CHAPTER 4
CUMULATIVE IMPACTS

The CEQA Guidelines require that an EIR discuss cumulative impacts of a project, taken together with other past, present, and probable future projects producing related impacts. The goal of this analysis is twofold: first, to determine whether the impacts of all such projects would be cumulatively significant; and, second, to determine whether the proposed project would itself cause a "cumulatively considerable" (and thus significant) incremental contribution to any such cumulatively significant impacts. The definition of cumulatively considerable is provided in Section 15065(a)(3) of the CEQA Guidelines: "'Cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

4.1 CEQA REQUIREMENTS

CEQA Guidelines Section 15130(b) provides the following parameters relative to cumulative impact analysis: the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified related projects contribute, rather than the attributes of other projects which do not contribute to the cumulative impact.

CEQA Guidelines Section 15130 allows for the use of two alternative methods to determine the scope of projects to analyze cumulative impacts.

List Method: A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.

Projection Method: A summary of projects contained in an adopted general plan or related planning document, or in a prior environmental document, that have been adopted or certified, which describe or evaluate regional or area-wide conditions contributing to the cumulative impact.

4.2 RELATED PROJECTS

The geographic area that could be affected by implementation of the proposed project in combination with other projects varies depending on the type of environmental resource being considered. For instance, cumulative aesthetics or noise impacts are more localized; whereas, cumulative air quality and greenhouse gas emissions impacts occur on a broader regional or global scale. Table 4-1 describes the geographic scope of cumulative impact analysis for each environmental resource category. Also described is the method of evaluation for each category.

Table 4-1
Geographic Scope and Method of Evaluation for Cumulative Impacts

Environmental Resource		Geographic Area	Method of Evaluation
Aesthetics		Immediate vicinity	List
Air Quality	Toxic Air Contaminants; Odors	Immediate vicinity	List and Projections
	Construction and Mobile Sources	South Coast Air Basin	
Cultural Resources		Regional	List
Geology and Soils		Regional and Immediate vicinity	List
Greenhouse Gas Emissions		South Coast Air Basin	Projections
Hazards and Hazardous Materials		Immediate vicinity	List
Hydrology and Water Quality		Ballona Creek Watershed	List
Land Use and Planning		City of West Hollywood	List
Noise	Construction and Operational Sources	Immediate vicinity	List and Projections
	Operational Off-Site Traffic Noise	Regional	
Public Services		City of West Hollywood	List and Projections
Transportation and Traffic		Regional	List and Projections
Utilities and Service Systems		Regional	List and Projections

Table 4-2 and Figure 4-1 includes all of the approved, under construction, or proposed development projects within the vicinity of the project. The list of development projects is derived from lists provided by the City of West Hollywood, the City of Beverly Hills, and the City of Los Angeles. For those environmental resources that were evaluated based on the projections approach, the projections take into consideration future projects that are not included in the below list of related projects.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
City of West Hollywood				
1	8816 Beverly Boulevard	Mixed Use	959	d.t.
2	8899 Beverly Boulevard	Apartments	82	d.u.
		Commercial	36,000	s.f.
3	612 Croft Avenue	Condominiums	11	d.u.
4	920 Fairfax Avenue	Retail/Office	86	d.t.
5	937 Fairfax Avenue	Condominiums	17	d.u
6	1216 Flores Street	Condominiums	14	d.u.
7	1041 Formosa Avenue (The Lot)	Office/Media Support	562,772	s.f.
8	1264 Harper Avenue	Condominiums	16	d.u.
9	1345 Havenhurst Drive	Condominiums	16	d.u.
10	1342 Hayworth Avenue	Condominiums	16	d.u.
11	1211 Horn Avenue	Condominiums	16	d.u.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
12	1217 Horn Avenue	Condominiums	7	d.u.
13	1125 Kings Road	Condominiums	10	d.u.
14	1232 Kings Road	Apartments	25	d.u.
15	1145 La Brea Avenue	Apartments/Office	32	d.u.
16	1201 La Brea Avenue	Restaurant	4,575	s.f.
17	623 La Peer Drive	Hotel	69	o.r.
		Condominiums	8	d.u.
		Retail	1,750	s.f.
		Restaurant	2,680	s.f.
18	1223 Larrabee Street	Condominiums	8	d.u
19	8451 Melrose Avenue	Retail	3,929	s.f.
20	8551 Melrose Avenue	Retail	6,500	s.f.
21	8564 Melrose Avenue	Retail/Commercial	28,474	s.f.
22	8583 Melrose Avenue	Retail/Commercial	9,545	s.f.
23	8650 Melrose Avenue	Retail	14,571	s.f.
		Apartments	7	d.u.
24	8711 Melrose Avenue	Commercial	21,565	s.f.
25	8715 Melrose Avenue	Restaurant	8,997	s.f.
		Retail	10,355	s.f.
26	507 Orlando Avenue	Apartments	9	d.u.
27	7144 Santa Monica Boulevard (Domain)	Apartments	166	d.u.
		Retail/Restaurant	9,300	s.f.
28	7302 Santa Monica Boulevard (Movietown)	Apartments	370	d.u.
		Retail	32,00	s.f.
29	7811 Santa Monica Boulevard	Hotel	78	o.r.
		Apartments	88	d.u.
30	8120 Santa Monica Boulevard	Mixed Use (SMB20 Project [Walgreens])	1,118	d.t.
31	8350 Santa Monica Boulevard	Mixed Use (Kings Road)	432	d.t.
32	8550 Santa Monica Boulevard	Retail/Restaurant	497	d.t.
33	8555 Santa Monica Boulevard	Mixed Use	2,914	d.t.
34	9001 Santa Monica Boulevard	Mixed Use (Palm Project)	829	d.t.
35	9040,9060,9080,9098 Santa Monica Boulevard	Mixed Use (Melrose Triangle)	3,578	d.t.
36	1040 Spaulding Avenue	Condominiums	5	d.u.
37	8240 Sunset Boulevard	Condominiums	27	d.u.
38	8305 Sunset Boulevard	Retail/Restaurant	1,137	d.t.
39	8418 Sunset Boulevard	Mixed Use (Sunset Time)	2,226	d.t.
40	8490/8500 Sunset Boulevard	Mixed Use (Sunset Millennium)	5,496	d.t.
41	8497 Sunset Boulevard	Mixed Use	898	d.t.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
42	8950 Sunset Boulevard	Hotel	196	o.r
		Apartments	4	d.u.
43	9040 Sunset Boulevard	Hotel	2,986	d.t.
44	1253 Sweetzer Avenue	Condominiums	8	d.u.
45	West Hollywood Park	Park (Phase II Park Master Plan Implementation Project)	n/a	n/a
City of Beverly Hills				
46	257 North Canon Drive	Commercial	1,042	d.t.
47	246 North Canon Drive	Restaurant	7,100	s.f.
48	9262 Burton Way	Condominiums	23	d.u.
49	325 North Maple Drive	Office	50,000	s.f.
50	450- North Palm Drive	Condominiums	35	d.u.
51	154-168 North La Peer Drive	Condominiums	16	d.u.
52	425 North Palm Drive	Condominiums	20	d.u.
53	432 North Oakhurst Drive	Condominiums	34	d.u.
54	8955 West Olympic Boulevard	Auto Sales	19,800	s.f.
55	332 North Oakhurst Drive	Condominiums	31,000	d.u.
56	121 San Vicente Boulevard	Medical Office	35,000	s.f.
57	207 South Robertson Boulevard	Office	1,700	s.f.
58	8600 Wilshire Boulevard	Mixed Use	960	d.t.
59	8767 Wilshire Boulevard	Mixed Use	2,492	d.t.
60	9200 Wilshire Boulevard	Mixed Use	2,172	d.t.
61	9230 Wilshire Boulevard	Auto Sales	150,300	s.f.
City of Los Angeles				
62	300 South Wetherly Drive	Condominiums	140	d.u.
63	6535 Wilshire Boulevard	Mixed Use	786	d.t.
64	7901 West Beverly Boulevard	Mixed Use	493	d.t.
65	316 North La Cienega Boulevard	Mixed Use	602	d.t.
66	8150 West Sunset Boulevard	Mixed Use	1,077	d.t.

Sources: Appendix J; Pers Comm. City of West Hollywood and Dudek 2015
d.u. = dwelling unit
d.t. = daily vehicle trips
o.r. = occupied rooms
s.f. = square feet

4.3 CUMULATIVE IMPACT ANALYSIS

For the purposes of this EIR, the proposed project would have a significant cumulative effect if:

1. The cumulative effects of related projects (past, current, and probable future projects) are already significant and implementation of the proposed project makes a considerable contribution to the effect; or

2. The cumulative effects of related projects (past, current, and probable future projects) are not significant but the incremental impact of implementing the proposed project is substantial enough, when added to the cumulative effects of related projects, that a new a new cumulatively significant impact occurs.

The analysis that follows addresses whether, after adoption of project-specific mitigation, the residual impacts of the project would (1) contribute considerably to an existing/anticipated (without the project) cumulatively significant effect or (2) cause a new cumulatively significant impact.

4.3.1 Aesthetics

As explained in Section 3.1 of this EIR, the proposed project is one of several types of projects defined by the state whose aesthetic impacts shall not be considered significant impacts on the environment (PRC Section 21099(d)(1)). Nevertheless, for informational purposes for decision makers this EIR includes an analysis of the project's aesthetic impacts based on the aesthetics thresholds in Appendix G of the CEQA Guidelines.

Visual Character/Quality

Development of related projects alters the visual environment in the City and in neighboring jurisdictions. In general, visual resource impacts of the related projects are site-specific and would not be expected to combine with other projects in separate viewsheds to create a cumulative impact. However, related projects in close proximity to the project site would potentially result in cumulative impacts to visual resources in combination with the proposed project.

The proposed project, the La Peer Hotel (623 La Peer Drive), the Palm Project (9001 Santa Monica Boulevard) would be visible from Santa Monica Boulevard and La Peer Drive. The proposed project and the planned aquatic and recreation center (West Hollywood Park) would be visible from Roberson Boulevard. As such, these projects are within the same viewshed. The area in which these projects are situated has already been subject to urban development. Land use intensification at these sites would not substantially degrade the visual character or quality of the viewshed. As such, the proposed project would not contribute considerably to an existing/anticipated cumulatively significant effect on visual character and quality. The height and massing of the proposed project, the La Peer Hotel, the Palm Project, and the aquatic and recreation center would be compatible with existing contrasts in scale within the densely developed and eclectic urban environment of the Design District. While the proposed project would be visible from adjacent areas along Robertson Boulevard and from within West Hollywood Park, the La Peer Hotel and the Palm Project would be less prominent (if even visible) from Robertson Boulevard or from West Hollywood Park. Upon implementation of the proposed project and the related projects in the immediate vicinity, the height and massing of structures in the Design District would remain varied, and the visual interest and contrast of the

area would remain a feature of the visual environment. Due to the existing characteristics of the Design District and the consistency between development projects and this existing character, cumulative impacts to visual character/quality would be **less than significant**.

Light

Cumulative effects of lighting are visible over a wide area, due to the potential for lighting from a number of projects to create skyglow. Nearby related projects would, in most cases, create additional sources of light, since many of the related projects increase the development intensity on their respective sites. However, the proposed project and the related projects are located in a highly developed and already well-lit area. Skyglow is an existing condition of the greater Los Angeles metropolitan area that would not be substantially affected by the related projects. As such, the development of the related projects would not represent a substantial change in the lighting environment of the area to the extent that nighttime views that are currently available would become unavailable. As with the related projects, the proposed project would involve additional lighting on the site. The lighting design of the proposed project would incorporate standard practices that would reduce the proposed project's effects: all exterior lighting would be appropriately shielded and directed away from public rights-of-way, timers and/or photosensors would be installed and utilized for exterior lighting, and occupancy sensor lighting would be used during operation of the multi-use hotel building. It is expected that the related projects would incorporate similar practices in their lighting design as the proposed project, as shielding and photosensors are typical elements of lighting plans. Due to these practices and the project's location in a highly urbanized, well-lit area, cumulative impacts involving lighting would be **less than significant**.

Glare

Development of related projects has the potential to create glare from reflective surfaces and nighttime lighting to the extent that such projects may cause visual contrast between lighting and nearby darker areas, such as the night sky. The design of the project and many of the related projects would include surfaces that are potentially reflective, such as windows and stainless steel. The proposed project and related projects may also create lit surfaces that protrude above the surrounding urban context. However, unlike lighting, which can be visible over a wide area, glare is more site specific. As such, the related projects that could combine with the proposed project to produce a cumulatively considerable glare effect are generally limited to the La Peer Hotel, which is being constructed across La Peer Drive from the project site, approximately 150 feet to the southwest. With the exception of the La Peer Hotel, the nearby related projects are not located immediately adjacent to the proposed project. The nearest project (aside from the La Peer Hotel) is approximately 300 feet to the northwest of the project site, on the north side of Santa Monica Boulevard. There are well-lit, highly developed areas separating the proposed project

from this project and from the other related projects within the cumulative impact area for aesthetics. As such, the glare produced by the project would be negligible to unnoticeable at the project sites of the other related projects.

Glare attributable to the proposed project and the La Peer Hotel could potentially be noticeable along La Peer Drive; however, the design of the proposed project would generally incorporate clear, untinted glass and other low-glare surfaces. Mirrored, reflective, or tinted glass would not be used for the proposed project except as an architectural or decorative accent. In these instances, glass would generally be recessed and shielded by proposed façade articulations. Additionally, as described above, lighting would be shielded. This would reduce the glare caused by the contrast of nighttime lighting against the dark sky. Similarly, the La Peer Hotel is a boutique hotel that is not expected to be constructed with surfaces that produce substantial glare, such as reflective glass or brightly illuminated signs. As such, any increases in glare produced by the proposed project and/or the La Peer Hotel would be minor and would not adversely affect daytime or nighttime views. Due to the existing developed and well-lit nature of the area and the lack of highly reflective surfaces in the design of the proposed project and related projects, cumulative impacts involving glare would be **less than significant**.

Shade/Shadow

Many of the related infill development projects involve increases in height and/or massing relative to the structures that previously existed on the related project sites. Increases in height and/or massing have the potential to create shade and shadow effects. Such effects are highly localized, since they are limited to the boundaries of the shade and shadows created by each new structure. As such, the related projects that could produce a cumulatively significant effect when combined with the proposed project are limited to those within the immediate vicinity, such as the La Peer Hotel Project. As explained in Section 3.1 of this EIR, the proposed project would produce shade/shadow that would extend beyond the limits of the project site. However, as shown in the shade/shadow analysis that was conducted for the proposed project (see Section 3.1), the proposed project would not cast shadows that extend out to any sensitive receptors, with the exception of West Hollywood Park (see Figures 3.1-13, 3.1-14, and 3.1-15). As described in Section 3.1, the shade/shadow effects of the project on the park would be less than significant because shadows would be cast temporarily, users of the park areas tend to be mobile, and the central and western portions of the park (which feature large turf areas) would be available to park users, thereby ensuring a variety of lighting conditions throughout the park as a whole. As shown in Figure 4-1, the park is not adjacent to any other related projects. As such, the shadows from the project would not have the potential to combine with shadows from related projects to create a cumulative adverse effect on the park. Because the effects of the proposed project would be generally site specific, and because the project's shadows would not combine with potential shadows from related projects to affect the park, cumulative impacts involving shade and shadow would be **less than significant**.

4.3.2 Air Quality

The geographic extent for the analysis of cumulative impacts related to air quality includes the SCAB. In analyzing cumulative impacts from the proposed project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for selected air pollutants under the CAAQS and NAAQS. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

The SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the project would generate VOC and NO_x emissions (which are precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$.

Construction Emissions

As discussed in Section 3.2 Air Quality, regional daily construction emissions during construction of the proposed project would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$. Accordingly, cumulative impacts involving regional daily construction emissions would be less than significant.

Regarding localized impacts, cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. Although the project would involve the implementation of Rule 403 through dust management practices, the maximum daily PM_{10} and $PM_{2.5}$ concentrations would exceed localized significance thresholds (LSTs) during project construction activities. Mitigation measure MM-AQ-1 and MM-AQ-2 (see Section 3.2.6 of the Draft EIR) would reduce PM_{10}, and $PM_{2.5}$ ambient air quality impacts to less than significant levels. MM-AQ-1 would reduce fugitive dust to the extent feasible and MM-AQ-2 would require off-road equipment with engines rated at 50 horsepower or greater to apply Tier 3 or better engines. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. However, with mitigation the project would not exceed significance thresholds for PM_{10} and $PM_{2.5}$. As such, the proposed project would not have a considerable contribution to the SCAB's nonattainment designation for PM_{10} and $PM_{2.5}$, and therefore the project would not cause a new cumulatively significant impact. Cumulative impacts involving localized effects of construction emissions on sensitive receptors would therefore be **less than significant with mitigation incorporated**.

Operational Emissions

Following the completion of construction activities, the project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicular traffic generated by hotel guests, commercial users, and visitors; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating and cooking appliances. The combined mobile and area source emissions would not exceed the SCAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ at build-out of the project. As such, operation of the project would not contribute considerably to an existing/anticipated cumulatively significant impact, and therefore the project would not result in a cumulatively significant impact. During operation, cumulative impacts would be **less than significant**.

4.3.3 Cultural Resources

Historical Resources

Development of related projects can affect historical resources if such projects adversely alter and/or demolish historical resources that may be interrelated, such as historical resources that are part of a historic district. Because all historical resources are unique and nonrenewable members of finite classes, projects that demolish or alter certain historical resources have the potential to erode a class of historical resources that could result in a cumulatively significant effect on historical resources.

A cultural resources evaluation was conducted for this EIR to evaluate the impacts associated with the proposed demolition of one existing commercial building (655-657 North Robertson Boulevard) and the alteration/adaptive reuse of the Factory building (661-665 North Robertson Boulevard/652 N. La Peer Drive). As a result, the Factory building was determined eligible for listing under California Register Criteria 1 and 3 and City of West Hollywood Cultural Resource Criteria A.1, A.3, A.5, B, and C. Therefore, it is considered a historical resource for the purposes of CEQA. However, the Factory building was not found to be a contributor to a historic district, and no historic resources were identified in the immediate vicinity of the Factory building.

The project would involve disassembly of the 24,990–square foot Factory building and the reassembly of an approximately 140-foot-long, two-story portion of the originally 240-foot-long building. The building would be repositioned from its current axis and location to a new location along Robertson Boulevard at the eastern edge of the project site. As discussed in Section 3.3.5, the proposed changes to the Factory building would introduce a range of impacts that would reduce the building's overall integrity; however, Mitigation Measures CUL-1 through CUL-11 would ensure that the building retains sufficient integrity to convey its significance. As such, the Factory building would remain eligible for the California Register and as a West Hollywood

Cultural Resource. Further, as discussed above, the Factory building is not adjacent to any other identified Cultural Resource, and it is not part of a historic district. Cumulative impacts involving historical resources would therefore be **less than significant with mitigation incorporated**.

Archaeological and Paleontological Resources/Human Remains

Development of related projects can affect archaeological resources, paleontological resources, and/or human remains if such projects destroy or adversely affect such resources. This can happen, for example, if ground-disturbing activities during construction uncover buried resources, and such resources are significant but become destroyed, lost, or otherwise adversely affected during construction. This is most likely to occur where buried but previously unknown resources or remains exist. Such effects are highly localized, since they are limited to the boundaries of ground disturbing activities. As such, the related projects that could produce a cumulatively significant effect when combined with the proposed project are limited to those within the immediate vicinity where ground disturbing impacts could affect similar archaeological or paleontological resources or human remains, such as the La Peer Hotel Project that is currently under construction. As discussed, no known archaeological or paleontological resources or human remains have been identified on the project site. Further, no archaeological or paleontological resources or human remains were identified in the CEQA process for the La Peer Hotel Project, or have been identified during the construction of that project. Like the La Peer Hotel Project, all of the related projects have undergone (or will undergo) review under CEQA. During the CEQA process, the presence or absence of known archaeological resources, paleontological resources, and/or human remains is generally revealed through records searches, site surveys, and communication with Native American tribes. However, related projects involving ground disturbance have the potential to uncover previously unknown archaeological resources, paleontological resources, and/or human remains during construction. There are standard measures that are typically applied to most ground-disturbing projects, usually as mitigation measures or conditions of approval, which require construction to be stopped in the vicinity of any archaeological resource, paleontological resource, and/or human remains that are discovered. Such measures or conditions of approval often require involvement of a qualified archaeologist, paleontologist, and/or Native American monitor. There are also state laws in place that protect human remains and that require certain actions to be taken if significant resources and/or remains are discovered. These standard measures and regulations that are generally put in place for related projects would also apply to the proposed project (see MM-CUL-12, MM-CUL-13, and MM-CUL-14). Nevertheless, none of the related projects (besides the La Peer Hotel project) are located close enough to the project site and park site such that they could combine with the proposed project to result in a cumulative effect to archaeological or paleontological resources or human remains. As discussed above, no archaeological or paleontological resources or human remains were identified in the CEQA process for the La Peer Hotel Project. Therefore,

no cumulatively significant impact would occur. Cumulative impacts to archaeological resources, paleontological resources, and human remains would be **less than significant**.

4.3.4 Geology and Soils

Development of related projects would generally increase the land use intensities in the region. As such, an increased number of persons and structures would become susceptible to geologic hazards that are present in the Los Angeles region, such as seismic ground shaking and liquefaction hazards. Similarly, increased amounts of construction-related erosion may occur as related projects are constructed over time. However, as with the proposed project, the related projects are subject to uniform site development and construction standards that are designed to protect public safety and structures and to reduce adverse effects to soils, such as erosion. Existing seismic and safety regulations reduce the overall potential for a cumulative impact involving increased exposure of persons and structures to geologic and soils hazards. In addition to standard seismic and safety regulations, many development projects in the area (such as the Melrose Triangle Project and the 8899 Beverly Boulevard Project) also incorporate the recommendations of a site-specific geotechnical report into the project design and engineering. To ensure that the proposed project would incorporate such recommendations, mitigation measure MM-GEO-1 is provided in this EIR. This measure requires the proposed project to be designed and constructed in accordance with the applicable geotechnical recommendations provided for the project. As such, the proposed project would not considerably contribute to a cumulatively significant impact involving increased exposure of persons and structures to geologic and soils hazards and/or increased construction-related erosion, nor would it create a cumulatively significant impact related to these issue areas.

Development of related projects in the immediate vicinity of the proposed project would have the potential to affect site-specific soil conditions. However, none of the related commercial, residential, or mixed-use projects are located on adjoining parcels. As such, any geologic hazards that may be associated with related projects would not be anticipated to affect the proposed project site or the park site. Conversely, the redevelopment of the project site and the installation of a subterranean parking garage beneath the park site would not have the potential to contribute to geologic hazards on other project sites. As described in the paragraph above, other projects in the City, such as the nearby La Peer Hotel Project and the Phase II Park Master Plan Implementation Project, would be subject to uniform site development and construction standards that are designed to protect public safety and structures. In addition to standard seismic and safety regulations, many development projects in the City (such as the Melrose Triangle Project and the 8899 Beverly Boulevard Project) also incorporate the recommendations of a site-specific geotechnical report into the project design and engineering. Existing regulations and the incorporation of site-specific geotechnical recommendations would reduce the potential for projects in the immediate vicinity to have any effect on the geologic conditions of the project site

or park site. Likewise, MM-GEO-1 requires the proposed project to be designed and constructed in accordance with the applicable geotechnical recommendations provided for the project and would reduce the potential for the project to affect geological conditions on sites in the immediate vicinity. Through compliance with applicable regulations, and through incorporation of site-specific geotechnical recommendations that would be applied to the proposed project and many of the related projects, cumulative impacts would be **less than significant**.

4.3.5 Greenhouse Gas Emissions

Under CEQA, a project would have a significant cumulative impact caused by the combined impact of past, present, and probable future projects if its incremental impact represents a "cumulatively considerable" contribution to such cumulative impacts (14 CCR 15064(h)). As GHG emissions and climate change are a global issue, any approved project regardless of its location has the potential to contribute to a cumulative global accumulation of GHG emissions (as opposed to the relatively temporary nature of pollutants related to air quality). In theory, the geographic extent of the cumulative contributions to GHGs and climate change is worldwide. However, lead agencies are only able to regulate GHG emissions within their respective jurisdictions; therefore, the geographic extent is primarily contingent upon the area over which lead agencies have authority. As such, the geographic extent for the purposes of the project is the SCAB.

The SCAQMD has not adopted recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of development projects. However, the California Natural Resources Agency adopted amendments to the CEQA Guidelines on December 30, 2009, which became effective on March 18, 2010.

While the project would result in emissions of GHGs during construction and operation, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. However, it is generally the case that an individual project is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. Thus, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective (CAPCOA 2008). As indicated in Section 3.5, Greenhouse Gas Emissions, the project would result in an increase in GHG emissions relative to existing conditions. However, implementation of the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Projects included in Table 4-2 would be required to demonstrate compliance with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, such as the City's CAP. The project was found to be consistent with the City's CAP to reduce GHG emissions. Additionally, the proposed project would be constructed and designed in accordance with the City's Green Building Ordinance, which would include implementing energy efficient systems

and appliances, installing energy efficient lighting, and using water-efficient landscaping, irrigation systems, and water conserving plumbing and fixtures. Furthermore, several statewide GHG reduction measures would reduce GHG emissions associated with motor vehicles and electrical generation over time. For these reasons, and as described in detail in Section 3.5, Greenhouse Gas Emissions, the project would not result in a significant GHG impact and would not create a considerable contribution to a cumulative impact. Cumulative impacts are therefore **less than significant**.

4.3.6 Hazards and Hazardous Materials

Transport, Use, or Disposal of Hazardous Materials

Construction of the proposed project and related projects would involve the transport, use, and disposal of hazardous materials such as fuels and lubricants, in association with construction vehicles and equipment. However, such materials are not considered acutely hazardous and are routinely used during construction throughout the cities of West Hollywood, Beverly Hills, and Los Angeles. Furthermore, there are regulations governing the use of hazardous materials with which the proposed project and related projects would be required to comply. As a result, development of the proposed project and the related projects would occur in accordance with adopted plans and regulations. Further, none of the related projects in close proximity to the Project site involve sites identified as containing hazardous materials. For these reasons, the transport, use and disposal of hazardous materials typical during the construction process by the project and the related projects would not result in a significant cumulative impact. Through compliance with applicable regulations, cumulative impacts would be **less than significant**.

Operation of the proposed project and related projects would involve transport, use, and disposal of potentially hazardous materials. The related projects in the immediate vicinity of the proposed project consist of mixed-use, hotel, and commercial projects. As such, hazardous materials used by the proposed project and related projects would generally be limited to materials associated with janitorial, maintenance, and repair activities (i.e., commercial cleaners, lubricants, or paints), and household cleaning supplies. Use of these materials would be limited, and transport, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. As a result, development of the proposed project and the related projects would occur in accordance with adopted plans and regulations. None of the related projects in close proximity to the project site would involve the routine use, storage or transport of hazardous materials beyond those typical of residential and business uses. For these reasons, the transport, use and disposal of hazardous materials typical during business and residential operations would not result in a significant cumulative impact. Through compliance with applicable regulations, cumulative impacts would be **less than significant**.

Release of Hazardous Materials

The release of hazardous materials to the environment could occur in association with the use, transport, or disposal of such materials, which is addressed above. Additionally, the release of hazardous materials can also occur during demolition of buildings containing ACM, LBP, and/or other hazardous building materials. Because many of the related projects are infill development, some many involve demolition and/or renovation of buildings containing hazardous building materials. As identified in Section 3.6 of this EIR, existing buildings on the project site and park site also have the potential to contain ACM and LBP. However, as discussed in Section 3.6, there are state laws that govern the removal of such substances. Compliance with these laws would prevent the release of ACM, LBP, and/or other hazardous building materials resulting from demolition on the project site, park site, and the sites of related projects in the immediate vicinity. Through compliance with these applicable regulations by the proposed project and related projects, cumulative impacts would be **less than significant**.

Hazardous Materials Near Schools

The proposed project is not located within one-quarter mile of a school. As such, it would not create a considerable contribution to a cumulative impact related to the exposure of schools to hazardous materials, nor would the project create a new cumulatively significant impact in this issue area. **No cumulative impact** would occur.

Hazardous Materials Sites

As described in Section 3.6, the project site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. **No cumulative impact** would occur.

Airport Hazards

The project would not be located within the vicinity of an airport. **No cumulative impact** would occur.

Emergency Response and Evacuation Plans

Development of related projects increases the land use intensity of the area, which could increase the potential for conflicts with emergency response plans to occur. Conflicts could arise if, for example, construction of one or more related projects requires street closures along an emergency evacuation route, thereby causing a physical interference with an emergency evacuation plan. The proposed project site is not located along an emergency evacuation route as designated in the City's SEMS/NIMS Emergency Plan. As such, construction and operational activities on the streets bordering the project site would not affect an emergency evacuation plan.

While some of the related projects are located along emergency evacuation routes, such projects would be required to be consistent with emergency response plans. Further, all development projects (including the proposed project and related projects) would be required to implement standard construction traffic management practices per City requirements. Because the project is not located along a designated evacuation route and due to required compliance with emergency response plans and City requirements for construction traffic management, **cumulative impacts would be less than significant**.

Wildland Fire

The project and the related projects are located in the highly urbanized areas. Therefore, no impact related to wildland fire exposure could occur. As such, the project would not considerably contribute to an increase in persons exposed to wildland fire, nor would it create a new cumulative impact involving exposure of persons to wildland fire. **No cumulative impact** would occur.

4.3.7 Hydrology and Water Quality

Water Quality Standards/Waste Discharge Requirements

The project and related projects in the areas discharging to Ballona Creek would be subject to state and regional water quality permit requirements. The project, and most of the related projects, would be subject to the Construction General Permit and the Los Angeles County NPDES permit requirements. The project and related projects would be required to adhere to the applicable permit requirements. Through compliance with applicable regulations, **cumulative impacts would be less than significant**.

Groundwater

Development of related projects may affect groundwater supply by (1) increased land use intensities resulting in increased water usage and/or (2) increased land use intensities resulting in increased impervious surfaces, to the extent that groundwater recharge is affected. The majority of the related projects are located in a highly urbanized, built-out area and are infill projects. This indicates that many of the projects are located on sites that are already fully covered or partially covered with impervious surfaces and where water was used previously. The area containing the related projects generally overlies the Hollywood Basin. Groundwater recharge in the Hollywood Basin occurs primarily in the Santa Monica Mountains, since the lowland portion of the basin, including the City of West Hollywood, is urbanized. As shown in Figure 4-1, the related projects would not affect groundwater recharge in the Santa Monica Mountains. The City of Beverly Hills operates the only water supply wells that draw from the Hollywood Basin. Overall development of the related projects is not anticipated to have a substantial, adverse effect on

groundwater recharge in the Hollywood Basin, to the extent that a net deficit in aquifer volume or a lowering of the local groundwater level would occur.

While the overall development of related projects would increase water use in the area, the water suppliers in the area (namely, the City of Beverly Hills and the Los Angeles Department of Water and Power) have prepared Urban Water Management Plans, which calculate water demand projections and show how anticipated future water demand will be fulfilled. The Urban Water Management Plans also include drought planning to ensure a reliable supply in the event of a drought, as well as analyses and evaluations of groundwater supplies. As such, to the extent that related projects are generally consistent with regional growth patterns and projections, the projects would not be expected to result in increased water usage causing a net deficit in aquifer volume or a lowering of the local groundwater level. Further, compliance with the California Green Building Code would be required for new development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on the redevelopment sites. This ensures that development projects do not result in wasteful or inefficient use of limited water resources. While the proposed project would increase water use at the site relative to existing conditions, this increase would not substantially alter the amount of groundwater that is extracted from the Hollywood Basin. The City of Beverly Hills, which serves the project site, receives approximately 90% of its water from imported surface water purchased from MWD. As such, the majority of the water that is used by the project and the related projects within the City of Beverly Hills' service area would be supplied from surface water.

Because the proposed project and related projects would not substantially alter the amount of impervious surfaces that overlie the Hollywood Basin and because the proposed project and related projects would be primarily supplied by surface water, cumulative impacts to groundwater resources during operation of the proposed project and related projects would be **less than significant**.

The proposed project would require temporary dewatering activities associated with construction processes. Because the project is located in an area of relatively high groundwater, related projects with features requiring excavation extending below the groundwater table (such as a subterranean parking garage) may also require dewatering. One such project is the Melrose Triangle Project, which would require construction dewatering during excavation activities and foundation installation (City of West Hollywood 2014a). However, the temporary extraction of groundwater from the project site, park site, and related project sites would be negligible relative to the volume of water in the groundwater basin. Not all of the related projects have required, or will require, construction dewatering. Construction dewatering is temporary and affects the area immediately around the point of extraction. As such, temporary dewatering at the project site and dewatering for the construction of related projects would not combine to create a cumulatively

significant impact on the groundwater basin. Due to the highly localized and temporary nature of construction dewatering, cumulative impacts during construction of the proposed project and related projects would be **less than significant**.

Drainage Patterns/Increased Runoff/Water Quality

The proposed project and the related projects are located in an urban area where most of the project sites and the surrounding properties are developed. As such, the existing storm drainage system serving the cumulative impact area has been designed to accommodate runoff from a built-out environment. Furthermore, larger development projects (projects disturbing greater than one acre, such as the proposed project) are required to implement Stormwater Pollution Prevention Plans during construction. Implementation of such plans reduces runoff from construction sites and reduces pollutants such as sediment and construction-related chemicals that could flow from construction sites during a storm. Many redevelopment projects, including the proposed project, are also subject to the most recent Municipal Stormwater Permit for Los Angeles County, which includes a requirement to capture and treat the volume of water produced by the 85th percentile storm event. Compliance with this permit generally results in a reduction in stormwater runoff from redevelopment and infill sites, when compared with existing conditions. This reduction would occur for the proposed project and is expected to occur for most of the related projects, which are primarily infill and redevelopment projects. Due to the existing developed nature of the project site and surrounding areas and required compliance with applicable permits, cumulative impacts during construction of the proposed project and related projects would be **less than significant**.

Flooding/Inundation

As described in Section 3.7 of this EIR, the project site and park site are not located within a dam inundation area or a 100-year flood hazard zone. While the project and related projects may be subject to localized flooding during a storm event, the development of the proposed project would not substantially increase flood hazards or exposure of persons to flood hazards. Therefore, the proposed project would not considerably contribute to a cumulatively significant impact involving flooding and inundation, nor would it trigger a new cumulatively significant impact. **No cumulative impact** would occur.

4.3.8 Land Use and Planning

Development of the related projects in the City of West Hollywood would result in further urbanization and redevelopment within the City. Each related project would be subject to independent environmental review, which includes land use conformity analyses. Because the City is generally built out and because many of the related projects are urban infill and redevelopment projects, it is unlikely that related projects would physically divide an established

community. As discussed in Chapter 3.8, upon approval of the Robertson Lane Specific Plan, the proposed project would be consistent with the General Plan policies, the Streetscape Master Plan, and the Park Master Plan policies adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, the proposed project is located on an existing commercial site, and the proposed redevelopment of this site would not physically divide an established community. The proposed project and related projects are required to be designed consistent with the overall goals and policies of applicable land use plans and as a result, **no cumulative impact** involving land use would occur.

4.3.9 Noise

Due to the localized nature of noise impacts, the analysis of cumulative noise impacts focuses on the related projects located within a quarter-mile radius of the project. There are several related projects located less than a quarter-mile from the project:

- **La Peer Hotel (623 La Peer Drive)** – a hotel project located 150 feet southwest of the project site, under construction at the time of this writing and expected to be complete in spring 2017
- **Palm Project (9001 Santa Monica Boulevard)** – a mixed-use project located 300 feet northwest of the project site, under construction at the time of this writing
- **Melrose Triangle Project** – a mixed-use project located 500 feet southwest of the project site, approved but is not yet under construction at the time of this writing
- **8711 Melrose Avenue** – a commercial project located 700 feet southeast of the project site, under construction at the time of this writing
- **8715 Melrose Avenue** – a mixed use project located 700 feet southeast of the project site, under construction at the time of this writing
- **8650 Melrose Avenue** – a mixed use project located 1,200 feet southeast of the project site, under construction at the time of this writing
- **Phase II Park Master Plan Implementation Project –** a park improvement project located at West Hollywood Park, which is within and directly adjacent to the park site. This project is approved and construction is anticipated to commence in early 2017.

The proposed project and the related projects would all be subject to applicable noise standards (see Section 3.9 of this EIR for a description of the standards applicable in the City of West Hollywood). Cumulative impacts related to temporary increases in ambient noise, permanent increases in ambient noise, and vibration impacts are discussed below.

Temporary/Periodic Increases in Ambient Noise Levels

The proposed project would result in temporary noise increases during the construction period. The proposed project's construction period would have the potential to overlap with the related projects' construction processes. As such, the proposed project and the nearby projects listed above would have the potential to create a cumulatively significant temporary or periodic increase in ambient noise levels. However, there are physical barriers (buildings, etc.) and significant distance between most of the related projects and the proposed project site, which would limit the potential for cumulative noise impacts during construction. Specifically, the only projects with the potential to generate cumulative noise impacts during construction are the La Peer Hotel Project (150 feet to the southwest of the project site) and the Phase II Park Master Plan Implementation Project (West Hollywood Park), both of which are already under construction. Because the La Peer Hotel project is expected to be complete in spring 2017, no construction-related (i.e., temporary) cumulative noise impacts are expected to occur as a result of this project.

As described in Section 3.9 of this EIR, anticipated construction noise effects of the proposed project as experienced by a recreational sensitive receptor at West Hollywood Park would be between 88 to 103 dBA, assuming that the recreational receptor is approximately 10 feet from the construction activity. These noise values represent maximum noise generation, or full-power operation, of individual pieces of construction equipment. With incorporation of MM-NOI-1 and MM-NOI-2, these construction-related noise effects of the proposed project would be reduced to a level of less than significant, as explained in Section 3.9.

As stated in the Park Master Plan IS/MND and in the Park Master Plan IS/MND Addendum, equipment for Park Master Plan construction would include backfillers, bulldozers, draglines, front loaders, compactors, scrapers, and graders (City of West Hollywood 2004, 2014b). This construction fleet and the types of activities would be similar to those of the proposed project. In the event that the two projects were to occur simultaneously, it is possible that sensitive receptors in the park could experience increased noise levels from simultaneous operation of construction equipment. However, the noise impacts would be localized and the magnitude of impacts would be highly dependent on the location and type of the construction equipment at each site. As this information is not currently available, it is not possible to quantify cumulative noise impacts associated with both projects. That being said, it is unlikely that the combined effects of the two projects would exceed the short-term construction noise levels identified in Section 3.9 of this EIR for the proposed project, which assumes that sensitive noise receptors would be located approximately 10 feet from the active construction equipment. In addition, typical equipment operating cycles do not generally involve continuous full-power operation, and as one increases the distance between equipment, or separation of areas with simultaneous construction activity, dispersion and distance attenuation reduce the effects of separate noise sources added together. For these reasons, cumulative noise levels

during construction would likely be lower than the maximum of 103 dBA. Nonetheless, if both projects were to occur simultaneously and heavy equipment were to be operating concurrently within different areas of the park, park users could temporarily experience elevated noise levels resulting in cumulatively considerable noise impacts.

As explained in Section 3.9, mitigation measures MM-NOI-1 and MM-NOI-2 would be applied to the proposed project to reduce construction-related noise effects to below a level of significance. MM-NOI-1 involves compliance with the City's noise ordinance, which would also be required for Park Master Plan construction, as stated in the Park Master Plan IS/MND and in the Park Master Plan IS/MND Addendum (City of West Hollywood 2004, 2014b). Upon implementation of MM-NOI-1 and MM-NOI-2, the project's contribution to potential cumulative effects as West Hollywood Park would be reduced below a level significance. Cumulative impacts would therefore be **less than significant with mitigation incorporated**.

Permanent Increase in Ambient Noise Levels

On-Site Operational Noise. Development of the related projects would generally increase the land use intensity at the related project sites, resulting in increased noise levels. At the proposed project site, long-term operational noise would result from operations of the proposed project such as noise from hotel operations, retail uses, dining, subterranean parking garage noise, night club noise, people gathering outdoors and amplified sound at the project's outdoor use areas on Levels 1, 3, 4, and 9, and other permanent on-site noise sources (such as HVAC equipment). The proposed project's operations and those of the related projects would be subject to the City's Noise Control Ordinance, which limits the noise levels of hotels and businesses to 60–70 dBA CNEL. Noise produced from the proposed parking garage would be underground and shielded from noise-sensitive uses. As identified in Section 3.9, the project's HVAC equipment, amplified sound systems, and other stationary sources would be designed to meet the noise requirements of the City's Municipal Code and would not exceed the City's noise standards at nearby sensitive receptors at West Hollywood Park, West Hollywood Library, and residential neighborhoods. Nonetheless, mitigation measures MM-NOI-4 and MM-NOI-5 would be applied to the project to ensure that on-site operational noise impacts would be **less than significant with mitigation incorporated**.

As discussed above, there are seven related projects located within one-quarter mile of the proposed project. Five of these projects are situated such that there are intervening buildings and major roadways between the proposed project and the respective related project sites. However, two projects (La Peer Hotel and the Phase II Park Master Plan Implementation Project) are located near the project site. The La Peer Hotel is separated from the project site by La Peer Drive and some smaller intervening buildings. The Phase II Park Master Plan Implementation Project is separated from the project site by Robertson Boulevard, but with no intervening buildings. Impacts of the proposed project's on-site noise sources with respect to West

Hollywood Park are discussed in Section 3.9 of this EIR, since users of the park and the West Hollywood Library are considered noise-sensitive receptors themselves. Impacts were determined to be less than significant with application of MM-NOI-5, which would ensure that stationary equipment on the project site is within a range that does not exceed City standards. Like the proposed project, the La Peer Hotel and the new aquatic and recreation center at West Hollywood Park would have on-site noise sources such as outdoor uses and HVAC equipment. These sources could combine with those of the proposed project. However, there are no noise-sensitive receptors within the immediate vicinity of the proposed multi-use hotel building and the La Peer Hotel. The nearest receptors to the La Peer Hotel and the proposed project site are multi-family residential dwellings located approximately 245 feet to the northwest of the project site. These receptors are separated from the La Peer Hotel and the proposed multi-use hotel by Santa Monica Boulevard and by commercial buildings along the north side of Santa Monica Boulevard. As such, no cumulative effect would result at a sensitive receptor from the combined effects of the proposed project's on-site noise sources and the La Peer Hotel's on-site noise sources. The nearest receptors to the aquatic and recreation center and the project site are the West Hollywood Public Library, located approximately 540 feet from the project site, and the passive recreation areas of West Hollywood Park, located approximately 150 feet from the project site. The new aquatic and recreation center is located in the southern portion of the park; as such, it would be separated from the proposed multi-use hotel by Robertson Boulevard and by several commercial structures fronting Robertson Boulevard. The intervening structures, roadway, and distance would reduce the potential for on-site noise sources from the multi-use hotel building to combine with those from the aquatic and recreation center to create a cumulative effect on park or library users. Further, to ensure that noise levels from the proposed project do not exceed applicable thresholds, the proposed project has been designed to include sound attenuating features (see Chapter 2) and mitigation measures MM-NOI-3, MM-NOI-4, and MM-NOI-5 are provided, which would require verification that on-site stationary equipment does not exceed noise thresholds for stationary sources as set forth by the City. Similarly, the related projects would be required to comply with these same City noise standards. Compliance with the City's Noise Control Ordinance and implementation of these mitigation measures would reduce the proposed project's contribution to potential cumulative impacts involving a permanent increase in ambient noise levels attributable to on-site noise sources. Due to compliance with the City's Noise Control Ordinance and implementation of project-specific mitigation measures when required, cumulative impacts would be **less than significant with mitigation incorporated**.

Off-Site Traffic Noise. The proposed project and the related projects would generate an overall increase in off-site traffic noise, since the proposed project and many of the related projects would lead to an increase in vehicle trips relative to existing conditions. When calculating future traffic impacts, the traffic consultant considered 55 additional projects (see

Section 3.11). Thus, the future traffic results with and without the proposed project already account for the cumulative impacts from the list of related projects contributing to traffic increases. (Note that the geographic scope for cumulative off-site traffic noise impacts is equivalent to the geographic scope for transportation and traffic as identified in Table 4-1, since regional and local projects could contribute to off-site traffic noise, not just projects located within a one-quarter mile radius of the project site). Since the noise impacts are generated directly from the traffic analysis results, the 2019 Without Project Noise Level and 2019 Plus Project Noise Level described in Section 3.9 of this EIR already reflect cumulative impacts. As described in Section 3.9, the noise level increases associated with both of these scenarios (2019 Without Project and 2019 Plus Project) would generate a noise level increase of less than 1 dB CNEL (rounded to whole numbers) along the studied roads in the vicinity of the project site. As such, increases would be below the significance threshold of 5 dB and cumulative impacts would be **less than significant**.

Vibration

The proposed project and related projects may generate vibration during the construction process. Ground vibration generated by construction equipment spreads through the ground and diminishes greatly in magnitude with increases in distance, on the order of approximately 25 feet. Vibration effects caused by the proposed project would have the potential to be heightened by construction vibration related to the Phase II Park Master Plan Implementation site (i.e., West Hollywood Park), if the two projects were to occur simultaneously. All other related construction projects are further than 25 feet from the project site.

In the event that the proposed project and the Phase II Park Master Plan Implementation Project were to be constructed simultaneously, cumulative vibration impacts would be limited to the immediate construction boundaries of each project site, as impacts would diminish within 25 feet of vibration-generating equipment. Not all construction equipment generates vibration, and vibration-generating construction activities are typically brief and sporadic, further minimizing the likelihood of potential cumulative vibration impacts. Furthermore, as stated in Section 3.9 of this EIR, recreational users at West Hollywood Park are generally at the park for short durations and would be expected to avoid the park areas near construction activities, whether those activities are associated with the proposed project or with the Phase II Park Master Plan Implementation Project. While some recreational users could experience vibration that exceeds the 0.1-inches/second threshold for annoyance, these temporary vibration impacts to park users would be brief and sporadic and would attenuate rapidly over short distances. Further, the West Hollywood Library is located 240 feet from the nearest construction activities that would be associated with the proposed project. As such, any vibration generated by the proposed project during construction would not combine with vibration generated during the Phase II Park Master Plan Implementation Project to adversely affect the library. Due to the distances between the

project and the related projects, the distance between the project site and sensitive receptors, and the brief and sporadic nature of vibration-causing construction activities, cumulative impacts related to vibration would be **less than significant**.

4.3.10 Public Services

Fire and Police. Development of related projects in the City of West Hollywood would generally increase the land use intensities in the City. Incremental increases in land use intensity that would be caused as the related projects are developed could lead to incremental increases in the number of calls for fire and police protection services. As discussed in Section 3.10 of this EIR, the project site would be served by the LACFD for fire protection services and the Los Angeles County Sheriff's Department (Sheriff's Department) for police protection services. The proposed project and related projects would be required to be developed in accordance with applicable fire codes and emergency access requirements (Section 3.10 includes a list with a number of these requirements that apply to the proposed project). Compliance with these requirements would help prevent and/or ameliorate fire emergencies (automatic sprinkler systems and fire alarms) and would help facilitate more expedient emergency response (adequate fire flows, turning radii, width of emergency accesses). Further, the proposed project and most of the related projects are infill projects and therefore involve replacement of existing structures with new structures. New structures are subject to modern standards for fire protection. As such, infill projects generally result in development of structures that are less likely to cause or contribute to an urban fire hazard when compared with structures that were built in accordance with outdated fire protection requirements. As such, development of the proposed project and related infill projects will incrementally reduce the potential for urban fire hazards within the City. Additionally, LACFD reviews fire station placement and fire services through its annual budget process, and resources are expanded or reassigned as necessary to meet increases in service demands. As such, development patterns and increases in demand are monitored and responded to by LACFD.

Similarly, the proposed project has been designed to improve public safety and alleviate any potential increases in demands for police services that may occur as a result of increasing the land use intensity of the site. As described in Section 3.10, temporary security measures would be put in place during construction at the project site. During operation, the project site would have 24-hour private on-site security, a closed circuit security camera system, and controlled access to and from hotel buildings and related parking areas. These aspects of the project would lessen the demand for police protection services at the project site. It is expected that related projects in the City of West Hollywood would incorporate similar design elements that would reduce each project's incremental effect on police services by preventing emergencies and facilitating expedient access and response. Further, the Sheriff's Department evaluates its service needs on an annual basis to keep pace with projected growth.

Payment of development fees by the proposed project and all related projects would offset the costs of increased service needs as necessary and would ensure that performance objectives for fire and police services are not substantially affected by incremental increases in land use intensity within service areas. Due to the facilities planning efforts of police and fire services, required payment of requisite development fees, and compliance with modern performance standards, cumulative impacts would be **less than significant**.

Parks. Development of related projects would generally increase the land use intensities in the service area for the City's parks. To the extent that related projects increase the number of residents in the City, the City's parkland-to-resident ratio would cumulatively decrease as the related projects (particularly residential projects) are developed. Under existing conditions, the City's parkland-to-resident ratio is below the standard of 3.0 acres of parkland per 1,000 residents that is often used as a benchmark for adequacy of park space (see Section 3.10 for details on this benchmark). During construction of the proposed project, the project would cause a temporary decrease in the amount of parkland available in the City. Total park acreage available in the City during construction on the park site would be reduced from 15.31 acres to approximately 14.11 acres. Construction on the park site would last for up to one year. In the event that park site construction were to overlap with other construction within West Hollywood Park (associated with the Phase II Park Master Plan Implementation Project) and with the development of new residential projects, the proposed project would combine with these projects to further reduce the parkland-to-resident ratio. However, upon completion, both the proposed project and the Phase II Park Master Plan Implementation Project would enhance the ability of West Hollywood Park to provide space to help meet the recreational needs of residents. Because the effects of the project would be temporary, they would not combine with the effects of related development projects to substantially increase demand on parks such that new parks would need to be constructed. As such, cumulative impacts would be **less than significant**.

Schools and Libraries. The need for new school and library facilities is typically associated with an increase in residential population and housing. Because the proposed project is a commercial project, it would not contribute to the residential population in the City of West Hollywood to the extent that it would considerably contribute to a cumulatively significant impact to school and library facilities, or to the extent that it would cause a new cumulatively significant impact to such facilities. **No cumulative impact** would be caused by the proposed project.

4.3.11 Transportation and Traffic

Conflicts with Plan, Policy, or Ordinance; Conflicts with CMP Guidelines

As discussed in Section 3.11 of this EIR, future traffic conditions take into account a total of 55 related projects in the cities of West Hollywood, Los Angeles, and Beverly Hills as well

as general traffic growth in the area (i.e., "background" traffic growth). The 55 related projects are all located within a 1.5-mile radius from the project and were chosen due to their potential to affect traffic circulation in the area. Related projects listed in Table 4-2 located beyond the 1.5-mile radius are not anticipated to specifically affect traffic circulation in the study area and are considered part of the background traffic growth. The related projects used to formulate the cumulative traffic scenario (i.e., future traffic conditions) are listed in Section 3.11, Table 3.11-10. As part of the traffic analysis, future traffic conditions were added to the proposed project traffic to formulate a "future-with-project" scenario. This scenario was then analyzed relative to the applicable traffic impact criteria established by the City of West Hollywood, City of Los Angeles, City of Beverly Hills, and the County CMP. Impacts of the proposed project under the "future-with-project" traffic conditions were determined to be less than significant for all intersections and roadway segments in the traffic study area, with the exception of the intersection of Robertson Boulevard and Santa Monica Boulevard. At this intersection, a potentially significant impact was identified under City of West Hollywood thresholds. However, upon implementation of mitigation measure MM-TRF-1, the project's impact would be reduced to less than significant under the cumulative growth conditions. As such, the cumulative impacts related to inconsistences with established performance measures and with the CMP would be a **less than significant with mitigation incorporated**.

Road Safety

The proposed project would result in an increase in the number vehicles that enter and exit the project site. The proposed project would have a driveway along La Peer Drive, located approximately 40 feet south from the intersection of Santa Monica Boulevard and La Peer Drive. The project's Robertson Boulevard driveway would be located approximately 360 feet south from the intersection of Santa Monica Boulevard and Robertson Boulevard. In order to determine whether the project would have a significant impact relative to vehicle queuing and traffic delays associated with the proposed project driveways, KOA Corporation conducted an analysis of vehicle queuing to measure both on-site and off-site queuing issues and traffic delays at the driveways. This analysis includes future-with-project traffic conditions, which is the cumulative traffic scenario for the traffic study area and therefore includes the vehicles that would be added to roadways by the projects on the related projects list. The study showed that expected vehicle delays at the project driveways would be 1–3 seconds (equating to LOS A) for all peak periods under both existing-plus-project traffic conditions and future-with-project traffic conditions. Furthermore, the vehicle queues due to project trips at all approaches to the driveways are expected to be less than one vehicle during the peak hours. As such, the proposed project in combination with related projects would not produce significant vehicle delays at the project driveways, and cumulative impacts would therefore be **less than significant**.

The proposed project and immediately adjacent projects could lead to an overall increase in pedestrian activity in the area. While the increased traffic and pedestrian activity associated with related projects may combine to increase overall pedestrian hazards in the area, the proposed project is not expected to significantly exacerbate any pedestrian hazards in the area. The project is located near striped crosswalks with pedestrian signals (specifically, at the intersections of Santa Monica Boulevard & Robertson Boulevard and Melrose Avenue & Robertson Boulevard). Furthermore, the proposed project would improve pedestrian connections and would create a pedestrian-friendly street environment around the project site. Pedestrian traffic generated by related projects within walking distance of the proposed project would also have the benefit of the pedestrian-oriented nature of the proposed project and the general increase in pedestrian awareness that may result in the project area. Further, pedestrians generated by related projects within walking distance of the proposed project would have access to similar crosswalks, such as those at the intersections of Santa Monica Boulevard and its major cross streets. Due to the pedestrian-oriented nature of the proposed project and the existing pedestrian safety features that are situated throughout the project area, cumulative impacts would be **less than significant**.

Alternative Transportation

Development of related projects is anticipated to incrementally increase the use of transit, bicycle, and pedestrian facilities in the area, in part because many of the projects would increase land use intensity and in part because many of the projects would include design elements that encourage increased use of alternative transportation. At the local and regional level, increased use and enhancement of alternative transportation modes is being encouraged and successfully implemented. Infill and redevelopment projects, such as the proposed project and many of the related projects, are anticipated to increase the use of alternative transportation modes by developing services and residential dwellings within the vicinity of existing and future alternative transportation facilities. Many infill and redevelopment projects also include components that encourage use of alternative transportation and/or components that directly expand or enhance alternative transportation modes. For example, the proposed project includes on-site bicycle facilities and implements plans for increased pedestrian connections in the project vicinity. Furthermore, overall development in the area, including the proposed project and related projects, would be required to comply with applicable adopted policies, plans, or programs regarding public transit, bicycle, and pedestrian facilities. Due to the infill nature of the proposed project and related projects, the urbanized nature of the project area and existing access to alternative transportation, as well as required compliance with applicable plans and policies pertaining to alternative transportation, cumulative impacts would be **less than significant**.

4.3.12 Utilities and Service Systems

Wastewater Treatment Requirements

Wastewater generated in the City is treated at the Hyperion Treatment Plant. The plant consists of a tertiary treatment system, which is governed under the Los Angeles Regional Water Quality Control Board Order R4-005-0020, which establishes performance criteria and effluent limitations to ensure that treated effluent discharges do not violate basin plan objectives. As such, the proposed project and related projects in the City would discharge their wastewater to a treatment plant that is in compliance with a permit issued by the Los Angeles Regional Water Quality Control Board Order. The wastewater that would be generated by the proposed project is anticipated to constitute approximately 0.16% of the remaining capacity of this treatment plant. The proposed project and related projects are required to pay development fees and connection fees that are used by wastewater treatment providers to update and expand their facilities pursuant to applicable permit requirements. Further, such facilities are planned based on regional growth projections, such as those produced by the SCAG. The available capacity of treatment facilities is generally limited to levels associated with growth identified by SCAG. The proposed project is within population and employment growth projections that have been identified by SCAG. So long as projects fall within these projections, existing wastewater treatment facilities have been planned to accommodate commensurate increases in wastewater generation across the region. Because the wastewater treatment plant that would serve the project and many of the related projects is subject to an existing permit, because the project and related projects would be required to pay development fees that fund updates to wastewater facilities, and because the project falls within regional growth projections, **no cumulative impact** would occur related to exceedances of wastewater treatment requirements.

Wastewater Treatment

The proposed project and each related project listed in Table 4-2 would incrementally increase the amount of wastewater that is being generated in the area. However, as described in Section 3.12, the increase in sewage flows attributable to the proposed project would not exceed the capacity of the existing sewer lines that serve the project site, nor would it exceed the capacity of the Hyperion Treatment Plant. The Hyperion Treatment Plant has a remaining capacity of approximately 88 million gallons per day (City of Los Angeles Bureau of Sanitation 2015). The increase in sewage flow attributed to the proposed project would account for 0.16% of the plant's remaining capacity. As described in the paragraph above, the available capacity of treatment facilities is generally limited to levels associated with growth identified by SCAG. The proposed project falls within these regional growth projections. Further, the proposed project and related projects are subject to development fees and connection fees that fund improvements to wastewater treatment facilities. Because the project and related projects would be required to pay development

fees that fund updates to wastewater facilities, and because the project falls within regional growth projections, **no cumulative impact** would occur as a result of the proposed project.

Storm Drainage Facilities

As stated in Section 4.3.7, the proposed project is located in an urban area where most of the surrounding properties are developed. The existing storm drainage system serving this area has been designed to accommodate runoff from this built-out environment. Furthermore, larger development projects (projects disturbing greater than one acre, such as the proposed project) are required to implement Stormwater Pollution Prevention Plans during construction. Implementation of such plans reduces runoff from construction sites and reduces pollutants such as sediment and construction-related chemicals that could flow from construction sites during a storm. Most redevelopment projects, including the proposed project, are also subject to the most recent Municipal Stormwater Permit for Los Angeles County, which includes a requirement to capture and treat the volume of water produced by the 85th percentile storm event. Compliance with this permit generally results in a reduction in stormwater runoff from redevelopment and infill sites, when compared with existing conditions. This reduction would occur for the proposed project and is expected to occur for most of the related projects that are infill and redevelopment projects. Due to the existing developed nature of the project site and surrounding areas and required compliance with applicable permits, cumulative impacts would be **less than significant**.

Water Supply and Water Treatment Facilities

Development of related projects would increase land use intensities in the area, resulting in increased water usage and increased demand for water treatment. The proposed project and some of the related projects are served by the City of Beverly Hills Public Works Department. As such, development of the proposed project and the related projects would increase the amount of water used in the City of Beverly Hills' service area. The City of Beverly Hills Urban Water Management Plan has planned for provision of regional water including drought scenarios for the City of Beverly Hills and for the portions of the City of West Hollywood that are in its service area. The plan uses regional population, land use plans, and projections of future growth as the basis for planning water system improvements (including but not limited to water treatment plants) and demonstrating compliance with state water conservation goals and policies. As such, to the extent that related projects are generally consistent with regional growth patterns and projections, the projects would not be expected to result in increased water usage causing the need for new entitlements, resources, and/or treatment facilities that are not already being planned to accommodate regional growth forecasts. The City of Beverly Hills also has a Capital Improvement Program, which allocates ongoing funding to repair and replace water infrastructure in the service area. The Capital Improvement Program includes funding and programs to replace and/or rehabilitate undersized, deteriorated, or old water mains. In addition, the Capital Improvement

Program contains funding and programs to investigate new sources of water and repair and rehabilitate wells to ensure maximum production for the Hollywood Basin (City of West Hollywood 2010). Further, compliance with the California Green Building Code would be required for new development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on redevelopment sites. This would ensure that many of the related projects, as well as the proposed project, do not result in wasteful or inefficient use of limited water resources and may in fact result in an overall decrease in water use per person. Due to water planning efforts, water conservation standards, and the urban infill/redevelopment nature of the proposed project and many of the related projects, cumulative impacts would be **less than significant**.

Solid Waste

Development of related projects would increase land use intensities in the area, resulting in increased solid waste generation in the service area for Los Angeles County landfills. However, the proposed project and many of the related projects are urban infill and/or redevelopment projects. As such, solid waste is generated at the proposed project site and many of the related project sites prior to development of these projects. Further, Assembly Bill 939, or the Integrated Waste Management Act of 1989, mandates that cities divert 50% of the total solid waste generated. In order to maintain state requirements of diverting 50% of solid waste and to offset impacts associated with solid waste, the proposed project and all related projects would be required to implement waste reduction, diversion, and recycling during both demolition/ construction and operation. (Specifically, during construction, the City requires diversion of 80% of construction and demolition waste.) Through compliance with City and state solid waste diversion requirements and due to the recycling collection features that would be part of the proposed project design and the design of many typical urban infill projects, cumulative impacts would be **less than significant**.

4.3.13 Energy Consumption

The proposed project and related projects would incrementally increase energy consumption in the area. As described in Section 3.13, there are numerous requirements that apply to the proposed project and to related projects which would reduce energy consumption of new development and redevelopment in the area. For example, all future projects, including the proposed project, would be required to meet the California Building Energy Efficiency Standards. The California Building Energy Efficiency Standards that were applicable through 2016 were the 2013 standards. Buildings constructed in accordance with the 2013 standards use 25% less energy for lighting, heating, cooling, ventilation, and water heating than buildings constructed in accordance with the 2008 standards. The most recent amendments to Title 24, Part 6, referred to as the 2016 standards, became effective on January 1, 2017. In general, non-

residential buildings built to the 2016 standards will use an estimated 5% less energy than those built to the 2013 standards (see Section 3.13 for details). As described in Section 3.13, the proposed multi-use hotel building is expected to consume less electricity and natural gas per square foot relative to the existing uses on the project site. Due to the urbanized nature of the City and surrounding areas, many of the related projects are expected to result in a similar pattern—while the overall use of electricity and natural gas on the site increases, the energy use per square foot is expected to decrease due to compliance with modern standards and incorporation of modern technologies and design standards. A development pattern of increased density combined with increased efficiency is less energy intensive when compared with new development located on previously undeveloped land away from urban centers. As such, while the proposed project and related projects would result in increasing energy consumption in the region, they would also result in increased energy efficiency.

Specifically regarding petroleum use, the proposed project and related projects would require petroleum during construction for off-road equipment, truck trips, and worker vehicle trips. However, construction of the proposed project and related projects would be temporary. Furthermore, projects in the City would be required to comply with mitigation measure 3.15-1 from the Final Program EIR for the City's General Plan and CAP. This measure addresses and reduces construction-related greenhouse gas emissions in the City (see Section 3.5 of this EIR for details). Reducing greenhouse gas emissions during construction would help reduce construction-related fuel usage for the proposed project and for related projects in the City. Additionally, the proposed project and most related projects are located on urban infill sites. As such, construction worker trips and truck trip distances are anticipated to be reduced as compared to sites that are not located in urban centers. During operation of the proposed project and related projects, increased land use intensity would result in additional vehicles miles traveled in the area. However, over the lifetime of the proposed project and the related projects, the fuel efficiency of vehicles is expected to increase. Furthermore, the urban setting of the proposed project and the related projects would encourage the use of alternative transportation modes. Over time, access to alternative transportation modes and use of such modes is expected to increase as plans and policies for development of alternative transportation are implemented. Due to the overall pattern of urban infill in the area and compliance with increasingly stringent local and state regulations for energy efficiency in buildings and vehicles, cumulative effects resulting from the proposed project and related projects would be **less than significant**.

4.4 REFERENCES

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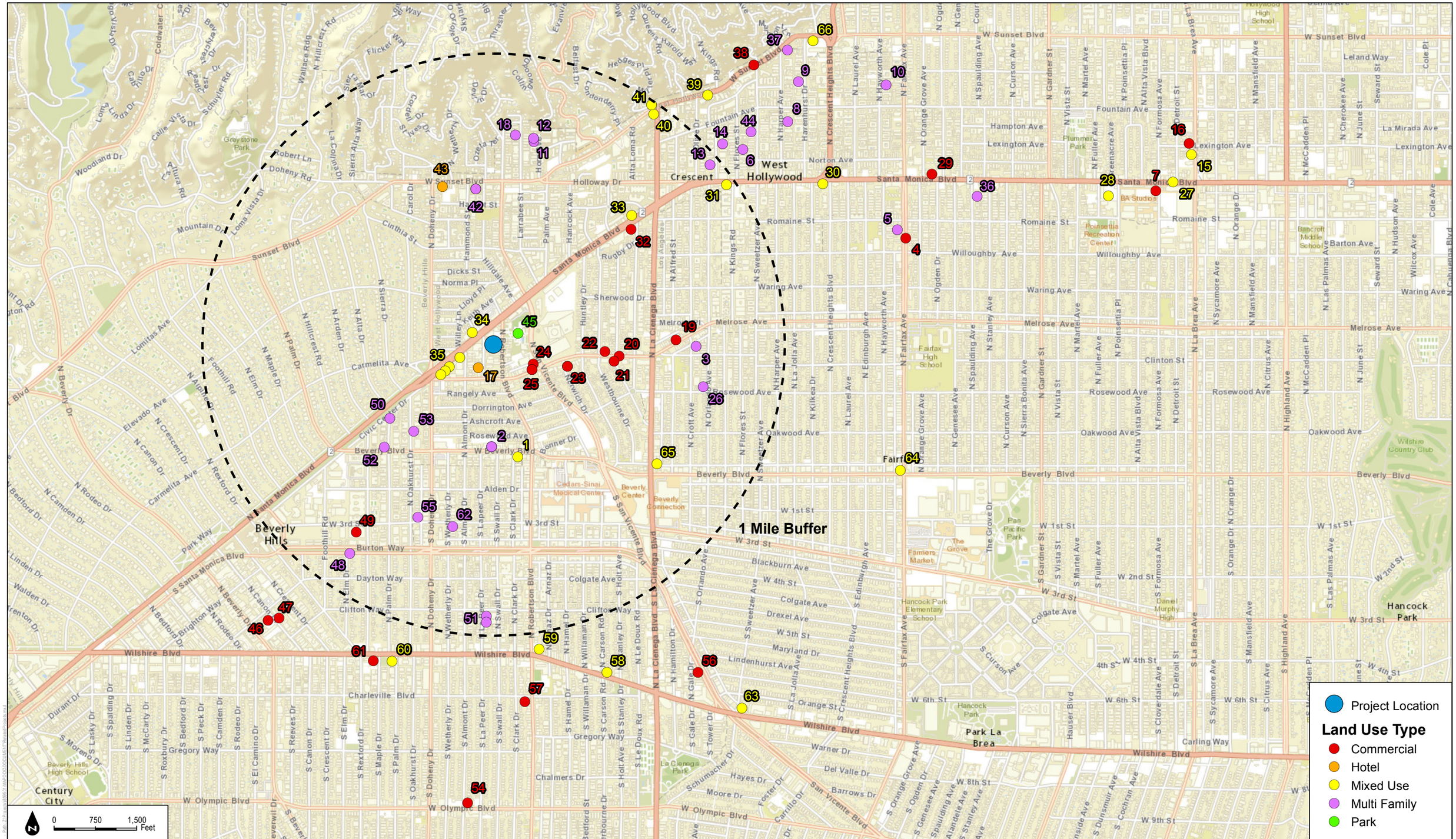

SOURCE: ESRI, 2016

FIGURE 4-1
Related Projects

DUDEK

Robertson Lane Hotel Project

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