hollywood's rehabilitation incentives. Owner JK Hotel Group plans to continue adaptive reuse of the property, and proposes to rehabilitate portions of these existing historic buildings in a manner that conforms with the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)*. The proposed project would provide much needed reinvestment in the property, as many of the buildings are in poor condition. This report describes the existing historical resources and evaluates the proposed project for conformance with the *Secretary's Standards* for purposes of local building permit and CEQA review. This report concludes that the proposed work is in conformance with the *Secretary's Standards* and constitutes a less than significant historical resources impact under CEQA.

Current and historic photographs and existing floor plans and elevations are attached (Exhibits A-D). This report evaluates the proposed project based on drawings and plans prepared by Appleton & Associates in a set titled "Planning Re-Submittal," dated May 9, 2014, and including a cover sheet and 25 architectural sheets. There are three additional sheets dated July 8, 2014, showing demolition and retention of existing buildings, including sheets SK011, SK012, and SK013.

San Vicente Inn currently has a Mills Act Historical Property Contract and a Ten-Year Restoration/Rehabilitation and Maintenance Plan, which was prepared February 8, 2000 (2000 Plan). Because a major rehabilitation is now proposed and over ten years have passed, the 2000 Plan is no longer relevant. A new Ten-Year Restoration/Rehabilitation and Maintenance Plan is proposed in this document (Exhibit E) and is found to conform with the *Secretary's Standards*.

METHODOLOGY

To prepare this report, Chattel, Inc. (Chattel) reviewed existing documentation of the subject property, including: previous historic resource survey forms; Sanborn fire insurance maps; and historic photographs. Chattel visited the site on several occasions, including on July 23, 2013 and August 7, 2013 to evaluate existing historic material and alterations, and take photographs.

QUALIFICATIONS

Chattel is a full service historic preservation consulting firm with offices in Los Angeles and San Francisco, and statewide practice. The firm represents governmental agencies and private ventures, successfully balancing project goals with a myriad of historic preservation regulations without sacrificing principles on either side. Comprised of professionals meeting the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61, Appendix A) in architectural history and historic architecture, the firm offers professional services including historic resources evaluation and project effects analysis, and consultation on federal, state and local historic preservation statutes and regulations. Chattel is committed to responsible preservation, but recognizes that we live in a real world. Assessing effects on historic resources requires not only professional expertise, but the ability to work effectively toward consensus and compromise. We invite you to explore our website www.chattel.us. This report was prepared by firm President, Robert Chattel; Senior Associate, Kathryn McGee; and Associate Allison Lyons, all of whom meet the Secretary of the Interior's Professional Qualifications Standards.

PHYSICAL DESCRIPTION

San Vicente Inn contains nine buildings on the east and west sides of San Vicente Boulevard. The east property consists of one assessor parcel and corresponds to address 850 N. San Vicente Boulevard. It is rectangular and has one single-family home at the west side of the parcel (Building A) and a carport at the east side. The west property consists of three assessor parcels and contains addresses 837-849 N. San Vicente Boulevard. It is rectangular, with three single-family homes (Buildings B-D) at the east side of the parcels fronting San Vicente Boulevard. At the west side of the property are six rear ancillary buildings (Buildings E-J), which were originally a mix of single- and multi-family homes, and later converted into guestrooms. There is an interior courtyard with a pool and landscaping at the center of the property. A site plan is included below identifying Buildings A-J. All buildings are wood-frame vernacular; the houses (Buildings A-D) have some elements of Queen Anne architectural style and were constructed during the period of significance for the OSTG; they are described in detail below. Buildings E-J do not generally retain integrity from their dates of construction due to alterations and were largely constructed outside the period of significance for the OSTG (after 1922). Buildings E-J and the carport at the east property, do not contribute to the OSTG and are not considered historical resources.

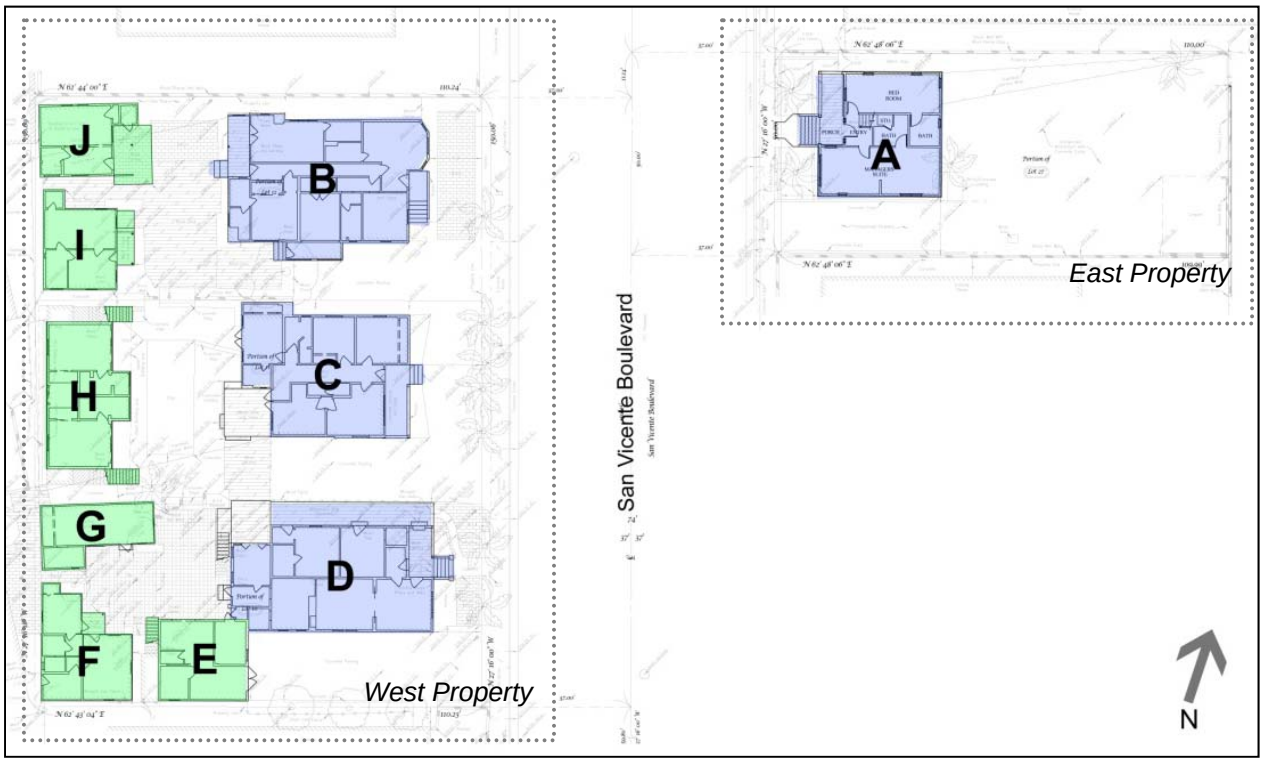

Fig 1: Current site plan with contributing buildings in blue and non-contributing buildings in green.

Below are descriptions of existing conditions of Buildings A-D.

East Property

Building A

Building A was originally located at 873 N. San Vicente Boulevard and was moved to its current location at 850 N. San Vicente Boulevard in 1999. Oriented west, Building A is a one-and-a-half story wood-frame vernacular house with elements of Queen Anne style, a hipped roof with boxed eaves, and a front-facing dormer with a balconette. When the house was moved to its current location, it was raised up above its original height; as such, the majority of the height of the

basement level is visible above grade. The façade is generally symmetrical, with a central, single door with side lights, a partial inset front porch at its north side accessed by a wood stoop with six steps, and a three-part bay window at its south side. There is a secondary rear entrance at the east elevation providing basement access. Fenestration consists of generally wood double-hung windows of varying sizes on all elevations; most windows at the façade and side (north and south) elevations have a sense of verticality, stretching from a stringcourse above to continuous sill molding below. Some windows have metal security bars. Windows at the rear (east) elevation are of random shapes and sizes. The east elevation also has exposed, surface-mounted piping and conduit. There is wood clapboard siding at the first floor and wood shingle siding at the partial second floor in the west façade and clapboard in the east elevation. Decorative features include: a frieze; square columns at porch and dormer, floral and leaf-patterned ornament in the dormer gable peak and at the balcony surround, arched front door transom, and semi-circular roof venting. The interior consists of a central entry hall with access to guestrooms to the north and south, and a stair leading up to the partial second floor.

Alterations
The building has been moved from a location where it was set back from the street and partially obscured by dense vegetation and trees. It was previously set on a lower foundation with a crawl space and wood stoop, but is now situated on a higher, raised basement with new tongue and groove siding oriented horizontally. A new stoop with wood railings was added. Other alterations to the building entail removal of some historic windows and addition of new non-historic windows, replacement of original stoop and wood siding at basement level.

West Property

Building B
Oriented east, Building B is a one-and-a-half-story wood-frame vernacular cottage, capped by a hipped roof with a side dormer and boxed eaves, and a front facing gable over the north side of the elevation. At the façade, access is provided through a single door and partial front porch, which is supported by a row of slender columns. There is a projecting angled bay at the north side of the elevation. Decorative features include a frieze; front facing gable peak details include Japanese flair, shingles, and venting. Fenestration generally consists of wood double-hung windows. The south elevation has a lean-to addition. Both south and north elevations contain several windows of varying shapes and sizes. There are several secondary entrances at the west elevation, providing access to a central hallway and to guestrooms. Siding at the first floor consists of wood clapboard and at the crawl space vertically oriented wood board in a tongue-and-groove-and-groove pattern. The brick foundation is visible below the siding. The interior contains five guestrooms accessed off a central hallway.

Alterations
Primary alterations to Building B include removal of historic windows, removal and reconfiguration of the front porch, addition of the south elevation lean-to, and addition of the large, south elevation dormer.

Building C
Oriented east, Building C is a one-story wood-frame vernacular cottage with a cross gable roof with boxed eaves, ogee molding at eaves, and a front facing, flaired gable over the north side of the elevation. At the façade, access is provided by a stoop without sidewalls and through a single door and partial front porch. The porch is supported on square columns and has an original vaulted ceiling clad in tongue and groove wood. Secondary guestroom entrances are provided through two sets of double doors at the west elevation. Fenestration consists of a variety of non-historic wood sash. Decorative features include gable peaks with curved skirts and fish scale shingles at the south and west elevations. There is a rear addition at the west elevation. Siding consists of wood

clapboard. The interior contains five guestrooms accessed off a central hallway.

Alterations
Primary alterations to Building C include removal of historic windows, removal of front stoop side walls, and alterations to porch columns.

Building D
Oriented east, Building D is a one-and-a-half-story wood-frame vernacular cottage with a rear, two-story addition, a flaired, hipped roof with boxed eaves, and large side dormers. The façade has a central dormer with decorative venting. At the façade's north end is an inset, partial-width porch. Access is provided by a stoop and through two separate, single doors at the façade (one in the center of the façade and one providing access directly into the south portion of the façade). Access is also provided through secondary doors at the north and west elevations. Fenestration throughout includes a variety of non-historic wood sash; at the façade is an original window with diamond pattern transom. Siding consists of wood clapboard horizontal curved-edge siding grouped in threes. The north elevation has an attached raised walkway addition running the length of the elevation. At the south elevation, the brick foundation is visible beneath the siding. The south elevation also has exposed, surface-mounted conduit, piping, and air conditioning units. Building E is attached to the southwest corner of the building. At the interior, Building D contains four guestrooms at its easternmost and central portions, as well as an office at its south end. Guestrooms all have doors that provide direct access to the exterior.

Alterations
Primary alterations to Building D include removal of some of the historic windows and addition of new non-historic windows; the addition of the north elevation walkway; the rear addition at the southwest corner; and the non-historic north and south elevation dormers.

REGULATORY SETTING

Summary

The subject property is a contributor to the Old Sherman Thematic Grouping, which is a locally listed historic district in the City of West Hollywood; it is a historical resource for purposes of CEQA review.

City of West Hollywood

Cultural Preservation Ordinance

The City of West Hollywood Cultural Preservation Ordinance constitutes Chapter 19.58 of the City Municipal Code. It provides that the Historic Preservation Commission may approve a nomination application for and recommend designation of, and the Council may designate a cultural resource, or any portion thereof (both interior and exterior) or historic district in compliance with Sections 19.58.060 (Designation of Historic Districts) and 19.58.070 (Review and Approval of Designations), below, if it finds that the cultural resource meets one or more of the following criteria.

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

The Cultural Preservation Ordinance provides that a Potential Cultural Resource is defined as:

> "Any building, structure, portion of a structure, improvement, natural area feature, object, district, grouping, or site, for which an application for nomination for designation has been filed, or for which a final designation determination has not yet been made. In compliance with CEQA, potential resources may also include those resources which are considered significant by members of the preservation community, the general public, or any other preservation agency. These may be resources which have either been denied designation

and removed from the city's inventory or local register or any resource which was contained on the initial Survey conducted by the city..."[1]

According to the City's Municipal Code, demolition permit applications for Potential Cultural Resources are subject to Historic Preservation Commission review (Municipal Code Sections 19.58.0040, 19.90.020, and 19.50.050).

Relationship to Assessment
The subject property contains four contributors to the Old Sherman Thematic Grouping (OSTG), a designation for the earliest residential and commercial buildings that formed the community from which West Hollywood developed. The Old Sherman Thematic Group is treated as a historic district comprising sites that are not physically contiguous.

Historic Resource Surveys
The City of West Hollywood has conducted two historic resource surveys, one completed in 1987 (1987 survey) and another completed in 2008 (2008 survey). The 1987 survey included an evaluation of the subject property and is described below, while the 2008 survey focused exclusively on multi-family residential properties built prior to 1961 that have R2, R3 and R4 zoning classifications. The subject property was not evaluated as part of the 2008 survey.

Work on the 1987 survey began in 1985 when the City received a grant from the California Office of Historic Preservation (OHP) for survey work. Approximately 1,750 sites were evaluated at the reconnaissance level; of those properties 118 were found to be potential historic resources and an inventory form was prepared for each.[2] This survey primarily focused on buildings constructed prior to 1942.[3] A historic context statement was prepared in conjunction with the survey. A final survey report was also prepared and the survey was accepted by City Council on October 19, 1987 and subsequently transmitted to OHP;[4] its findings appear in the Los Angeles County Historic Property Data File (HPDF).

The 1987 survey identified a potentially eligible historic district, the Old Sherman Thematic Grouping (OSTG). Comprising single family homes designed with modest wood-frame vernacular architectural styles, the OSTG was found significant for its association with the Town of Sherman, which was established in the late 1890s and incorporated as the City of West Hollywood in 1984. The 1987 OSTG survey record provides the following significance statement: "The [OSTG] is historically significant not only because the homes are the remnants of the original residential development of the community, but also because they are the remnants of a town that played a very important role in the development of the region."[5] In the 1987 survey, contributing buildings were identified with California Historical Resource Status Code (CHRSC) "4D" as "Resources which are potentially eligible for listing in the National Register as part of a grouping or district, with conditions."[6] CHRSCs of "4" are antiquated; the California Office of Historic Preservation now interprets "4s" as "7Ns", signifying they must be reevaluated using current standards.[7] The below table includes properties identified as contributing in the 1987 survey, and whether these properties

[1] City of West Hollywood Municipal Code Section 19.90.020.
[2] Historic Preservation Element, Revised Public Review Draft, *West Hollywood General Plan 2035*.
[3] Architectural Resources Group for the City of West Hollywood, "City of West Hollywood Draft Survey of R2, R3 and R4 Zoned Areas," November 2007, 1.
[4] Johnson Heumann Research Associates for the City of West Hollywood and California Office of Historic Preservation, *City of West Hollywood Historic Resources Survey 1987 Final Report*.
[5] David Amorena for the City of West Hollywood, Old Sherman Thematic Grouping Historic Resources Inventory Form, 1987.
[6] Johnson Heumann Research Associates for the City of West Hollywood and California Office of Historic Preservation, *City of West Hollywood Historic Resources Survey 1987 Final Report, 50.*
[7] Dr. Knox Mellon, State Historic Preservation Officer, California Office of Historic Preservation, Memorandum regarding interpretation of California Historical Resource Status Codes (2 pages), 15 Aug 2003, 1.

are currently extant.[8] Of the 24 contributors identified in 1987, five buildings have been demolished. It should be noted that in certain cases buildings located on a single parcel were identified separately. Thus, while there are 24 *buildings* originally identified as contributing, there are in actuality fewer contributing *parcels*.

Old Sherman Thematic Grouping - Table of Contributing Properties	
Address in 1987	**Extant in 2013?**
8914 W. Cynthia St	Extant
8924 W. Cynthia St	Extant
985-87 N. Hancock Ave	Extant
825 N. Larrabee	Extant
829 N. Larrabee	Extant
858 N. Larrabee	Extant
918 N. Palm Ave	Extant (Property is identified in map of the OSTD DPR form map, but no photo or description is included.)
927 N. Palm Ave	Extant
931 N. Palm Ave	Extant
950 N. Palm Ave	Extant
837 N. San Vicente Blvd	Extant (San Vicente Inn)
838 N. San Vicente Blvd	Extant (on same parcel as 840 N. San Vicente Blvd)
840 N. San Vicente Blvd	Extant (on same parcel as 838 N. San Vicente Blvd)
843-45 N. San Vicente Blvd	Extant (San Vicente Inn)
847 N. San Vicente Blvd	Extant (San Vicente Inn)
849 N. San Vicente Blvd	Extant (San Vicente Inn)
850 N. San Vicente Blvd	Demolished. (The building located at 873 N. San Vicente Blvd was subsequently moved to 850 N. San Vicente Blvd.)
853 N. San Vicente Blvd	Demolished
863 N. San Vicente Blvd	Demolished
864 N. San Vicente Blvd	Demolished
873 N. San Vicente Blvd	Moved to 850 N. San Vicente Boulevard (San Vicente Inn)
889 N. San Vicente Blvd	Demolished
935 N. San Vicente Blvd	Extant
972 N. San Vicente Blvd	Extant (Property is identified in map of the OSTD DPR form map, but no photo or description is included.)

Relationship to Assessment:
The parcels comprising the subject property were designated by the City of West Hollywood as contributors to the OSTG in 1999 (City of West Hollywood Resolution No. 99-2191). The designation includes the buildings fronting San Vicente Boulevard only and states building interiors and accessory structures are not part of the designation.

[8] David Amorena for the City of West Hollywood, Old Sherman Thematic Grouping Historic Resources Inventory Form, 1987.

Historic Preservation Element

The City's current Historic Preservation Element was adopted by the City Council on September 19, 2011 as part of the West Hollywood General Plan 2035; it contains goals and policies aimed at protecting the City's important historic and cultural resources. The City's previous Historic Preservation Plan and General Plan Element, adopted September 14, 1998, also contains goals and policies, with accompanying implementation measures for protecting the City's important historic and cultural resources.

The Historic Preservation Element includes the OSTG in its list of designated historic districts and provides the following description:[9]

> The Old Sherman District contains some of the original residences of West Hollywood, then known as Sherman. Built between 1899 and 1907, these dwellings were homes for many of the workers at the Pacific Electric Railway. The buildings contain common architectural elements including hipped roofs, narrow wood clapboard sidings, simple endboards, and window trim, front porches and simple floor plans. Known as the "Plains Cottages," these homes pre-date the craftsman-style dwellings, which were built after 1910. They reflect the housing styles familiar to the Midwestern emigrant workers that settled in Sherman. The homes in this Old Sherman District are representative of West Hollywood's birth as a distinctive city and evoke its modest beginnings.
>
> *Relationship to Assessment*
> The subject property is a contributor to the OSTG, a locally designated historic district identified as such in the *West Hollywood General Plan 2035.*

Mills Act Historical Property Contract Program

The City of West Hollywood uses the Mills Act Historical Property Contract (Mills Act Contract) program, which can provide reduction of property tax in exchanged for continued preservation of a property. To qualify, properties must be privately owned, not exempt from taxation, and: (a) listed in the National Register of Historic Places; (b) located in a National Register historic district; or (c) listed in any state, city or county official register or historical or architecturally significant sites, places or landmarks. As of 2010, the City of West Hollywood had approved a total of 83 Mills Act Contracts.

> *Relationship to Assessment:*
> The subject property has a Mills Act Contract.

California Register

The California Register was established to serve as an authoritative guide to the state's significant historical and archaeological resources (PRC §5024.1). State law provides that in order for a property to be considered eligible for listing in the California Register, it must be found by the State Historical Resources Commission to be significant under any of the following four criteria; if the resource:

1) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; or
2) is associated with the lives of persons important in our past; or
3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values; or

[9] Historic Preservation Element, *West Hollywood General Plan 2035*, 4-6.

4) has yielded, or may be likely to yield, information important in prehistory or history.

The California Register also includes properties which: have been formally *determined eligible for listing in*, or are *listed in* the National Register of Historic Places (National Register); are registered State Historical Landmark Number 770, and all consecutively numbered landmarks above Number 770; points of historical interest, which have been reviewed and recommended to the State Historical Resources Commission for listing; and city and county-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with California Register criteria). PRC §5024.1 states:

g) A resource identified as significant in an historical resource survey may be listed in the California Register if the survey meets all of the following criteria:
    1) The survey has been or will be included in the State Historical Resources Inventory.
    2) The survey and the survey documentation were prepared in accordance with [OHP]… procedures and requirements.
    3) The resource is evaluated and determined by the office to have a significance rating of category 1-5 on DPR [Department of Parks and Recreation] form 523.
    4) If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

Relationship to Assessment:
The subject property is not listed in the California Register.

California Environmental Quality Act (CEQA)

According to CEQA,

> an historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources..., or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant (California Public Resources Code, PRC §21084.1).

If the proposed project were expected to cause *substantial adverse change* in an historical resource, environmental clearance for the project would require mitigation measures to reduce impacts. "Substantial adverse change in the significance of an historical resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (PRC§15064.5 (b)(1)). PRC §15064.5 (b)(2) describes *material impairment* taking place when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register… or
(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register... or its identification in an historical resources survey... unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register... as determined by a lead agency for the purposes of CEQA.

Relationship to Assessment:
The subject property is an historical resource for purposes of CEQA review.

National Register of Historic Places

The National Register is the nation's official list of historic and cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, as amended, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect the country's historic and archaeological resources. Properties listed in the National Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The National Register is administered by the National Park Service (NPS), which is part of the U.S. Department of the Interior.

Resources are eligible for the National Register if they:

A) are associated with events that have made a significant contribution to the broad patterns of our history; or
B) are associated with the lives of significant persons in or past; or
C) embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D) have yielded or may be likely to yield, information important in history or prehistory.[10]

Once a resource has been determined to satisfy one of the above-referenced criteria, then it must be assessed for "integrity." Integrity refers to the ability of a property to convey its significance, and the degree to which the property retains the identity, including physical and visual attributes, for which it is significant under the four basic criteria listed above. The National Register recognizes seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association. To retain its historic integrity, a property must possess several, and usually most, of these aspects.

The National Register includes only those properties that retain sufficient integrity to accurately convey their physical and visual appearance from their identified period of significance. Period of significance describes the period in time during which a property's importance is established. It can refer simply to the date of construction, or it can span multiple years, depending on the reason the property is important. The period of significance is established based on the property's relevant historic context and as supported by facts contained in the historic context statement.

Evaluation of integrity is founded on "an understanding of a property's physical features and how they relate to its significance."[11] A property significant under criterion A or B may still retain sufficient integrity to convey its significance even if it retains a low degree of integrity of design, materials or workmanship. Conversely, a property that derives its significance exclusively for its architecture under Criterion C must retain a high degree of integrity of design, materials, and workmanship. For

[10] National Register Bulletin #15, "How to Apply the National Register Criteria for Evaluation" (National Park Service, 1990, revised 2002).
[11] National Register Bulletin #15, *How to Apply the National Register Criteria for Evaluation* (National Park Service, 1990, revised 2002).

some properties, comparison with similar properties is considered during the evaluation of integrity, especially when a property type is particularly rare.

While integrity is important in evaluating and determining significance, a property's physical condition, whether it is in a deteriorated or pristine state, has relatively little influence on its significance. A property that is in good condition may lack the requisite level of integrity to convey its significance due to alterations or other factors. Likewise, a property in extremely poor condition may still retain substantial integrity from its period of significance and clearly convey its significance.

Relationship to Assessment:
The subject property is not listed in the National Register.

HISTORIC CONTEXT

Property History

The historic buildings comprising the subject property were constructed as small single-family homes. On the west property, Buildings B, C and D were constructed prior to 1910 and the rear ancillary buildings were mostly added in the 1920s (see below Sanborn maps)[12]. Buildings B-J were converted into a bed and breakfast inn in the mid-1990s. On the east property, Building A was moved to its current location from 873 N. San Vicente Boulevard in 1999 and subsequently converted into use for the inn.

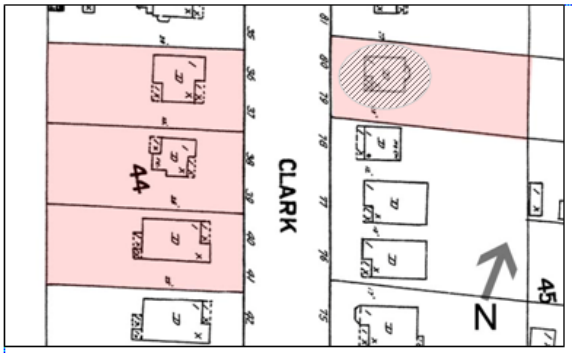

Fig 2: 1910 Sanborn Map. Building circled in gray demolished prior to 1999. (Sherman, Sheet 2)

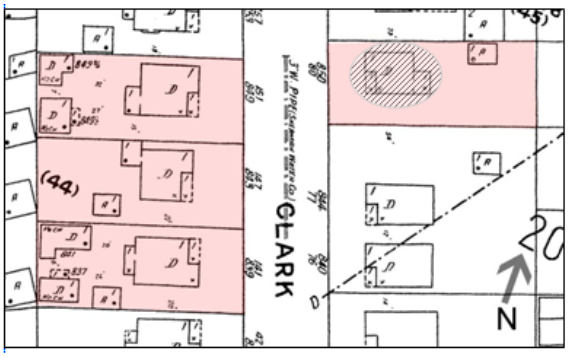

Fig 3: 1929 Sanborn Map. Building circled in gray demolished prior to 1999. (Los Angeles County, Vol. 20, Sheet 2026).

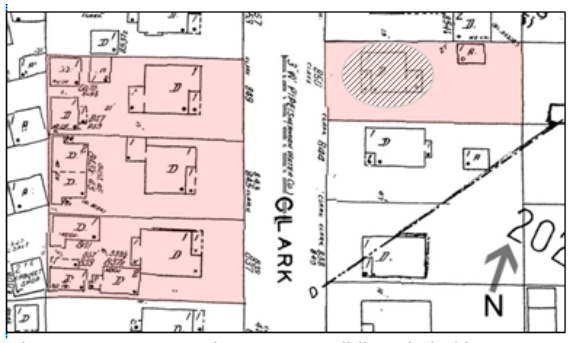

Fig 4: 1926-1950 Sanborn Map. Building circled in gray demolished prior to 1999. (Los Angeles County, Vol. 20, Sheet 2026)

[12] Digital Sanborn Maps 1867-1970, online database, Los Angeles Public Library, <www.lapl.org>, accessed 27 Aug 2013.

City of West Hollywood

The following discussion of the history of the City of West Hollywood has been abstracted from several sources, including the historic district record for the Old Sherman Thematic Grouping, completed in 1987,[13] and West Hollywood's Historic Preservation Plan and General Plan Element, adopted September 14, 1998[14] and edited from an article by Robert Vulcan, Founder, West Hollywood Historical Society.

West Hollywood's initial residents included Gabrielino Indians, who survived on a hunting and foraging economy. In the 1700s, the Spanish Crown awarded the rights to graze cattle and sheep in the area to Spanish soldiers. In 1828, Mexico granted an area roughly bordered by present-day Robertson Boulevard, Wilshire Boulevard, Gower Street and the Cahuenga Pass to Antonio Jose Rocha. Named Rancho La Brea, it was subsequently sold to Henry Hancock. With its near-surface ground water and mild climate, the area was ideal for growing fruits and vegetables. A number of parcels of the old Rancho were subdivided and sold for farms growing peas, beans, chilies, fruits and vegetables for the Los Angeles market. Large expanses of agricultural land were initially framed by sparse urban development to the east and west.

In 1892, real estate and transportation entrepreneurs General Moses Sherman and E.P. Clark developed Los Angeles' first electric street railway system, the Los Angeles Consolidated Electric Railway. The railway ran along present-day Santa Monica Boulevard. A repair facility called Sherman opened on 5.5 acres of land at the intersection of present-day San Vicente and Santa Monica Boulevards in 1896. Sherman evolved into a town with many residents who worked in the yards, metal shops, and car barns for the railway. The area surrounding the railway was settled with simple, single-family wood-frame houses and small neighborhood stores serving the needs of local workers. Wealthier merchants of the town built vernacular cottages as rental housing for rail yard employees. In its early years, Sherman was known as a "rough and tumble company town," with its citizenry comprised mostly of working-class immigrant men and few families.[15]

The Consolidated Electric Railway was purchased by the Pacific Electric (PE) company, forming the largest urban railway system at the time. That rail line "had an enormous impact on the form and extent of regional development, essentially creating the skeleton of the transportation pattern that is reflected in today's major boulevards and early freeway system. The South Hollywood-Sherman line, which ran along what is now Santa Monica Boulevard, was the main transportation corridor through Sherman. Sherman served as a stop on the Pacific Electric's "Balloon Route," a day-trip that formed a circle from Los Angeles to the beach communities and back."[16]

Development of Sherman in the 1920s was influenced by the success of the Hollywood entertainment industry to the east. The silent movie industry was active in Hollywood at that time and pioneers of that industry had begun to establish suburban satellites for movie colonies. An early sign of Sherman's coming urbanization, in 1919, Mary Pickford and Douglas Fairbanks located their United Artists movie studio in Sherman at the intersection of Santa Monica Boulevard and Formosa Avenue. The expanses of agricultural lands in Sherman were developed in the 1920s, following a regional trend that included construction of multi-unit buildings such as duplexes, triplexes, fourplexes, garden courts, and easily constructed one- and two-story buildings of eight to twelve units. Maintaining its autonomy, Sherman resisted annexation in 1923 when other communities

[13] David Amorena for the City of West Hollywood, *Old Sherman Thematic Group,* Department of Parks and Recreation Historic Resources Inventory, completed December 1987.

[14] *The City of West Hollywood's Historic Preservation Plan and General Plan Update, adopted September 14, 1998,* 4-9. The discussion is an edited version of the material contained on pages 4-9, with minor modifications.

[15] Ryan Gierach, Images of America West Hollywood (Charleston: Arcadia Publishing, 2003), 7.

[16] Architectural Resources Group for the City of West Hollywood, "City of West Hollywood Draft Survey of R2, R3 and R4 Zoned Areas," November 2007, 10.

were being annexed to the City of Los Angeles.[17] In 1925, the local Chamber of Commerce voted to change the name of the town from Sherman to West Hollywood.[18]

Despite West Hollywood's new identity, there was little County oversight for town development, including a lack of law enforcement and building codes that "fostered the Wild West mentality of the town," which would, "remain a bohemian outpost well past Hollywood's hey-day," housing a variety of establishments such as speakeasies, gambling haunts, prostitution and massage parlors, bars and more. While this so-called "seedy adult activity" was focused on Santa Monica Boulevard, near the rail yards, development on the area of Sunset Boulevard known as the "Sunset Strip" maintained a cleaner and more glamorous image, catering to the Hollywood stars that lived and worked nearby.[19]

Commercial development continued to be focused along Santa Monica and Sunset Boulevards, the major linear corridors stretching east-west through West Hollywood,[20] linking Hollywood and Beverly Hills. Similar to development of Wilshire Boulevard to the south, Sunset Boulevard was largely developed in the 1920s and 1930s with commercial establishments that catered to the automobile, with easily accessible parking made available. Sunset Boulevard established itself as an important center for high-end shopping, dining and entertainment. Changes to local zoning codes in the 1930s supported expansion of commercial development on Sunset Boulevard. Substantial development in this area in the 1930s halted around 1938 when development reached the eastern boundary of Beverly Hills to the west.

By the 1940s, streetcar service had ended in West Hollywood and the City was largely built out. As there was little open space to accommodate new residential development, the post-World War II housing shortage resulted in many of the City's early residential properties being redeveloped into multi-family apartment buildings, frequently in what became known as the "stucco box"[21] style. A housing type that became extremely prolific in the Los Angeles area in the postwar period, the stucco box provided affordable housing for the masses. It can generally be described as a multi-family building that occupies the entirety of its land parcel, accommodating cars, frequently with tuck-under parking. Its architecture typically consists of simple, rectangular building forms, clad in stucco and often featuring applied ornament, such as a starburst (also called a dingbat), pierced metal grate, or decorative script lettering with the apartment name or street number, the façade often featuring the building's only decoration.

By the 1950s, the interior design industry had begun to have a strong presence in West Hollywood, marked in large part by opening of a Charles Eames-designed Herman Miller showroom on Beverly Boulevard in 1949.[22] Interior design showrooms and related businesses flourished in the area of Beverly and Robertson Boulevards over the coming decades. In 1975, the first building of three monolithic structures comprising the Pacific Design Center (PDC), opened in West Hollywood on San Vicente Boulevard and Melrose Avenue. "The opening of PDC, a wholesale design market

[17] Architectural Resources Group (ARG) for City of West Hollywood, "City of West Hollywood Draft Survey of R2, R3, and R4 Zoned Areas," November 2007, 23.
[18] Architectural Resources Group (ARG) for City of West Hollywood, "City of West Hollywood Draft Survey of R2, R3, and R4 Zoned Areas," November 2007, 22.
[19] Ryan Gierach, Images of America West Hollywood (Charleston: Arcadia Publishing, 2003) 7-8.
[20] Present-day Sunset Boulevard was originally known as Santa Monica Avenue and present-day Santa Monica Boulevard was known as Sherman Avenue (Sanborn Fire Insurance Maps for Sherman, June 1910, available through Los Angeles Public Library ProQuest Digital Sanborn Maps, 1867-1970).
[21] The stucco box as a building typology and architectural expression is thoroughly described by John Chase in his book *Glitter Stucco, & Dumpster Diving; Reflections on Building Production in the Vernacular City* (London: Verso, 2000) 3-37.
[22] Architectural Resources Group (ARG) for City of West Hollywood, "City of West Hollywood Draft Survey of R2, R3, and R4 Zoned Areas," November 2007, 17.

open only to the trades, reaffirmed West Hollywood's position as an industry leader in design."[23] The second PDC building was completed in 1988 and the third is currently under construction.

With the rise of rock and roll and television in the 1960s and 1970s, those decades saw an influx of music and television industry related land uses in West Hollywood, with associated establishments, such as night clubs, talent agencies and recording studios, concentrating on the Sunset Strip. "The cheap rents made the area an important destination for the aspiring singers/actors/writers trying to make it onto a soap opera or break into the club scene." In addition, during this time, "because the Los Angeles County sheriff's deputies didn't harass gays as badly as did Los Angeles police officers, the unincorporated area of West Hollywood drew gays and lesbians to live there."[24]

By the late 1970's, the area housed over 35,000 people, many of whom were recent Jewish immigrants from Europe. During that same period, rents began rising in the region, threatening the economic well-being of the City's residents, who were mostly renters. A coalition of seniors, Jews, gays and renters formed the Community for Economic Survival (CES), which in large part drove West Hollywood to cityhood in 1984. Residents of the area quickly mobilized to put the issue to a vote in November 1984, and the proposal passed. Simultaneously, voters elected the first City Council, singling out five candidates from a field of forty. One of the first agenda items of the newly formed City was to adopt a rent control policy, which remains one of the strongest in the nation.[25] In 1984, the City population "consisted of the following non-mutually exclusive segments: 50% Jewish, 33% gay, 85% tenants and roughly 40% senior citizens."[26]

The City of West Hollywood remains an important center of the entertainment and interior design industries, with Sunset Boulevard still home to a variety of entertainment venues and related businesses; meanwhile, Beverly and Robertson Boulevards, as well as surrounding streets, are home to a collection of high-end interior furnishing and design stores and clothing boutiques, centered on the growing Pacific Design Center. In addition, West Hollywood still serves its historic minority populations, with a well-known collection of bars, restaurants and shops on Santa Monica Boulevard that are geared toward local gay culture.

Relevant Architectural Style

The buildings of the Old Sherman Thematic Grouping are best described as wood frame vernacular houses. This style has many variations based on plan, roof form, and decorative features. Generally, wood frame vernacular houses share the following historical context and design features:[27]

> The vernacular cottage was prevalent in the United States from 1879 to 1910 and first appeared in Los Angeles around the mid 1880s, a development period which coincides with the growth of the Queen Anne, Eastlake and Shingle styles.[28] These cottages

[23] Architectural Resources Group (ARG) for City of West Hollywood, "City of West Hollywood Draft Survey of R2, R3, and R4 Zoned Areas," November 2007, 17.
[24] Ryan Gierach, Images of America West Hollywood (Charleston: Arcadia Publishing, 2003) 8.
[25] Christensen, Terry, and Larry Gerston. "West Hollywood: a City Is Born." Cities 4.4 (1987): 299.
[26] Architectural Resources Group (ARG) for City of West Hollywood, "City of West Hollywood Draft Survey of R2, R3, and R4 Zoned Areas," November 2007, 20.
[27] Office of Historic Resources, Los Angeles Department of City Planning, *Historic Context Statement: SurveyLA, City of Los Angeles, Los Angeles County, California*, 2011
[28] The vernacular cottage, sometimes referred to as "Folk Victorian" is in common usage among cultural geography scholars, who use the designation to describe what are generally very modest, largely unadorned vernacular houses dating from circa 1870 through just after 1900. These buildings mimic the higher style architectural styles of the late nineteenth century, such as Eastlake, Queen Anne, Italianate, though with a very limited use of applied decoration (Source: Ingolf Vogeler, University of Wisconsin-Eau Claire; Tom Paradis, University of Northern Arizona). Architectural historians Lee and Virginia McAlester (1984. A Field Guide to American Houses) have borrowed the terminology from geographers. See also Gottfried and Jennings, *American Vernacular Design*, *1870-1940.*

> assumed their overall shape from the intersection of the roof forms, which were usually gabled with an ell [L] plan porch sheltering the entrance. Influenced by the extension of the railroads and the industrial revolution, the turned and carved wooden decorative elements emblematic of this style were made inexpensive by the development of the assembly line process powered by the steam engine. More elaborate examples are characterized by porches with spindlework detailing, intricately cut perforated gables (Gingerbread trim), and an asymmetrical façade. Vernacular cottages are one or two stories, often with hipped or clipped gables, wide over-hanging eaves with decorative brackets, and tall narrow windows.

In the Old Sherman Thematic Grouping historic district record, buildings are classified as three variations of wood frame vernacular buildings: plains cottages, hipped bungalows, and California bungalows. All types are ornamented to varying degrees with Queen Anne elements, multi-paneled doors, flaired eaves, carved rafters, and stick work. The district record distinguishes between each type as follows:[29]

> Plains Cottage: L-shaped with a cross-gabled roof. Gables have decorative shingles that contrast with the clapboard siding.
>
> Hipped Bungalows: Square or L-shaped in plan with extended boxed eaves at the roof line. The design is often enhanced with recessed porches, centered dormers, and projecting bays.
>
> California Bungalows: Square in plan with a hipped roof featuring projecting gables or gabelets to the front and exposed rafters.

Period of Significance

The period of significance for the Old Sherman Thematic Grouping is 1898 to 1922. This period of significance corresponds to the Town of Sherman's founding and its first wave of residential growth. The dates also correspond to the construction of all contributing buildings within the grouping.

[29] David Amorena for the City of West Hollywood, *Old Sherman Thematic Group* (Department of Parks and Recreation Historic Resources Inventory, completed December 1987) 3.

Contributing and Non-Contributing Features

Contributing features are the physical features that contribute to the historic significance of the subject property and are where rehabilitation efforts should be focused, while non-contributing features may accommodate alteration. Buildings A-D are the only buildings that contain contributing features. They are associated with development of the Town of Sherman, constructed within the period of significance for the OSTG (1898-1922). Buildings E-J (rear buildings) are non-contributing buildings added to the subject property in 1922-1960, outside of the period of significance for the OSTG. They are altered from their dates of construction, generally have low integrity, and were excluded from the Cultural Resource designation for the subject property.

Character-Defining Features

Character-defining features common to each contributing building are listed below, along with the project approach to retaining and/or restoring each feature. More specific building-by-building guidance for retaining and restoring each feature is provided in marked-up building elevations in Exhibit A.

- Most roof structures, including flaired roof shapes, have wide boxed eaves with wood tongue-and-groove patterns that appear to be generally intact and are character-defining (although some dormers are later additions and thus are not character-defining).

- Primary entrance configurations with concrete and wood stoops and inset and projecting porches are not all original, but are important and should be restored based on physical evidence and evaluation of like properties from the period.

- Original windows are character-defining features, although many window openings and frames/sash have been altered and should be restored. In many cases, window fenestration has changed and evidence of early patterns exists.

- Original cornice, frieze, molding, stringcourse, and window sill details are extant in some locations; those that are extant should be used as a guide to restore missing details throughout.

- Existing original horizontal and vertical wood siding and shingles should be retained to the maximum extent feasible, even if it must be salvaged and reinstalled during project implementation. Siding design, generally with horizontal boards grouped in sets of three, should be maintained, even if replaced with new in-kind. Likewise, retain the flaired “skirt” quality and stacking of wood dormer shingles three-high where it occurs; recreate stacking detail if any shingles must be replaced. Consider roof replacement with wood shingles or similar throughout.

- Remove exterior wall air conditioning units and other exposed pipes and/or mechanical equipment.

- Visible raised foundations (crawl spaces) appear to require seismic retrofit. The bricks themselves are not character-defining and can be removed to allow for new concrete foundations with wood siding extending over the stem walls to the maximum extent allowable.

- Floor plans identifying the approximate original building footprints based on Sanborn map research are included in Exhibit A. It is recommended that future plans retain or otherwise

interpret these historic footprints instead of existing floor plans that have been altered numerous times.

PROPOSED REHABILITATION

Approach

This report describes an approach to designing a project in conformance with the rehabilitation standards of the *Secretary's Standards*. Rehabilitation focuses on retaining and repairing historic fabric to return the subject property to a state of utility, and does not require removal of features from outside the period of significance or reconstruction of missing features. However, as an overall approach, the features of the elevations most visible from San Vicente Boulevard will be restored to their original 1898-1907 appearance. Compatible alterations will be focused on secondary elevations and non-contributing features. Alterations are compatible in terms of mass, scale, and materials with the contributing buildings, supporting overall project conformance with the *Secretary's Standards*. The below Significant Space Map shows visually this overall project approach. Areas shown in orange will be the focus of strict restoration efforts, to return the buildings to their original 1898-1907 appearances (Fig 5).

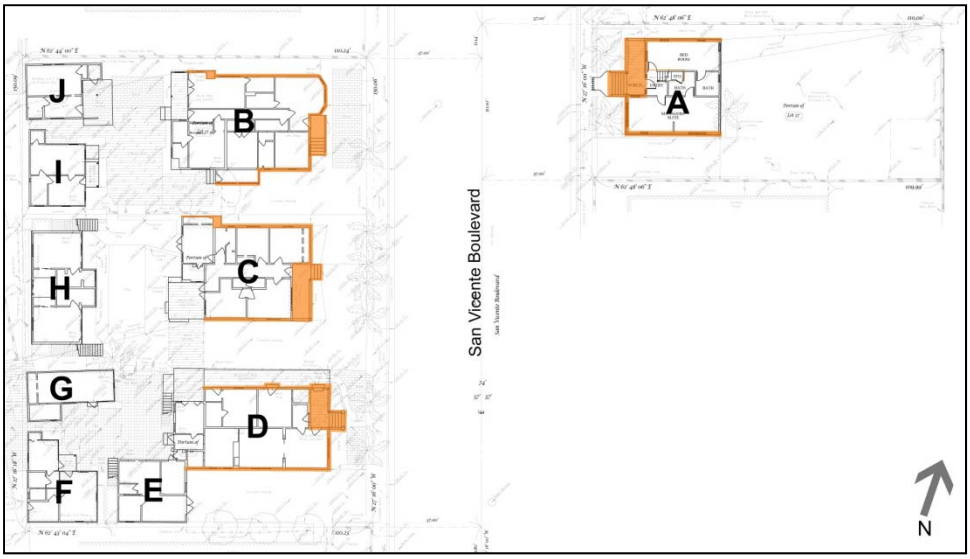

Fig 5: Current site plan with building elevations to be restored in orange.

Project Description

The proposed project entails continuing use of the subject property as an inn. As an overall strategy, the street-facing elevations of Buildings A-D (i.e. those visible from San Vicente Boulevard) will be restored to match their original appearance as closely as possible. The project will therefore be a vast improvement on existing conditions. The restoration approach was developed through careful field analysis of existing conditions to ensure inappropriate non-historic alterations are reversed so the buildings more closely resemble their original appearance. While no early historic photographs were found, in many cases, there is physical evidence of original conditions. For example, there are visible vertical lines where siding has been changed to accommodate new windows. There are also Sanborn maps showing original building plan configurations. Based on this evidence, as-built plans were marked up by Chattel identifying extant historic materials and alterations, with recommendations for where non-historic alterations such as inappropriate dormers and windows, should be removed, and how they should be replaced. The resulting proposed plans developed by the project architect reflect this analysis and design intent, although in some cases detailed drawings of specific features have not yet been developed.

The proposed project entails continuing use of Building A as part of the inn. It will encompass space for a reception, lounge, and guestrooms, with a rear addition providing accessible guestrooms. Buildings B-J will incorporate a restaurant and bar, auxiliary room, and guestrooms. The existing feel of both east and west properties will be retained: Building A will continue to read as a distinct single-family home; and the west property will maintain its feel as a series of low-slung buildings surrounding a private courtyard. The addition to Building A requires removal of the non-contributing carport and has been carefully designed so as not to overwhelm or substantially alter the existing single-family home. At the west property the proposed project entails new construction that is generally in keeping with the existing building footprints and overall scale, mass, and setbacks of the existing buildings. Buildings B-D will be restored at their street-facing elevations, while Buildings E-J, which were not found to be contributing, will be demolished.

The following provides a detailed, building-by-building description of the proposed project:

East Property (850 San Vicente Boulevard, Building A)

Raising Level of Building A: Building A will be temporarily relocated within the parcel to allow construction of a new foundation and erection of the new rear addition. When moved back in place, it will be raised approximately five feet. To provide visual transition to the raised level of the house without impacting setting, a new retaining wall of stepped planters finished in smooth stucco will be added, extending from the house to sidewalk edge. Access to the house will be provided by a new stair that will switch back north of the entrance. The raised basement will be known as the "lower level" and will be finished with smooth stucco at its north and south elevations. A new entrance will be added at the south elevation (of the lower level), accessed by a stone paved walkway.

As background, several options to raising the level of the house were studied, but determined infeasible for continuing use of the property as an inn, which necessitates adding guestrooms. The floor level of the new addition needs to be level with that of the house to provide continuous passage through the house to the addition. Issues of accessibility and drainage require an even grade, and depressing or sinking the addition was deemed impossible as below-grade guestrooms are infeasible for use as an inn. The National Park Service has previously weighed in on the issue of raising a historic building,[30] finding that it is critical to consider whether altering the height of a building adversely impacts setting. In the case of Building A, setting has already been compromised, since the building was moved to its current location from original in 1999. Further, surrounding buildings are already out of scale with the single-family home and are not considered contributors to the OSTG. Therefore, raising the height of Building A in the manner proposed does not compromise its integrity.

Restoration of Street-Facing Elevations of Building A: The proposed project entails restoration of street-facing elevations of Building A. Elements to be retained are: original door, transom, and side lights; porch with wood post supports; original double hung wood windows with decorative crown molding at window surrounds; decorative stick work railing and detailing around the central front dormer balconette; and wood siding above the skirt. Missing elements to be restored include the intermediate molding on porch and posts accenting the balcony of the central front dormer balconette. The wood stoop will be restored to its original depth and non-original porch rails will be removed. New wood siding will be installed where appropriate on the raised foundation.

Rear Addition: A four-story addition accommodating twenty-one guestrooms will be constructed east of the house, its height finishing in a low, flat parapet and rising approximately one level above the roofline of the raised house. The addition will be connected to the house internally at the lower level and by a hyphen at level one. The hyphen is carefully designed to provide visual separation

[30] Antonio Aguilar, Technical Preservation Services, National Park Service, *Interpreting the Standards Bulletin Number 41: Incompatible Alterations to the Setting and Environment of a Historic Property*, Oct. 2006.

between the house and addition so that the house still reads as a single-family home distinct from the new construction. The west elevation of the addition features a wall articulated with inset terraces and a projecting center bay capped in a hipped roof. The penthouse (level four) will step back from the lower levels. Levels one through three will be finished with smooth stucco, while level four will feature wide-plank wood siding. Railings at the inset terraces will be of steel and obscured glass. Fenestration types at side elevations will be narrow steel sash casement with a mullion pattern mimicking existing double-hung wood sash of the house; fenestration patterns and floor heights will align with that of the existing house.

Interior of Building A and Addition: The interior of Building A will be reconfigured to contain a lower level lobby and storage/mechanical room. The east wall will connect internally to the rear addition, which will contain guestrooms at this lower level. At level one (currently the first floor), there will be a lounge and bar; as with the lower level, the east wall will connect internally to the rear addition, which will contain guestrooms. Level two will accommodate a loft guestroom with bathroom, but will not connect to the addition. At the interior of the addition, guestrooms will be configured around a central double-loaded corridor at each level. Circulation will be provided by two stairs: one at the west of center on the south side, and the other at the northeast corner; there will also be an elevator on the south side.

Carport: The existing carport at the southeast corner of the parcel is a non-historic two-car structure with a side gable roof and open eaves. It was constructed in the 1950s, after the period of significance for the OSTG. It is not considered a contributing feature of the property or a historical resource, and will be demolished.

<u>West Property (837-839 San Vicente Boulevard, Buildings B-J)</u>

- *Building B (existing):* Exterior street-facing elevations of Building B will be restored, including reconstruction of original wood windows, doors, and front porch to match original appearance and configuration; salvage and reinstallation of existing wood clapboard siding to the maximum extent feasible; and rehabilitation of existing trim, frieze, stringcourse, and other moldings. Restoration will also entail removal of the non-historic south elevation dormer and replacement with a new shed dormer with a more appropriate size and scale, as well as removal and replacement of the non-historic lean-to addition at the south elevation. The roof's existing skirt shape will be retained. Finally, the existing brick foundation visible below siding requires retrofit; the new foundation will be generally hidden beneath wood siding. The front gable with Japanese flair and square shingles will be retained, as will the gable's existing decorative vent. The interior will continue to provide guestrooms and will be reconfigured to contain three separate suites. One of the guestrooms will feature a second floor loft accessed by an interior stair. Preliminary analysis provides that Building B may require a new foundation, and that the existing conditions require further study by a structural engineer.

- *Building C (existing):* Exterior street-facing elevations of Building C will be restored, including reconstruction of original wood windows, doors, door trim, and front stoop to match original appearance and configuration; salvage and reinstallation of existing wood clapboard siding to the maximum extent feasible; and rehabilitation of existing trim, frieze, stringcourse and other moldings. The vaulted ceiling in the porch will be retained, as will be original porch columns. Ogee molding at roof eaves will also be retained. At the south elevation, the gable peak with fish scale shingles stacked three high and curved skirt will be retained. The rear (west) portion of the building is a non-historic addition and will be removed. The interior will be reconfigured to serve as a bar/dining area, and will also contain common restrooms and shower areas. A new single-story hyphen will connect the south elevation to Building D. Preliminary analysis provides that Building C may require a new foundation, and that the existing conditions require further study by a structural engineer.

- *Reception/Hyphen (new construction):* A new one-story Reception area-hyphen wing serving as central point of entry for the property will connect Buildings C and D. It will be rectangular, oriented north-south, and set back from the east façades of Buildings C and D. Thus it will be distinguished from the surrounding historic buildings while also not competing with them visually. It will have a side gable metal standing seam roof. An exterior canvas awning supported on tall, narrow posts will sit in front (east) of the Reception area-hyphen to emphasize the entrance.

- *Building D (existing):* Exterior street-facing elevations of Building D will be restored, including reconstruction of original wood windows, doors and door trim to match original appearance and configuration; salvage and reinstallation of existing wood clapboard siding to the maximum extent feasible; and rehabilitation of existing trim, frieze, stringcourse, and other moldings. Restoration will also entail removal of non-historic dormers and replacement with new shed dormers with a more appropriate size and scale. The existing original window at the south side of the east façade (with diamond lattice transom) will be retained. The interior first floor will be reconfigured to provide an open-plan space for dining, as well as entrance vestibule and restrooms. Access will be provided through the Reception area-hyphen, as well as through a single door at the east porch, two sets of double doors to the exterior in the north elevation and a single door in the south elevation connecting to the Kitchen. The second floor will provide an open, living room space and restroom, to which access will be provided by an exterior patio and stair at the west elevation. Preliminary analysis provides that Building D will require a new foundation. The building will be temporarily moved to allow removal of the existing foundation and construction of new, and then carefully moved back to its current location. There will be ongoing consultation with a structural engineer on how to accomplish this without damage to historic materials.

- *Kitchen (new construction):* The kitchen be a two-story rectangular building oriented east-west and connected to Building D at its north elevation. Access to the Kitchen will be provided through an interior door to Building D, as well as an exterior door at the west end of the north elevation, and an interior door to the Auxiliary Room to the west. With a front gable roof at the second floor at hipped at the first floor, the kitchen will closely match the scale and mass of existing Building E, though it will step down to one-story at the east portion to relate to existing Building D and San Vicente Boulevard. It will remain set back from the east façade of Building D so as not to overwhelm the existing building. Front doors at the east elevation will be swinging, barn-style wood doors mimicking the appearance of existing. The first floor will be configured as an open, rectangular space, while the second floor will contain an office and covered terrace that connects to the second floor of the Auxiliary Room to the west.

- *Auxiliary/Recreation Building (new construction):* The Auxiliary/Recreation Building will be a new two-story rectangular building, oriented north-south and connected at its east elevation to the kitchen. Access will be provided through an interior door from the kitchen and an exterior elevator at the east elevation. There will also be an exterior stair at the north elevation providing second floor access. The first and second floors will both be configured as open, rectangular spaces serving as auxiliary and recreation rooms, respectively.

- *Lanai/Guestroom Building (new construction):* The Lanai/Guestroom Building will be a two-story rectangular building oriented north-south. It will be open to the courtyard at its first floor, providing semi-outdoor seating, as well as restrooms at its northwest and southwest corners. Access to the second floor will be provided by exterior stairs at the north and south elevations. The second floor will contain two guestrooms.

- *Guestroom Building 1 (new construction):* The Guestroom Building 1 will be a one-story C-shaped building oriented north-south and wrapping a central patio. It will contain two guestrooms at its first floor, with access provided through two sets of double doors off the patio.

- *Guestroom Building 2 (new construction):* The Guestroom Building 2 will be a two-story rectangular building oriented east-west and attached to the north end of the east elevation of Guestroom Building 1. It will contain a guestroom at its first floor and a second guestroom at its second floor. First floor access will be provided by a single door at the south elevation, while second floor access will be provided by an exterior stair at the east elevation.

Conformance with Secretary's Standards

The rehabilitation standard is recommended as a treatment, "When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate."[31] The rehabilitation standards are outlined below and include an explanation of overall project conformance with each standard.

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

   In conformance with Standard 1, the proposed project continues the existing use of the property as an inn, while incorporating ancillary uses. Changes will improve the street facing elevations of Buildings A-D through restoration, and new construction will respect historic in terms of mass, scale, and setback.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

   In conformance with Standard 2, the proposed project will improve the street facing elevations of Buildings A-D through retention of historic materials and restoration of missing features, to bring the elevations back to more closely match their original appearance. Historic material on these elevations that must be removed to facilitate the project will be salvaged and reinstalled to the maximum extent feasible. Existing spatial relationships characterizing the property will be retained, as new construction will either closely match existing in terms of scale, mass and setback, or will be carefully designed to step back from the existing buildings so as not to detract from them.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

   In conformance with Standard 3, the proposed project will retain important historic fabric from an early period, so that the property can continue to be recognized for its association with the Town of Sherman. New construction will be clearly distinct from existing in terms of architectural style and materials selection, though it will draw from existing shapes and materials for inspiration to ensure compatibility.

[31] *The Secretary of the Interior's Standards for The Treatment of Historic Properties With Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Weeks and Grimmer, 1995)

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

   In conformance with Standard 4, the proposed project will retain important historic fabric from an early period, so the property can continue to be recognized for its association with the Town of Sherman. No later additions or alterations have been identified as taking on significance over time; thus, removal of inappropriate non-historic alterations will be an improvement.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

   In conformance with Standard 5, the proposed project will retain existing historic material, features, and finishes to the maximum extent feasible on the street-facing elevations of Buildings A-D. In some cases, historic material has already been removed due to alterations, and a restoration approach will be employed to return these elevations to match their original conditions as closely as possible.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

   In conformance with Standard 6, the proposed project will retain existing historic features, repairing rather than replacing them, to the maximum extent feasible. Where repair is infeasible, new material that is compatible with existing will be used, and will be selected based on physical and other evidence of what was there historically.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

   In conformance with Standard 7, the proposed project will treat historic material with the gentlest means possible. Should pressure washing be required, it will be done at less than 400 psi and no sandblasting will be employed.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

   It cannot be reasonably expected that archaeological resources will be found during implementation of the proposed project.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

   In conformance with Standard 9, the proposed project will have new additions and related new construction that do not destroy historic materials, features, or spatial relationships that characterize the property. The raising of Building A does not compromise its integrity because: its setting has already been altered since the

building was moved to its current location; the new front retaining wall with stepped planters provides visual transition from the street level up to the house; and surrounding buildings are already out of scale with the single-family home. The rear addition to Building A is appropriate because it has been carefully designed to step back from the existing single-family home to ensure compatibility. Also, the new buildings to be constructed west of Buildings B-D mimic the existing rear buildings (E-J) in terms of mass, scale, and set back, to retain the existing compatibility with buildings B-D.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

    In conformance with Standard 10, the proposed project will not damage existing integrity of Buildings A-D. As Building A has already been moved from its original location to a new setting, additional changes to accommodate the proposed rear addition will not diminish integrity of setting. The project will be an improvement on the existing condition of the building, by reversing non-historic alterations through restoration. Buildings B-D will also be improved upon, as non-historic alterations will be removed and street-facing elevations restored.

Conclusion

The proposed project is evaluated as a whole, including the work proposed for both the west and east properties. It is the professional opinion of Chattel that because a strict restoration approach is being adopted for street-facing elevations, this provides a vast improvement to the existing buildings, which are altered and do not currently retain a high degree of integrity. In addition, the new construction is compatible in mass, scale and proportion, fenestration, and use of materials with existing buildings. When weighed on balance with the proposed new construction, the overall project is an improvement on existing conditions and in conformance with the *Secretary's Standards*. Proposed project impacts were analyzed for conformance with the *Secretary's Standards* and potential to result in a "substantial adverse change" to the significance of historical resources. It is the professional opinion of Chattel that, as proposed, the proposed project does not amount to a "substantial adverse change," is in conformance with the *Secretary's Standards*, and therefore constitutes a less than significant historical resources impact under CEQA.

RECOMMENDATIONS

Particular attention to the following items will be given as designs for the proposed project progress. Recommendations will be made to ensure continuing conformance with the *Secretary's Standards*:

- 850 San Vicente Boulevard (Building A):
  - Articulation of retaining wall, including design, materials, and shadow lines or reveals
  - Incorporation of planters or locations for vine pockets in retaining walls
  - Design of railings for stair leading up to house
  - Design of new lobby
  - Manner in which new addition projects west toward the existing single-family home
  - Design and materials of new addition level one patio
  - Design of south elevation lobby door at lower level
  - Selection of wood siding for new addition upper floor and penthouse
  - Roof material selection for new addition
  - Design of new addition's fenestration patterns to mimic that of the historic building
  - Design of windows to avoid large expanses of glass with small muntins, as well as window materials selection
  - Design of new doors (swinging preferred to sliding for flatter appearance in keeping with paired windows)
  - Design of new addition's parapets, guardrails, balconies and terraces
- 849 San Vicente Boulevard (Building B):
  - Detail of new porch at east elevation
  - Design of new dormer
- 845 San Vicente Boulevard (Building C):
  - Design of canopy at new Reception area-hyphen connector
- 837 San Vicente Boulevard (Building D):
  - Retention and integration of existing window and door at restrooms in east elevation
  - Design of canopy at new hyphen connector

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Introduction

At the request of Rincon Consultants, Inc., Architectural Resources Group (ARG) has completed this peer review of the *Secretary's Standards Conformance Review for Proposed Rehabilitation Project* (the "*Conformance Review"*) for the proposed project at the San Vicente Inn (the "Project"). The San Vicente Inn is located at 837-849 and 850 N. San Vicente Blvd. in West Hollywood, in the block north of Santa Monica Blvd. The Project, further described below, consists of remodeling of the four small turn-of-the-century houses that comprise the street-facing portions of the Inn, along with new construction located behind and between the houses. The project has potential impacts to historical resources due to the local designation of the four houses as contributors to the Old Sherman Thematic Grouping. Project proponents are pursuing a Negative Declaration.

The documentation under peer review (the *"Conformance Review"*) was completed by Chattel, Inc., Historic Preservation Consultants. Chattel, Inc. worked with the developer of the proposed Project, JK Hotel Group, to evaluate the project's conformance with the Secretary of the Interior's Standards for Rehabilitation and to make recommendations for limiting the impacts to historical resources.

This peer review has been completed by Jennifer Trotoux, Associate, an architectural historian and preservation planner who meets the Secretary of the Interior's professional qualifications standards for history and architectural history. She has 18 years of professional experience in historic preservation consulting in the Los Angeles area. Katie Horak, Senior Associate, also contributed to this review.

Methodology

The methodology for this peer review was first to review the *Conformance Review* document produced by Chattel, Inc. We toured the project site and its surroundings on September 19, 2014, in the company of architect Robert Chattel, principal of Chattel, Inc., and discussed the project at that time. The site visit allowed us to take note first-

hand of the condition of the historic buildings; the alterations to those buildings that have occurred over time; the integrity level of the buildings, both interior and exterior; and the spatial relationships within the property created by the existing buildings. We had access to a full set of drawings for the proposed new construction and rehabilitation by Appleton and Associates, Inc., Architects. We also reviewed the Historic Resources Inventory (HRI) for Los Angeles County, the 1987 survey forms for the grouping identified at that time, and the documentation that was completed in 1999 for the Old Sherman Thematic Grouping, which was designated by the City of West Hollywood as a small subset of the resources originally identified as potential contributors. The latter documents contain a great deal of background and historical information and explain how the grouping came to include these particular buildings while excluding others. The entirety of this background information also gives a sense of how diminished this grouping of resources is from its first documentation over 25 years ago.

Project Description

The San Vicente Inn occupies four properties on San Vicente Blvd., each of which contains a one-story single family residence facing the street. Three of these, located at 837-849, are contiguous on the east side of the street. The fourth is located on the west side of the street at the address of 850; the house thereon was moved to this location in 2003 from 873 N. San Vicente Blvd., less than a block away.

The main cluster of the Inn's historic cottages ("cottage" herein refers only to contributing buildings of the Old Sherman Thematic Grouping) is located on the east side of the street. The three front buildings, 837-849 San Vicente, will be rehabilitated for continued use as a part of the Inn, including reception spaces, dining spaces, and guest rooms. The courtyard that currently exists will essentially remain. The six smaller buildings along the rear of the property, Buildings E through J, are not historic and will be demolished. These buildings will be replaced by larger structures a maximum of two stories in height that will contain service spaces and guest rooms.

On the east side of the street, a four-story building will be constructed directly behind Building A to contain additional guest rooms. Building A will be further raised from its current, nonoriginal foundation in order to align with the second floor level of the new building behind it to allow elevator access (the first story is at grade). There are setbacks at the front corners of the fourth story that are designed to cut down on the volume visible directly behind the historic house. Lounge areas to be located within Building A will support the rooms on this side of the street to minimize the necessity to cross the street during a guest's stay at the Inn.

Project Background

The main (front) buildings of four of the properties are listed as local historic resources in the City of West Hollywood. In 1987 a potential "thematic grouping" was identified that included these residences and others of similar type and date that represent the town of Sherman, which was the predecessor of West Hollywood. Sherman was founded around the yards of the Los Angeles Consolidated Electric Railway in the vicinity of Santa Monica Blvd. (formerly Sherman St.) and N. San Vicente Blvd. (formerly Clark St.) by Los Angeles Railway owners Gen. Moses H. Sherman and Elias P. Clark. The potential grouping consisted of a number of one-story, single-family residences (dated 1898-1910) mostly located along N. San Vicente Blvd. and the nearby Cynthia St., Larrabee Ave., and Palm Ave.

Twenty-one properties (and 24 buildings) were identified as potential contributors to the thematic grouping in 1987. In 1999, a City Council resolution resulted in the local designation of the properties associated with the San Vicente Inn plus one additional property at 8914 Cynthia St. whose designations were not opposed by the property owners. The climate of developer interests and local politics, not the relative merits of the buildings, led to some being designated with owner consent and others being specifically denied listing. The relevant result of this action for the purposes of this review is that the four buildings belonging to the Inn, representing 4 out of the 5 designated buildings, are essentially carrying the weight of a designation that could have included many more properties.

Three of the cottages identified as potential contributors were converted for use together as an Inn in the 1990s. This combined property, recently under new ownership, is the subject of the current development proposal.

The San Vicente Inn cottages came to represent a historic context in the City of West Hollywood that was rapidly vanishing under development pressure. The most significant losses of potentially contributing buildings resulted from a condominium project in 2000 for which multiple potential contributors were demolished. One of the structures on that property, 873 San Vicente, was moved to the address of 850 San Vicente, slightly south of its original location on the opposite (east) side of the street as partial mitigation for the project's impacts to historic resources. At the time of its relocation, this cottage became a part of the San Vicente Inn across the street and was subsequently designated as a contributor to the Thematic Grouping.

As noted in the *Conformance Review*, the parcels on the west side of the street contain multiple buildings but only the front building of each parcel (Buildings B, C, and D) is designated as contributing to the Thematic Grouping. The rear buildings are smaller, more altered, and generally built outside of the period of significance. The interiors of Buildings B, C, and D are completely altered, but those of Building A are fairly intact. The listing, however, excludes all building interiors (and accessory structures).

Peer Review of *Conformance Review* Findings

The *Conformance Review* is divided into sections for an introduction and a description of methodology and qualifications. The main sections that follow are a physical description of the property, the regulatory setting that applies, the historic context of the resources, and a discussion of the proposed rehabilitation.

Physical Description: The physical description of the properties is accurate and sufficient, supplemented by clear maps and diagrams, along with photographs at the end of the report.

Regulatory Setting: In this section, an oversight was made regarding the status code of Building A, now relocated to 850 N. San Vicente Blvd. This property is listed in the Historic Resources Inventory (HRI) under its prior address of 873 with a status code of 3S, meaning that it appeared individually eligible for the National Register. In the City of West Hollywood's survey, the buildings in the grouping were originally given the status code 4D, as the *Conformance Review* notes, which was translated later to 7N in the revised California Register Status Codes. However, when the City's survey results were forwarded to the State Office of Historic Preservation (SHPO), this one building was upgraded to 3S. This determination is over 25 years out of date, so it clearly needs to be reexamined. The building has since been moved and may have lost historic integrity in the process. Still, it was an oversight not to have noted the building's status code, analyzed whether it still appears individually eligible for the

National (or California) Register, and considered the impacts to the building as an individually eligible property (only if it still appears eligible). Note that this upgraded code (3S) was given in a prior regulatory environment, ten years before the enactment of the California Register. It may be that the building remains eligible for the California Register (but perhaps not for the National Register) despite its relocation. That determination is outside of the scope of this review, but presumably would have been undertaken in the *Conformance Review* had the 3S been noted by its authors.

It may also be noted that while the four historic buildings on the Inn property are designated locally, the construct of a "Thematic Grouping" does not exist within the California Register. However, the grouping may be eligible as a historic district for the California Register, since most of the properties in the grouping are contiguous. Such a district would exclude the fifth building in the grouping, 8914 Cynthia St., since it is located at some distance from the others. This construct would be more closely parallel to the California Register, making the grouping a clearer resource for purposes of CEQA. It appears to us that not all thematic groupings would be eligible for the California Register, even if they are designated locally.

Historic Context: This section of the report should have contained a discussion of whether Building A is eligible as an individual resource. This discussion may be bolstered by an expanded discussion of the architecture of the period in the context of West Hollywood. See discussion of Regulatory Setting, above.

Proposed Rehabilitation: The approach taken by Chattel, Inc. was to look at the cumulative impacts of the various components of the project on the Old Sherman Thematic Grouping (4 out of 5 of those buildings in the grouping are a part of the Inn).The main section of the *Conformance Review* consists, appropriately, of a discussion of each of the *Secretary of the Interior's Standards for Rehabilitation* (the Standards) and whether the Project meets each Standard. We concur with the report's findings regarding Standards 3, 4, 5, 6, 7, and 8. We believe that Standards #2, #9, and #10 are incomplete and merit further discussion or more information, as discussed below. This level of detail is necessary to produce a well-supported finding for the impacts of the project as a whole.

Separate from the discussion of impacts to the Old Sherman grouping, if Building A is found to be an individual resource, then the project's impacts on that resource should be discussed separately.

Standard #1: A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

While it is true that the property will continue to be used as an inn, it should have been noted that this was not its historic use. Standard #1 refers to the compatibility of the proposed and historic use of the property. The change of use occurred in the 1990s from single family residential to a hospitality use. The use as short-term lodgings has so far proven to be an appropriate use of the buildings, particularly in light of the relatively small scale of the Inn up to this point.

Standard #2: The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

We concur with the analysis for this Standard regarding the impacts to the Old Sherman Thematic Grouping. Even with the addition of interstitial spaces between the historic buildings, the "existing spatial relationships" among these buildings are maintained and they remain in their original locations.

If Building A (850 N. San Vicente Blvd.) is individually eligible for the California Register, then the impacts of the proposed design to the historic character of this property -- on its own -- would have to be evaluated to determine conformance with Standard #2.

Standard #9: New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

We concur with the *Conformance Review's* finding that the treatment of Buildings B, C, and D meets Standard #9. This additional discussion is provided because we found the justification for the finding in the report to be incomplete. Discussion of Standard #9 is one of the more important for this particular project, and essentially no justification was made.

The kitchen addition south of Building B and the reception "hyphen" connecting Buildings B and C are set back from the main facades and their character is distinct from that of the houses, allowing the volume of the original buildings to be read from the street. The sense of a front yard in front of each house will be returned to the cluster through the landscape design.

The buildings to be added to the site behind these buildings will be a maximum of two stories. They are separated from the rear of the historic buildings by a courtyard, allowing usable space between so that the separation of the buildings and the original volume of the historic buildings can easily be distinguished from within the Inn property. The relatively modest height and volume, combined with the setback toward the rear of the property, also allows the new buildings to avoid visually overwhelming the smaller, historic front buildings. As required by Standard #9, the "size, scale and proportion, and massing" are appropriate to the setting of the historic buildings, which does "protect the integrity of the property and its environment."

Regarding Building A, however, first it must be determined whether Building A is still an individually eligible resource. If it is found to be so, the impacts to this building as an individual resource should be evaluated. The proposed Project may not meet Standard #9 with regard to Building A alone since it appears that "related new construction" may "destroy historic…. spatial relationships that characterize the property" and that is not compatible with the historic "size, scale and proportion, and massing" of the property. Therefore, it cannot be said to "protect the integrity of the property and its environment." The new construction is several times the volume and nearly twice the current height of the cottage and located close behind it, engaging with its raised foundation and main level. The raising of the building by five feet also may be said to "destroy… spatial relationships that characterize the property."

If Building A (850 N. San Vicente Blvd.) is individually eligible for the California Register, then the impacts of the proposed design on this property -- on its own -- would have to be evaluated to determine conformance with

Standard #9. While all of these changes can be absorbed within the context of a small district, given the improvements to the buildings that are noted to be planned, but may not preserve the individual eligibility that Building A may still retain.

Standard #10: New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

We concur with the *Conformance Review's* finding that the Project meets this Standard for Buildings B, C, and D. However, we disagree with the statement that given that Building A was already moved, "additional changes to accommodate the proposed rear addition will not diminish integrity of setting." The building is currently situated on the property in a manner comparable to that at its prior location, with a front yard and back yard and the appropriate spatial relationships to neighboring buildings and those few structures within its own property. While the building lacks integrity of location, the move to this property did furnish it with a setting nearby and comparable to its original setting. It was not argued in the report that the building lacks integrity of setting. Some of the measures noted in the design, specifically the terracing of the front yard, may help to lessen the impact of the raised foundation from the street. However, the other changes proposed represent a drastic enough change in the character of the property that they cannot be dismissed.

We also disagree that "the project will be an improvement on the existing condition of the building by reversing non-historic alterations through restoration." The integrity of Building A with regard to materials, design, and workmanship is actually much higher than that of Buildings B-D. If the building is individually eligible for the California Register, then the loss of the significant features of the interior such as the stair hall and the staircase and an alteration of its relation to the ground plane by five additional feet would diminish its integrity in a serious way and possibly impact its *individual* eligibility, even if the interior features are not part of the Thematic Grouping listing.

Both of these issues, however, appear to apply more appropriately to Standard #9. We do concur that the reversibility of the treatment of Building A, however disruptive of the appropriateness of the setting and the integrity of historic feeling, may well be reversible with respect to the exterior.

Findings and Recommendations

We concur with the statement made in the *Conformance Review* that the project is likely to represent "a vast improvement on existing conditions" due to the restoration approach taken with the historic buildings, at least as it affects the Old Sherman Thematic Grouping.

We have two outstanding concerns about the *Conformance Review*:

1) The status code of 850 N. San Vicente should have been noted. Since the 3S code dates to over 25 years ago, its individual eligibility for the National or California Register must be reviewed. If it is found to still be individually eligible, the impacts to that property as an individual resource must be evaluated.

2) The discussion of some of the Standards for Rehabilitation was incomplete and did not furnish enough analysis to be convincing in some places, as noted.

   If 850 N. San Vicente is found to be a historical resource for purposes of CEQA, then the discussion of the Standards would have to be revised to evaluate impacts to Building A as an individual resource.

We concur with the ultimate conclusion of Chattel, Inc.'s *Secretary's Standards Conformance Review* with regard to the impacts on the Old Sherman Thematic Grouping. The treatment of the property overall has the potential to raise the average integrity level of the grouping through the correction of past alterations, with the net effect that the Old Sherman Thematic Grouping will have greater integrity of design, setting, and, overall, possibly historic feeling, than it does without the project. The investment in rehabilitation of the four cottages, will allow continued life for the contributors to the Old Sherman Thematic Grouping.

The preservation approach taken for the historic buildings in the complex has essentially functioned to make the proposed project self-mitigating with respect to any impacts on historic resources. This is accomplished by the rehabilitation of the front portions of each primary and side façade where they are exposed to the street in order to reinforce their historic integrity, bring back some features that have been altered over time, reconsider the size and shape of features like added dormers, and better distinguish the historic buildings from the portions of the building that are to be added. Prior additions have simply caused the historic structures to be subsumed by later layers of space, an effect particularly pronounced on the rear of the buildings. The project will correct some of these conditions.

By: Jennifer L. Trotoux

E-mail: jennifert@arg-la.com

CC:

Chattel, Inc. | Historic Preservation Consultants

MEMORANDUM

October 14, 2014

TO: Jeff Klein
JK Hotel Group
8358 W. Sunset Boulevard
West Hollywood, CA 90069

FROM: Robert Chattel, President
Kathryn McGee, Senior Associate
Chattel, Inc.

RE: San Vicente Inn
Response to ARG Peer Review of Conformance Review Report

This memo responds to peer review of our report on rehabilitation and reuse of San Vicente Inn (proposed project). We evaluated the proposed project for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (*Secretary's Standards*) and found it in conformance, and therefore to have a less than significant historical resources impact under the California Environmental Quality Act (CEQA). Peer review was provided by Architectural Resources Group (ARG) in a report dated October 1, 2014.[1] ARG identifies the following concerns:

(1) The status code of the 850 building should have been noted. Since the 3S code dates to over 25 years ago, its individual eligibility for the National or California Register must be reviewed. If it is found to still be individually eligible, the impacts to that property as an individual resource must be evaluated.

(2) The discussion of some of the Standards for Rehabilitation was incomplete and did not furnish enough analysis to be convincing in some places, as noted.

If the 850 building is found to be a historical resource for purposes of CEQA, then the discussion of the Standards would have to be revised to evaluate impacts to Building A as an individual resource.

As background, the 850 building was moved to its current location in 1999 from its original location at 873 San Vicente Boulevard. It was constructed prior to 1910 and is locally designated as part of the Old Sherman Thematic Grouping, a City of West Hollywood Cultural Resource. It has not been reevaluated for separate listing in the National Register since after being moved to its current location.

The following responds to ARG's primary concerns:

[1] Architectural Resources Group, Memorandum regarding San Vicente Inn, Peer Review of *Secretary's Standards Conformance Review for Proposed Rehabilitation Project*, 1 Oct 2014.

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(1) The 850 building's status code of 3S is listed under a different address in the current Los Angeles County Historic Property Data File (HPDF), where 873 San Vicente Boulevard actually applies to the 850 building. The HPDF has not been updated to reflect that the 850 building moved from 873 San Vicente Boulevard. The 3S finding is from the 1987 survey;[2] the 850 building was found to contribute to the OSTG (assigned status code 4D).[3] The 1987 survey results were transmitted to the California Office of Historic Preservation (OHP), which then elevated the 850 building's status code 3S. An Environmental Impact Report (EIR) for a nearby project prepared in 1999 explains that because OHP provided funding for the 1987 survey, they were able to change status codes.[4]

None of this additional information changes the manner in which potential impacts of the proposed project should be evaluated. The primary reasons for this are as follows:

- The 850 building already has presumptive significance as an historical resource due to its local designation as part of the OSTG (CEQA Guidelines §15064.5(a)); therefore, it is identified as an historical resource in our report (page 1), and treated as such. Even if the building were separately listed in the National Register, we would not evaluate it differently in our report.

- The 1987 survey finding of 3S does not have presumptive significance under CEQA, as the survey finding is over five years of age (CEQA Guidelines §15064.5(a)(3)).

- Under CEQA, it is not necessary to evaluate eligibility for the National Register. CEQA requires identification of historical resources, which are defined as properties eligible for or listed in local or California Registers only (CEQA Guidelines §15064.5(a)).

- A finding that the 850 building is eligible for separate listing in the National Register would not change our analysis of the proposed project. The *Secretary's Standards* are used as the standards of review for the proposed project, as required by CEQA to determine significance of impacts (CEQA Guidelines §15064.5(b)(3)). The same standards would apply to evaluation of impacts on a National Register-eligible property and would not be applied differently than they have already been.

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[2] State of California Department of Parks and Recreation Historic Resources Inventory form, Old Sherman Thematic Grouping, prepared by David Amorena, City of West Hollywood, Dec 1987.

[3] The 4D means the OSTG *could* become eligible for the National Register, but that certain conditions need to be met first. Thus, it by nature means *ineligible* for the National Register (California State Office of Historic Preservation Department of Parks & Recreation, Technical Assistance Bulletin #8, User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory, Nov 2004).

The 1987 survey report provides that conditions to be met to prove National Register eligibility include further research on the history and significance of the OSTG. Specifically, the 1987 survey report provides, "more research should be performed [on the OSTG] in order to illuminate this valuable record of the origins of the community" (C*ity of West Hollywood Historic Resources Survey 1987-1987 Final Report*, prepared by Johnson-Heumann Research Associates for the City of West Hollywood and Office of Historic Preservation, State of California, 49).

[4] Historical Resources Section, Environmental Impact Report, Villas de San Vicente Courtyard Housing Project, prepared by Myra L. Frank & Associates, Inc., May 1999, 3-50–3-61.

(2) ARG finds that our conformance review is incomplete in how it evaluates compliance with standards 2, 9 and 10 of the Rehabilitation Standards.

- Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

  As noted in our report on page 23:

  In conformance with Standard 2, the proposed project will improve the street facing elevations of Buildings A-D through retention of historic materials and restoration of missing features, to bring the elevations back to more closely match their original appearance. Historic material on these elevations that must be removed to facilitate the project will be salvaged and reinstalled to the maximum extent feasible. Existing spatial relationships characterizing the property will be retained, as new construction will either closely match existing in terms of scale, mass and setback, or will be carefully designed to step back from the existing buildings so as not to detract from them.

  ARG comments that if the 850 building is individually eligible, impacts of the proposed project would have to be evaluated separately. As noted above, separate eligibility of the 850 building would not change our analysis or the manner in which we apply the *Secretary's Standards*.

- Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. This new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.

  As noted in our report on page 24:

  In conformance with Standard 9, the proposed project will have new additions and related new construction that do not destroy historic materials, features, or spatial relationships that characterize the property. The raising of Building A does not compromise its integrity because: its setting has already been altered since the building was moved to its current location; the new front retaining wall with stepped planters provides visual transition from the street level up to the house; and surrounding buildings are already out of scale with the single-family home. The rear addition to Building A is appropriate because it has been carefully designed to step back from the existing single-family home to ensure compatibility. Also, the new buildings to be constructed west of Buildings B-D mimic the existing rear buildings (E-J) in terms of mass, scale, and set back, to retain the existing compatibility with buildings B-D.

  ARG comments that more detail is needed for evaluation of conformance with Standard 9, noting important design features of proposed plans for

the portion of the property on the west side of San Vicente Boulevard, including: design of the "hyphen" connecting street-facing buildings, set back from the street; low-scale, two-story height of buildings to be added behind street-facing buildings, which helps avoid the feeling that the historic buildings are being overwhelmed by new buildings; clear distinction between historic and new buildings; and, separation of historic and new buildings by a deep setback (the pool/courtyard area) within the project site. We concur that this additional explanation helps explain how the project conforms with Standard 9.

ARG also comments that if the 850 building is individually eligible, impacts of the proposed project would have to be evaluated separately. As noted above, separate eligibility of the 850 building would not change our analysis or the manner in which we apply the *Secretary's Standards*.

- Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

  As noted in our report on page 25:

  In conformance with Standard 10, the proposed project will not damage existing integrity of Buildings A-D. As Building A has already been moved from its original location to a new setting, additional changes to accommodate the proposed rear addition will not diminish integrity of setting. The project will be an improvement on the existing condition of the building, by reversing non-historic alterations through restoration. Buildings B-D will also be improved upon, as non-historic alterations will be removed and street-facing elevations restored.

  ARG disagrees with our statement that since the 850 building has already lost its setting, since it was moved from its original location. ARG finds that because the 850 building was moved to an appropriate receiver site, its setting is comparable to original, and that the building retains integrity of setting. We find that the 850 building does not retain integrity of setting, because it has lost its original compass orientation, placement within a line of other period homes, mature landscaping, and positioning on a foundation that originally sat closer to the ground.

Notably, ARG finds that if the 850 building is found eligible as an historical resource, discussion of the *Secretary's Standards* should be revised to evaluate impacts to the 850 building as an individual resource. As noted above, the 850 building is in fact identified as an historical resource in our report. Even if the building were evaluated for separate listing in the National Register and found eligible, such a finding would not change the manner in which we apply the *Secretary's Standards* approach to evaluating potential impacts of the project.

Most importantly, since the time of the 1987 survey a project known as the "Desmond" was approved resulting in the moving of the building at 873 San Vicente Boulevard to 850 San Vicente Boulevard. The Historic Resource

> Mitigation Measures for the Final EIR for the Villas de San Vicente Courtyard Housing Project, HP4, found that "If the bungalow(s) are moved off of the project site and subsequently owned and rehabilitated by a party other than the project developer, the prior to relocation, the City of West Hollywood shall execute a contract with the future owners of the bungalow(s) to ensure that after the bungalow(s) are relocated, the owner(s) will accept title to the bungalows subject to nominating the buildings for designation as city Cultural Resources, in accordance with the procedures in the Cultural Heritage Preservation Ordinance, Article IX, Zoning, Chapter 9450 of the West Hollywood Municipal Code. That designation occurred by Resolution 00-312 on July 20, 2000. Accordingly, as provided for in the 1999 Final EIR, the 850 building became a local resource in 2000 when it was designated by the City as part of a group of buildings. Therefore, while 850 is a designated resource its status code is now likely 5D1.

Evaluation of 850 Building for Separate Listing in the California and National Registers

While it is unnecessary to evaluate separate eligibility of the 850 building for the California and National Registers, we nevertheless provide below a summary of the primary reasons why we find the building ineligible for separate listing. As California and National Register evaluation criteria generally align, the following evaluates both California and National Register eligibility at the same time.

Resources are eligible for listing in the California or National Registers if they:

1/A) are associated with events that have made a significant contribution to the broad patterns of our history; or
2/B) are associated with the lives of significant persons in or past; or
3/C) embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
4/D) have yielded or may be likely to yield, information important in history or prehistory.[5]

The 850 building does not possess adequate significance to warrant separate listing in the California or National Registers for the following reasons:

- Criterion 1/A: The 850 building is important as a contributor to a grouping of early houses associated with development of the Town of Sherman, but is not significant on its own. It does not do a better job of representing the early history of Sherman than any other examples in the OSTG. By itself, it does not have the necessary context to convey its association with Sherman.

- Criterion 2/B: The 850 building is associated with the original owner, Alfred Watts.[6] No additional biographical information on Watts was found. Research does not support that Watts was a significant figure in history. The 850 building does not appear significant for association with him.

[5] National Register Bulletin #15, "How to Apply the National Register Criteria for Evaluation" (National Park Service, 1990, revised 2002).

[6] Historical Resources Section, Environmental Impact Report, Villas de San Vicente Courtyard Housing Project, prepared by Myra L. Frank & Associates, Inc., May 1999, 3-56.

- Criterion 3/C: The 850 building is architecturally unremarkable. It is typical of its style. While it does have a few architectural flourishes that make it interesting, this is not sufficient to support it being separately eligible for its architecture. The buildings of the OSTG were primarily worker cottages significant as nondescript, typical period housing.

- Criterion 4/D: The 850 building cannot reasonably be expected to yield information potential.

Integrity: Once a resource has been determined to satisfy one of the above-referenced criteria, then it must be assessed for "integrity." Since the 850 building has not been found significant, it should not be evaluated for integrity. It should be noted that the primary difference between eligibility for the California or National Register is integrity. The California and National Registers use the same criteria for determining significance, but higher integrity is expected for National Register-eligible properties. Since the 850 building is not found significant, the discussion of integrity is superfluous, but nevertheless provided.

Integrity refers to the ability of a property to convey its significance, and the degree to which the property retains the identity, including physical and visual attributes, for which it is significant under the four basic criteria listed above. The National Register recognizes seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association. To retain its historic integrity, a property must possess several, and usually most, of these aspects.

The 850 building does not retain adequate integrity. It has lost its original location, compass orientation, and setting, as it was moved to 850 San Vicente Boulevard in 1999. It was originally located at 873 San Vicente Boulevard, facing west, and now it faces east. It originally sat in a line of other period homes, and is now flanked by larger, non-historic buildings on either side. Moving the building and placing it on a new foundation changed its relationship to the ground. It sits higher off the ground than it did originally, as the plywood skirting concealing the basement is now visible. Other more minor alterations identified in our report (see existing elevation drawing with notes, Exhibit C) include the following: reconstruction of front stoop, including railing posts, loss of intermediate molding spanning width of the façade under roof eave, and reconstruction of attic balcony railing posts (posts appear to be too large and therefore out of scale). Given these alterations, the 850 building has lost integrity of location, setting, feeling, and association in particular, and has also sustained more minor loses to design, materials, and workmanship. While it still has meaning as part of the locally designated OSTG, it does not appear separately eligible for listing in the California or National Registers.

Conclusion

This memo clarifies that the 850 building has presumptive significance as an historical resource under CEQA, and is treated as an historical resource in our report. Therefore, even in light of the new information included in this memo, our finding that the proposed project results in a less than significant historical resources impact under CEQA does not change. ARG's peer review is generally supportive of our findings, stating, "We concur with the ultimate conclusion of [Chattel's report] with regard to the impacts on the Old Sherman Thematic Grouping." As we've clarified the 850 building is not separately eligible, it appears our findings are consistent with that of ARG. The project will not have a significant impact on identified historical resources, regardless of whether National, California or local-level in quality, and will in fact be beneficial.