City of West Hollywood

Center For Early Education Project

Draft Initial Study – Mitigated Negative Declaration

October 2015

rincon

Environmental Scientists Planners Engineers

Center for Early Education Expansion Project

Draft Initial Study – Mitigated Negative Declaration

Prepared by:

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October 2015

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INITIAL STUDY

1. **Project Title:**
   Center for Early Education School Project

2. **Lead Agency Name and Address:**
   City of West Hollywood
   8300 Santa Monica Blvd.
   West Hollywood, California 90069

3. **Contact Person and Phone Number:**
   Rachel Dimond, Senior Planner
   (323) 848-6486

4. **Project Location:**
   The project site is located at 563 N. Alfred Street in the City of West Hollywood south of Santa Monica Blvd. The project site is bordered on the west by La Cienega Boulevard, on the east by N. Alfred Street, and on the north by Melrose Ave and Clinton Avenue. After completion, the project would be located at 521-523 and 533-563 North Alfred Street, 8490 Clinton Avenue, 8494 Melrose Avenue, and 526-532 and 542-548 North La Cienega Boulevard. The properties at 534-540 North La Cienega Boulevard and 529 North Alfred Street are not a part of the proposed project or the proposed CEE Specific Plan area.

   Figure 1 shows the regional location and Figure 2 shows the project site location.

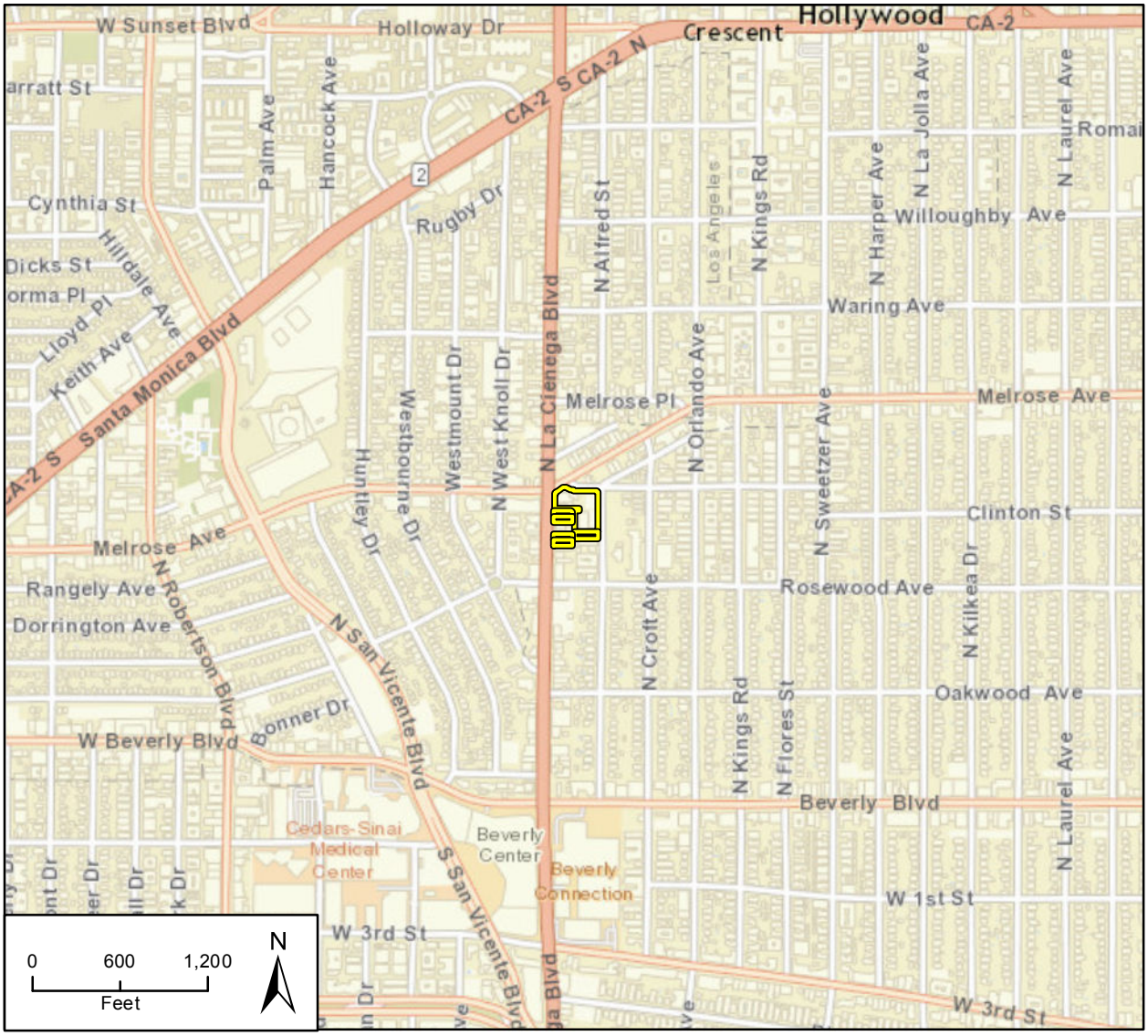
5. **Project Sponsor's Name and Address**
   Center for Early Education
   563 N. Alfred Street
   West Hollywood, CA 90048

6. **General Plan Designation:**
   Public Facilities (PF); Commercial, Community 1 (CC1); Residential, Multi-Family, Medium Density (R3C)

7. **Zoning:**
   Public Facilities (PF); Commercial, Community 1 (CC1); Residential, Multi-Family, Medium Density (R3C)

8. **Description of Project:**

   In order to modernize its West Hollywood educational campus and provide new outdoor recreation space for students while maintaining current student enrollment, the Center for Early Education (CEE) proposes a redevelopment and expansion of its existing campus with the addition of new properties to create an approximately 2.32-acre (approximately 100,639 square foot) urban campus with street frontages on N. La Cienega Boulevard, Clinton Avenue, and N. Alfred Street. This is referred to as the "proposed project." The proposed site plan is shown on Figure 3.



Imagery provided by National Geographic Society, ESRI and its licensors © 2015. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

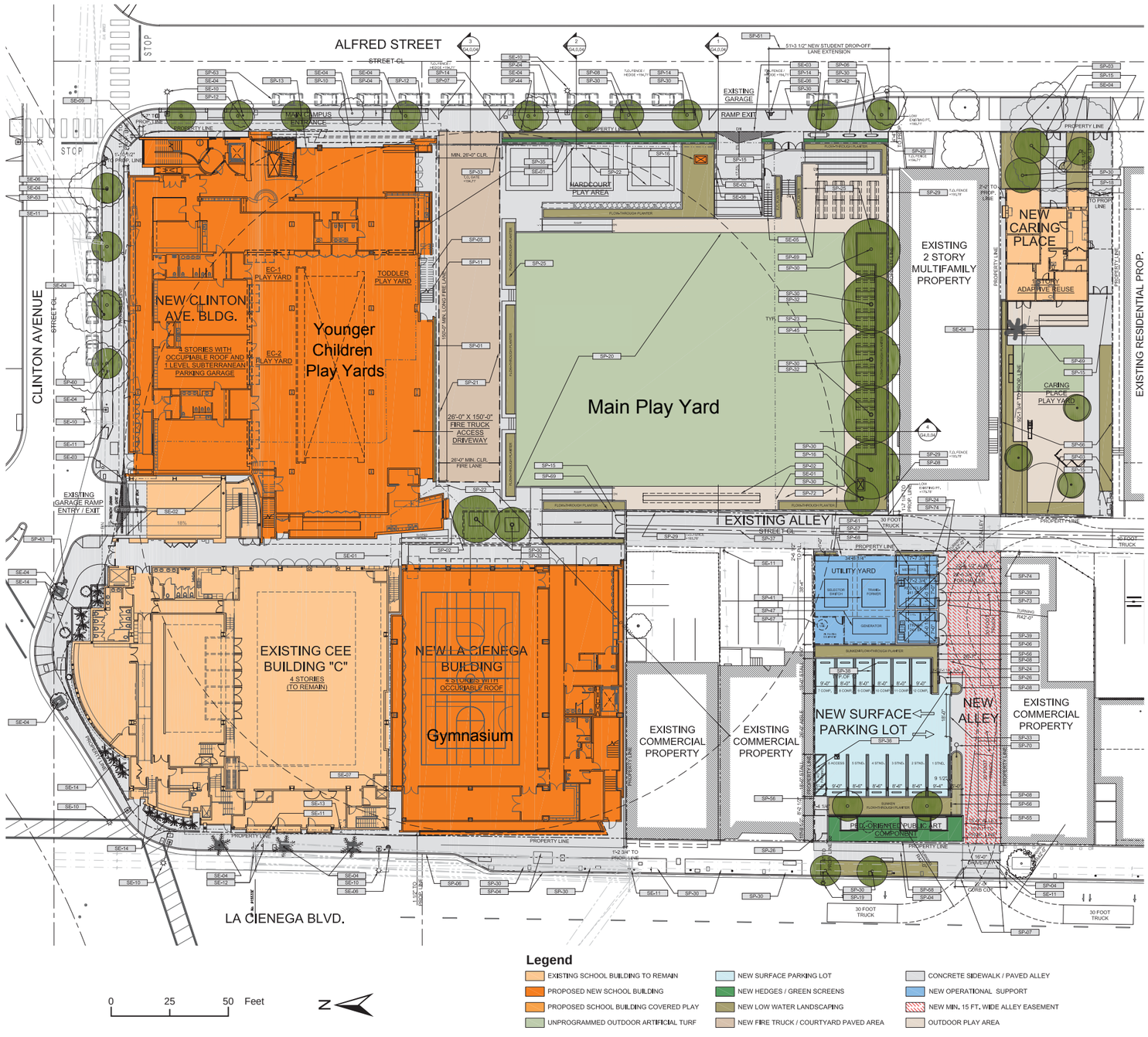
Regional Location

Figure 1

Imagery provided by Google and its licensors © 2015.

Project Location

Figure 2



Legend

- EXISTING SCHOOL BUILDING TO REMAIN
- PROPOSED NEW SCHOOL BUILDING
- PROPOSED SCHOOL BUILDING COVERED PLAY
- UNPROGRAMMED OUTDOOR ARTIFICIAL TURF
- NEW SURFACE PARKING LOT
- NEW HEDGES / GREEN SCREENS
- NEW LOW WATER LANDSCAPING
- NEW FIRE TRUCK / COURTYARD PAVED AREA
- CONCRETE SIDEWALK / PAVED ALLEY
- NEW OPERATIONAL SUPPORT
- NEW MIN. 15 FT. WIDE ALLEY EASEMENT
- OUTDOOR PLAY AREA

Site Plan

Source: Johnson Favaro Architecture and Urban Design, July 2015

Figure 3

As more fully described below, CEE proposes the demolition of approximately 68,350 gross square feet of educational, commercial, and residential buildings (see Figure 4 for Demolition Plan).

CEE proposes the development of 67,000 gross square feet of new and renovated educational buildings and the retention of an existing 39,200 gross square-foot elementary school building, the school would include 106,200 gross square feet of building area upon completion. This would equal a Floor Area Ratio (FAR) of approximately 1.06 to 1.0 (106,200 gross square feet development/100,639 square feet of property). This would result in an overall reduction of 3,010 gross square feet of development as compared to existing conditions. CEE is not proposing any enrollment increase as part of the project.

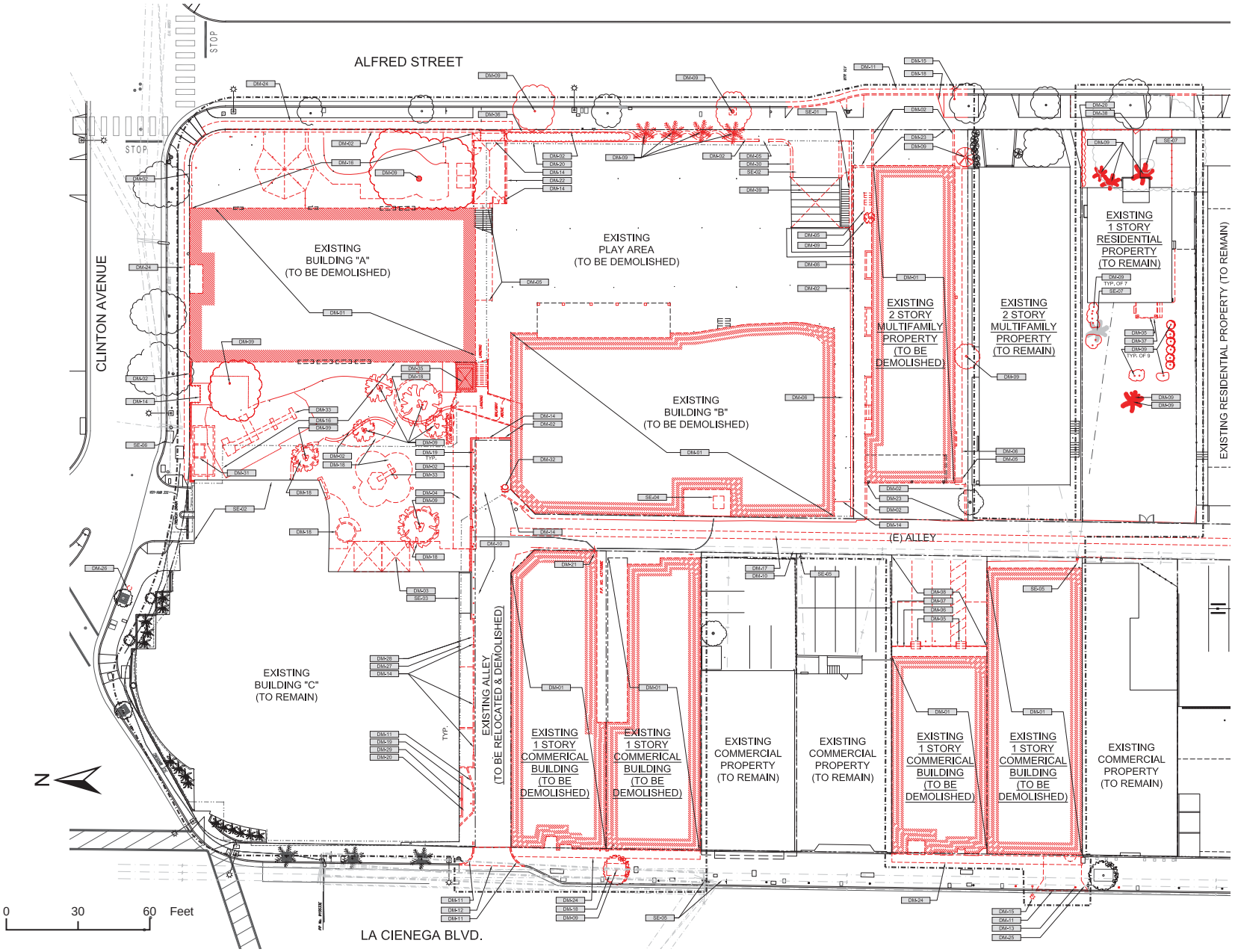
To develop and implement the project and provide uniform regulations and development standards across all parcels within the Enhanced Campus, CEE proposes the creation and establishment of the Center for Early Education Specific Plan (CEE Specific Plan).
The CEE Specific Plan is intended to:

1. Replace inefficient and outdated school facilities
2. Expand and improve the school's academic, athletic, and administrative facilities
3. Reconfigure and significantly expand the school's outdoor play areas
4. Provide additional on-site parking
5. Strengthen and develop an existing school that enhances the social needs of the region's and City's residents
6. Maintain and augment the urban form and land use pattern of the area to enhance the quality of life thereby meeting the community's vision for its future while being compatible with its surroundings
7. Establish land use and development standards for the stable development of the Center for Early Education in support of that portion of the General Plan that relates to this geographic area so as to provide for the public's needs, convenience and general welfare.

<u>Existing and Proposed Campus Properties</u>
The existing approximately 1.45-acre CEE campus consists of ten tied lots and two tied vacated street/alley parcels with primary frontage on N. Alfred Street, but also with prominent street frontage at the southeast corner of La Cienega Boulevard, Melrose Avenue, and Clinton Avenue. CEE proposes to add approximately 0.87 net acres of additional property to its campus. The new parcels proposed to be added include:

- *542-548 N. La Cienega Blvd. – Lots 8 and 9 in Block 12 of Tract 6072*
- *526-532 N. La Cienega Blvd. – Lots 12 and 13 in Block 12 of Tract 6072*
- *521-523 and 533 N. Alfred St. – Lots 24 and 26 in Block 12 of Tract 6072*
- *Proposed vacation of approximately 3,900 square feet of the northern portion of the alley separating the existing CEE campus and Lots 8 and 9 in Block 12 of Tract 6072 (542-548 N. La Cienega)*

CEE proposes to create a new alley by easement across the southern 15 feet of Lot 13 in Block 12 of Tract 6072 (526 N. La Cienega) to provide access to and from La Cienega Boulevard to the remaining portion of the existing alley not being vacated and to a



Demolition Plan

Figure 4

Source: Johnson Favaro Architecture and Urban Design, July 2015

new surface parking lot for school staff proposed to be located on Lot 12 and the remaining portion of Lot 13 in Block 12 of Tract 6072 (530-532 N. La Cienega).

The seven lots and vacated parcel at the northern portion of the block comprising the majority of the existing campus are located in the Public Facilities (PF) zone. The three lots fronting Alfred Street and vacated alley parcel comprising the remaining portion of the existing campus are located in the Medium Density Residential (R3C) zone. The two lots at 521-523 and 533 N. Alfred proposed to be added to campus are also located in the R3C zone. Finally, the four lots at 526-532 and 542-548 N. La Cienega Boulevard proposed to be added to Campus are located in the Community Commercial l (CC1) zone.

Table 1 summarizes the proposed demolition and construction program, which is described in detail below.

Proposed Demolition

To develop the proposed new educational buildings, recreation space, and play yards, CEE proposes the demolition of approximately 68,350 gross square feet of buildings including two existing CEE educational buildings on its current campus, four commercial buildings on the four lots located at 526-532 and 542-548 N. La Cienega Boulevard, and one apartment building located at 533 N. Alfred Street. The existing 15,850 square-foot two- story CEE 'A' Building proposed to be demolished is located at the east side of campus near the intersection of Clinton Avenue and Alfred Street. It currently contains CEE's early childhood facilities and play yard (for children ages 2-4), school administration and staff daycare. The existing 27,250 square-foot three-story CEE 'B' Building proposed to be demolished is located in the center of the existing campus immediately to the east of the public alley. It is located above a portion of the underground parking garage. Both the 'A' and 'B' Buildings have outdoor roof-top play courts.

Existing and Proposed Buildings

Existing 'C' Building

The existing 'C' Building located at the corner of La Cienega Boulevard and Clinton Avenue will remain as is and will not be modified other than to create new internal connections to new buildings that will be developed adjacent to it. The building encompasses approximately 39,200 gross square feet. It includes a multi-purpose room with a stage on the ground floor, a library on the second level, and classrooms on the third and fourth levels. The building is approximately 58 feet in height to its roof and is located above a portion of the single-level below grade parking garage. The other portion of the below-grade garage is located beneath the existing 'B' Building and the play yard on the Alfred Street side of the existing campus. The existing garage currently has 132 parking spaces. There are no outdoor occupied spaces on the roof of the 'C' Building.

Table 1
Proposed Project Characteristics

Parcels	5528-018-033, -034, -037, -038, -047, -049, -074
Site Size	
Existing	~ 1.58 acres
Proposed	~ 0.74 acres
Total	2.32 acres
Existing Site Structures	
Existing Building C	39,200 gsf
CEE owned 523 N. Alfred House	1,660 gsf
CEE Existing "A" Building	15,850 gsf
CEE Existing "B" Building	27,250 gsf
533 Alfred Apartment Building	9,040 gsf
546-548 La Cienega Building	4,660 gsf
542 La Cienega Building	4,570 gsf
530-532 La Cienega Building	3,220 gsf
526 La Cienega Building	3,760 gsf
Total Existing Development	109,201 gsf
Demolition Summary	
CEE Existing "A" Building	15,850 gsf
CEE Existing "B" Building	27,250 gsf
533 Alfred Apartment Building	9,040 gsf
546-548 La Cienega Building	4,660 gsf
542 La Cienega Building	4,570 gsf
530-532 La Cienega Building	3,220 gsf
526 La Cienega Building	3,760 gsf
Total Proposed Demolition	68,350 gsf
Construction Summary	
Proposed La Cienega Building	28,500 gsf
Proposed Clinton Building	36,840 gsf
Total Proposed Construction	65,340 gsf
Renovation Summary	
CEE owned 523 N. Alfred House	1,660 gsf
Parking Summary	
Existing spaces	132 spaces
Proposed for removal	11 spaces
Proposed for addition	59-63 spaces
Total Parking	180-184 spaces
Alternate fuel Parking	4 spaces
Handicap Parking	7 spaces
Bicycle Parking	25 spaces
Building Height	
Existing Building C	56'-6" Top of Parapet/68'-11" Top of Elevator Shaft
Existing 523 N. Alfred House	15'-0"
Proposed La Cienega Building	61'-0" Maximum
Proposed Clinton Ave. Building	60'-0" Maximum

sf = square feet

New La Cienega Building
The first new building is proposed to be located on the west side of the campus immediately to the south of the existing 'C' Building that would remain. The La Cienega Building would be located on Lots 8 and 9 in Block 12 of Tract No. 6072 (approximately 542- 548 N. La Cienega Boulevard), which contain two commercial buildings proposed for demolition, and that portion of the alley proposed to be vacated. The La Cienega Building would encompass approximately 28,500 gross square feet and would be approximately 45 feet in height above grade to the fourth level roof (which would include roof top structures above this height as described below). The building would include an approximately 6,000 square-foot gymnasium with bleacher seating for 120 people, gymnasium office and storage, and restrooms on the ground level, workrooms and offices on the second level, and two classrooms, two breakout rooms, a resource room, and a multipurpose room with an outdoor terrace on the third level. The multipurpose room, which could accommodate up to 40 people, would be used for CEE board meetings and other gatherings. The fourth level would be a partial story with the majority dedicated to an outdoor play court and shaded outdoor lunch area, which would be accessible to fourth level classrooms in the existing 'C' Building. There also would be boys' and girls' restrooms, enclosed playground storage, and enclosed circulation space including an elevator on the fourth level that would be approximately 61 feet in height above La Cienega Boulevard to the highest roof enclosing these appurtenant spaces on the fourth level. Solar panels may be installed on this highest roof. The fourth level outdoor play court and lunch area would be enclosed with an approximately 18-foot high fence along the east and north sides, a 16-foot high fence along the west side and 16-foot high parapet wall along the south side.

New Clinton Building
The second new building is proposed to be located on the east side of campus immediately to the east of the existing 'C' Building in the approximate location of the 'A' Building that is proposed for demolition. The Clinton Building would encompass approximately 36,840 gross square feet, excluding the covered outdoor entrance and covered play yards. The Clinton Building would be approximately 41 feet in height to the roof above grade (which would include roof top structures above this height as described below). A facade and circulation core on the east of the building facing Alfred Street would be approximately 58 feet in height. The ground level would provide classrooms and play area for the early childhood program children ages 2-4. The second level would provide classrooms for kindergarten, first and second grades. The third level would contain offices and meeting rooms for school administration. The roof on the fourth level would be an outdoor play court with an enclosed stairwell and elevator. This level would be accessible to the fourth level classrooms in the existing 'C' Building. The outdoor roof-top play court would be enclosed with an approximately 18-foot high fence along the south side and 16-foot high parapet wall along the north side facing Clinton Avenue.

Demolition of the 'A' Building would allow the construction of an addition to the below-grade garage under the new Clinton Building. The garage expansion would add approximately 40 new parking spaces and would connect the portions of the existing below-grade garage under the 'C' Building, and the 'B' Building and play yard, providing improved circulation within the garage and expanding the garage to a total of 168-172 parking spaces.

Renovation of 523 N. Alfred House
The existing house at 523 N. Alfred Street is proposed to be renovated. This property is located non-contiguously south of the main Enhanced Campus on Lot 24 on Block 12 of Tract 6072 (521-523 N. Alfred Street). The existing house is a one-story structure of approximately 1,660 square feet. It is approximately 15 feet in height. The building would be renovated to house CEE's staff daycare. The building and play area would be state licensed as a day care facility consistent with CEE's current early childhood programs.

Total Net Development
The existing educational, commercial, residential buildings total approximately 109,210 gross square feet. Proposed demolition is approximately 68,350 gross square feet and proposed new construction is approximately 65,340 gross square feet for total proposed development of 106,200 gross square feet. Thus, the proposed project would result in a net decrease of approximately 3,010 gross square feet (see Table 1).

Parking and Vehicle Circulation
The existing below-grade garage currently contains 132 parking spaces. CEE proposes to expand the garage by building approximately 40 additional below-grade parking spaces underneath the new Clinton Building to create a garage with approximately 168-172 parking spaces. The existing entrance to the garage from Clinton Avenue and the existing exit to Alfred Street would remain unchanged. In addition to the underground parking garage, CEE proposes developing a surface parking lot with 12 parking spaces on Lot 12 and northern half of Lot 13 in Block 12 of Tract 6072 (526-530 N. La Cienega). This would provide a total of 180-184 parking spaces for the Enhanced Campus. Entrance to the surface lot would be from a new alley connecting La Cienega with the portion of the alley not being vacated at the center of the block. Use of the surface parking lot would be limited to CEE staff during the day. The surface parking lot would be screened by a six foot high fence with landscaping between the sidewalk and the fenced parking area. Total parking available on the Enhanced Campus on a daily basis would be up to approximately 184 parking spaces.

Consistent with condition no. 4.2 in CEE's current conditional use permit, for any event at which adult family members of 200 or more children are expected to attend, CEE would provide off- campus parking either at LAUSD's Rosewood Avenue Elementary School or an alternative off- street site to accommodate all anticipated parking needs. CEE may also utilize a valet to maximize parking capacity within the below-grade garage.

No change to current morning drop-off and afternoon pick-up procedures is proposed. Vehicles move in a clockwise direction west to east on Clinton Avenue and north to south on Alfred Street. Drop-off and pick-up occur along the south side of Clinton Avenue and west of Alfred Street. The portion of street in front of 533 N. Alfred Street is proposed to be widened to extend the current drop-off lane by approximately 42 feet, which would further improve drop-off and pick-up procedures as compared to existing conditions.

Pedestrian Activation on La Cienega
A new art installation would be provided along the west façade of the La Cienega Building at the sidewalk approximately 10-12 feet (one story) in height. While the proposed art

installation has not been created, it would be developed to fulfill CEE's requirement to provide a public art component in compliance with the City's code for new development projects. The art installation would be developed working with the City's Urban Arts Subcommittee and the Planning Division to create an installation with the specific intent of activating the street. Thus, the proposed art installation would be designed to a scale and scope that would provide additional visual interest and activation along CEE's new frontage along La Cienega Boulevard.

Utility Infrastructure

CEE proposes to centralize its utilities for the Enhanced Campus with a small, approximately 1,900 square-foot dry utility yard (electric, gas, cable) and trash and recycle enclosure located on the eastern end of Lots 12 and 13 in Block 12 of Tract 6072 (526 – 532 N. La Cienega). CEE proposes to run its utilities from the utility yard under the alley to the north to connect with existing and proposed buildings. A new backflow preventer would be installed adjacent to the new surface parking lot along the new alley opening onto La Cienega Boulevard.

Enrollment

Consistent with condition no. 5.1 in CEE's current conditional use permit CEE is not proposing any increase to its cap of no more than 540 students on campus at any given time. The Enhanced Campus is intended to improve, reconfigure and modestly expand its facilities to better serve its students. No increase in enrollment is planned.

9. Entitlement Requests:

CEE requests approval of the following entitlements to allow the development and implementation of the Enhanced Campus:

- *General Plan Amendments to change land use designations from PF, CCI and R3C to CEE Specific Plan*
- *Zone Map Amendment from PF, CCI and R3C to CEE Specific Plan*
- *Establishment and adoption of the CEE Specific Plan*
- *Amendment of the existing Conditional Use Permit (CUP) to allow school and childcare uses on expanded CEE campus and incorporating new properties*
- *Development Permit to allow sequential development of two new and one renovated educational buildings totaling approximately 67,000 square feet to allow total campus development of approximately 106,200 square feet*
- *Demolition Permit to allow demolition of approximately 68,350 gross square feet of educational, commercial and residential buildings*
- *Alley vacation and new alley easement*

10. Surrounding Land Uses and Setting:

The project site is located on the east side of La Cienega Blvd, the west side of Alfred Street, and the south side of Melrose Ave. The site is bordered by an elementary school to the east, residential houses and apartments to the south, La Cienega to the west, and restaurants to the north, off Melrose Ave. Commercial development is located north, west, and south of the project site across and includes retail shops, restaurants, a gym and a salon and spa. Photos of the project site are shown in Figures 5a through 5d.

Photo 1: Current entrance to project site on Alfred Street.

Photo 2: Looking southwest across Clinton Avenue at Center for Early Education Building "A" that is proposed to be demolished and replaced with the new"Clinton Ave." building.

Photo 3: Looking south across Melrose Avenue at Center for Early Education Building "C" that is proposed to remain.

Photo 4: Looking east at Center for Early Education building "C" that is proposed to remain, view from the La Cienga Blvd and Melrose Avenue intersection.

Site Photos

Figure 5a

Photo 5: Looking east across La Cienega Blvd at two commercial buildings proposed to be demolished and replaced with the new "La Cienega" building.

Photo 6: Looking north off of Rosewood Ave sidewalk at existing alley to be demolished and relocated.

Photo 7: Looking northeast across Alfred St. at the Rosewood Elementary school yard directly east of project site.

Photo 8: Looking west across Alfred St. at residential unit proposed to be renovated and used as a staff daycare facility. Large tree in front yard would remain.

Site Photos

Figure 5b

Photo 9: Looking south along Alfred St. at current landscape conditions.

Photo 10: Looking west across Alfred St. at two-story residential unit proposed to be demolished and replaced by large open playfield.

Photo 11: Looking northwest from Alfred St. sidewalk at Center for Early Education builing "B" proposed to be demolished and replaced by large open playfield.

Photo 12: Looking west across La Cienega Blvd. at commercial buildings proposed to be demolished and replaced by a surface parking lot and an alley.

Site Photos

Figure 5c

Photo 13: From approximate location of Center for Early Education building "C" looking southwest across La Cienega Blvd. at surrounding commercial units.

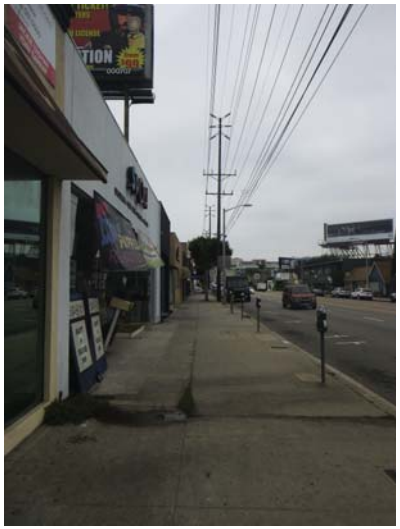


Photo 14: Looking south along east sidewalk of La Cienega Blvd. at proposed site for new tree plantings.

Photo 15: Looking northwest from corner of project site at commercial uses surrounding the La Cienega Blvd. and Melrose Ave. intersection.

Photo 16: Looking west from Clinton Ave. at Center for Early Education building "C" to the right and the La Cienega and Melrose Ave. intersection on the left.

Site Photos

Figure 5d

11. Other Public Agencies Whose Approval is Required:

The City of West Hollywood is the lead agency with responsibility for approving the proposed project. No other agencies have discretionary approval authority over any aspect of the project.

ENVIRONMENTAL FACTORS POTENTIALLY 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 Forest 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 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
Rachel Dimond	Senior Planner
Printed Name	Title

ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS				
-- Would the Project:				
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) Would the project have a substantial adverse effect on a scenic vista?

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 from various locations throughout the City. The Los Angeles Basin and high rise buildings in downtown Los Angeles are also visible from various locations throughout the City.

The proposed project involves construction of two four-story educational buildings, a large open playfield, a surface parking lot and the renovation of one-story day care center. See Figures 5a through 5d for photos of project site and surrounding area. Public views of the Hollywood Hills and the Los Angeles Basin from the project site vicinity are limited due to the topography of the area and existing trees and multi-story development, and there are no views of downtown Los Angeles. Since the existing "C" building is four stories in height and the proposed buildings would also be four stories in height, the proposed project would not block views from the existing residences south of the project site. Therefore, the proposed project would not block public views of the Los Angeles Basin, the Hollywood Hills, or downtown Los Angeles and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Currently, the project site includes two educational buildings (two- and three-story), four one-story commercial buildings, and a one-story residential property. The project site contains several mature landscape trees along the sidewalks, which would be removed (see figure 5c photo 9 for photo of trees to along sidewalk); however, more trees would be added than removed as a result of the proposed project, which would increase the aesthetic value of the site (see Section IV, *Biological Resources).* The project site does not contain rock outcroppings or historic resources (see Section III, *Cultural Resources*) and is not near any scenic highways (Caltrans, 2015). Therefore, a less than significant impact would occur as a result of the proposed project.

LESS THAN SIGNIFICANT IMPACT

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The visual character of the area surrounding the project site is diverse; the surrounding buildings have varying architectural styles, massing, and heights. The proposed project involves construction of two four-story educational buildings, a large open playfield, a surface parking lot, a pedestrian-oriented public art installation and the renovation of a one-story day care center (see Figure 3 for site plan). Currently, the project site includes two educational buildings (two- and three-story), four one-story commercial buildings, and a one-story residential property.

The proposed new structures would be four stories above grade along La Cienega Boulevard, Clinton Avenue, and Alfred Street. The adjacent commercial buildings on the east side of La Cienega Boulevard are one story in height; however, other buildings in the immediate vicinity of the project area are similar in height or taller. For example, a building directly across the street from the project site at the southwest corner of La Cienega Boulevard and Melrose Avenue is three stories and approximately 35 feet in height. A five-story mixed-use residential and commercial building on the west side of La Cienega Boulevard at Westmount Drive is approximately 1,000 south of the project site and the new four-story Maimonides Academy Building approximately 50 feet in height is approximately 0.25 miles south on La Cienega Boulevard. Lastly, the Beverly Center, located 0.3 miles south of the project site is eight stories high. See figures 5a-5c, specifically photo 4, photo 5 and photo 12 for views of the existing CEE building and adjacent commercial buildings proposed to be demolished. The residential properties on Alfred Street are two stories in height. See Figure 5c, photo 10 for view of residential property proposed to be demolished. As such, the proposed project would represent a change in the visual character of the project site. However, the existing four-story educational building with frontage on La Cienega Boulevard and Clinton Avenue is similar to the proposed project in terms of height and scale. See Figure 5a, photos 3 and 4 for views of existing CEE building proposed to remain. Other existing CEE buildings are two- and three-stories in height, with frontage on Clinton Avenue and Alfred Street. The proposed project would increase the number of trees along Alfred Street, which would improve the visual character of the residential neighborhood and the view from children attending the Rosewood Elementary School on Alfred Street. See Figure 3 for the site plan and Figure 5d, photo 14 for view of sidewalk on La Cienega Boulevard. In addition, the proposed project would add trees and

pedestrian-oriented public art along La Cienega Boulevard to improve the pedestrian environment on that road frontage. Therefore, the project would generally enhance the visual character of the site and impacts of the proposed project would be less than significant.

A shadow analysis was performed to determine how the proposed project would affect nearby residences (shown in figures 6a, 6b, and 6c). Prolonged periods of shade and shadow can negatively affect the character of certain land uses. The City of West Hollywood has not adopted any specific thresholds or regulations addressing shading; therefore, the City of Los Angeles shadow thresholds were used to determine significance. According to the City of Los Angeles thresholds, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Based on City of Los Angeles thresholds, shadow impacts can be considered significant if light-sensitive uses would be shaded by project related structures for more than three hours between 9:00 a.m. and 3:00 p.m. between late October and early April (including Winter Solstice), or for more than four hours between early April and late October (including Summer Solstice) (City of Los Angeles, 2006). The only light-sensitive uses in the direct vicinity of the project site include a rooftop restaurant that is above a commercial building at the corner of La Cienega Boulevard and Melrose Avenue, an outdoor patio of a restaurant along Clinton Avenue, north of the project site, outdoor spaces of residences on the north side of Clinton Avenue and the west side of Alfred Street, and the Rosewood Elementary School playground located on the east side of Alfred Street, directly east of the project site.

The estimated summer solstice (June 21) shadows generated by the proposed project are illustrated in Figure 6a. During 9:00 a.m. to 3:00 p.m. in the summer months, shadows would not be cast onto the Rosewood Elementary School, the rooftop restaurant, the outdoor restaurant patio, or the nearby residences. Therefore, because shadows would not be cast onto light-sensitive uses for a period greater than four hours between the hours of 9:00 a.m. and 3:00 p.m., impacts of the proposed project would be less than significant. See figures 7a, 7b, and 7c for project elevations.

The estimated winter solstice (December 21) shadows generated by the proposed project are illustrated on Figure 6b. At 8:00 a.m. in the winter months, shade would occur on the rooftop restaurant that is above a commercial building at the corner of La Cienega Boulevard and Melrose Avenue. However, the shadows would not be cast on the restaurant for more than four hours between 9:00 a.m. and 3:00 p.m., so the restaurant would not be impacted by the proposed project. An outdoor space of a residence on Clinton Avenue would be shaded at 3:00 p.m.; however, it would not shade the space for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. so it would not be significantly impacted by the project.

Shadows would be cast upon an outdoor patio of a restaurant 50 feet north of the project site between 10:00 a.m. and 3:00 p.m. The outdoor patio currently consists of three tables with umbrellas and is an extension of the restaurants main eating area. A comparison of the existing winter shade conditions was made to evaluate the existing condition of shade on the patio. See Figure 6c for shadow comparison. Existing shade conditions were modeled with the existing building "A" height, which is 30 feet. The existing building "A" also has a rooftop tennis court with windscreens that typically range from 10-12 feet in height. Because this was not modeled,

June 21, 9:00am

June 21, 12:00pm

June 21, 3:00pm

June 21, 6:00pm

Summer Solstice Shadows

December 21, 8:00am

December 21, 10:00am

December 21, 12:00pm

December 21, 3:00pm

Winter Solstice Shadows

Figure 6b

December 21, 8:00am

December 21, 10:00am

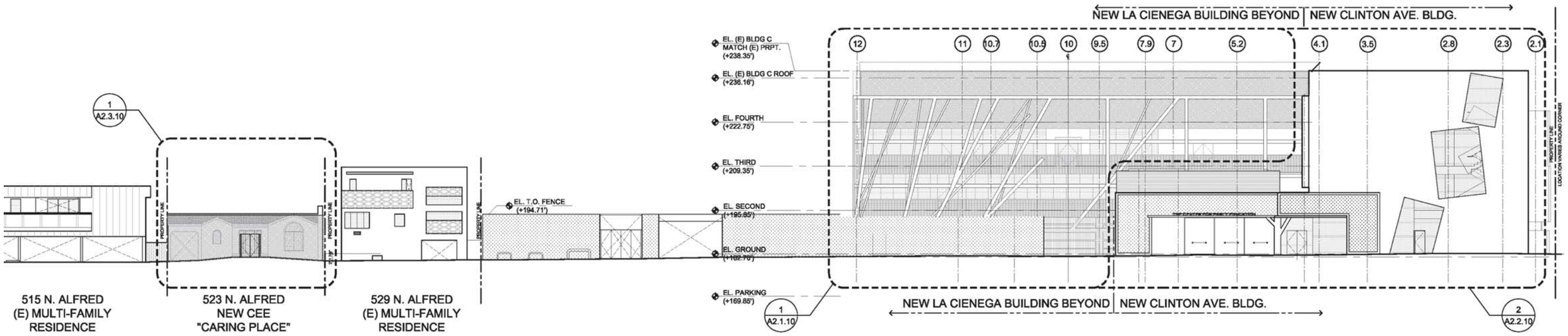
December 21, 12:00pm

December 21, 3:00pm

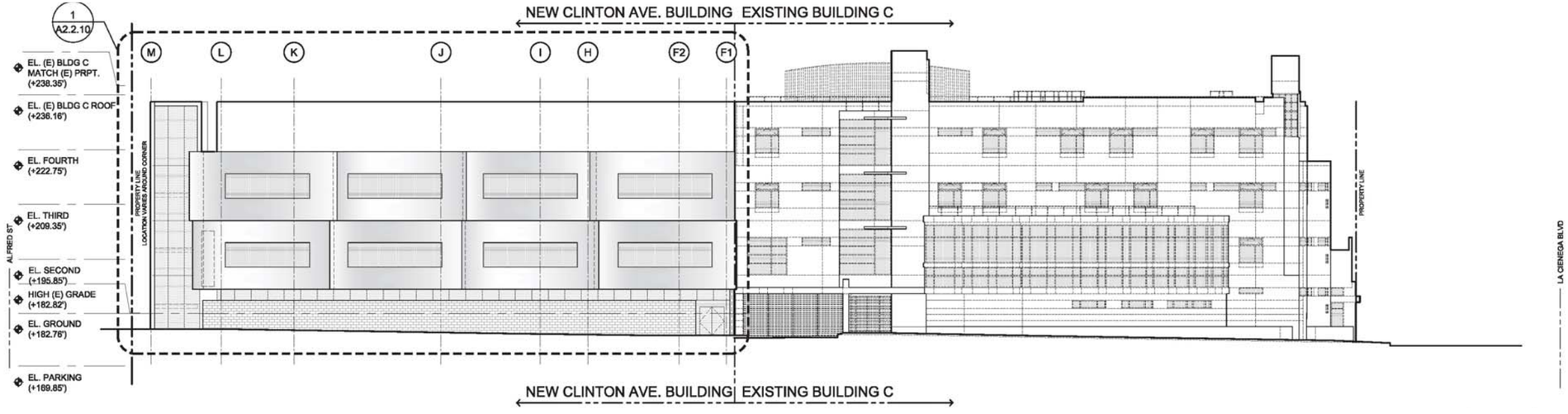
Existing Shade | Proposed Shade | Proposed Building | Sensitive Site

Winter Solstice
Shadow Comparison

Figure 6c



EAST SITE ELEVATION ALONG ALFRED STREET



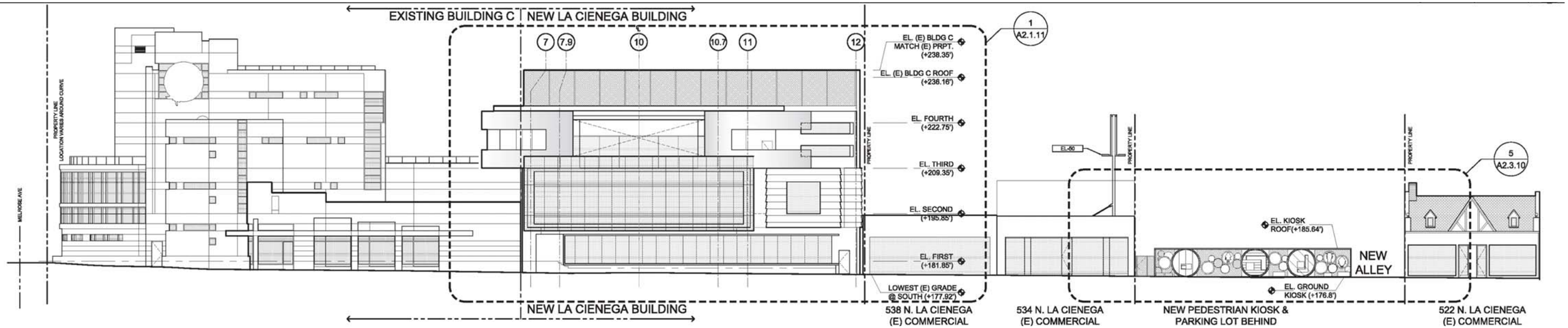
NORTH SITE ELEVATION ALONG CLINTON AVENUE

0 15 30 Feet

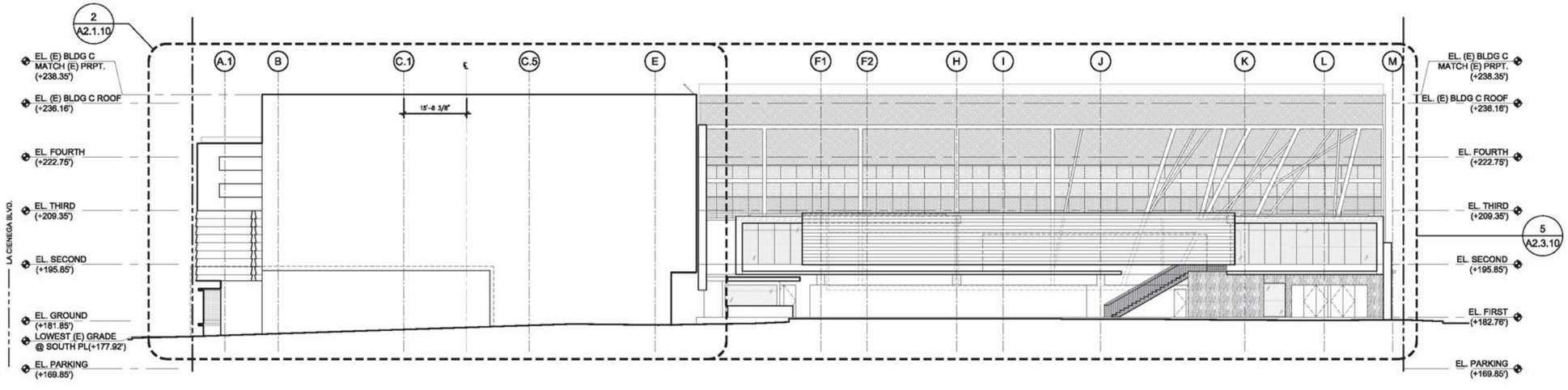
Project Elevations

Source: Johnson Favaro Architecture and Urban Design, July 2015

Figure 7a



WEST SITE ELEVATION ALONG LA CIENEGA BLVD



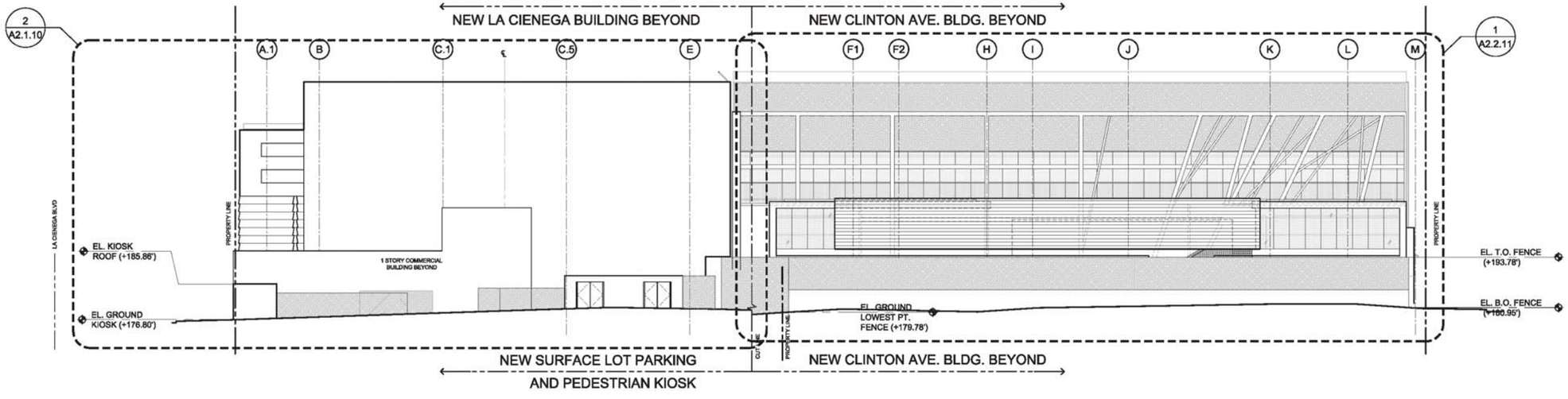
SOUTH SITE ELEVATION - EAST WEST CUT THROUGH BLOCK

0 15 30 Feet

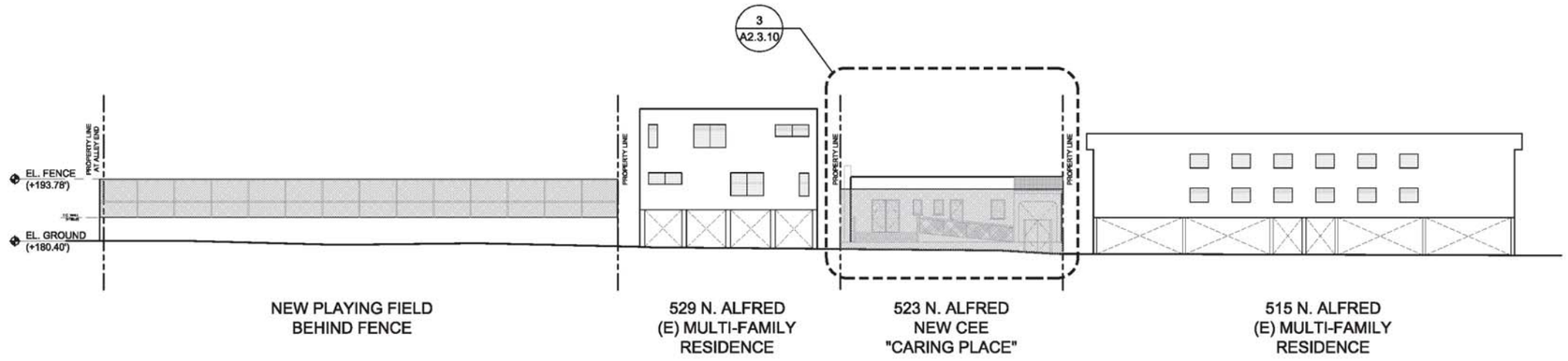
Project Elevations

Source: Johnson Favaro Architecture and Urban Design, July 2015

Figure 7b



SOUTH SITE ELEVATION AT ALFRED SOUTH PROPERTY/ SOUTH PARKING LOT ELEVATION



WEST ELEVATION AT NORTH-SOUTH ALLEY

0 15 30 Feet

Project Elevations

Source: Johnson Favaro Architecture and Urban Design, July 2015

Figure 7c

the existing shade projection is considered a conservative estimate. As shown in Figure 6c, shade currently occurs on the three tables of the outdoor patio between 12:00 p.m. and 3:00 p.m. Therefore, since shadows are already cast upon the patio for at least three hours and the City of West Hollywood General Plan PEIR (2010) states that new development would be located in areas that already experience at least minimal impacts from shade and shadow, the increase of shade due to the proposed project would be a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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

The project site is in an urbanized area with high levels of existing lighting. The adjacent residential and roadway uses generate light and glare along all sides of the project site. Primary sources of light adjacent to the project site include lighting associated with the existing residential buildings including building mounted lighting and headlights from vehicles on nearby streets. The primary source of glare adjacent to the project site is the sun's reflection from metallic and glass surfaces on vehicles parked on the streets bordering the project site.

Windows on the exterior elevations of the proposed project could incrementally 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 due to existing buildings.

The proposed project would incorporate exterior lighting in the form of pedestrian walkway lighting, building mounted lighting, and safety related lighting around the project site and in the proposed main play yard area. 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 surrounding urban development, including the light level associated with the Rosewood Elementary School, just east of the project site. Headlights of vehicles entering and exiting the surface parking lot from La Cienega Boulevard at night would shine light; however the light would not target any sensitive receptors since the only buildings present along La Cienega Boulevard are commercial buildings. The other parking area, which is proposed to be expanded, is the subterranean parking garage located near the southwest corner of Alfred Street and Clinton Avenue. Light from the headlights of vehicles entering and exiting the parking garage would shine toward residential units along Clinton Avenue. However, this light would be similar to that currently experienced by light-sensitive receptors as vehicles currently exit the parking garage of the project site. In addition, light would shine on adjacent light-sensitive receptors for short periods of time, as the vehicles would be mostly turning west on Clinton Avenue to reach Melrose Avenue or La Cienega Boulevard. Light from the headlights of vehicles entering and exiting the parking garage would not affect the Rosewood Elementary School because the school experiences its own operational and security lighting and would generally be closed before sunset.

The proposed project would not substantially alter existing light conditions, because of the relatively high ambient lighting levels in the vicinity of the project site resulting from surrounding urban development. In addition, the proposed project would be required to comply with West Hollywood Municipal Code (WHMC) Section 19.20.100, 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 0.5 to 5 foot candles (depending on hazards and activity level) for general human safety and 0.2 to 0.9 footcandles for parking or pedestrian areas. Further, pursuant to WHMC Section 19.46.050, the Planning Commission or the Design Review Subcommittee has review and approval authority over the architectural design, including the lighting plans for proposed development. This section of the WHMC prescribes that specific design elements such as lighting "have been incorporated into the proposed project to further ensure the compatibility of the structures with the character of surrounding development."

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. Therefore, impacts related to project light and glare would be less than significant.

LESS THAN SIGNIFICANT IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FOREST 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:				
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?	☐	☐	☐	■

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FOREST RESOURCES				
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) Would the project 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) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

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

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

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

The project site is within an 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 proposed project would have no effect on forestland or the conversion of farmland to non-agricultural uses.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY				
-- Would the project:				
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 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." Health effects associated with criteria pollutants upon which attainment of state and federal air quality standards is measured are described in Table 2.

The South Coast Air Basin (Basin), in which the project site is located, is a non-attainment area for federal standards for ozone, $PM_{2.5}$, and lead, and state standards for ozone, PM_{10}, $PM_{2.5}$, NO_2 and lead. This non-attainment status is a result of several factors, including 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.

Because the Basin currently exceeds several state and federal ambient air quality standards, the SCAQMD is required to implement strategies to reduce pollutant levels to recognized acceptable standards. To accomplish this requirement, the SCAQMD has adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of state and federal air quality standards.

Table 2
Health Effects Associated with Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: pulmonary function decrements and localized lung edema in humans and animals and 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.
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.

Source: U.S. Environmental Protection Agency, What are the Six Common Air Pollutants? website http://www.epa.gov/oaqps001/urbanair/, accessed August10, 2015.

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 3.

The SCAQMD has also developed Localized Significance Thresholds (LSTs), which were devised in response to concerns regarding the 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 (SCAQMD, revised July 2008). As such, LSTs for operational emissions do not apply to onsite development since the majority of emissions would be generated by cars on roadways.

Table 3
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

Source: SCAQMD, http://www.aqmd.gov/ceqa/handbook/signthres.pdf, March 2011.

[1] Reactive Organic Gases (ROG) are formed during combustion and evaporation of organic solvents. ROG are also referred to as Volatile Organic Compounds (VOC).

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 proposed project involves approximately 2.32 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 2.32-acre site in SRA-2 are shown in Table 4. LSTs are provided for receptors at a distance of 82 to 1,640 feet from the project site boundary. 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 feet. In addition, the use of LSTs is voluntary, to be implemented at the discretion of local agencies.

Table 4
SCAQMD LSTs for Construction

Pollutant	Allowable emissions (lbs/day) from a 2.32-acre site in SRA-2 for a receptor 82 feet away
Gradual conversion of NO_X to NO_2	125
CO	954
PM_{10}	8
$PM_{2.5}$	6

Source: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2, October 2009.

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

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, housing or employment growth exceeding the forecasts used in the development of the AQMP. The 2012 AQMP was developed using Southern California Association of Governments' (SCAG) population forecasts. According to the California Department of Finance, West Hollywood has a current population of 35,825 with an average household size of 1.55 persons (California DOF, 2015). SCAG projects that the County's population in West Hollywood will increase to 36,100 by 2035. Because the proposed project would not create an increase in student enrollment or staff members, it would not conflict with the population forecasts contained in the 2012 AQMP. Therefore, the project would have no impact related to implementation of the 2012 AQMP.

NO IMPACT

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Emissions generated by the proposed project would include temporary construction emissions and long-term operational emissions. Emissions are quantified below and compared to SCAQMD significance thresholds, described in detail above.

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.

Emissions associated with the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) version 2013.2.2.

Grading, excavation, hauling, and site preparation would involve the largest use of heavy equipment and generation of fugitive dust. For the purposes of modeling, it was assumed that construction of the proposed 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 Basin. Therefore, the following conditions would be required to reduce fugitive dust in compliance with SCAQMD Rule 403 and were included in the CalEEMod model version 2013.2.2 for site preparation and grading phases of construction for the proposed project.

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

2. ***Soil Treatment.*** *Construction contractors shall 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 occur as necessary, and at least twice daily, preferably in the late morning and after work is completed for the day.*

3. ***Soil Stabilization.*** *Construction contractors shall monitor all graded and/or excavated inactive areas of the construction site daily 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 periodically treated with environmentally safe dust suppressants to prevent excessive fugitive dust.*

4. ***No Grading During High Winds.*** *Construction contractors shall 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 shall sweep all on-site 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 construction of the proposed project would comply with SCAQMD Rule 1113 regarding the use of low-volatile organic compound (VOC) architectural coatings. Construction is estimated to occur in phases over approximately five years between January 2016 and August 2020. Complete CalEEMod results and assumptions can be viewed in Appendix B. Table 5 summarizes the estimated maximum daily emissions of pollutants during construction assuming implementation of the above conditions in compliance with SCAQMD regulations. As shown in Table 5, neither SCAQMD regional thresholds nor LST thresholds would be exceeded. Therefore, impacts associated with construction of the proposed project would be less than significant.

Long-Term Emissions

Long-term emissions associated with project operation, as shown in Table 6, 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). The following emissions were based off the construction of 67,000 square feet of an Elementary School, 40 parking garage spaces and 12 surface parking lot spaces. A majority of the operational emissions are associated with the proposed school operations since the operational emissions associated with parking structures mostly include electricity usage from lighting in parking lots and lighting, ventilation and elevators. It also is important to note that the project would replace existing buildings that

currently have operational emissions that have not been deducted from the estimate of the project's operational emissions; therefore, the estimate of air pollutant emissions is conservative.

Table 5
Estimated Construction Maximum Daily Air Pollutant Emissions

	Maximum Daily Emissions (lbs/day)				
	ROG	**NO_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
2016 Maximum Daily Emissions (On-site and Off-site)[a]	1.6	11.5	9.5	1.1	0.8
2017 Maximum Daily Emissions (On-site and Off-site)[a]	1.4	12.7	7.5	0.8	0.7
2018 Maximum Daily Emissions (On-site and Off-site)[a]	1.3	9.4	8.8	1.5	1.0
2019 Maximum Daily Emissions (On-site and Off-site)[a]	2.8	12.0	10.5	0.9	0.7
2020 Maximum Daily Emissions (On-site and Off-site)[a]	1.1	7.2	7.8	0.6	0.4
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**
2016 Maximum Daily Emissions (On-site Only)[b]	1.3	11.2	8.7	1.0	0.8
2017 Maximum Daily Emissions (On-site Only)[c]	1.2	12.7	7.2	0.8	0.7
2018 Maximum Daily Emissions (On-site Only)[b]	1.1	9.3	8.3	1.4	1.0
2019 Maximum Daily Emissions (On-site Only)[c]	2.5	11.6	9.3	0.7	0.7
2020 Maximum Daily Emissions (On-site Only)[c]	0.7	7.1	7.0	0.4	0.4
Local Significance Thresholds (LSTs) at 82 feet[c]	*N/A*	*125*	*954*	*8*	*6*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**

Calculations were made in CalEEMod.

[a] *See Table 2.1 "Overall Construction-Unmitigated" of winter emissions CalEEMod worksheets in Appendix C. Maximum Daily Emissions includes both on-site and off-site emissions.*

[b] *See Tables under 3.0 Construction Detail in CalEEMod worksheets in Appendix C.*

[c] *LST's only include on-site emissions. LSTs for a 2-acre site in SRA-2, see Table 4*

Table 6
Estimated Project Operational Emissions

Sources	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area[1]	0.7	<0.01	<0.01	<0.01	<0.01	0
Energy	<0.01	0.02	0.02	<0.01	<0.01	<0.01
Mobile	1.3	1.1	4.2	0.8	0.2	0.01
Total Emissions (lbs/day)	**2.0**	**1.1**	**4.2**	**0.8**	**0.2**	**0.01**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

[1] *Area emission sources are associated with fireplaces, consumer products, architectural coatings, and landscaping equipment.*

Source: Calculations were made in CalEEMod. See Table 2.2 "Unmitigated Operational" in CalEEMod winter emissions worksheets in Appendix C.

Note: numbers may not add up due to rounding.

Emissions during operation of the proposed project would not exceed SCAQMD thresholds for any criteria pollutant. Therefore, air quality impacts associated with project operation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e) Would the project create objectionable odors affecting a substantial number of people?
The proposed project would involve construction of educational buildings that are not listed on Figure 4-3 of the 1993 *SCAQMD CEQA Air Quality Handbook* as a use that requires analysis of odor impacts. Further, educational 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 and impacts would be less than significant.
LESS THAN SIGNIFICANT IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES				
-- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

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

The project site is located in an urbanized area of West Hollywood. The project site has been developed and includes four commercial buildings, three educational facilities, and two residential properties. The proposed project would involve the construction of three new educational facilities, a private outdoor recreation facility, a staff daycare facility, a new alleyway and a surface parking lot. The project site contains intermittent vegetation including several landscaping trees and ornamental shrubbery. None of the trees present on the site are included on the Southern California Native Tree List in the City of West Hollywood's Heritage Tree Program. Species listed under the federal Endangered Species Act or California Special Concern Species are not expected to occur on or in proximity to the site, as the project site is located in a developed area and does not provide suitable habitat. The project site does not contain any riparian habitat or sensitive natural communities. No federal-or-state-listed endangered, threatened, rare, or otherwise sensitive flora or fauna were observed at the project site (Rincon Consultants, Inc., site visit, 2015).

The mature trees and shrubs within the project site provide potentially suitable nesting habitat for a variety of bird species that are afforded protection under the federal Migratory Bird Treaty Act (MBTA – 16 United State Code Section 703-711) and California Fish and Game Code (CFGC) Section 3503. No active nests were identified in existing trees and due to the limited number of existing larger trees and shrubs, the proposed project has minimal potential to impact migratory and other bird species even if construction activities were to occur during the nesting season, which is typically February 1 through August 31. Construction-related disturbance may result in nest abandonment or premature fledging of the young. However, any tree removals or other activities that could disturb active nests would be required to comply with the MBTA 16 United State Code Section 703-711 and CFGC Section 3503 to avoid construction-related disturbance of nesting birds. Compliance could involve avoiding vegetation clearing or other soil disturbances during the bird breeding season (February 1 through August 31) or having a qualified biologist conduct pre-construction/grading surveys to avoid nests during construction activities. With compliance with MBTA and CFGC requirements, no impact would occur as a result of the proposed project.

NO IMPACT

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The project site is not located on or in the vicinity of a federally protected wetland (FWS wetlands Mapper, 2015). Therefore, no impact would occur as a result of the proposed project.

NO IMPACT

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

As described above, there is no native biological habitat on the project site. In addition, there are no native wildlife nursery sites on the project site or in its immediate vicinity. 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). The proposed project would involve the construction of educational facilities on a currently developed site within an urbanized area that lacks native biological habitat. The proposed project would not 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. Therefore, no impact would occur as a result of the proposed project.

NO IMPACT

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

The project site contains approximately 40 living trees. The sidewalks surrounding the project site along Clinton Avenue, Alfred Street, and La Cienega Boulevard contain approximately 18 mature landscape trees. The proposed project would involve the removal of one tree on La Cienega Boulevard and two trees on Alfred Street. However, the proposed project would include the planting of 20 new trees, seven of which would be on La Cienega Boulevard, four of which would be on Alfred Street, and the rest of which would be within the project site. Generally, tree species located on the project site include jacarandas, Mexican palms, queen palms, ficuses, a golden medallion tree, two mulberry trees, a silk floss tree, an Italian cypress, cajeput trees, and a Chinese elm. None of the existing trees present on the site are included on the Southern California Native Tree List in the City of West Hollywood's Heritage Tree Program, nor are they designated heritage trees. No local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, apply to the project site. Therefore, no impact would occur as a result of the proposed project.

NO IMPACT

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

The project site is not located within an area that is subject to an adopted habitat conservation plan (2035 General Plan FEIR, 2010). Therefore, no impact would occur as a result of the proposed project.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES				
-- Would the project:				
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) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

The project site is within a developed area where two educational buildings, four commercial buildings and one residential complex would be demolished. The project site and adjacent properties do not contain any historic resources defined under the California Public resources Code § 15064.5. The structures are not identified by the California State Parks Office of Historical Preservation's California Historical Resources list or by the City of West Hollywood Historic and Cultural Resources Map (California State Parks, 2015; City of West Hollywood, 2011). Therefore, no impact would occur as a result of the proposed project.

NO IMPACT

b) Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?

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

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

The project site is within an urbanized area. The site is developed and currently includes four commercial buildings, three educational facilities, and two residential properties. There is no evidence that intact 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 Public Resources Code as appropriate. If human remains are unearthed, State 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 Public Resources Code Section 5097.98. Due to the previous development and use of the project site and with compliance with existing regulatory requirements in the event that unanticipated resources are identified during grading and excavation, no impact would occur as a result of the proposed project.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. GEOLOGY AND SOILS				
-- Would the project:				
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	☐	☐	☐	■

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. GEOLOGY AND SOILS				
-- Would the project:				
where sewers are not available for the disposal of wastewater?				

a.i) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

a.ii) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

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. According to the Southern California Earthquake Data Center Map (SCEDC), nearby active faults include the Santa Monica Fault, the Hollywood 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.

As identified in WHMC Section 13.04.010, the City of West Hollywood has adopted the Los Angeles County Building Code (Title 26) and the California Building Code (CBC) (2013 edition). With adherence to the WHMC, design and construction of the project's proposed buildings 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 foundation design and construction would be subject to review and approval by the City of West Hollywood Building and Safety Division. Therefore, seismic hazard impacts of the proposed project would be less than significant.

a.iii) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

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 Seismic Hazards Zone Map in the City of West Hollywood General Plan Update Geologic and Seismic Technical Background Report (City of West Hollywood, 2010). The General Plan states that a liquefaction area is defined as an area where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693 (c) would be required. Mitigation is defined as those measures that are consistent with established practice and that will reduce seismic risk to acceptable levels. Implementation

of Mitigation Measure GEO-1 would ensure that potential impacts due to liquefaction would be less than significant.

> **GEO-1** **Liquefaction.** Due to the potential for liquefaction, a mat foundation is recommended for both the La Cienega Building and the Clinton Building. The mat should be founded exclusively in the natural alluvial soils for the Clinton Building with the basement, and in a newly-compacted fill for the at-grade La Cienega Building. The bottom of the mat foundation should be a minimum of 18 inches in depth below the lowest adjacent grade at the perimeter of the structure. An allowable bearing pressure of 3,500 pounds per square foot may be utilized in the design of the proposed mat foundation. See Appendix E for further details in the geotechnical report.

Compliance with Mitigation Measure GEO-1 would be enforced by the City of West Hollywood Engineering Division prior to issuance of building permits. With implementation of Mitigation Measure GEO-1, impacts related to potential liquefaction hazards would be less than significant.

Further, as identified in WHMC Section 13.04.010, the City of West Hollywood has adopted the Los Angeles County Building Code (Title 26) and the California Building Code (CBC) (2013 edition), and the project's buildings would be required to be constructed to comply with the City of West Hollywood Building Code. Compliance with the West Hollywood Building Code and implementation of Mitigation Measure GEO-1 would ensure the proposed project's potential liquefaction impacts would be less than significant.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

a.iv) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

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. In order to fail, unstable slopes need to be disturbed; 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 an urbanized area and is relatively flat with a gentle slope across the project site from northeast to southwest. 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). Therefore, impacts related to landslides for the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Loose soils create conditions that can lead to erosion. The potential for erosion generally increases after soil has been disturbed by clearing and grading. Temporary erosion could occur during project construction. As discussed in Section III, *Air Quality*, dust control measures would be implemented during construction as required by the SCAQMD Rule 403 as conditions to minimize fugitive dust emissions. Measures to minimize fugitive dust emissions include watering exposed surfaces and covering soil stockpiles. These measures are also effective in reducing soil erosion. In addition, 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 WHMC requirements shall apply to construction on the project 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.*

The proposed design of the project would also incorporate standards and regulations identified by the City and RWQCB, including preparation and implementation of operational erosion and sedimentation controls. The requirements discussed would reduce temporary erosion-related impacts related to construction and long-term operation of the proposed project to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

c) Would the project 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?

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, including, but 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 project site is within a potential liquefaction zone as

identified on the Seismic Hazards Zone Map in the City of West Hollywood General Plan Update Geologic and Seismic Technical Background Report (City of West Hollywood, 2010). See section *a.i* above for liquefaction discussion.

The project site is subject to a high water table. At the time the existing subterranean garage was completed, a permanent dewatering collection system was installed removing approximately 7,000 gallons of water per day. The water is treated and either used for irrigation on the existing campus, or discharged to the storm drain after being treated as required by water quality regulations. Project engineers have determined that the expansion of the subterranean garage should not require an expansion of the existing dewatering collection system and should not increase the flow or volume of water removed. Additionally, the proposed expansion of the subterranean garage and foundation would be designed to resist the infiltration of groundwater. Further, the project would be required to comply with the City of WHMC, which adopts Los Angeles County Building Code and CBC requirements related to subsidence, including the remedial grading requirements described above. With compliance with the WHMC, impacts associated with lateral spreading, subsidence, or collapse would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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 are present in West Hollywood, and more prevalent in the southern part of the City, south of Santa Monica Boulevard, where the project site is located. However, the project would be required to comply with the WHMC, which adopts Los Angeles County Building Code and CBC requirements. 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. Project foundation design and construction would be subject to review and approval by the City of West Hollywood Building and Safety Division. Therefore, impacts related to expansive soils would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e) Would the project 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?

The project would connect to the City's sewer system and would not require the use of septic tanks. Therefore, no impact would result.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS				
-- Would the project:				
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) may be adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, and as a result may be 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. GHGs produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since 1750, it is estimated that 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 may 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 of global climate change in California may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (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 may contribute to climate change. The CAP includes seven emission reductions strategies:

1) *Community leadership and engagement*
2) *Land use and community design*
3) *Transportation and mobility*
4) *Energy use and efficiency*
5) *Water use and efficiency*
6) *Waste reduction and recycling*
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 of carbon dioxide equivalent (CO_2E) per year from industrial development projects to be significant (SCAQMD, 2009). 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 formally adopted, the SCAQMD has a recommended tiered GHG significance threshold (SCAQMD, 2008). Under Tier 2, project impacts would be less than significant if a project is consistent with an approved local or regional plan. Therefore, GHG emissions associated with the proposed project would be less than significant if the project is consistent with the City of West Hollywood CAP and other applicable GHG reduction policies or plans.

For informational purposes, SCAQMD recommended Tier 3 thresholds as screening level quantitative thresholds. If a local or regional GHG reduction policy or plan does not apply to a project, emissions would be less than significant if they are under the Tier 3 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).

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

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

The City of West Hollywood CAP outlines a course of action to reduce municipal and communitywide GHG emissions that contribute to climate change. The proposed project would be consistent with the City's CAP if it includes provisions to implement applicable CAP GHG reduction measures. Table 7 compares the proposed project to applicable CAP measures. As shown, the proposed project would be consistent with the City's CAP.

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 climate change. Included in this document are various measures that may reduce the global climate change 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 proposed 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 in close proximity 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 eight miles from the coastline and is not at risk for inundation from sea level rise (California Energy Commission, Cal-Adapt website, 2015).

Table 7
Consistency with Applicable West Hollywood CAP Reduction Measures

Measure	Project Consistency
Transportation and Mobility	
T-1.1: Increase the pedestrian mode share in West Hollywood with convenient and attractive pedestrian infrastructure and facilities.	**Consistent** The proposed project includes a pedestrian-oriented public art component and is located within walking distance of retail facilities, restaurants, and public transportation (< 25 feet),
T-2.1: Increase the bicycle mode share by providing accessible, convenient, and attractive bicycle infrastructure.	**Consistent** The proposed project includes 25 bicycle parking stalls and 2 showers and 15 lockers for employees.
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 in accordance with WHMC requirements on a site where bicycle parking does not currently exist.
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 meet or exceed Title 24 California Building Code Energy Efficiency standards and solar panels may be installed on the La Cienega Building.
E-3.2: Require the use of recycled materials for 20% of construction materials in all new construction.	**Consistent** The proposed project would include at least 20% recycled-content materials in the foundation, insulation, landscaping, and interior and exterior finishes.
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 the use of drought tolerant and California Native Species in the landscaping of the sidewalks on La Cienega Boulevard, Alfred Street, and communal outdoor areas. Limited irrigation consistent with WHMC requirements would be required.
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. As of 2012, the daily per employee disposal rate in West Hollywood was 5.2 pounds per employee. This exceeds CalRecycle's target of 7.7 pounds per employee per day (CalRecycle, 2012). 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 proposed project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
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 adjacent roads and although it would remove 3 mature, living trees, at least 11 new trees would be planted.

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 West Hollywood's CAP and objectives of AB 32, SB 97 and SB 375. Therefore, impacts of the proposed project would be less than significant.

Nevertheless, for informational purposes GHG emissions associated with construction emissions and operational emissions from the proposed project were quantified and are discussed below.

Construction Emissions

As shown in Table 8, emissions of CO_2E units generated by construction of the proposed project are estimated at 772 metric tons. When amortized over a 30-year period (the assumed life of the project), CO_2E construction emissions would be approximately 26 metric tons per year.

Table 8
Estimated Construction Emissions of Greenhouse Gases

	Emissions (metric tons CDE)
Total Emissions	772 metric tons
Amortized over 30 years	26 metric tons per year

See Appendix C 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 9. Operational emissions were calculated using CalEEMod version 2013.2.2. Full results are shown in Appendix B. In accordance with AB 939, it was assumed that the proposed project would achieve at least a 50% waste diversion rate. 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 9, total combined annual emissions of GHG associated with the proposed project are estimated at about 767 metric tons of CO_2e per year, which is below the SCAQMD recommended Tier 3 screening level quantitative threshold for all land use types of 3,000 metric tons CO_2e /year. It is important to note that the project would replace existing buildings that currently have operational GHG emissions. Because this analysis, has not accounted for the

reduction in emissions due to the removal of existing buildings, the results are a conservative estimate of GHG emissions.

LESS THAN SIGNIFICANT IMPACT

Table 9
Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions CDE
Construction	27 metric tons
Operational	
Area	<1 metric tons
Energy	48 metric tons
Solid Waste	4 metric tons
Water	3 metric tons
Mobile	
CO_2 and CH_4	109 metric tons
N_2O	0 metric tons
Total Emissions from the Proposed Project	**164 metric tons**
SCAQMD Proposed Tier 3 Threshold	*3,000 metric tons*
Threshold exceeded?	**No**

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS				
-- Would the project:				
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?	☐	☐	■	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS				
-- Would the project:				
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?	☐	☐	☐	■
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) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

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

The proposed educational facilities would not involve the routine transport, use or disposal of hazardous substances, other than minor amounts used for maintenance and landscaping. Minor amounts of potentially hazardous materials such as fuels, lubricants, and solvents could be used

during construction of the project. However, the transport, use, and storage of hazardous materials during construction would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Adherence to these requirements would reduce impacts to a less than significant level for the limited quantities of hazardous materials that may be used during construction. The proposed school would not involve the long-term use of large quantities of hazardous materials.

LESS THAN SIGNIFICANT IMPACT

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?

The nearest existing school is Rosewood Elementary School, located across Alfred Street, approximately 200 feet east of the project site. The next closest school is the Maimonides Academy, 0.3 miles southwest from the project site. Other schools, including West Hollywood Elementary School and Laurel Span Elementary School, are located approximately 1 mile northeast and northwest of the project site. Since the proposed project is the expansion of educational facilities, it would not emit any hazardous materials during operation. Construction of the proposed project would occur over five years, in which minor amounts of potentially hazardous materials such as fuels, lubricants, and solvents could be used during construction of the project. However, the transport, use, and storage of hazardous materials during construction would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Therefore, construction activity would not generate hazardous emissions and adherence to these requirements would reduce impacts to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

d) Would the project 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?

The following databases compiled pursuant to Government Code Section 65962.5 were checked (August 20, 2015) for known hazardous materials contamination at the project site:

- *Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database*
- *Geotracker search for leaking underground storage tanks (LUSTs)*
- *Cortese list of Hazardous Waste and Substances Sites*
- *Department of Toxic Substances Control's Site Mitigation and Brownfields Database*

The project site does not appear on any of the above lists, but three LUST sites are within 1,000 feet of the project site. Two of the LUST sites are closed and one site is eligible for closure, indicating the sites are no longer hazards. Therefore, impacts related to hazardous material sites would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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?

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?

There are no public or private airports on or adjacent to the project site. The nearest airport is Santa Monica Airport, located approximately six miles southwest of the project site. No impact related to airport hazards would occur.

NO IMPACT

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

The proposed project involves the demolition of educational, commercial and residential buildings and construction of two new educational buildings, a surface parking lot and a large open playfield. In addition to these facilities, the project includes the construction of a new 26-foot wide fire and emergency access lane that would provide fire truck access from Alfred Street for a depth of 150 feet into the campus. The new fire and emergency access lane would be located immediately south of the new Clinton Building, to the north of the new main playfield. Therefore, project implementation would not interfere with emergency response or evacuation. The proposed project would be required to comply with applicable California Fire Code requirements. Therefore, no impact would occur.

NO IMPACT

h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project site is 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. Therefore, **no** impact would occur as a result of the proposed project.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY				
-- Would the project:				
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)?	☐	☐	■	☐
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?	☐	☐	■	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY				
-- Would the project:				
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) Result in inundation by seiche, tsunami, or mudflow?	☐	☐	☐	■

a) Would the project violate any water quality standards or waste discharge requirements?

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

d) Would the project 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) Would the project 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) Would the project otherwise substantially degrade water quality?

The proposed project would not involve alteration of a stream or river and would not substantially alter drainage patterns in the area. The proposed 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 requires implementation of Best Management Practices (BMPs) to control surface runoff. BMPs would be required to reduce potentially polluted runoff from the project site by retaining, treating, or infiltrating polluted runoff onsite. For example, the proposed project would be required to use permeable surfaces, including landscaping, in at least 50% of required ground-level common open spaces and setback areas (WHMC Sections 19.20.060 and 19.20.190). Therefore, impacts associated with storm water runoff water quality, surface hydrology, and storm water drainage system would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering 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)?

The proposed project involves the demolition of educational, commercial, and residential buildings and the construction of less-water intensive uses, including educational facilities, an open playfield and a surface parking lot. The open playfield would be made of artificial turf and, therefore, would not require water. The project site is subject to a high water table. At the time the existing subterranean garage was completed, a permanent dewatering collection system was installed removing approximately 7,000 gallons of water per day. The water is treated and either used for irrigation on the existing campus, or discharged to the storm drain after being treated as required by water quality regulations. The project engineers have determined that the expansion of the subterranean garage should not require an expansion of the existing dewatering collection system and should not increase the flow or volume of water removed. Additionally, the proposed expansion of the subterranean garage and foundation would be designed to resist the infiltration of groundwater.

Water for the project would be provided by Beverly Hills Water, which received 10% of its water from groundwater sources in 2009 and is projected to receive approximately 4% of its water from groundwater sources in 2015 (City of Beverly Hills, 2011). Water demand associated with the proposed project would not substantially deplete groundwater supply since no net increase in water demand is anticipated (refer to Section XVI, *Utilities and Service Systems*, for further discussion of this impact). Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The project site is not located in a designated FEMA special flood hazard area (SFHA). The project site is located within Zone X, which is defined as an area outside the 500-year flood zone (FEMA Map No. 06037C1585F, 2008). Therefore, flood impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

i) Would the project 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) Would the project result in inundation by seiche, tsunami, or mudflow?

The site is not located within a potential dam inundation area (City of West Hollywood, 2035 General Plan Safety and Noise Element). The site is approximately eight miles from the Pacific

Ocean and is not located within a seiche or landslide/mudslide hazard zone (California Department of Conservation, 1999). Therefore, no impact would occur.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
X. LAND USE AND PLANNING				
-- Would the project:				
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) Would the project physically divide an established community?

The proposed project involves the development of new educational facilities in an urbanized area. The proposed project would not involve a road or other facility that would physically divide an established community. Rather, the proposed educational facility would be expected to blend into the fabric of the community. Therefore, no impact would occur.

NO IMPACT

b) Would the project 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?

The project site currently has three General Plan land use designations - Public Facilities (PF) on the northern portion of the project site fronting Melrose Avenue and Clinton Avenue, Community Commercial 1 (CC1) on the western portion of the project site fronting La Cienega Boulevard, and Multi-family Medium Density Residential (R3C) on the eastern portion of the site fronting North Alfred Street. The project site is located in the Melrose/Beverly District commercial subarea as described in the Land Use Element of the General Plan.

General Plan Amendment

The proposed General Plan Amendment from Public Facilities (PF), Community Commercial 1 (CCI), and Multi-family Medium Density Residential (R3C) to Center for Early Education Specific Plan (CEE SP) is consistent with the Goals, Objectives, Policies, General Land Uses and Programs of the West Hollywood General Plan 2035, and the City's other adopted goals and policies including the following:

Goal LU-1: *Maintain an urban form and land use pattern that enhances quality of life and meets the community's vision for its future.*

> *Policy LU-1.1: Maintain a balanced land use pattern and buildings to support a broad range of housing choices, retail businesses, employment opportunities, cultural institutions, entertainment venues, educational institutions, and other supportive urban uses within the City.*
> *Policy LU-1.2: Consider the scale of new development within its urban context to avoid abrupt changes in scale and massing.*
> *Policy LU-1. 14: Support the continuation of existing and new uses that enhance the social and health needs of residents.*

Goal LU-2: *Maintain a balanced mix and distribution of land uses that encourage strategic development opportunities and mobility choices within the City.*

> *Policy LU-2.8: Consider increases in the General Plan's permitted FAR and height for projects in all commercial designations that provide one or more of the following:*
>
> *a. Expand existing facilities or introduce new uses which are considered to be of significant importance {public benefits, historical use, socially-valued use, etc.).*
> *b. Provide significant benefits to the City.*
> *c. Offer architectural design that is of unusual merit and will enhance the City.*

Goal LU-3: *Allow for public and private institutional uses throughout the City that are compatible with and complement adjacent land uses.*

> *Policy LU-3.4: Where appropriate, allow for new institutional uses that are compatible with their surroundings.*

Goal HS-4: *Support and collaborate with LA USD and other educational providers.*

The CEE is well established in West Hollywood and has been located at the project site in some form since 1946. Originally, the CEE started as the School for Nursery Years in 1939 and moved to the Alfred Street location in 1946. The school has grown with West Hollywood over the decades. The last addition to the campus was the 'C' Building located at the northwest corner of the site at the intersection of La Cienega Boulevard and Melrose Avenue/Clinton Avenue. In order to modernize its West Hollywood educational campus and provide an open playfield for students while maintaining current student enrollment, the CEE has proposed a redevelopment and expansion of its existing campus with the addition of new properties to create an approximately 2.32 acre (approximately 100,639 square foot) urban campus with street frontages on N. La Cienega Boulevard, Clinton Avenue, and N. Alfred Street.

The City allows school uses in all general plan land use designations and all zones within the City with the approval of a conditional use permit. The proposed CEE Specific Plan land use designation would be similar to the Public Facilities designation applicable to the existing school campus portion of the project site relative to uses allowed, while providing development standards that would allow the school the necessary Floor-Area-Ratio (FAR) and building heights for the proposed project, and also ensuring that the project is compatible in scale and massing within its urban context next to existing commercial and multi-family buildings on the southern portion of the block. Therefore, the proposed General Plan Amendment would allow the expansion of the well-established existing school onto additional parcels where school uses are currently allowed through a conditional use permit, and would apply consistent standards across those parcels.

The project's new facilities have been designed to be compatible with their surroundings. The northern frontage of the site along Clinton Avenue is across the street from the rear of commercial buildings fronting Melrose Avenue. Directly across Alfred Street to the east is LAUSD Rosewood Elementary School that occupies the entire approximately 3.7-acre block bounded by Clinton Avenue, Croft Avenue, Rosewood Avenue, and Alfred Street. Along the southerly edge of the site are one- and two-story residential and commercial office buildings. The western edge of the site is bounded by 100-foot wide La Cienega Boulevard with one-, two-, and three-story commercial buildings on the west side of La Cienega Boulevard. The proposed General Plan Amendment would allow the development of new four-story elementary school buildings fronting on La Cienega Boulevard and Clinton Avenue and would also allow the creation of a an open playfield fronting Alfred Street and Rosewood Elementary. The height and densities of these buildings would be consistent with applicable regulations following approval of the requested General Plan Amendment and Specific Plan. In furtherance of applicable General Plan policies, the new building on La Cienega Boulevard has been specifically designed with attention to create a building that enhances the pedestrian experience. The building would provide additional ground level pedestrian and vehicular oriented display windows and artwork along the La Cienega sidewalk and street frontage. Above the grade level there would be a large scale window that opens up visual access into and out of the proposed gymnasium. On occasions, the gymnasium would provide light and activity and consequently contribute to the vitality of the block. In addition, an existing one-story single family structure would be renovated to the south of the main campus at 523 N. Alfred Street to house the state-licensed staff daycare center and outdoor play area, which would be compatible with surrounding multi-family residential development.

It also should be noted that the proposed General Plan Amendment would allow the continuation of existing school uses that meet the social needs of West Hollywood residents and the broader Los Angeles community. Also, it would allow an increase in the permitted FAR and height to expand existing school facilities, which are considered to be of significant social value.

Zoning Map Amendment

The proposed Zoning Map Amendment from Public Facilities (PF), Community Commercial 1 (CC1), and Multi-family Medium Density Residential (R3C) zones to Center for Early Education Specific Plan (CEE SP) zone is consistent with the Goals, Objectives, Policies, General Land Uses and Programs of the General Plan 2035, and the City's other adopted goals and policies for the

reasons set forth above. The proposed Zoning Map Amendment would be necessary to maintain consistency with the proposed General Plan designation of CEE Specific Plan.

The CEE Specific Plan is intended to:

1. Replace inefficient and outdated school facilities;
2. Expand and improve the school's academic, athletic, and administrative facilities;
3. Reconfigure and significantly expand the school's outdoor play areas;
4. Provide additional on-site parking;
5. Strengthen and develop an existing school that enhances the social needs of the region' s and City's residents;
6. Maintain and augment the urban form and land use pattern of the area to enhance the quality of life thereby meeting the community's vision for its future while being compatible with its surroundings; and
7. Establish land use and development standards for the stable development of the Center for Early Education in support of that portion of the General Plan that relates to this geographic area so as to provide for the public's needs, convenience and general welfare.

As noted above, school uses are allowed within all zones in the City subject to a conditional use permit. Following the approval of the Zone Map Amendment to CEE Specific Plan, the uses, height and densities of the project's proposed buildings would be consistent with applicable regulations. Therefore, based on the above, impacts related to potential conflicts with land use plans would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c) Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

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

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. MINERAL RESOURCES -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. MINERAL RESOURCES				
-- Would the project:				
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) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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

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

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. NOISE				
-- Would the project result in:				
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?	☐	■	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. NOISE				
-- Would the project result in:				
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 dBA. For example, 70 dBA ambient noise levels are combined with a 60 dBA noise source the resulting noise level equals 70.4 dBA. Based on the logarithmic scale, a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise 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), ground attenuation of about 1.5 dBA per doubling of distance normally occurs. 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 Safety and Noise Element also establishes land use compatibility categories for community noise exposure. The maximum "normally acceptable" noise level for the exterior of residential areas and schools is 60 dBA CNEL or Ldn.[1]

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

WHMC Section 9.08.050 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 WHMC Section 9.08.050, 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.

[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).*

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 City has not adopted any thresholds or regulations addressing vibration.

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 (Federal Transit Administration, May 2006). 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, and 75 VdB for institutional land uses with primary daytime use (such as churches and schools). The threshold for the proposed project is 75 VdB for institutional land uses with primarily daytime and evening use such as schools, as these are the only sensitive receptors in the vicinity of the project 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.

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.

Acoustical Engineering Services, Inc. conducted a noise impact study of the project in June 2015 (see Appendix C). The objectives of the noise study were to a) determine potential noise impacts on noise sensitive uses from project operation-related outdoor play yard uses, and b) provide project mitigation measures to avoid or reduce the potential noise impacts. As part of this study, an ambient noise monitoring program was conducted using several Quest Technologies Model 2900 Integrating/Logging Sound Level Meters. Measured ambient noise levels are summarized in Table 10.

The equivalent noise level (Leq) measured at and near the project site over 15-minute periods (Leq[15]) ranged from 54.5 dBA on the southernmost boundary of the project site near the proposed staff daycare facility to 64.4 on the project site adjacent to Alfred Street near the western site boundary. In general, the existing sound environment in the vicinity of the project site is dominated by local auto traffic (e.g., La Cienega Boulevard, Melrose Avenue, and Alfred Street) and nearby commercial uses (e.g., retail and restaurants) (Acoustical Engineering Services, Inc., 2015).

Table 10
Measured Noise Levels

#	Measurement Location	Approximate Distance to Project Site	Leq[15] (dBA)[1]
1	Residences at 533 and 529 N. Alfred Street, directly south of the project Site.	0 feet	54.5
2	Rosewood Elementary School, across from the Project Site.	200 feet	54.9
3	Residence at the northeast corner of Rangely Avenue and Clinton Street, northeast of the Project Site.	130 feet	55.3
4	Residence on Knoll Drive between Melrose Avenue and Rosewood Avenue, west of the Project Site	400 feet	58.5
5	Commercial facility on the La Cienega Boulevard, adjacent to the Project Site.	0 feet	57.9
6	On project Site – project northeast corner	0 feet	64.4

Source: Acoustical Engineering Services, Inc. See figure 8 for noise measurement locations and Appendix C noise measurement results.

[1] The equivalent noise level (Leq) is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). For this measurement the Leq was over a 15-minute period (Leq[15]).

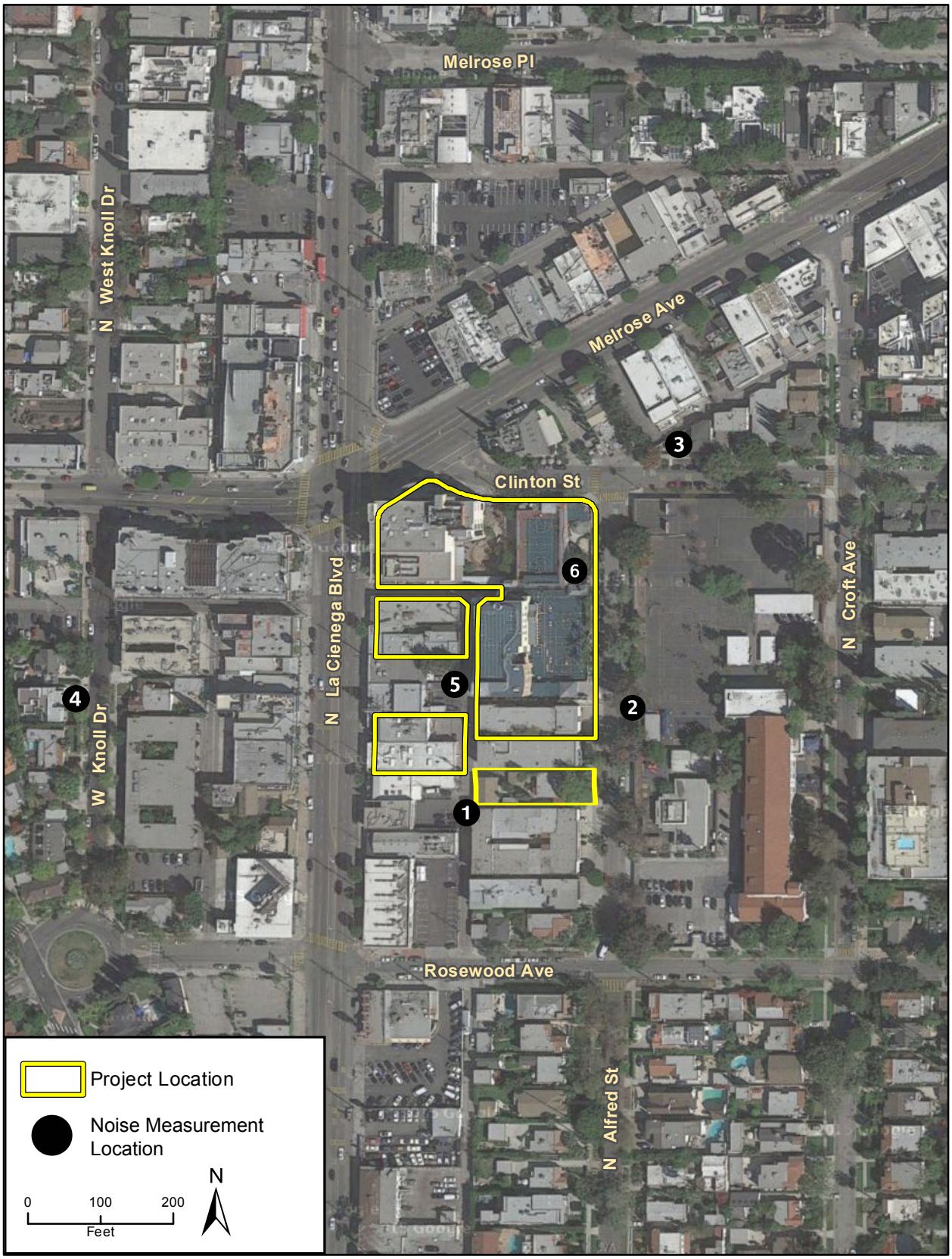
a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

c) Would the project result in a substantial permanent increase in ambient noise levels above levels existing without the project?

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Noise

Noise levels from construction of the proposed project would result from construction of the structure and traffic noise from construction vehicles. Nearby noise-sensitive land uses, including the single-family and multi-family residences that surround the project site, would be exposed to temporary noise during project construction. In addition, an elementary school is located approximately 70 feet from the project site and would be subject to increased noise levels during construction. 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 in phases over a period of approximately five years. Table 11 shows the typical noise levels at construction sites.



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Noise Measurement Locations

Figure 8

Table 11
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
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 noise levels from individual pieces of construction equipment range from about 86 to 95 dBA at a distance of 25 feet. Such levels, which would occur intermittently during the five-year construction period, would exceed ambient sound levels in the area. As discussed above, pursuant to WHMC Section 9.08.050, 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. 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.*

Construction is expected in an urban area and these regulations make educational, residential, and construction activities compatible to the extent possible. In addition, residences and the elementary school near the project site are adjacent to Alfred Street and already experience high volumes of traffic. Because construction activity would be required to comply with the City's construction hour restrictions in the WHMC Noise Ordinance and the conditions of approval listed above, impacts related to temporary construction noise would be less than significant.

Operational Noise

The proposed project would relocate the three existing outdoor play yards for younger students currently located at the northeast area of the project site to the south side of the new Clinton Building, and would result in four distinct play yard areas for younger students. The locations of the new younger children play yards would provide additional sound attenuation to the off-site receptor locations to the north and east, as compared to the existing conditions, due to the new Clinton Building and associated walls surrounding the courtyard area.

The main school play yard (currently asphalt) is located at the eastern edge of the CEE campus on Alfred Street and under the proposed project would be expanded to include both a hardcourt and a grass play field area. The hardcourt would be in approximately the same location as the existing main school play yard, and the new grass play field area would extend to the east and also include much of the property where the existing on-site Building "B" (to be demolished) is currently located, and where the building at 533 N. Alfred (to be demolished) is currently located.

Noise impacts associated with the future outdoor play yards were determined by comparing the potential increase in the ambient noise levels at the off-site sensitive receptors with the play yards at their future locations to the ambient noise levels that are currently generated at those off-site sensitive receptors with the play yards in their existing locations. Noise levels associated with the CEE's existing younger children play yards were measured on July 25, 2014, while they were in use by children enrolled in the CEE's summer program. In addition, noise levels associated with the main school play yard were measured on June 1, 2015, during a regular school day.

The noise levels were measured over a period of 15 to 30 minutes at each of the CEE's play yards. A computer noise prediction model, SoundPlan, was used to model the play yard operation noise levels for both the existing and future conditions. See Appendix B for Noise Impact Study Results.

The CEE currently uses an outdoor Public Announcement system (PA system), including three speakers mounted within the existing main school play yard. The PA system is currently and would continue to be used regularly once in the morning for a short announcement (less than a minute) and occasionally for emergency and emergency preparation (safety drill) purposes. The

reconfigured PA system layout would be similar to the existing system with the loudspeakers mounted at the perimeter of the expanded main play yard area and oriented (angled) toward the play yard and away from the off-site noise sensitive uses. Based on field measurements done by Acoustical Engineering Services, Inc., the existing PA system generates a 72 dBA sound level at a distance of 25 feet from each of the speakers. However, since the PA system would only be used for a short duration (less than a minute), the noise increase relative to the existing ambient noise levels (hourly Leq) at the off-site sensitive receptors would be less than 1 dBA. See Appendix B for Noise Impact Study Results. Therefore, noise impacts associated with the CEE PA system would be less than significant.

The location of the younger children play yards would provide additional sound attenuation to the off-site receptor locations to the north and east as compared to the existing conditions, due to the new Clinton Building and associated walls surrounding the courtyard area. The estimated noise levels from the younger children play yards operation under the future conditions would result in an increase of ambient noise levels at receptors/measurement locations 1, 2, 3 and 4, as compared to existing conditions. The increases in noise at these receptors are primarily due to the reduction of noise shielding due to the demolition of the existing two-story residential building at 533 N. Alfred Street to the south and the existing on-site building (Building B). WHMC Section 9.08.060 states that outdoor activities conducted on public or private school grounds are exempt from the City's Noise Control Ordinance. Although operation of school play yards is exempt from the City of West Hollywood Noise Ordinance, in order to be conservative and for purposes of this analysis it is assumed that if play yard noise increases the existing ambient noise levels by more than 3 dBA Leq, a significant impact could result. The estimated increase in ambient noise levels at the identified receptors with the younger children play yards at their new locations would be below the 3 dBA significance threshold. Therefore, noise impacts associated with the relocation and reconfiguration of the younger children play yards to four distinct play yard areas would be less than significant.

Noise levels generated by the main school play yard would be similar those generated under existing conditions. However, with the removal of the existing building at 533 N. Alfred Street, the adjacent multi-family residential building at 529 N. Alfred Street would be exposed to additional noise from the main school play yard. Without mitigation, noise from the large open playfield would cause an increase in noise estimated at 11.9 dBA at 529 N. Alfred Street when compared with the existing conditions. Although noise levels associated with school play yards are specifically exempt from the City of West Hollywood Noise Ordinance (Section 9.08.060), mitigation has been recommended to reduce noise levels from the main school play yard below the applicable threshold of significance (3 dBA). Implementation of Mitigation Measure N-1 would ensure that potential noise impacts from the main school play yard on the multi-family residential building at 529 N. Alfred would be less than significant.

N-1 **Sound Barrier.** The applicant shall provide an eight (8) foot high sound barrier wall, constructed of a concrete masonry unit or any other solid and uninterrupted construction materials of a minimum surface density of 10 pounds per square foot, along the southern boundary of the main play yard adjacent to the multi-family residential building at 529 N. Alfred Street. The sound barrier

shall break the line-of-sight between the main play yard and the residential building.

Implementation of Mitigation Measure 1 would reduce the potential noise impacts from the main play yard to the multi-family residential building at 529 N. Alfred from an 11.9 dBA increase in the ambient noise level to a maximum 2.4 dBA increase, which is below the 3 dBA Leq threshold. Therefore, potential noise impacts associated with the relocation and reconfiguration of the main school play yard would be reduced to a less than significant level.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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

Operation of the proposed project would not perceptibly increase groundborne vibration or groundborne noise on the project site above existing conditions, due to the nature of the proposed project. Construction of the proposed project could potentially increase groundborne vibration on the project site, but construction effects would be temporary. The sensitive receptor nearest to the project site is the multi-family residential building, 529 Alfred Street, adjacent to project site and within 25 feet of construction activities. Based on information presented in Table 12, the residential building would be exposed to maximum vibration levels of about 86 VdB during construction. Residences at the northeast corner of Rangely Avenue and Clinton Street, are located approximately 130 feet northeast of the project and would be exposed to maximum vibration levels of about 74 VdB.

Table 12
Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
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. Because vibration levels would be well below 100 VdB, structural damage would not occur as a result of construction activities. The vibration levels at the residential units within 100 feet of the project site would exceed the groundborne velocity threshold level of 72 VdB established by the Federal Transit Administration for residences and buildings where people normally sleep and the 75 VdB threshold for institutional land uses with primarily daytime and evening use such as schools. 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 City holidays. Therefore, construction would not occur during recognized sleep hours for residences.

The Rosewood Elementary School is 200 feet away from the project site, separated from the project site by Alfred Street and a LAUSD playfield. Therefore, vibration associated with temporary construction would be well below the 75 VdB threshold and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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?

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 impacts related to aircraft noise would occur.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. POPULATION AND HOUSING				
-- Would the project:				
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) Would the project 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)?

Based on data from the California Department of Finance (DOF), the estimated population of West Hollywood is 35,825 and the average household size is 1.55 persons (California DOF,

2015). As indicated in Table 13, the Southern California Association of Governments (SCAG) estimated in the 2012 RTP that the population of West Hollywood will be 35,100 by 2020 and 36,100 by 2035.

Table 13
Local and Regional Population and Employment Projections

Jurisdiction	2020	2035
Population		
West Hollywood	35,100	36,100
Los Angeles County	10,404,000	11,353,000
Southern California	21,468,934	25,047,292
Employment		
West Hollywood	34,500	36,600
Los Angeles County	4,558,000	4,827,000
Southern California	9,183,026	10,287,122

Source: SCAG Adopted 2012 RTP/SCS Growth Forecast by City.

No increase in the number of students enrolled at the school is projected, nor is an increase in staff members is expected for the proposed project. Therefore, there would be no population growth impacts associated with the project.

NO IMPACT

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

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The proposed project would involve the demolition one 9-unit, two-story, residential building. Since the property is currently inhabited, tenants of the building would be displaced by demolition of the building. According to the California Department of Finance (DOF), West Hollywood has a total of 25,134 household units and an estimated vacancy of 8.4% (California DOF, 2015). Therefore, 2,111 household units are unoccupied. Thus, although the proposed project would displace existing residents, the number of units displaced would not necessitate the construction of replacement housing to house displaced residents. Therefore, no significant environmental impacts would occur as a result of displacement of people and housing.

LESS THAN SIGNIFICANT IMPACT

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

a (i) 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 fire protection?

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 2 fires stations, #7 and #8 located within West Hollywood. The fire station closest to the project site is Fire Station #7, located about one mile away at 864 N. San Vicente Boulevard. Because the proposed project would include the removal of four commercial buildings and one residential building and expansion of an existing school, the proposed project would reduce the number of occupants on the project site. Therefore, the proposed project would not impact demand for fire protection services.

As identified in WHMC Section 14.04.010, the City of West Hollywood has adopted the Los Angeles County Fire Code (Title 32), which is an amended version of the California Fire Code (2013 edition), and an amended version of the International Fire Code (2012 edition).The Fire Code contains regulations related to construction, maintenance and design of buildings and land uses. The project would adhere to Fire Code regulations and as a result, have a more

modern fire prevention system in place compared to the existing buildings which would be demolished. The project would result in an overall reduction in square footage on site and provide new, modern fire suppressant systems that would help decrease the existing demand on fire protection.

The project includes the construction of a new 26-foot wide fire and emergency access lane that would provide fire truck access from Alfred Street for a depth of 150 feet into the campus. The new fire and emergency access lane would be located immediately south of the new Clinton Building, to the north of the new main playfield, which would improve fire access to the campus.

Through the provision of the new fire lane and 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) and impacts related to fire protection service would be less than significant

LESS THAN SIGNIFICANT IMPACT

a (ii) 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 police protection?

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 operates from the West Hollywood station located at 780 N. San Vicente Boulevard. LACSD 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. This exceeds the average of 1.7 officers per 1,000 residents for cities in the Western United States.

The proposed project involves the demolition of commercial and residential buildings to accommodate expansion of a school where there would be no enrollment or staff increase. A new security wall and fence 14 feet in height would be provided along the east edge of campus along Alfred Street, along the south edge of campus adjacent to the apartment building, and along the east side of the alley to enclose the western edge of the campus to provide added security for the students and staff. CEE's campus is under 24-hour web-based video surveillance which is monitored in real time by the CEE security staff , and is accessible for viewing remotely by authorized users anywhere with an internet connection. The security alarm systems in all existing and proposed buildings are and will continue to be monitored by CEE's security service 24 hours a day seven days a week. Further, CEE's Emergency Response Plan is annually reviewed by and filed with the West Hollywood divisions of the Los Angeles County Fire Department and Los Angeles County Sheriff's Department. Because the proposed project would cause a decrease in the number of occupants as compared to existing conditions (i.e., removal of existing residences and commercial buildings), it would not affect service ratios such that new or expanded police facilities are needed. Therefore, impacts for the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a (iii) 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 schools?

As of January 1987, State law allows school districts to levy three different levels of development fees directly on new residential, commercial, and industrial development (Government Code Section 65995). Districts set their own fees within this limit based on a nexus study establishing their funding requirements. Since Proposition 1A was passed by the voters and Government Code Section 65995(h) was adopted by the State Legislature in 1996, school fees generated by new development are deemed legally-sufficient mitigation of any impacts based on generation of students on school facilities. However, the proposed project is exempt from these fees since it is a facility used exclusively as a private full-time day school as described in Section 48222 of the Education Code. There would be no impact to public schools as a result of the proposed project.

NO IMPACT

a (iv) 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 parks?

Please refer to Section XV, *Recreation*.

NO IMPACT

a (v) 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 other public facilities?

Library services are provided by the West Hollywood Library located at 625 North San Vicente Boulevard in West Hollywood. Since the proposed expansion of the CEE would not increase enrollment, it would not increase the use of existing library facilities. Additionally, the West Hollywood Library was opened in West Hollywood in 2011 and it accommodates the needs of the City and others in the Los Angeles County. Therefore, no impact to library facilities would occur as a result of the proposed project.

Impacts to other public facilities (e.g., sewer, storm drains, and roadways) are discussed in Sections XVI, *Transportation/Traffic*, and Section XVII, *Utilities and Public Services,* of this Initial Study.

LESS THAN SIGNIFICANT IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. RECREATION				
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) 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?

As identified in the City of West Hollywood General Plan Parks and Recreation Element, the City's parks system consists of 15.31 acres of land designated as parks. The City owns and operates 11 parks, pocket parks, open space areas, and recreational facilities (City of West Hollywood, Parks and Facilities website). West Hollywood Park is the City recreational facility closest to the project site and includes open space, a playground and a pool. It is located 0.5 miles west the project site.

The City's current population is estimated at 35,825 people (California DOF, 2015). Therefore, the 15.31 acres of parkland within the City limits provide 0.44 acres of parkland for every 1,000 residents. Since no increase in enrollment is associated with the proposed project, it would not increase the population of West Hollywood and would not decrease the parkland ratio. The project also would have no direct impact on any existing parks and would improve recreational facilities provided by the CEE for its enrolled students. Therefore, no impact would occur to the use of existing parks as a result of the proposed project.

NO IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC				
-- Would the project:				
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) Would the project 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) Would the project 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?

As previously discussed, the CEE proposes new and expanded facilities to provide an enhanced learning and teaching environment for students and faculty/staff. No increases to student enrollment or faculty/staff are proposed. As the student enrollment will not change and the number of faculty/staff will generally remain the same, it is reasonable to conclude that overall number of vehicle trips generated by operations of the school will not change following completion of the project as compared to current conditions.

It is also appropriate to consider the reduction in vehicle trips to and from the project site due to the proposed removal of existing buildings. As previously noted, the project proposes to remove 10,700 square feet of residential floor area (containing 10 residential units) and 16,210 square feet of commercial floor area. Construction of the proposed project would cause the transportation of additional trucks and equipment to the project site. However, these will be limited as the construction schedule is to occur over a 5 year period and the number of trips would be below the threshold requiring a traffic study. Since a reduction in trips would occur as compared to existing conditions, and there would be no increase in trips generated by the school, a less than significant impact would occur as a result of the proposed project.

LESS THAN SIGNIFICANT IMPACT

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No airport or airstrip is located within or adjacent to the City of West Hollywood. The nearest airport is Santa Monica Airport, located approximately six miles southwest of the project site. The proposed project would not affect air traffic patterns. Therefore, no impact would occur as a result of the proposed project.

NO IMPACT

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

The proposed project does not include any design features that would increase hazards. The expansion of the school facilities and a large open playfield 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. Therefore, no impact would occur as a result of the proposed project.

NO IMPACT

e) Would the project result in inadequate emergency access?

The project would involve development in an urbanized that would not hinder emergency access or evacuation. CEE proposes to create a new alley by easement across the southern 15 feet of 526 N. La Cienega to provide access to and from La Cienega Boulevard to the remaining portion of the existing alley (not being vacated) and to a new surface parking lot for school staff proposed to be located at 530-532 N. La Cienega. In addition, a new 26-foot wide fire and emergency access lane would provide fire truck access from Alfred Street for a depth of 150 feet

into the campus. The new fire and emergency access lane would be located immediately south of the new Clinton Building, north of the new main playfield. The proposed project would be required to conform to traffic and safety regulations that specify adequate emergency access measures. The site is also located along an existing roadway lacking any identified significant safety hazards. Adherence to existing state and federal regulations would reduce potential impacts (2035 General Plan FEIR, 2010). Therefore, impacts of the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f) Would the project 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?

The proposed project involves the expansion of educational facilities on sites previously used for commercial and residential purposes. 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 along La Cienega Boulevard and Alfred Street. The proposed project would also include 25 bicycle parking stalls and a pedestrian oriented public art component on La Cienega Boulevard. The project site is transit-accessible and within walking distance of several Metro Local Lines and City Line Blue and Orange lines. Sidewalks are provided along all key roadways in the project site vicinity and pedestrian crosswalks with walk lights are provided at signalized intersections in the project area.

The project would have no impact with respect to 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. Therefore, impacts of the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS				
-- Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	■

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS				
-- Would the project:				
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) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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

The sewer collection system in West Hollywood contains City-owned local sewers and County-owned trunk sewer links. About 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).

The proposed project's wastewater generation was analyzed by Sherwood Design Engineers. Calculations for the existing and proposed project site sewer flows were performed based on the guidelines provided in the City of West Hollywood's "Sewer Capacity Study Requirements." To determine flow generation, the project site was divided into user categories that each have an assigned daily flow rate per unit. The flow from each of the user categories was summed to produce the average daily flow (QAF). See Appendix D for the Sewer Capacity Study.

Two iterations of the existing and proposed flow calculations were done based on different user category classifications for the school. For the first iteration, the school was classified as the "School: Elementary/Jr. High" user category, which defines flow generation on a per-student basis. Given that the school enrollment is not proposed to increase, this approach was not considered a conservative metric to assess potential flow from the additional development proposed. As a result, a second iteration of calculations was performed in which the school was classified as the "School: Kindergarten" user category, which defines flow generation on a square footage basis. The square footage for this user category was calculated as the available amount of classroom space under existing and proposed conditions, with the assumption that classroom space is the limiting factor for expansion. Classroom square footage totals are based on the programming plan for the school. See Appendix D for further details.

The two different iterations of calculations produced very similar results. The more conservative results from the per-square footage basis calculations will be used for the purpose of this analysis. Table 17 below summarizes the average daily flow and peak flow values for existing and proposed conditions. The project would involve demolition of existing structures that generate wastewater, including a commercial building and a nine-unit residential building. Therefore, a net reduction in overall wastewater generation is anticipated. As shown in Table 17, the proposed project would result in a net reduction of average daily flow and peak flow of about 0.003 CSF and 0.007 CSF.

A flow monitoring study was performed at the downstream sanitary sewer manhole on the 15'' main sewer line to determine existing flow capacity. The study found that the proposed project would reduce the average daily flow in the 15'' line by 0.12%. See Appendix D for the Sewer Capacity Study including as part of its Appendix 2, the Flow Monitoring Study Report. The proposed project's peak flows would be less than 1% of the total flows in the 15'' line and would decrease the 15'' line's peak flow by 0.20%. Since the amount of wastewater generated on site would be reduced as compared to existing conditions, there would be no impact related to wastewater treatment.

Table 14
Sewer Flow Generation Summary

	Average Daily Flow (CFS)	Peak Flow (CFS)
Existing Conditions	0.012	0.030
Proposed Conditions	0.009	0.023
Anticipated Decrease	0.003	0.007

CSF = cubic feet per second

Source: Sherwood Design Engineers, 2015. See Appendix D for Sewer Capacity Study.

NO IMPACT

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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 developed with educational, commercial and residential facilities and limited permeable areas. However, under the proposed project approximately 19% of the proposed project site would consist of permeable surface (19,045/100,639 square feet). The permeable areas of the proposed project site would include permeable inorganic cover, rooftop landscapes, setbacks, and parkways. Additionally, the proposed project would include landscaping on the sidewalks along Alfred Street and La Cienega Boulevard where a pedestrian-oriented public art component with additional landscaping is proposed. The proposed project would be required to comply with WHMC Chapter 15.56 and Chapter 19.20.190. These sections require stormwater runoff to be minimized and require a MS4 Low Impact Development (LID) Plan for new development. The proposed project would be required to implement Best Management Practices (BMPs) to reduce runoff, as described in Section IX, *Hydrology and Water Quality*. Due to the increase in permeable area on the project site and with adherence to applicable regulations, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Beverly Hills Water (BHW) would provide water service to the project site. BHW provides water service to approximately 45,000 residents in the City of Beverly Hills and a portion of the City of West Hollywood, including the area in which the project site is located (City of Beverly Hills, 2011). The primary sources of water supply for BHW are purchased imported water from the Metropolitan Water District (MWD, approximately 90% in 2009) and local groundwater extracted from the Hollywood Subbasin (approximately 10% in 2009) (City of Beverly Hills, 2011).

Water demand is determined by two main uses, staff and enrollment and landscaping. Since there is no increase in enrollment and staffing associated with the project, then no increase in water demand would occur as result of the project. Additionally, as noted in Section IX, Hydrology and Water Quality, the site has a surplus of water, pumping approximately 7,000 gallons of ground water each month from the below-grade garage. As noted in Section IX, Hydrology and Water Quality, this ground water pumping will continue on the project site but will not be expanded. Some of the ground water that is currently pumped is treated and is then available for landscape watering needs as a way to divert it from being discharged into the storm drain system. Thus, because the proposed project does not include staff or enrollment increases, and because the school currently uses and treats ground water supplies that are not otherwise available to the City for some landscaping needs, the project would not consume water in excess of the water supplies available to the City and would have no impact on local water supplies.

NO IMPACT

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

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 taken to their recycling and sorting facility, the City of Industry Materials Recovery Facility (MRF) (Matthew Magener, personal communication, October 2015). Food waste is processed and delivered to their compost facility, American Organics, in Victorville (Athens, 2015). Waste that cannot be recycled is disposed of at a landfill. Following closure of the Puente Hills landfill in 2013, Athens Services transports waste to the San Bernardino County Landfill system. 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, 2015). For example, Mid-Valley Landfill alone accepts an average of 2,650 tons/day of solid waste and has a remaining capacity of 4,850 tons/day (San Bernardino County, 2009).

Waste management within the City of West Hollywood is subject to California law, including the Integrated Solid Waste Management Act of 1989 (AB939) and amendments found in SB 1016 (2007). The Integrated Solid Waste Management Act of 1989 required local jurisdictions to meet waste diversion goals of 25% by 1995 and 50% by the year 2000. AB 939 also established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. The SB 1016 amendments updated the 50% diversion requirement; waste diversion is now measured in terms of pounds per person per day, instead of by total volume within a given jurisdiction.

The California Department of Resources Recycling and Recovery (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. West Hollywood's waste generation rates were slightly below both the resident and employee targets set by CalRecycle in 2013. CalRecycle sets a target for student per capita per day disposal rates. The proposed project does not involve an increase in enrollment; thus, no long-term increase in waste would occur.

Waste would be created during the demolition and construction of the proposed project. However, West Hollywood Municipal Code (WHMC) Section 19.20.060 Green Building requires that projects divert a minimum of 80 percent of all construction and demolition waste away from landfills in accordance with the standards set by the Department of Public Works. The majority of the waste would be generated by the demolition of Building "A", Building "B", the residential property and the two commercial properties. However, materials within these structures would be recyclable, such as toilets, door frames and concrete used in floors, support floors, and tilt-walls. The construction of the project would generate a small percentage of waste compared to the demolition of the existing buildings. Construction and demolition waste would be hauled away by a hauler permitted to operate in the City of West Hollywood. Using one of the following companies allows the City of West Hollywood to meet the required recycling goals set by the State of California: Arrow Services, Athens Services, Recology Los Angeles, G.O. Rodriguez Trucking, Interior Removal Specialist, Inc. and Waste Management, Inc. (City of West Hollywood, 2015). Additionally, Athens Services operates the landfills for construction and demolition waste from West Hollywood in addition to other cities in the area; therefore, capacity at these landfills is managed accordingly, and with consideration of other demands of Los Angeles Region (Matthew Magener, personal communication, October 2015). Since the proposed project would be required to comply with Section 19.20.060 and therefore, less than 20% of the generated waste would be diverted to a landfill, a less than significant impact would occur.

LESS THAN SIGNIFICANT IMPACT

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☐	☐	☐	■

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
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) 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?

As noted under sections IV, *Biological Resources*, and V, *Cultural Resources,* implementation of the proposed project would have no impact on known cultural resources or on biological resources.

NO IMPACT

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)?

As described in the discussions of environmental checklist Sections I through XVII, the project would have no impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues. Cumulative impacts with some of the resource areas have been addressed in the individual resource sections above: Air Quality, Greenhouse Gases, Water Supply, Transportation/Traffic and Solid Waste (See CEQA Guidelines Section 15064(h)(3)). Some of the other resource areas (agricultural, biological, cultural, mineral) were determined to have no impact in comparison to existing conditions and therefore would not contribute to cumulative impacts and did not warrant further analysis. With respect to construction noise, there are no known related construction projects in the immediate vicinity of the project site, and therefore no cumulative construction noise impacts would occur. There are no other known projects in development or under consideration that would affect the other resource areas. As such, cumulative impacts would be less than significant (not cumulatively considerable).

LESS THAN SIGNIFICANT IMPACT

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in the preceding responses, the proposed project would not result, either directly or indirectly, in adverse hazards related to air quality, or hazardous materials. However, the project site is within a potential liquefaction zone as identified on the Seismic Hazards Zone Map in the City of West Hollywood General Plan Update Geologic and Seismic Technical Background Report (City of West Hollywood, 2010). The General Plan states that a liquefaction area is defined as an area where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693 (c) would be required. Mitigation is defined as those measures that are consistent with established practice and that will reduce seismic risk to acceptable levels. Implementation of Mitigation Measure GEO-1 would ensure that potential impacts due to liquefaction would be less than significant and compliance with Mitigation Measure GEO-1 would be enforced by the City of West Hollywood Engineering Division prior to issuance of building permits.

The proposed project would also result in a potential operational noise impact that could be potentially significant unless mitigated for. Due to the removal of the existing building at 533 N. Alfred Street, the adjacent multi-family residential building at 529 N. Alfred Street would be exposed to additional noise from the main school play yard. Without mitigation, noise from the main school play yard would cause an increase in noise estimated at 11.9 dBA at 529 N. Alfred Street when compared with the existing conditions. Although noise levels associated with school play yards are specifically exempt from the City of West Hollywood Noise Ordinance (Section 9.08.060), mitigation has been recommended to reduce noise levels from the main school play yard. Implementation of Mitigation Measure N-1 in Section XII, *Noise*, would ensure that potential noise impacts from the main school play yard on the multi-family residential building at 529 N. Alfred would be less than significant.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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