

City of West Hollywood Robertson Lane Hotel Project Initial Study

Prepared for:

City of West Hollywood

8300 Santa Monica Boulevard West Hollywood, California 90069 Contact: Jennifer Alkire, AICP, Senior Planner

Prepared by:

Dudek

38 North Marengo Avenue Pasadena, California 91101

December 2014



TABLE OF CONTENTS

Sec.	<u>tion</u>		Page No.
ACR	ONYM	IS AND ABBREVIATIONS	III
1	INTI	RODUCTION	1
2	ENV	TRONMENTAL FACTORS POTENTIALLY AFFECTED	15
3		ERMINATION	
4		LUATION OF ENVIRONMENTAL IMPACTS	
	4.1	Aesthetics	
	4.2	Agriculture and Forestry Resources	
	4.3 4.4	Air Quality	
	4.4 4.5	Biological Resources	
		Cultural Resources	
	4.6 4.7	Geology and Soils	
		Greenhouse Gas Emissions	
	4.8	Hazards and Hazardous Materials	
	4.9 4.10	Hydrology and Water Quality	
	4.10	Land Use and Planning	
		Mineral Resources	
	4.12	Noise	
	4.13	Population and Housing	
	4.14	Public Services	
	4.15	Recreation	
	4.16	Transportation and Traffic	
	4.17	Utilities and Service Systems	
	4.18	Mandatory Findings of Significance	56
FIG	URES	S	
1	Regio	onal Map	7
2	Vicin	nity Map	9
3	Conc	reptual Site Plan	11
4	Build	ling Elevations	13

TABLES

1	Proposed Project Characteristics	3
2	Existing Zoning	4
3	Existing Site Uses	
4	Employment Generation – Proposed Project versus Existing Conditions	45
5	Employment Projections for the City of West Hollywood	46

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AQMP	Air Quality Management Plan
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
City	City of West Hollywood
CNDDB	California Natural Diversity Database
CO	carbon monoxide
DPR	California Department of Parks and Recreation
EIR	Environmental Impact Report
FAR	floor area ratio
GHG	greenhouse gas
LACFD	Los Angeles County Fire Department
LSTs	localized significance thresholds
NO _x	oxides of nitrogen
NO ₂	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
PM _{2.5}	fine particulate matter
PM ₁₀	coarse particulate matter
proposed project	Robertson Lane Specific Plan Project
RLSP	Robertson Lane Specific Plan
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
sf	square foot; square feet
specific plan	Robertson Lane Specific Plan
SO ₂	sulfur dioxide
SUSMP	Standard Urban Stormwater Mitigation Program

1 INTRODUCTION

1. Project Title: Robertson Lane Hotel Project

2. Lead Agency: City of West Hollywood

8300 Santa Monica Boulevard West Hollywood, California 90069

3. Contact Person: Jennifer Alkire, AICP, Senior Planner

Phone: (323) 848-6487 Email: jalkire@weho.org

4. Project Location: 645, 647, 653, 655, 657, 661, 665, and 681 North

Robertson Boulevard and 648, 650, 652, and 654 North La

Peer Drive

West Hollywood, California 90069

5. Project Sponsor's Name Faring Capital LLC

and Address: 8899 Beverly Boulevard, Suite 716

West Hollywood, California 90048

6. General Plan Designation: Commercial, Neighborhood 2 and Commercial,

Community 2

7. Zoning: CN2 (Commercial, Neighborhood 2) and CC2

(Commercial, Community 2)

8. Description of Project:

The Robertson Lane Specific Plan project (proposed project) would involve construction and operation of an approximately 509,000 square foot (sf) building (calculated per the Building Code, with parking areas included). As calculated per the Zoning Code (i.e., without the parking included in the total square footage), the proposed building would occupy approximately 252,700 gross square feet, consisting of a hotel and commercial uses (proposed hotel/commercial building) that would be bisected by a pedestrian walkway (Robertson Lane). These uses would be developed on an approximately 1.94-acre site located within the City of West Hollywood (City) consisting of the following addresses: 645, 647, 653, 655, 657, 661, 665, and 681 North Robertson Boulevard and 648, 650, 652, and 654 North La Peer Drive. Figure 1 shows the location of the project site in a regional context, and Figure 2 shows the location of the project site in a local context. As shown in Figure 2, the site is bounded to the west by North La Peer Drive, a two-lane, north-south street (hereafter referred to as La Peer Drive), and to the east by North Robertson Boulevard, a two-lane, north-south street (hereafter referred to as Robertson Boulevard). The project site has approximately 400 feet of street frontage along Robertson Boulevard and approximately 200 feet of street frontage along La Peer Drive. The width of the

site, measured as the distance between the La Peer Drive frontage and the Robertson Boulevard frontage, is approximately 280 feet. While the site has street frontages to the east and west, it is bound by other commercial properties to the north and south. The commercial properties abutting the north side of the project site are situated along Santa Monica Boulevard, a northeast-southwest trending four-lane roadway.

The characteristics of the proposed hotel/commercial building are summarized in Table 1 and are depicted on the conceptual site plans shown in Figure 3. The proposed building would include approximately 34,400 square feet of restaurant space, approximately 24,400 square feet of retail space, approximately 7,923 square feet of wholesale design showroom space, and a 251-room hotel with associated amenities such as a spa, pools, and a club. The pedestrian walkway, Robertson Lane, would extend northeast-southwest across the project site with entrances at La Peer Drive and Robertson Boulevard. The walkway would be approximately 30 feet wide, and approximately three-quarters of its length would be open to the sky, with the remaining portion covered by a portion of the upper levels of the hotel. Retail uses and restaurants would front the walkway on its north and south sides. The design of the proposed project incorporates stepbacks, architectural design features, and articulations so that the highest portions of the structure are set back from Robertson Boulevard. As a result, the proposed building would be a maximum of 46 feet in height (4 aboveground levels) along Robertson Boulevard and a maximum of 103 feet in height (8 aboveground levels) along La Peer Drive (see Figure 4).

The proposed project would also include a four-level subterranean parking garage providing approximately 1,048 parking spaces and 6 off-loading spaces. The parking lot would be situated on levels P4 through P1 of the building, with P4 being the lowest in elevation. The ground level (Level 1) would contain restaurant space, retail space, the hotel lobby, wholesale design showroom space, hotel back-of-house uses, outdoor dining space, and Robertson Lane. All retail uses would front Robertson Lane or Robertson Boulevard. The street level uses fronting La Peer Drive would consist of the hotel restaurant at the southernmost end of the building, an entrance to Robertson Lane, the hotel porte cochere and entry court, and an entrance to the subterranean parking garage. Level 2 would consist of a variety of hotel uses, including a hotel restaurant, hotel meeting rooms, a hotel lobby, a hotel gym and fitness area, hotel back-of-house uses, and an outdoor terrace area overlooking Robertson Boulevard. Level 3 would consist of 41 hotel rooms, a small hotel restaurant with an outdoor dining area, hotel back-of-house uses, hotel outdoor gardens, and private terraces for hotel guests. Level 4 would consist of 51 hotel rooms, private terraces for hotel guests, a hotel pool and deck, hotel gardens, an outdoor event area, several areas for mechanical uses, and hotel back-of-house uses. Level 5 through Level 7 would primarily contain hotel rooms, with each of these three floors containing approximately 53 rooms. Level 8 (Rooftop Level) would contain restaurant space and an associated outdoor dining area, a pool, and hotel back-of-house uses. The project would provide a total of approximately 70,800 square feet of outdoor areas, consisting of Robertson Lane, outdoor dining areas, gardens, private terraces for hotel rooms, and two pool areas. Approximately 10,000 square feet of the

Robertson Lane Hotel Project Initial Study

8595

December 2014

outdoor areas would be landscaped. Landscaping would be located primarily at the ground level, at the third and fourth levels, and on the rooftop. The rooftop and the fourth level would have the most extensive landscaping.

Table 1
Proposed Project Characteristics

Parcels	4336-009-003, 43	336-009-004, 4336-009-005, 4336-009-006, 4336-009-007, 4336-010-005					
Project Site	84,500 square feet						
Area of Proposed Site Uses in Square Feet (sf)	Building Area Building Area of Hotel Uses: 216,300 (zoning code) Building Area of Public Commercial/Restaurant Uses: 36,400² (zoning Building Area of Parking Areas: 256,000 (building code) Total Building Area: 509,000 (building code)						
	Building Area (FAR)	· ·					
	Outdoor Areas	Outdoor Area of Hotel Uses (gardens, pools, terraces, dining): 37,400 Outdoor Area of Public Uses (dining, pedestrian walkway): 33,400 Total Outdoor Area: 70,800					
Parking	 Approximately 1,048 spaces would be provided in a subterranean garage, which would be shared among the site uses. Ingress/egress to the parking garage would be provided on La Peer Drive at the northernmost end of the proposed building and on Robertson Boulevard at the 						
	Up to 70% cApproximate	southernmost end of the proposed building. Up to 70% of spaces may be provided in mechanized stacked parking systems Approximately 25% of spaces would be compact spaces 6 off-street loading spaces provided at the first level of the garage					
Building Height	Robertson B	Boulevard frontage: 46 feet (4 aboveground levels) ve: 103 feet (8 aboveground levels)					
Floor Area Ratio 1	2.9:1 (244,700 F)	AR sf / 84,506 site area sf)					

The City defines floor area ratio (FAR) as the ratio of floor area to total lot area. FAR restrictions are used to limit the maximum gross floor area allowed on a site (including all structures on the site). The maximum gross floor area of all structures permitted on a site is determined by multiplying the FAR by the total area of the site (FAR x Site Area = Maximum Allowable Gross Floor Area). Basement area is not included in calculation of floor area ratio.

Note: all distances, square footages, and building area ratios provided in this table are approximated.

The project site is currently built out with four one- to two-story commercial building and three surface parking lots. Three of the four commercial buildings and all three surface parking lots would be demolished under the proposed project. The commercial building that would remain is located along the southern site boundary. Construction of the proposed project is anticipated to take approximately 30 months to complete, starting in fall 2016 and ending in spring 2019. It is estimated that the project site would be occupied and in operation by March 2019.

Existing Zoning and Land Use Designations

The project site is located within the CN2 (Commercial, Neighborhood 2) and CC2 (Commercial, Community 2) zoning districts. The portion of the site that fronts La Peer Drive

Includes approximately 5,580 square feet of existing retail building that would remain in place.

(comprising four lots) is within the CC2 zone and the portion of the site that fronts Robertson Boulevard (comprising eight lots) is within the CN2 zone, with the zoning boundary extending through the approximate middle of the project site. Table 2 summarizes several requirements of each zone.

Table 2
Existing Zoning

Zone	CN2 (frontage on Robertson Boulevard)	CC2 (frontage on La Peer Drive)
APNs within zone	4336-009-003, 4336-009-004, 4336-009-005, 4336-009-006, 4336-009-007 (partial), 4336-010-005	4336-009-007 (partial)
General Purpose	The CN2 zoning district identifies areas appropriate for low-intensity commercial land uses. The intent of the zone is to allow land uses that are small-scale and that serve local residents. Appropriate land uses include neighborhood convenience uses and specialty shops.	The CC2 zoning district is intended to provide a wide variety of commercial opportunities to serve local community needs, as well as broader market areas. The CC2 zoning district identifies areas appropriate for a variety of commercial uses including retail; professional offices; business support and personal services; entertainment uses; restaurants; specialty shops; overnight accommodations; cultural uses; and small-scale manufacturing uses related to design furnishings, galleries, motion pictures, television, music or design-related uses. Mixed-use developments with residential and office uses above businesses are encouraged, except in areas subject to the commercial-only overlay district.
Permitted Uses ¹	Retail, restaurant, office, wholesale design showroom, art studios, fitness facilities, libraries, museums	Similar to permitted uses of CN2, with the addition of more intensive uses such as vehicles sales and media production
Allowable Floor Area Ratio (FAR) ²	1.00	2.00
Allowable Height	2 stories; 25 feet	4 stories; 45 feet

Refer to Table 2-5 in Section 19.10.030 of the City's Municipal Code for a complete list of permitted uses in each zoning district.

Source: City of West Hollywood Municipal Code, Chapter 19.10 and Chapter 19.90

The West Hollywood General Plan identifies the project site as being located in the Melrose/Beverly District Commercial Sub-area, which is primarily developed with arts and design studios, offices, and related businesses. Robertson Boulevard, which the proposed project would partially front, is designated as a "Pedestrian Destination Street." The project site is not currently located within a specific plan area.

The City defines FAR as the ratio of floor area to total lot area. FAR restrictions are used to limit the maximum gross floor area allowed on a site (including all structures on the site). The maximum gross floor area of all structures permitted on a site is determined by multiplying the FAR by the total area of the site (FAR x Site Area = Maximum Allowable Gross Floor Area). Basement area is not included in calculation of FAR.

Because the proposed project would exceed the currently allowable height and FAR of the project site's general plan and zoning designations, the project would require approval of the proposed Robertson Lane Specific Plan. If approved, the specific plan would replace the current general plan land use and zoning designations for the site and would establish new height limits, allowable density, and design standards for the project site.

9. Surrounding land uses and setting:

Directly north of and adjacent to the project site are four single-story structures occupied by several retail stores and restaurants that front Santa Monica Boulevard. From west to east, these businesses currently include Heritage Classics Motorcar Company, Trust Hair Salon, Cigar Emporium, Bossa Nova Brazilian, and Hamburger Haven. Santa Monica Boulevard lies beyond these commercial uses, with commercial and residential development located north of Santa Monica Boulevard. Directly south of and adjacent to the project site are two single-story buildings occupied by Anawalt Lumber Company. South of Anawalt Lumber Company are a variety of commercial uses, followed by several commercial uses fronting Melrose Avenue to the south. South of Melrose Avenue is a single-family residential neighborhood. West of the project site, across La Peer Drive, are several one- to two-story commercial buildings and an associated surface parking lot. The businesses occupying these buildings currently include the West Hollywood Animal Hospital. West of these uses are commercial and residential developments. Northeast of the project site, across Robertson Boulevard, are three nightclub and restaurant establishments including the Abbey Food & Bar, Here Lounge, and Pump. East of the project site, across Robertson Boulevard, are several one- to two-story commercial buildings and West Hollywood Park. The businesses occupying the commercial structures include Christian Louboutin, Kinara, and Ariana Rugs and The Abbey. Adjacent to West Hollywood Park is the West Hollywood Public Library, as well as a parking structure and community center that are currently proposed for expansion. East of these uses is the Pacific Design Center, which is a campus of design-oriented retail, commercial, office, and showroom-related uses.

10. Required Approvals:

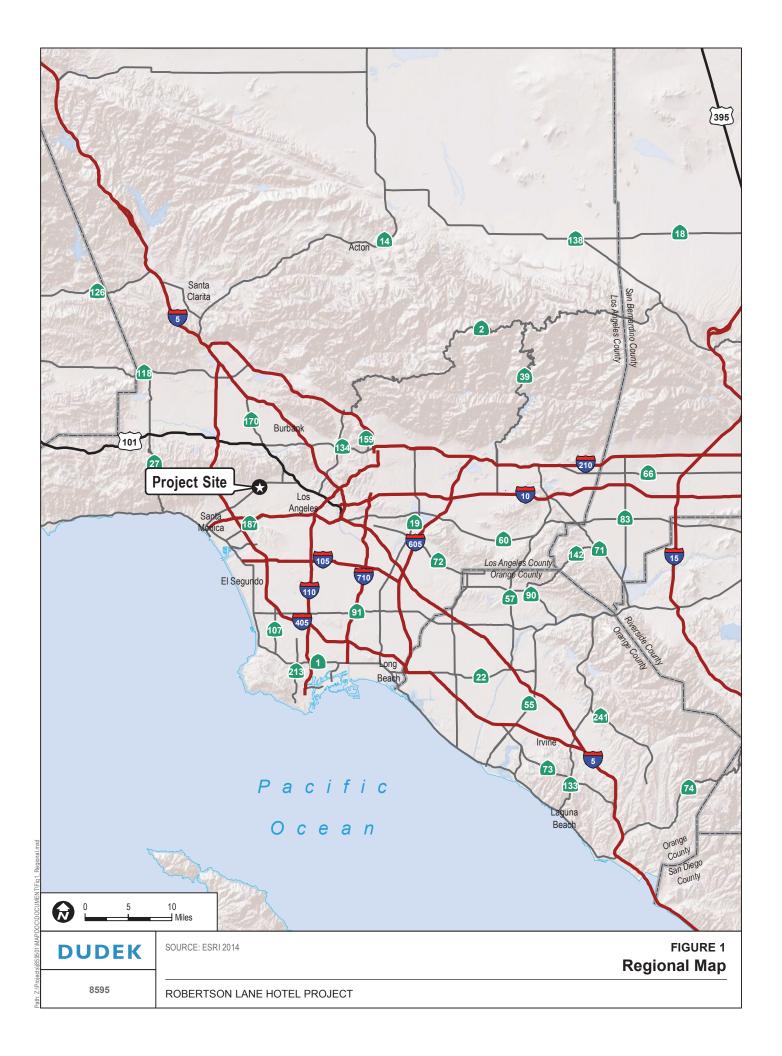
The City is the lead agency for the proposed project pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15367. The proposed project would require a number of land use entitlement approvals from the City, listed as follows:

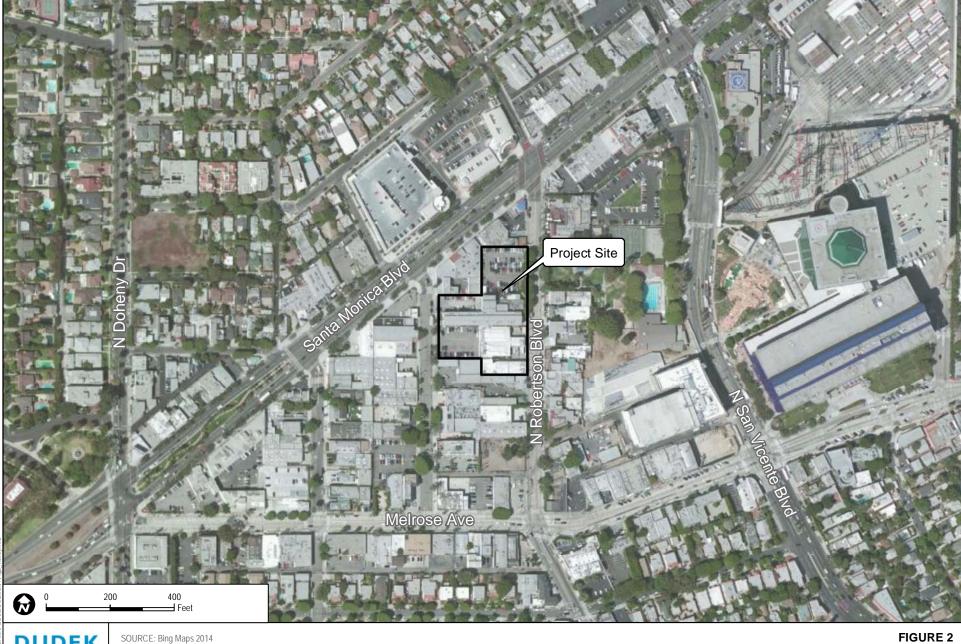
- Adoption of the Robertson Lane Specific Plan (RLSP)
- General Plan Amendment to add the RLSP to the West Hollywood General Plan 2035 and to change the project site's land use designation from CN2 and CC2 to RLSP
- Zoning Map Amendment (Zone Change) to change the zoning districts of the project site from CN2 (lots fronting Robertson Boulevard) and CC2 (lots fronting La Peer Drive) to RLSP zone for all properties within the project site
- Zoning Text Amendment to add the RLSP to the City's Zoning Ordinance

- Development Permit
- Conditional Use Permits to allow a hotel on the site and to allow a nightclub and bars on the site
- Minor Conditional Use Permits to allow the sales and service of alcoholic beverages in the restaurants and bars owned and operated by the hotel and in the meeting rooms, as well as for guest room service and mini-bar service in the guest rooms. The independently owned restaurants and cafes on the project site would be required to obtain separate Minor Conditional Use Permits at a future date, prior to commencing any sales, service, or consumption of alcohol on-site.
- Administrative Permit to allow outdoor dining on the project site
- Demolition Permit to allow the existing structures and surface parking lots to be demolished as part of the proposed project
- Vesting Tentative Tract Map for air-rights subdivision of the commercial property
- Potential Encroachment Permit(s) for use of the public right-of-way along the site frontage during construction

Other approvals from the City and other regulatory agencies may include, but are not limited to, the following:

- Demolition, excavation, and construction permits
- State Water Resources Control Board Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit
- Los Angeles Regional Water Quality Control Board Applicant must submit a Notice of Intent to discharge groundwater during construction and to comply with the General Permit
- Los Angeles County Fire Department Plan approval
- Los Angeles County Sheriff's Department Plan approval
- Utility providers Utility connection permits





DUDEK

Vicinity Map

8595

ROBERTSON LANE HOTEL PROJECT







SOURCE:Hodgetts + Fung Design and Architecture

FIGURE 4
Building Elevations

8595

ROBERTSON LANE HOTEL PROJECT

2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

3 DETERMINATION

On th	ne basis of this initial evaluation:	
	I find that the proposed project COULD NOT have environment, and a NEGATIVE DECLARATION will be	_
	I find that although the proposed project could have environment, there will not be a significant effect in this project have been made by or agreed to by the project NEGATIVE DECLARATION will be prepared.	s case because revisions in the
\boxtimes	I find that the proposed project MAY have a significant eff ENVIRONMENTAL IMPACT REPORT is required.	fect on the environment, and ar
	I find that the proposed project MAY have a "pote "potentially significant unless mitigated" impact on the effect (1) has been adequately analyzed in an earlier do legal standards, and (2) has been addressed by mitigation analysis as described on attached sheets. An ENVIRONM required, but it must analyze only the effects that remain to	environment, but at least one ocument pursuant to applicable measures based on the earlier IENTAL IMPACT REPORT is
	I find that although the proposed project could have environment, because all potentially significant effects (a) in an earlier ENVIRONMENTAL IMPACT REPORT or pursuant to applicable standards, and (b) have been avoide earlier ENVIRONMENTAL IMPACT REPORT or N including revisions or mitigation measures that are important to applicable standards.	have been analyzed adequately NEGATIVE DECLARATION and or mitigated pursuant to that IEGATIVE DECLARATION
	galkin	12/11/14
Sig	gnature	Date

4 EVALUATION OF ENVIRONMENTAL IMPACTS

The following is a preliminary analysis of the proposed project's potential impacts relative to each of the environmental topics addressed in the CEQA Guidelines Appendix G Initial Study Checklist. In accordance with Section 15063 of the CEQA Guidelines, the analysis was prepared to identify the potential environmental effects of the proposed project and assist the lead agency in determining whether preparation of an Environmental Impact Report (EIR) is necessary. Additional analysis will be performed, as appropriate, as part of the EIR process.

4.1 Aesthetics

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?			\boxtimes	
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?			\boxtimes	
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		\boxtimes		
e)	Create a new source of shade or shadow that would adversely affect shade/shadow sensitive structures or use.			\boxtimes	

Scenic Vistas

The project site is located in a highly developed urban area and is surrounded on all sides by development. The topography of the area surrounding the site is relatively flat; therefore, surrounding buildings, ornamental landscaping, and utility poles obstruct lines of sight through the project site and to the north, south, east, and west of the project site. Intermittent views of the Hollywood Hills can be observed by motorists and pedestrians from the north-south corridors that are formed by Robertson Boulevard and La Peer Drive, which are located to the east and west of the project site, respectively. While the proposed project would have the potential to obstruct portions of this view, the existing views of the Hollywood Hills are intermittent and have already been substantially compromised by existing development. Therefore, impacts of the proposed project on scenic vistas would be less than significant, and no further analysis of this issue is required in the EIR.

State Highways

Santa Monica Boulevard is located approximately 75 feet north of the project site. However, this road is not designated as a State Scenic Highway. The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge. The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 13 miles northwest of the project site. Due to this distance, the proposed project site is not within the viewshed of this State Scenic Highway. Therefore, impacts to state scenic highways would not occur, and no further analysis of this issue is required in the EIR.

Visual Character / Quality

The proposed project involves demolition of three existing one- to two-story commercial structures and three surface parking lots on the project site. The proposed project would also include removal of several existing ornamental trees located along La Peer Drive and Robertson Boulevard. The demolition and construction processes would alter the visual character of the project site, as observed from La Peer Drive, Robertson Boulevard, Melrose Avenue, and Santa Monica Boulevard. However, the demolition and construction process would be temporary and would be confined to the project site. The proposed project would replace the existing one- to two-story commercial structures and surface parking lots with a four- to eight-story hotel/commercial building and would also introduce new landscaping to the site. While operation of the proposed project would result in a permanent change in the visual character of the site and a structure that is several stories taller than most commercial development in the area, the proposed project would be consistent with the urban, developed character of the City. Photorenderings will be prepared and included with the EIR to show the change in views from surrounding key observation points. However, because the proposed project would be generally consistent with the developed character of the City, it is anticipated that impacts would be less than significant.

Light and Glare

The existing commercial buildings and surface parking lots on the project site have nighttime building lighting and security lighting. However, the proposed project may result in additional sources of light and glare relative to those that currently exist on the site. Potential changes in light and glare that would be emitted from the site as a result of the proposed project will be examined further in the EIR.

Shade / Shadow

The proposed hotel/commercial building would be two to six stories taller than the buildings on the existing site. Therefore, the proposed project would have the potential to cast additional shade and shadows on the adjacent commercial buildings. A shade and shadow analysis will be included with the EIR to show the extent of the shadows that would be cast by the proposed building. While it is expected that the proposed building would cast longer shadows compared to existing conditions, it is not expected that the shadows would be cast on sensitive land uses for an extended period of time throughout each day exceeding the thresholds for a significant impact. Therefore, impacts are expected to be less than significant.

References

California Department of Transportation (Caltrans). 2011. California Scenic Highway Mapping System. Last updated September 7, 2011. Accessed September 30, 2014. http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.

4.2 Agriculture and Forestry Resources

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				\boxtimes
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 or conversion of forest land to non-forest use?				

Conversion of Farmland

The project site and surrounding area are characterized by features typical of an urban landscape. As shown on the Los Angles County Important Farmland map, the project site does not include any areas mapped by the Farmland Mapping and Monitoring Program as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2011).

Implementation of the proposed project would not involve changes that could result in conversion of farmland to non-agricultural use, as no agricultural uses or farmland exist on the project site or in close proximity to the project site. Furthermore, the site is already graded, paved, and developed. Therefore, because the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmlands of Statewide Importance to a nonagricultural use, no impact would result, and no further evaluation of this issue is required in the EIR.

Agricultural Zoning and Williamson Act Contracts

The project site is currently located within the CN2 (Commercial, Neighborhood 2) and CC2 (Commercial, Community 2) zoning districts. As shown on the Los Angeles County Williamson Act Fiscal Year 2012/2013 map, no areas that are under a Williamson Act contract exist on the project site or in the vicinity of the project site (California Department of Conservation 2013). Therefore, implementation of the proposed project would not conflict with existing zoning for agricultural use, nor would it conflict with a Williamson Act contract. Therefore, no impact would occur, and no further evaluation of this issue is required in the EIR.

Forest Land

As described above, the project site is zoned for commercial use, as it is located within the CN2 (Commercial, Neighborhood 2) and CC2 (Commercial, Community 2) zoning districts. As such, the project site is not zoned for forest land, timberland, or timberland production. Furthermore, no forest land, timberland, or Timberland Production areas (as defined in California Public Resources Code Sections 12220 (g), 4526, or 51104 (g)) are located within or adjacent to the project site. Therefore, the project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The project would be constructed on an existing commercial site that is surrounded by fully developed areas. No impact to forest land or timberland would occur as a result of the proposed project. Therefore, no further evaluation of this issue is required in the EIR.

Indirect Conversion of Farmland or Forest Land

As characterized above, no farmland or forest land is located on the project site or within the vicinity of the project site, as the area is urbanized and developed with commercial, residential, and public facilities uses. No farmland or forest land would be converted or otherwise affected as a result of implementation of the proposed project, and no impact would occur. Therefore, no further evaluation of this issue is required in the EIR.

References

California Department of Conservation. 2011. Los Angeles County Important Farmland 2010. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program.

September 2011. Accessed October 1, 2014. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf.

California Department of Conservation. 2013. *Los Angeles County Williamson Act FY* 2012/2013. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2013. Accessed October 1, 2014. http://www.consrv.ca.gov/dlrp/lca/Pages/Index.aspx.

4.3 Air Quality

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with or obstruct implementation of the applicable air quality plan?	\boxtimes			
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	\boxtimes			
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)?	\boxtimes			
d)	Expose sensitive receptors to substantial pollutant concentrations?	\boxtimes			
e)	Create objectionable odors affecting a substantial number of people?		\boxtimes		

Air Quality Plans

The proposed project is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The most recent applicable air quality plan is the SCAQMD 2012 Air Quality Management Plan (AQMP), which includes reduction and control measures that are outlined to mitigate emissions based on existing and projected land use and development. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the SCAQMD AQMP. While the proposed project would not include new housing, it would involve employment growth and would generate additional vehicle trips to the project vicinity. Because the proposed project would require a General Plan Amendment and a Zoning Map Amendment, it would potentially result in growth not included in the AQMP. Given the potential for employment growth and increased air quality impacts, the EIR will evaluate the project's consistency with the SCAQMD 2012 AQMP.

Robertson Lane Hotel Project Initial Study

8595

Air Quality Standards

Construction and operation of the proposed project may result in short-term and long-term emissions of air pollutants from mobile and/or stationary sources, which would have the potential to exceed air quality standards. Therefore, air quality emissions will be analyzed as part of the EIR to determine the level of significance of the short- and long-term impacts.

Criteria Pollutants

The entire SCAB is designated as a nonattainment area for both federal and state ozone (O₃) standards and fine particulate matter (PM_{2.5}) standards. The federal nitrogen dioxide (NO₂) standard was revised in 2010, and all areas of California have been designated unclassifiable/nonattainment, and the SCAB is also designated as a nonattainment area for the state NO₂ standards. The SCAB is designated as an attainment area for federal and state carbon monoxide (CO) and sulfur dioxide (SO₂) standards. While the SCAB has been designated as an attainment area for the federal coarse particulate matter (PM₁₀) standard, it is a nonattainment area for the state PM₁₀ standards. Air quality emissions anticipated to result from construction and operation of the proposed project will be quantified as part of the EIR. This analysis will indicate whether the proposed project would result in a cumulatively considerable net increase in criteria air pollutants for which the SCAB has been designated non-attainment.

Sensitive Receptors

Sensitive receptors generally include land uses such as residential areas, schools, hospitals, and playgrounds. The project site is surrounded by commercial development and several public uses, such as West Hollywood Park and West Hollywood Public Library. Residential neighborhoods are located approximately 500 feet to the north and south of the project site. The residential neighborhoods to the north are separated from the site by a major four-lane roadway, Santa Monica Boulevard, and the residential neighborhoods to the south are separated from the site by other commercial developments. Construction and operation of the proposed project may have the potential to expose sensitive receptors, such as the nearby residential neighborhoods and the playground and athletic facilities at West Hollywood Park, to increased pollutant concentrations. The SCAQMD recommends that a project's construction emissions be assessed with respect to the SCAQMD's Localized Significance Thresholds (LSTs). The LSTs are intended to assess whether development of a project—primarily the CO, oxides of nitrogen (NO_x), PM₁₀, and PM_{2.5} emissions generated during construction—would cause or contribute to exceedances of ambient air quality standards at sensitive receptors near the project site. The air quality analysis in the EIR will determine conformance with the LSTs using the lookup tables and the construction emission estimates from the California Emissions Estimator Model (CalEEMod) and will determine whether potential effects to sensitive receptors would occur as a result of the proposed project.

Robertson Lane Hotel Project Initial Study

Odor

Earthwork and construction-related activities would have the potential to result in the emission of diesel fumes, tar fumes, and other odors typically associated with construction activities that may be considered objectionable. Operation of the proposed project would involve activities typical of a hotel, restaurants, and retail stores. These activities would have the potential to result in objectionable odors, and this issue will be further evaluated in the EIR.

References

- CARB (California Air Resources Board). 2014. 2012 State Area Designations. Area Designations Maps / State and National. Last reviewed August 22, 2014. Accessed October 2, 2014. http://www.arb.ca.gov/desig/adm/adm.htm.
- EPA (U.S. Environmental Protection Agency). 2014. "Region 9: Air Quality Analysis, Air Quality Maps." Last updated February 11, 2014. Accessed October 2, 2014. http://www.epa.gov/region9/air/maps/.
- SCAQMD. 2009. South Coast Air Quality Management District Final Localized Significance Threshold Methodology. Appendix C. Revised October 21, 2009.

SCAQMD. 2011. SCAQMD CEQA Handbook. Originally published 1993; revised March 2011.

4.4 Biological Resources

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			\boxtimes	
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				

Robertson Lane Hotel Project Initial Study

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes
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?				\boxtimes
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?				

Candidate, Sensitive, or Special-Status Species

Under existing conditions, the project site is developed with four commercial buildings and three surface parking lots. The areas surrounding the site are developed with commercial, residential, and public facilities uses. Vegetation on the project site is generally sparse, as it is located in a highly urbanized area. While the majority of the site is paved, it also contains 18 ornamental trees, consisting of five Chinese Banyan (*ficus microcarpa*), four cypress (*cupressus sempervirens*), four pear trees (*pyrus*), three eucalyptus (*eucalyptus*), one bottletree (*brachychiton*), and one additional ornamental tree. The site also contains several planters with ornamental shrubs. West Hollywood Park, located adjacent to and east of the project site, is more fully landscaped than the project site and the surrounding areas. While the park contains a variety of trees, grasses, and shrubs, it is a substantially altered area and is partially developed with a pool and tennis courts.

Based on an electronic database review of the Beverly Hills quadrangle in the California Natural Diversity Database (CNDDB), several sensitive species have historically been sighted in the general areas of the project site (CNDDB 2014). However, based on the disturbed and developed condition of the site and the relative lack of suitable habitat, the potential for any known sensitive species to occur on the site is very low, as the project site and the project vicinity are highly urbanized with few natural areas that could support wildlife. The sensitive species near the project site would be expected to occur in undeveloped areas within the Hollywood Hills, located approximately one mile north of the project site. Therefore, the proposed project would

Robertson Lane Hotel Project Initial Study

not have a substantial adverse effect on any species identified as candidate, sensitive, or special status in local or regional plans or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Therefore, impacts would be less than significant, and no further evaluation of this issue is required in the EIR.

Riparian Habitat / Wetlands / Sensitive Natural Communities

Because the trees and other landscaping present on the project site are situated in an urban environment and are ornamental in nature, they do not constitute a sensitive natural community in themselves. With the exception of the planters in which the trees and shrubs grow, the site is fully developed with impervious surfaces and does not contain any streams, water courses, or other riparian areas. Thus, riparian habitats, wetlands, and sensitive natural communities do not exist on the project site, and the proposed project would result in no impact on riparian habitats, wetlands, and other sensitive natural communities. Therefore, no further evaluation of this issue is required in the EIR.

Wildlife Movement

There are no wetlands or running waters within the proposed project area, and therefore, the proposed project would have no potential to affect the movement of migratory fish. The project site has been developed for over a half century and is located within a developed, urbanized area. Therefore, the site is not part of a wildlife corridor. Migratory or nesting birds that would have the potential to utilize the on-site trees would be protected under the Migratory Bird Treaty Act of 1918. Therefore, the proposed project would have a less than significant impact on the movement of native or resident species and on the use of native wildlife nursery sites. No further evaluation of this issue is required in the EIR.

Policies, Ordinances, Habitat Conservation Plans

The proposed project would involve the removal of nine on-site trees (five Chinese Banyan, one bottletree, three eucalyptus, and an additional ornamental tree). Four pear trees and four cypress trees would remain on the site. Some of the existing planters with ornamental shrubs may also be removed. The City has adopted a Heritage Tree Program to identify, maintain, and protect designated Heritage Trees throughout the City. The trees on the project site have not been listed under the Heritage Tree Program (City of West Hollywood 2014). Chapter 11.36 of the City's Municipal Code requires a permit to be obtained from the Director of Public Works prior to removing or otherwise altering trees and other plantings that are located on public property. Furthermore, Section 11.36.040 of this chapter states that any tree located on public property that is removed is required to be replaced with another tree, at the discretion and specification of the Director of Public Works. The proposed project would comply with all applicable permit requirements prior to the removal of any trees or plantings located on public property. Therefore, implementation of the proposed project would not conflict with local policies or ordinances

protecting trees or other biological resources. No impact would occur, and no further evaluation of this issue is required in the EIR.

The City's general plan does not designate any areas of the City as being within a habitat conservation plan (City of West Hollywood 2011). Furthermore, the City is not within any of the regional conservation plans designated by the state (CDFW 2014). Therefore, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat plan. No impacts would occur, and no further evaluation of this issue is required in the EIR.

References

- City of West Hollywood. 2011. West Hollywood General Plan 2035. Adopted September 6, 2011. Accessed October 8, 2014. http://www.weho.org/city-hall/download-documents/folder-155.
- City of West Hollywood. 2014. *Designated Heritage Trees*. Heritage Tree Program. Accessed October 2, 2014. http://www.weho.org/city-hall/city-departments/public-works/facilities-and-field-services/heritage-tree-program.
- CDFW (California Department of Fish and Wildlife). 2014. *California Regional Conservation Plans* [map]. March 2014. Accessed October 8, 2014.
- CNDDB (California Natural Diversity Database). 2014. "Data for sensitive species" [GIS data]. California Natural Diversity Database. Accessed October 2, 2014.

4.5 Cultural Resources

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	\boxtimes			
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		\boxtimes		
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		\boxtimes		
d)	Disturb any human remains, including those interred outside of formal cemeteries?		\boxtimes		

Robertson Lane Hotel Project Initial Study

8595

Historical Resources

The proposed project site is entirely developed. The site contains three surface parking lots and at least four commercial buildings built over 45 years ago (see Table 3). The proposed project would involve demolition of three of the four historic-age buildings, as the building at the southeastern-most portion of the site would remain in place. As part of the process of identifying and assessing impacts to cultural resources in the EIR, each of the four historic-age commercial properties will be recorded and evaluated for historical significance against California Register of Historical Resources and local-level designation criteria on the appropriate State of California Department of Parks and Recreation Series 523 Forms (DPR forms). An evaluation of the Factory building has been prepared, which will be updated as part of the EIR process on a new set of DPR forms. The results of the California Historical Resources Information System records search, archival and building permit research, Native American and local government/historical group consultation, intensive-level survey, and subsequent significance evaluations will be provided in a cultural resources technical report, and all DPR forms will be provided in an appendix. The results of the cultural resources technical report, including potential impacts to historical resources under CEQA, will be further discussed in the EIR.

Table 3
Existing Site Uses

APN	Existing Land Use	Address	Current Tenant	Proposed Demolition Plans
4336-009-003, 4336-009-004, 4336-009-005	94-space surface parking lot	Northeast corner of site	Parking lot	Proposed for demolition
4336-010-005	One-Story Commercial	645 Robertson Boulevard	retail (Anichini)	Proposed to remain in
	Building	647 Robertson Boulevard	retail (Raphael)	place
		653 Robertson Boulevard	retail (DSI Entertainment Systems)	
4336-009-006	One-Story Commercial Building	657 Robertson Boulevard (Lots 9-10 of Tract 3585)	retail (Christian Louboutin)	Proposed for demolition
		655 Robertson Boulevard (Lots 9-10 of Tract 3585)	retail (Phyllis Morris)	
	One-Story Commercial Building	653 Robertson Boulevard (Lots 9-10 of Tract 3585)	retail (Phyllis Morris)	Proposed for demolition
4336-009-007	Two-Story Commercial Building and two	661 Robertson Boulevard (Lot 8 of Tract 3585)	nightclub (Factory/Ultra Suede)	Proposed for demolition
	surface parking lots at northwest (28 spaces)	665 Robertson Boulevard (Lot 7 of Tract 3585)	restaurant (The Pearl)	
	and southwest (75 spaces) corners of project site	654 La Peer Drive (Lot 39 of Winnetka Tract)	surface parking lot	
		652 La Peer Drive (Lot 38 of Winnetka Tract)	nightclub (The Factory)	

Table 3
Existing Site Uses

APN	Existing Land Use	Address	Current Tenant	Proposed Demolition Plans
		648-650 La Peer Drive (Lots 36-37 of Winnetka Tract)	surface parking lot	

Archeological Resources / Paleontological Resources / Human Remains

The proposed project site has been developed since at least the early 1900s and is currently developed with commercial buildings and surface parking lots. Therefore, it is not anticipated that the site contains any surface-level archeological or paleontological resources or human remains. However, ground-disturbing activities associated with construction of the proposed project, such as excavation of the four-level subterranean parking garage and grading of the site during site preparation, has the potential to damage or destroy intact subsurface archeological deposits, paleontological resources, and human remains that may be present below the ground surface. The EIR will therefore discuss the potential for such resources to be impacted by the proposed project and will identify mitigation measures to reduce impacts of the proposed project on any archeological resources, paleontological resources, or human remains that may be present.

4.6 Geology and Soils

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	 Rupture of a known earthquake fault, as delineated on the most recent Alquist- Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 		\boxtimes		
	ii) Strong seismic ground shaking?	\boxtimes			
	iii) Seismic-related ground failure, including liquefaction?				
	iv) Landslides?			\boxtimes	
b)	Result in substantial soil erosion or the loss of topsoil?			\boxtimes	

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		\boxtimes		
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				

Fault Rupture

As with many areas of Southern California, the City is located within a seismically active area. The Hollywood Fault is an active fault that runs through the City and is capable of producing surface fault rupture during an earthquake (City of West Hollywood 2011). The EIR will include a geotechnical report addressing the location of active faults relative to the project site and the potential for fault rupture to occur on the site. The analysis provided in the EIR will summarize the findings made in the geotechnical report.

Seismic Ground Shaking

In addition to the Hollywood Fault, there are numerous other active fault systems within the greater Los Angeles region that can cause strong ground shaking at the project site (e.g., the Newport-Inglewood Fault Zone, the Sierra Madre Fault Zone, and the San Jacinto Fault Zone). A large earthquake on any of these faults—or a "blind" fault (which was the case for the 1994 Northridge Earthquake)—could expose the site to strong seismic ground shaking. Therefore, this impact will be further analyzed in the EIR.

Seismic-Related Ground Failure / Liquefaction

The proposed project site is located in an area where liquefaction may occur, as designated on the Seismic Hazard Zones map in the City's general plan and in the State of California Seismic Hazard Zones map (California Department of Conservation 1999; City of West Hollywood 2011). New development within seismic hazard zones for liquefaction is required to comply with technical guidelines adopted by the City, as well as *Special Publication 117*, *Guidelines for Evaluating and Mitigating Seismic Hazards in California*, prepared by the California Geologic Survey (California Geologic Survey 2008). The purpose of these geologic hazard

regulations is to ensure that the engineering and design of proposed development incorporates feasible and appropriate mitigation measures to reduce to acceptable levels potential risks to life and property. The geotechnical work that will be completed as part of the proposed project's engineering and design process, per the California Building Code and the Seismic Hazards Mapping Act, must evaluate the geologic and seismic conditions present and recommend appropriate grading/earthwork practices; fill, foundation and material specifications; and other construction/design practices. Mitigating for liquefaction hazards typically involves either deeply driven pile foundations or substantial fill modification. Due to the proposed four-level subterranean parking garage, sub-grade excavations would extend to a maximum depth of 53 feet below the finished surface of Robertson Boulevard. As such, excavation would be substantial and will require proper design of retaining walls to protect site workers and to ensure proper emplacement of foundations. The liquefaction hazard on the site will require further analysis in the EIR.

Landslides

The project site and surrounding areas have relatively flat topography, and the project site is not within the earthquake-induced landsliding zone designated on the Seismic Hazard Zones map in the City's general plan (City of West Hollywood 2011). The nearest areas that would be subject to landslides are the Hollywood Hills, located approximately one mile north of the project site. Numerous structures stand between the project site and the base of the hills. Therefore, the risk of landslides is considered negligible, and impacts would be less than significant. No further analysis of this issue is required in the EIR.

Erosion

The relatively flat nature of the project site precludes it from being readily susceptible to erosion. However, construction of the proposed project would result in ground surface disruption during grading and excavation that could create the potential for erosion to occur. Since the project site is greater than one acre, the construction contractor would be required to comply with the Storm Water Construction Activities General Permit and obtain an NPDES permit, which requires the construction contractor to prepare and comply with a Storm Water Pollution Prevention Plan. The Storm Water Pollution Prevention Plan must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. Adherence to existing regulations and implementation of standard construction practices would ensure that soil erosion would be reduced to a less than significant level, and no further analysis of this issue is required in the EIR.

Robertson Lane Hotel Project Initial Study

8595

Instable Geological Units and Soils

As discussed above, the project site is located in an area of the City that is susceptible to liquefaction. Potential soil instabilities besides earthquake-induced liquefaction could include expansive soils, compressible clay or peat soils, and soils that could fail during foundation excavations (which would include substantial sub-grade excavations associated with the proposed parking garage). These potential issues will require further analysis in the EIR.

Septic Tanks

The proposed project would use the regional sewer system for disposal of wastewater, and therefore, it would not require septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur, and no further analysis of this issue is required in the EIR.

References

- California Department of Conservation. 1999. *State of California Seismic Hazard Zones Beverly Hills Quadrangle*. [map]. 1:24,000. Division of Mines and Geology. Released March 25, 1999.
- California Geologic Survey. 2008. *Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California*. Re-adopted September 11, 2008. Accessed October 3, 2014. http://www.conservation.ca.gov/cgs/shzp/Pages/shmppgminfo.aspx.
- City of West Hollywood. 2011. "Safety and Noise" in *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed October 1, 2014. http://www.weho.org/city-hall/download-documents/-folder-155.

4.7 Greenhouse Gas Emissions

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	\boxtimes			
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	\boxtimes			

December 2014 3

Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions would be generated as a result of construction and operational activities associated with the proposed project. Construction activities would result in GHG emissions from heavy construction equipment, truck traffic, and worker trips to and from the project site. Operation of the proposed project would generate GHG emissions associated with vehicle trips to and from the proposed project. Operation of the proposed project would also require electricity and natural gas, the consumption of which would result in GHG emissions. The proposed project would also generate GHG emissions associated with water supply, wastewater, and solid waste disposal. As global climate change is a cumulative impact, the proposed project would participate in this potential impact through its incremental contribution of GHG emissions combined with the cumulative increase of all other sources of GHGs. The EIR will identify the sources of construction and operational GHG emissions, as well as the project design features that would be incorporated to reduce emissions, and will determine whether the proposed project would result in a significant cumulative increase in GHGs.

Plans, Policies, and Regulations

The City adopted the City of West Hollywood Climate Action Plan (CAP) on September 6, 2011. The City's CAP includes strategies and performance indicators to reduce GHG emissions from municipal and communitywide activities within the City (City of West Hollywood 2011). The EIR will evaluate whether the proposed project would be consistent with the CAP.

References

City of West Hollywood. 2011. *City of West Hollywood Climate Action Plan*. Adopted September 6, 2011. Access September 30, 2014. http://www.weho.org/city-hall/city-departments/community-development/general-plan-2035/west-hollywood-general-plan-2035-and-west-hollywood-climate-action-plan.

4.8 Hazards and Hazardous Materials

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
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?				

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d)	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
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?				\boxtimes
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?			\boxtimes	

Use of Hazardous Materials

Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the proposed project. Once construction is complete, construction-related fuels and chemicals would no longer remain on site. Hazardous materials that could be used during operation of the proposed project would include chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, pool chemicals, oils, and miscellaneous organics and inorganics that are used as part of building maintenance, restaurant operation, and hotel operation. Use of these hazardous materials would be very limited, and transport, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Due to the limited use of hazardous materials that would be associated with the proposed project and requirements to comply with health and safety regulations, impacts related to use and transport of hazardous materials would be less than significant. No further analysis of this issue is required in the EIR.

Hazardous Materials near Schools

The schools that are closest to the project site include Pacific Hills School, Doheny School (preschool), Huntley Preschool, Rosewood Elementary School, The Center for Early Education, West Hollywood Elementary, and Maimonides Academy. All are located approximately between 0.4 miles and 0.6 miles of the project site. While the proposed project would involve limited quantities of hazardous materials, the transportation, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Due to the limited use of hazardous materials that would occur on site during construction and operation and due to existing health and safety regulations, the proposed project would not pose a potential hazard to nearby schools. Therefore, impacts related to emitting or handling hazardous materials near a school would therefore be less than significant, and no further analysis of this issue is required in the EIR.

Hazardous Materials Sites

There is the potential for the proposed project to be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The EIR will include a Phase I Environmental Assessment. Preparation of this report will involve a search of databases containing records of hazardous materials sites, and the report will identify whether the project site is located on a site listed in one of the databases. The EIR will summarize the findings of the Phase I Environmental Assessment. In the event that the project site is listed in a hazardous materials site database, the EIR will evaluate whether a significant hazard to the public or the environment would result from developing the proposed project on the site.

Airport Safety

The project site is not located within a two-mile radius of any public airport or private airstrip. No airport land use plan applies to the site. Therefore, the proposed project would not create an airplane safety hazard for people residing or working in the project area, no impacts would occur, and no further analysis of this issue is required in the EIR.

Emergency Response Plans

The City maintains the West Hollywood Emergency Plan, which is an all-hazards preparedness, emergency evacuation, response, and recovery plan. It addresses hazards such as fires, earthquakes, floods, terrorism, transportation accidents, public health emergencies, and hazardous materials accidents (City of West Hollywood 2011). Prior to construction of the proposed project, the proposed site plans would be required to undergo review by the Los Angeles County Fire Department (LACFD), which contracts with the City to provide fire and emergency services. The proposed project would also be required to comply with all applicable codes and ordinances for emergency access. Therefore, the proposed project would provide for

emergency access and would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would therefore be less than significant, and no further analysis of this issue is required in the EIR.

Wildland Fires

The project site is located within an urban setting, surrounded by commercial development to the north, south, and east and by a park and library to the east. The nearest wildland areas are located at the base of the Hollywood Hills, approximately one mile north of the proposed project site. As stated in the City's general plan, a fire in the Hollywood Hills would have the potential to spread to the northern region of the City. The City has designated areas of wildland fire hazards in its general plan. The project site is not within a wildland fire hazard area designated in the general plan, nor is it located within the northern reaches of the City. In the unlikely event of a fire emergency at the project site due to wildland fires, the LACFD, specifically Fire Station 7 (864 North San Vicente Boulevard) and Fire Station 8 (7643 Santa Monica Boulevard), both located within the City, would provide fire protection services. Therefore, implementation of the proposed project is not likely to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would therefore be less than significant, and no further analysis of this issue is required in the EIR.

References

City of West Hollywood. 2011. "Safety and Noise" in *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed October 1, 2014. http://www.weho.org/city-hall/download-documents/-folder-155.

4.9 Hydrology and Water Quality

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements?		\boxtimes		
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 of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			\boxtimes	

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			\boxtimes	
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			\boxtimes	
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?		\boxtimes		
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				
j)	Inundation by seiche, tsunami, or mudflow?			\boxtimes	

Water Quality

During construction of the proposed project, gasoline, diesel fuel, lubricating oils, grease, and solvents may be used on the project site. Such chemicals would have the potential to be transported off site in runoff. Soils loosened during excavation and grading could also degrade water quality if mobilized and transported off site via water flow. Construction may also involve dewatering of the site due to the presence of high groundwater. Discharge of this groundwater would have the potential to introduce dissolved solids or other water pollutants to the storm drain system. Compliance with Los Angeles Regional Water Quality Control Board permit requirements for the discharge of groundwater during construction is expected to reduce any potential impacts to less than significance; however, this issue will be further addressed in the EIR. As the project site is currently developed with urban uses, operation of the proposed project would not be expected to result in a substantial increase in water pollutants on site or off site. The majority of the site currently consists of flat, impervious surfaces which would not change as a result of the proposed project. While project design includes a number of features to reduce surface runoff and/or to filter

this runoff, the effects of project construction and operation relative to water quality standards and water quality degradation will be further examined in the EIR.

Groundwater Supply

Water service on the west side of the City, including the project site, is provided by the Beverly Hills Public Works Department (City of West Hollywood 2014). The City of Beverly Hills utilizes the Hollywood Subbasin, a groundwater basin that underlies the northeastern portion of the Coastal Plain of the Los Angeles Groundwater Basin (City of Beverly Hills 2010; Department of Water Resources 2004). The proposed project would be expected to increase demand for potable water supplies. Therefore, the EIR will address whether the Beverly Hills Public Works Department would be able to accommodate the water demand of the proposed project and will also address whether the additional water demand would affect groundwater supplies. Areas within the City often contain high groundwater levels. As depicted in the City's general plan, the project site is located within an area where the depth to groundwater is approximately 10 feet (City of West Hollywood 2011). The geotechnical report that will be included in the EIR will provide site-specific information regarding depth to groundwater on the site. Due to potentially high groundwater levels on the site, excavation of the four-level subterranean parking garage may require dewatering of the site. If dewatering were required, the EIR will address any potential effects that dewatering would have on groundwater.

Drainage Patterns

Development of the proposed project would not require any substantial changes to the existing drainage pattern of the site or the area, and there are no natural water courses on or near the site. The project site is almost entirely developed with impervious surfaces. Construction of the proposed project would not substantially change the amount of impervious surface onsite. Therefore, implementation of the proposed project would not alter the course of a stream or river, or substantially increase erosion, siltation, or the amount of surface runoff. Standard City requirements to submit a site drainage plan prior to issuance of building permits and to comply with NPDES regulations would ensure that construction and operational impacts involving drainage patterns are minimized. Therefore, impacts would be less than significant, and no further analysis of this issue is required in the EIR.

Stormwater Drainage Facilities

Per NPDES and Standard Urban Stormwater Mitigation Program (SUSMP) requirements, the proposed project would be required to implement construction improvements to the drainage system to filter and cleanse stormwater prior to discharge to the storm drain network. Additionally, the construction improvements would include measures to ensure that the volume of stormwater runoff would not exceed existing conditions as required by the City as part of the SUSMP conditions. Therefore, compliance with existing regulations for stormwater runoff would ensure that the

proposed project would not exceed the City's stormwater capacity. Therefore, the proposed project would not result in the need for new or expanded stormwater infrastructure, impacts would be less than significant, and no further analysis of this issue is required in the EIR.

Flood Hazards

The project site is not located within a 100-year flood zone (City of West Hollywood 2011). Therefore, the proposed project would not place housing or structures within a 100-year flood zone. No impacts would result.

As shown in the Dam Inundation Hazard Areas map in the City's general plan, the project site is not within a dam inundation hazard area. Furthermore, no area of the City is mapped within a 100-year flood hazard zone. While the City may be subject to localized flooding during a storm event, such flooding does not typically overtop curbs and generally dissipates quickly after heavy rain ceases (City of West Hollywood 2011). Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of levee or dam failure, impacts would be less than significant, and no further analysis of this issue is required in the EIR.

Tsunami, Seiche, and Mudflows

Due to the distance of the project site from the Pacific Ocean, which is located approximately eight miles to the southwest of the site, and the numerous structures between the project site and the ocean, there is virtually no risk of on-site hazard due to tsunamis (seismically-induced waves). There are no enclosed water bodies within the vicinity of the project site that could place the site at risk from inundation due to a seiche (large waves that occur within a land-locked water body, such as a lake or a reservoir). The project site is approximately one mile from the Hollywood Hills, which could be subject to mudslides. However, numerous structures stand between the project site and the base of the hills. Therefore, the risk of mudflows is considered negligible, impacts would be less than significant, and no further analysis of this issue is required in the EIR.

References

- City of Beverly Hills. 2010. *City of Beverly Hills Urban Water Management Plan*. Prepared by SA Associates. August 2011. Accessed October 3, 2014. http://www.beverlyhills.org/living/utilities/waterservices/urbanwatermanagementplan/.
- City of West Hollywood. 2011. "Safety and Noise" in *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed October 1, 2014. http://www.weho.org/city-hall/download-documents/-folder-155.
- City of West Hollywood. 2014. *Water Boundary Map*. Utilities. Accessed September 30, 2014. http://www.weho.org/city-hall/city-departments/public-works/engineering/utilities.

Department of Water Resources. 2004. "Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin." *California's Groundwater Bulletin 118*. Updated February 27, 2014. Accessed October 1, 2014. http://www.water.ca.gov/pubs/groundwater/bulletin_118/basindescriptions/4-11.02.pdf.

4.10 Land Use and Planning

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Physically divide an established community?			\boxtimes	
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?			\boxtimes	
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?				

Physical Division of a Community

The proposed project would involve construction and operation of a four- to eight-story hotel/commercial building on a 1.94-acre site that is currently developed with commercial uses. The project site is surrounded by commercial development to the north, south, east, and west, and by a park and library to the east. Neither the project site nor the adjacent areas contain any residential neighborhoods that would be removed or divided as a result of the proposed project. Therefore, the conversion of the project site from commercial development to hotel and commercial development would not result in the physical division of an established community. Furthermore, under the proposed project, a pedestrian walkway would extend through the project site, providing connectivity between the uses located to the east of the site (the park, library, and community center and commercial development) and the uses located to the west of the site (commercial development). Therefore, the proposed project would not result in the physical division of an established community, impacts would be less than significant, and no further analysis of this issue is required in the EIR.

Land Use Plans and Policies

The project site is within the CC2 (Commercial, Community 2) and CN2 (Commercial, Neighborhood 2) zoning districts. Buildings within the CC2 zone are limited in height to 4 stories (45 feet) and buildings within the CN2 zone are limited in height to 2 stories (25 feet). Floor area ratio of a building is limited to 2:1 within the CC2 zone and 1:1 within the CN2 zone. The

December 2014

proposed project would be four stories in height on its eastern façade and eight stories in height on its western façade. The building would also have an FAR of approximately 2.9:1. Therefore, the proposed project would exceed both the height limits and the allowable FAR of the CC2 and CN2 zoning districts. Therefore, the Robertson Lane Specific Plan, which would replace the current land use and zoning designations for the site, is proposed for adoption in association with the proposed project. The Robertson Lane Specific Plan would establish height limits, allowable FAR, and design standards for the project site. If approved, the proposed project would be consistent with the standards contained in the proposed Robertson Lane Specific Plan. With its adoption, the specific plan would be incorporated into the City's general plan and the zoning of the site would change from CC2 and CN2 to RLSP (Robertson Lane Specific Plan). Therefore, with the adoption of the specific plan, the proposed project would be consistent with both the general plan land use designation for the site and the zoning designation for the site. The Robertson Lane Specific Plan will be further discussed in the EIR, and the EIR will also contain an analysis of the consistency of the proposed project with the City's general plan policies.

Habitat Conservation Plans

As stated in Section 4.4, Biological Resources, the project site is not located within the boundaries of a habitat conservation plan or natural community conservation plan. Therefore, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat plan. Therefore, no impacts would occur, and no further analysis of this issue is required in the EIR.

4.11 Mineral Resources

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b)	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				

The Department of Conservation has mapped the Los Angeles County region to provide information about the potential presence of portland cement concrete aggregate resources. The City has been mapped within Mineral Resource Zone 1 for aggregate resources. Mineral Resource Zone 1 is a designation given to areas where adequate information indicates that no

significant mineral deposits are present or where it is judged that little likelihood exists for their presence (Department of Conservation 1994). The City does not identify any mineral resource areas in its general plan or municipal code. Because the City is built-out and does not support mineral extraction activities, implementation of the proposed project would not result in the loss of availability of a known locally important and/or valuable mineral resource. Therefore, no impact to availability of mineral resources would occur, and no further evaluation of this issue is required in the EIR.

References

State of California Department of Conservation. 1994. *Generalized Mineral Land Classification Map of Los Angeles County – South Half – Aggregate Resources Only*. 1:100,000. USGS 7.5 Minute Topographic Quadrangles. Prepared by Russell V. Miller. 1994. Accessed October 2, 2014. http://www.quake.ca.gov/gmaps/WH/smaramaps.htm.

4.12 Noise

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	\boxtimes			
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	\boxtimes			
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	\boxtimes			
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 levels?				

Construction / Operational Noise and Vibration

Construction activities associated with the proposed project would intermittently generate increased noise levels and/or vibration on the project site and in areas adjacent to the project site. Construction noise and vibration would have the potential to disturb nearby sensitive receptors. Noise- and vibration-sensitive receptors typically include residential areas, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas where quiet environments are important for enjoyment, public health, and safety. Sensitive receptors adjacent to the project site include residential neighborhoods located about 500 feet to the north and south of the project site and the adjacent West Hollywood Park, West Hollywood Public Library, and community center. Operation of the proposed project building would represent an increase in intensity of uses on the site, which would likely be associated with an increase in both vehicle traffic and pedestrian activity in the vicinity of the site. Therefore, both construction and operation of the proposed project would have the potential to generate noise levels in excess of standards established in the City's general plan and/or noise ordinance and to increase ambient noise levels in the project vicinity. The EIR process will include a field noise study that will measure existing on- and off-site noise conditions. The analysis provided in the EIR will compare the existing noise levels as measured in the field and the established noise standards to the noise levels anticipated to result from construction and operation of the proposed project. The analysis will also address levels of vibration anticipated to be intermittently generated during construction of the proposed project and will determine whether the anticipated vibration levels would result in a significant impact.

Airport Noise

There are no public airports or private airstrips in the project vicinity. Accordingly, the proposed project would not expose people residing or working in the project area to aircraft noise. Therefore, no impacts would occur, and no further analysis of this issue is required in the EIR.

4.13 Population and Housing

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				

Population Growth

The proposed project would not involve the construction of new residential units in the City. However, the proposed project would likely increase the number of jobs available at the project site relative to the number of jobs that are currently available at the site. The estimated employment generated by the existing site uses and the estimated employment that would be generated by the proposed project is calculated and summarized in Table 4. The employment generation rate used in the calculations is obtained from the Southern California Association of Governments (SCAG) report on employment density.

Table 4
Employment Generation – Proposed Project versus Existing Conditions

Site Use	Square Feet (approx.)	Employment Generation Rate (square feet per employee)	Employees
		Existing	
Retail/Service	42,100	424	100
Parking Lot	41,332	n/a ¹	n/a
			Total Employees: 100
		Proposed ²	
Retail/Service ³	86,533	424	204
Hotel ⁴	217,575	1,152	189
			Total Employees: 392

While parking lots may be associated with several on-site employees who serve as parking attendants, these uses are not considered to be substantial employment generators.

Source: SCAG 2001

As shown in Table 4, it is estimated that the current site uses provide employment for approximately 100 individuals. The majority of these jobs would be temporarily lost with implementation of the proposed project, as three out of the four existing commercial structures on the site would be demolished. During construction of the proposed project, temporary construction employment would be generated on the site. Given the relatively common nature of the construction anticipated, the demand for construction employment would likely be met within the existing and future labor market in the City and in Los Angeles County. If construction workers live outside of the City, these workers would likely commute during the relatively short, and finite, construction period, which is anticipated to be approximately 30 months.

As shown in Table 4, it is estimated that operation of the proposed project would generate 392 jobs. This equates to 292 additional jobs on the project site relative to existing conditions (392

Square footage of the parking garage and mechanical areas were omitted from the square footage of the proposed project for the purposes of this table, as these uses would not be anticipated to generate substantial employment.

This number includes retail and restaurant uses open to the general public; hotel retail, restaurant, and club uses; and outdoor dining areas. It also includes the existing commercial building that would not be demolished under the proposed project.

⁴ No data is available from SCAG for employment generation of hotel/motel land uses in Los Angeles County. Regional employment generation data was used for this category.

proposed jobs – 100 existing jobs = 292 new jobs). This number of new jobs is within employment growth projections calculated by SCAG. Employment projections within the City, as calculated by SCAG, are shown in Table 5. Assuming that the proposed project would be completed in March 2019, an additional 292 jobs within the City would fall within employment growth as projected by SCAG.

Table 5
Employment Projections for the City of West Hollywood

2008 Employment 2020 Employment Projection		2035 Employment Projection	
32,300 jobs	34,500 jobs	36,600 jobs	

Source: SCAG 2012

It is anticipated that most of the jobs associated with the proposed project would be filled by existing City residents or by residents of neighboring cities in the densely populated Los Angeles metropolitan area. Therefore, it is not anticipated that the employment generated by the proposed project would lead to a substantial influx of residents to the City. In the event that the jobs offered by the proposed project were to draw new residents to the City, the number of new residents would be minimal relative to the City's existing population, which was estimated to be approximately 35,288 residents in 2013 (U.S. Census Bureau 2014). Furthermore, the City has established a Commercial Development Impact Fee to mitigate the impact of new commercial development on the need for affordable housing within the City. Under this program, new commercial developments are required to provide housing that is affordable to employees or to pay an in-lieu impact fee, which is placed in the City's Affordable Housing Trust Fund. This fund is used by the City for a variety of housing activities, including rehabilitation and new construction. While the proposed project would not be expected to generate the need for additional housing due to the highly populous nature of the City and the surrounding areas, the applicant would be required to comply with the Commercial Development Impact Fee program. Compliance with this program would ensure that any incremental increases in the need for housing within the City that are potentially generated by the proposed project would be accounted for by projects and programs developed with the City's Affordable Housing Trust Fund (City of West Hollywood 2011). Any new residential development that may indirectly result from the proposed project and/or from the project applicant's contribution to the Affordable Housing Trust Fund would be subject to separate CEQA review and would also be required to be consistent with the City's general plan. Due to the ability of the existing regional population to provide an ample employment pool within proximity to the project site and due to the minor increase in employment relative to total jobs available in the City, the proposed project would not generate substantial population growth, and impacts would be less than significant. No further evaluation of this issue is required in the EIR.

Housing

The project site is currently developed with commercial buildings and surface parking lots. Therefore, no residential units would be removed to construct the proposed project. Therefore, the proposed project would not displace existing housing or people necessitating the construction of replacement housing elsewhere. No impact would result, and no further evaluation of this issue is required in the EIR.

References

- City of West Hollywood. 2011. "Housing Element" in *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed October 6, 2014. http://www.weho.org/city-hall/download-documents/-folder-155.
- Southern California Associated of Governments. 2001. *Employment Density Study Summary Report*. Prepared by Natelson Company in association with Terry A. Hayes Associates. October 31, 2001. Accessed October 3, 2014. http://www.mwcog.org/uploads/committee -documents/bl5aX1pa20091008155406.pdf.
- Southern California Associated of Governments. 2012. *Adopted 2012 Regional Transportation Plan Growth Forecast*. 2012. Microsoft Excel data accessed from SCAG's Economic and Demographic Library on October 3, 2014. http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting.
- United States Census Bureau. 2014. "West Hollywood, California." State and County QuickFacts. July 8, 2014. Accessed October 6, 2014. http://quickfacts.census.gov/qfd/states/06/0684410.html.

4.14 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:					
Fire protection?		\boxtimes			
Police protection?		\boxtimes			
Schools?		\boxtimes			
Parks?			\boxtimes		
Other public facilities?			\boxtimes		

December 2014

Fire Protection

Fire services in the City are provided by the LACFD. The City is also within the Consolidated Fire Protection District of the County of Los Angeles, which provides immediate access to the Urban Search and Rescue and Hazardous Materials teams, Air Operations, and other emergency response resources. Two LACFD fire stations are located within the City: Fire Station 7, located approximately 0.5 miles north of project site at 864 North San Vicente Boulevard and Fire Station 8, located approximately 1.8 miles northeast of the project site at 7643 Santa Monica Boulevard (City of West Hollywood 2011). The project site is currently developed with three surface parking lots and four one- to two-story commercial buildings. Under the proposed project, these uses (with the exception of one building) would be replaced by a four- to eightstory hotel/commercial building. The increase in intensity of the use at the site may increase the number of service calls for fire protection. Therefore, this issue will be evaluated in the EIR.

Police Protection

The Los Angeles County Sheriff's Department contracts with the City to provide police protection. The City is served by the West Hollywood Sheriff's Station, located at 720 North San Vicente Boulevard, approximately 0.2 miles northeast of the project site. The increase in intensity of the use at the site may increase the number of service calls for police protection. Therefore, this issue will be evaluated in the EIR.

Schools

The City is served by the Los Angeles Unified School District. The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. As described in Section 4.13, Population and Housing, the proposed project would not involve residential housing. In the unlikely event that the proposed project were to increase the number of City residents, this growth would be minor relative to existing population levels. Furthermore, in compliance with California Government Code Section 65995, a school impact fee can be levied on commercial development. As stated in Government Code Section 65996, payment of school impact fees in accordance with Government Code Section 65995 is deemed to constitute full and complete mitigation for potential impacts to schools caused by development. Due to the minor increase in population that could be associated within the proposed project, this issue will be evaluated in the EIR.

Parks

Please refer to Section 15, Recreation, for a discussion of the project's effects on nearby parks. The proposed project would not result in new or expanded recreational facilities, and impacts to recreational facilities would be less than significant, and no further evaluation of this issue is required in the EIR.

Other Public Facilities

Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at the West Hollywood Public Library, which is within the County of Los Angeles Public Library system. The West Hollywood Public Library is located at 625 North San Vicente Boulevard, approximately 0.1 mile from the project site. The employees and customers of the proposed project could use the library services, but the increase in use would not be significant relative to citywide demand. As described in Section 4.13, Population and Housing, the proposed project would not involve residential housing. Thus, it is anticipated that existing library and City administrative services would accommodate any negligible increase in demand due to implementation of the proposed project. Therefore, impacts to other public facilities in the area would be less than significant, and no further analysis of this issue is required in the EIR.

References

City of West Hollywood. 2011. "Safety and Noise" in *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed October 1, 2014. http://www.weho.org/city-hall/download-documents/-folder-155.

4.15 Recreation

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			\boxtimes	
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?			×	

Physical Deterioration of Recreational Facilities

The City contains six municipal parks, with acreages totaling 15.31 acres. The majority of these park acres are in Plummer Park, located approximately two miles from the project site and West Hollywood Park, located adjacent to the project site. Given the U.S. Census Bureau's 2013 population estimate of 35,288 City residents, there are approximately 0.43 acres of parkland per 1,000 residents (City of West Hollywood 2011; U.S. Census Bureau 2014). The City's Parks and Open Space Background Report identifies that many cities throughout California use a standard

of 3.0 acres of parkland per 1,000 residents as a benchmark for sufficient park space. The City's ratio of approximately 0.43 acres of parkland per 1,000 residents is well below this typical standard. As stated in the Parks and Open Space Background Report, the City is unlikely to significantly expand park property to meet this standard due to the City's size, the absence of vacant, undeveloped properties, and high land values (City of West Hollywood 2010). Therefore, the City will likely remain below typical parkland acreage standards. However, the City has developed a variety of methods for expanding open space and green space, such as creating open and active spaces on street medians, establishing innovative development agreements, and promoting community gardens.

As described in Section 4.13, Population and Housing, the additional employment generated by the proposed project would be minor and would not substantially increase the population of the City. Therefore, the proposed project would not substantially exacerbate the City's parkland deficiency. The proposed project would be located adjacent to West Hollywood Park, and future guests, customers, and employees of the proposed project would be within walking distance of West Hollywood Park. The proximity of this park to the proposed project may result in additional visitors to the park. However, due to the approximately 70,800 square feet of open space, pools, and garden areas provided as part of the proposed project, it is anticipated that most of the people at the proposed hotel/commercial building would primarily utilize the on-site recreational facilities. Furthermore, West Hollywood Park, as well as the five other parks within the City, already serve current West Hollywood employees and residents. The minor increase in employment and visitors generated by the proposed project would not significantly exacerbate current conditions, given the non-residential nature of the proposed project and the provision of on-site recreational areas. Therefore, while the proposed project would have the potential to increase the use of parks, especially West Hollywood Park, it would not do so to the extent that parks would undergo substantial physical deterioration or the need for expansion. Impacts to recreational resources would therefore be less than significant, and no further evaluation of this issue is required in the EIR.

Construction or Expansion of Recreational Facilities

The proposed project would include approximately 33,400 square feet of public-use (non-hotel) outdoor areas and approximately 37,400 square feet of hotel outdoor areas. The public-use outdoor areas would consist of Robertson Lane and outdoor dining areas. Robertson Lane would be a pedestrian walkway extending through the project site that would be open to passersby, hotel guests, and shoppers. The public-use outdoor dining areas would be associated with restaurants and cafes occupying the proposed commercial spaces. The outdoor areas designated for hotel use would consist of two pools and associated deck areas, outdoor dining areas for the hotel restaurants, private terraces for individual hotel rooms, and several hotel gardens. All recreational facilities associated with the proposed project would be developed on site and are evaluated as part of the proposed project. As described above, the proposed project would result

in minor increases in demand on the City's recreational resources and is not expected to result in the need for expanded facilities or new facilities. Accordingly, impacts involving construction or expansion of recreational facilities would be less than significant. No further evaluation of this issue is required in the EIR.

References

- City of West Hollywood. 2010. *Parks and Open Space Background Report West Hollywood General Plan*. March 2010. Accessed October 6, 2014. http://www.weho.org/Home/ShowDocument?id=5344.
- City of West Hollywood. 2011. "Parks and Recreation" in *West Hollywood General Plan 2035*. Adopted September 6, 2011. Accessed October 6, 2014. http://www.weho.org/city-hall/download-documents/-folder-155.
- United States Census Bureau. 2014. "West Hollywood, California." State and County QuickFacts. July 8, 2014. Accessed October 6, 2014. http://quickfacts.census.gov/qfd/states/06/0684410.html.

4.16 Transportation and Traffic

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, 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?			\boxtimes	
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e)	Result in inadequate emergency access?				

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	\boxtimes			

Circulation-Related Plans, Ordinances, and Policies

The proposed project would involve construction and operation of a hotel/commercial building on the project site. The increase in intensity of site uses would have the potential to increase traffic in the vicinity of the site. Therefore, the proposed project would have the potential to conflict with applicable plans, ordinances, or policies that establish performance criteria for the circulation system, including the Los Angeles County Metropolitan Transportation Authority's 2010 Congestion Management Program, the applicable congestion management plan for the project site and the surrounding areas. A full traffic impact analysis will be conducted for the proposed project. The report will be summarized in the EIR and the complete report will be included as an EIR appendix. The EIR will identify whether the proposed project would be consistent with applicable plans, ordinances, and policies that establish standards and/or measures of effectiveness for the circulation system. The EIR will also address whether the proposed project would be consistent with policies, plans, and programs regarding public transit, bicycle, or pedestrian facilities and whether the proposed project would have the potential to decrease the performance or safety of such facilities.

Air Traffic

The project site is located approximately 5.5 miles northeast of the Santa Monica Municipal Airport, approximately 8 miles southwest of the Bob Hope Airport, and approximately 9 miles north of the Los Angeles International Airport. Therefore, the proposed project would not be located within proximity to an airport and would therefore not necessitate any changes in flight patterns or other air traffic patterns. While the proposed project may draw additional visitors to the region, the size of the proposed project and the number of hotel rooms that would be available (251 rooms) relative to the influx of visitors to the highly urbanized Los Angeles area would be negligible. Therefore, any increase in air travel associated with the proposed project would be negligible, and impacts would be less than significant.

A heliport is proposed for the roof of the hotel; however, it would only be used for emergency evacuations and would not increase air traffic levels that would result in substantial safety risks. No further analysis of this issue is required in the EIR.

Transportation Hazards

The proposed project involves two ingress/egress locations for the parking garage. The proposed project would also increase pedestrian activity in the area. Therefore, the traffic impact analysis will analyze project site vehicular and pedestrian access. All elements of site driveway and parking area circulation conditions will be analyzed, including inbound turn queuing issues, outbound queuing issues, queuing calculations at controlled access points, pedestrian/vehicle conflicts, turning radii, delivery access, and other related elements. The EIR will summarize the findings made in the traffic impact analysis and will identify whether the design of the proposed project would potentially lead to any traffic or pedestrian hazards.

Emergency Access

The proposed project would be required to comply with all building, fire, and safety codes relative to emergency access. Project plans would be reviewed by the LACFD and the City prior to the issuance of a building permit to ensure that adequate emergency access would be provided during construction and operation of the proposed project. Compliance with these standard requirements would ensure a less than significant impact relative to emergency access. No further analysis of this issue is required in the EIR.

4.17 Utilities and Service Systems

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			\boxtimes	
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?			\boxtimes	
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?			\boxtimes	
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			\boxtimes	
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?			\boxtimes	

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			\boxtimes	
g)	Comply with federal, state, and local statutes and regulations related to solid waste?			\boxtimes	

Wastewater Treatment Requirements

The City owns and operates the sewer collection system that serves the project site. The City's system feeds into lines owned and operated by the Los Angeles County Sanitation Districts and the City of Los Angeles Sanitation District. Wastewater generated in the City is treated at the Hyperion Treatment Plant, which is located in the City of Los Angeles and is owned and operated by the City of Los Angeles. The plant is designed to process up to 450 million gallons of sewage per day. 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. Because sewage produced by the proposed project would be treated by a wastewater treatment plant that is in compliance with Los Angeles Regional Water Quality Control Board requirements, the proposed project would not result in an exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board. Therefore, impacts would be less than significant, and no further analysis of this issue is required in the EIR.

Water and Wastewater Treatment Facilities

The proposed project represents an increase in the intensity of uses on the project site and would therefore be expected to increase the amount of wastewater generated at the project site. A sewer capacity study was conducted to analyze the projected wastewater generation of the proposed project relative to the existing capacity of the sewer system. A sewer main that is 8 inches in diameter runs north-south within Robertson Boulevard, and another sewer main, also 8 inches in diameter, runs north-south on La Peer Drive. The sewer capacity study concluded that both existing sewer mains would have the capacity to serve the estimated peak wastewater flow from the proposed project (KPFF 2014). While the proposed project would not be expected to produce wastewater that would exceed the treatment capacity of the Hyperion Treatment Plan, the EIR will compare the plant's existing capacity to the project's anticipated wastewater generation to ensure that the plant will accommodate the additional wastewater input.

Stormwater Drainage Facilities

Refer to Section 4.9, Hydrology and Water Quality, for a discussion of stormwater drainage facilities. As stated in Section 4.9, impacts related to stormwater infrastructure would be less than significant.

Water Supply

Water service on the west side of the City, including the project site, is provided by the Beverly Hills Public Works Department (City of West Hollywood 2014a). The project would not directly require or result in the construction of potable water treatment facilities because it would connect into this existing water service. To the extent that the project increases demands on the regional water system, it could indirectly contribute to the need to construct or expand water treatment facilities. The Urban Water Management Plan for the City of Beverly Hills 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 it serves. 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. While the proposed project would involve an intensification of uses on the site, the site is already developed with commercial uses under existing conditions, and the increased water use (e.g., hospitality services) would be minor and incremental, particularly in the context of the total water portfolio managed by the Beverly Hills Public Works Department. Therefore, the project would remain generally consistent with planning assumptions and thus the increase in water demands have been accounted for on a regional planning level. No new water entitlements would be required and thus the impact would be less than significant. While the proposed project would not be expected to exceed water supplies or planning assumptions for regional water demands, the EIR will further evaluate the existing buildings' water usage compared to the proposed project's anticipated water usage.

Solid Waste

Construction of the proposed project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, and plastics. In accordance with City requirements, 80% of all demolition and construction materials would be recycled, and the applicant would prepare a Construction and Demolition Waste Management Plan to demonstrate compliance with this requirement (City of West Hollywood 2014b). Compliance with this requirement would reduce the effect of the proposed construction activities on regional landfills. Operation of the proposed project would represent an increase in intensity of uses on the site and would likely be associated with increased generation of solid waste. Solid waste services would be provided by Athens Services, which has a Solid Waste Franchise Agreement with the City. Athens services is required to provide for recycling services, in compliance with Section 15.20.090 - Collection of Recyclables, set forth in the City's Municipal Code. It is expected that a substantial portion of the waste generated during operation of the proposed project would be recycled. The remaining non-recyclable waste would be disposed of

by Athens Services at a Class III landfill within Los Angeles County, such as Calabasas or Chiquita Canyon landfills. While landfill capacity within Los Angeles County is generally limited, the incremental increase in solid waste produced during operation of the proposed project would be negligible in a regional context. Furthermore, the proposed project would be required to comply with all applicable federal, state, and local requirements involving solid waste. Therefore, impacts involving solid waste production and solid waste regulations would be less than significant. While the proposed project would not be expected generate sufficient solid waste to impact regional landfill capacity, the EIR will study the proposed project's anticipated solid waste generation.

References

- City of Beverly Hills. 2010. *City of Beverly Hills Urban Water Management Plan*. Prepared by SA Associates. August 2011. Accessed October 3, 2014. http://www.beverlyhills.org/living/utilities/waterservices/urbanwatermanagementplan/.
- City of West Hollywood. 2014a. *Water Boundary Map*. Utilities. Accessed September 30, 2014. http://www.weho.org/city-hall/city-departments/public-works/engineering/utilities.
- City of West Hollywood. 2014b. *Construction and Demolition Waste Management Plan Form*. Construction and Development Information. Accessed October 1, 2014. http://www.weho.org/city-hall/city-departments/public-works/environmental-services/construction-and-development-information.
- KPFF Consulting Engineers. 2014. *Sewer Capacity Study*. Prepared for the City of West Hollywood Department of Public Works Engineering Division. September 17, 2014.

4.18 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to 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	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	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)?				
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	\boxtimes			

Based on this initial study, the proposed project is not expected to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Further cultural resource investigations will be conducted in the EIR to determine any potential impacts that the proposed project would have on important examples of the major periods of California history or prehistory.

The proposed project has the potential to result in significant cumulative impacts related to air quality, greenhouse gas emissions, water quality, noise, and transportation and traffic. It is anticipated that the proposed project may be developed while other projects in the area are being developed, and the incremental effect of this project may be cumulatively considerable. These potential cumulative impacts will be further examined in the EIR.

The proposed project has the potential to result in substantial adverse effects on human beings, either directly or indirectly (i.e., air quality, noise, and traffic). Further analysis will be provided in the EIR to determine potentially significant impacts and identify mitigation measures that would reduce impacts to the extent feasible.

INTENTIONALLY LEFT BLANK

5 PREPARERS

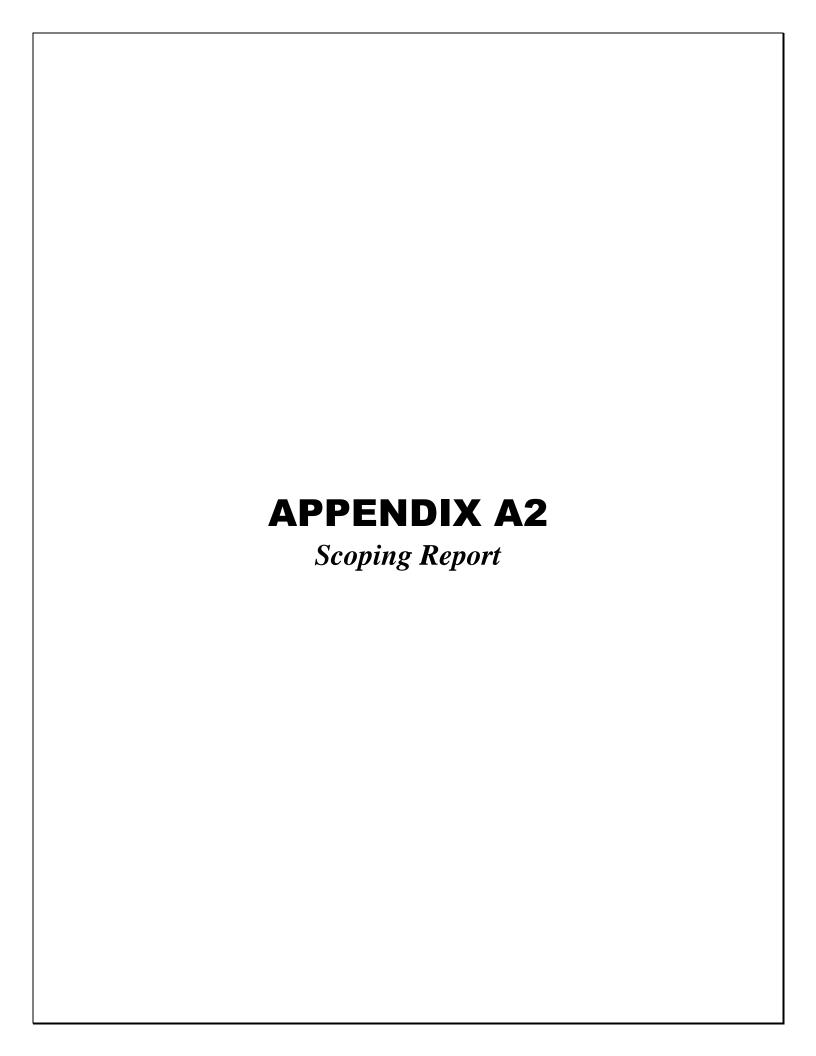
City of West Hollywood

Jennifer Alkire, AICP, Senior Planner

Dudek

Eric Wilson, Project Manager
Jennifer Reed, Air Quality and Greenhouse Gas Emissions Specialist
Mike Greene, INCE, Noise Specialist/Acoustician
Samantha Murray, RPA, Archaeologist/Architectural Historian
Dylan Duverge, Hydrogeologist/Environmental Analyst
Josh Saunders, Environmental Analyst
Michele Webb, Environmental Analyst
Hannah Panno, GIS Technician
Devin Brookhart, Publications Production Lead
David Mueller, Publications Specialist

INTENTIONALLY LEFT BLANK



SCOPING REPORT

1.1 INTRODUCTION

The City of West Hollywood (City) issued a Notice of Preparation (NOP) to prepare an Environmental Impact Report (EIR) for the proposed Robertson Lane Hotel Project (proposed project). Issuance of the NOP began the scoping process for proposed project. Scoping is the agency and public participation process used to assist lead agencies in determining the potential environmental issues and alternatives to be analyzed in an EIR for a project. This Scoping Report describes the scoping process undertaken by the City and provides as attachments the NOP, the NOP distribution list, State Clearinghouse correspondence, the newspaper notice, the sign-in sheet from the scoping meeting, and written comments received.

1.2 CEQA SCOPING PROCESS

The formal CEQA scoping process provides an opportunity for governmental agencies, organizations, and the public to provide comments on the potential environmental issues and suggestions for the scope of analyses to be disclosed in an EIR. CEQA Guidelines Section 15082 requires lead agencies to send an NOP to the Office of Planning and Research and to each responsible and trustee agency stating that an environmental impact report will be prepared. The issuance of the NOP begins the scoping period, during which responses to the NOP may be sent to the lead agency providing specific detail about the scope and content of the EIR. A lead agency may also hold a scoping meeting to collect both verbal and written comments on the scope of the EIR.

1.3 NOTICE OF PREPARATION

In accordance with CEQA Guidelines Section 15082, an NOP was prepared by the City and distributed to distributed to 27 agencies and organizations and was also filed with the State Clearinghouse. The review period for the NOP began on December 9, 2014, and ended on January 23, 2015. The NOP, the distribution list, and the State Clearinghouse NOP letter to state agencies are included as attachments to this scoping report.

1.4 COMMENT LETTERS

During the scoping process, 27 comment letters were received from agencies, organizations, and individuals regarding the scope and content of the EIR. These comment letters are included as an attachment to this report.

8595

1.5 SCOPING MEETING

A scoping meeting for the proposed project was held on January 7, 2015, at 6:30 pm at the West Hollywood Library Community Meeting Room located at 625 San Vicente Boulevard in West Hollywood. The purpose of this meeting was to seek input from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the proposed project.

Approximately 30 people attended the scoping meeting. The sign-in sheet from the meeting is included as an attachment to this report. A summary of the proposed project and the CEQA process was presented at the meeting, and approximately 12 attendees provided verbal comments regarding the scope and content of the EIR. One written comment letter was turned in by a meeting attendee and is included with the attached written comments in this Scoping Report. The verbal comments and questions related to environmental issues that were provided by the speakers at the scoping meeting are summarized below:

Aesthetics. Concerns regarding shade/shadow effects on neighboring properties (West Hollywood Park, Bossa Nova Brazilian restaurant, The Abbey and its patio, Hamburger Haven), on nearby street trees, and on landscaping at West Hollywood Park. Concern that nearby properties would get no afternoon sun. Questions regarding whether the landscape of the park would need to be redesigned due to loss of sunlight. Concerns regarding the height, scale, and massing of the proposed building. Concerns about setting a precedent for higher building heights. Concern regarding loss of views of the sky. Request expressed for visual representations of the proposed project from a street level (specifically, views from Bossa Nova, Hamburger Haven, and The Abbey). Questions regarding how the building aesthetically contributes to the gateway area of the Melrose Triangle and how it can lead people to West Hollywood Park. Questions regarding how the walls facing Santa Monica Boulevard would be handled aesthetically and whether or not these walls would have graphics, architectural details to provide scale and visual interest, and whether billboards would be allowed on those elevations. Concerns about potential effects on views from West Hollywood Park. Concerns about lighting, including the potential for trespass onto adjacent neighborhoods and the potential for the night sky to be overly lit. Questions regarding what constraints the City placed on the structure with respect to lighting to avoid overly or inappropriately lit buildings.

Cultural Resources. Concern regarding demolition of The Factory building. Speakers stated that The Factory is a historically and culturally significant resource and that the EIR should make that finding. Concern expressed about loss of tourist income, loss of history in Hollywood, and loss of the character and charm of the City. Concern that there are too many hotels in the City (hotels on Sunset Boulevard were referenced). If there are hotels but nothing to see, the basis for the economy would be destroyed. Concern that West Hollywood will become "the town that

February 2015

used to be" due to the loss of historical resources and structures. The historic Route 66 extends through the City, and concern was expressed that the City would become the stretch of Route 66 with no remaining historic resources. Concern that the project design has already been predetermined by the time the public is involved. Concern that The Factory would be demolished and that a statement of overriding considerations would be adopted. Overall concern regarding the loss of historical and cultural resources in the City.

Historical aspects of the building that were described by commenters are summarized below:

- The building was built in 1929 as the Mitchell Motion Picture Camera factory and played a major part in the motion picture business.
- The building is like a "time capsule" for many major events throughout the 21st century. It housed one of the largest gay discos in the 1970s.
- The building housed Studio 1 and the backlot that was part of Studio 1, which hosted performances by major celebrities.
- The West Hollywood Preservation Alliance did a walkthrough of the property and found the building to be intact, with Art Deco-inspired tin paneling on the building's sides that have been preserved.

Speakers requested that The Factory be preserved and adaptively reused and that a range of viable preservation alternatives be explored and considered in the EIR. A number of concepts and examples were presented, as summarized below:

- A marketplace, such as the Ferry Building in San Francisco or the and the Grand Central Market in downtown Los Angeles
- The Ghirardelli Square in San Francisco
- The pedestrian walkway, as proposed, can be moved
- Incorporate The Factory building into the proposed project by moving the location of the proposed pedestrian walkway and using The Factory as part of the hotel
- Historical buildings being used as artist studios and galleries in downtown LA
- Related to the site's proximity to the historic Route 66, one speaker gave the example of a motel made out of the teepees along Route 66. A similar concept could be applied to adaptively re-use The Factory into a hotel.

Hydrology and Water Quality / Utilities. How would the water use of the proposed project compare with water used by the existing site uses? Concerns expressed related to the current drought and the potential for increased water use due to the proposed project.

Scoping Report for the Robertson Lane Hotel Project

8595

Land Use and Planning. Concerns about changes in heights allowed on the site relative to the height requirements of the existing zoning designations. Questions regarding what qualifies as a specific plan and what qualifies as a variance. Questions regarding the impacts of a specific plan and the impacts of a variance. Concerns about whether the EIR will evaluate potential effects on the conditional use permits of surrounding businesses, especially those that were given use permits contingent on parking spaces that would not be available during construction, such as The Abbey. Concern regarding the number of hotels that are being developed in the City, including multiple new hotels being developed along Sunset Boulevard. Questions about how the project supports and enhances the concept of the "urban village" in the City. How does the project fit into the City's planning initiatives for the greater Melrose Triangle? How does the project promote walkability within the neighborhood and specifically in relation to Melrose Triangle, the Pacific Design Center, and Boys Town? How would the project accommodate or work with the proposed closure of Robertson Boulevard as described in the streetscapes proposed for Robertson Boulevard, Beverly Boulevard, and Melrose Avenue? How would the project contribute to related streetscape improvements proposed for La Peer Drive? How would the pedestrian boulevard terminate on La Peer Drive and connect to the west sidewalk of La Peer Drive? How would the project lead people into the park? How would the proposed building address streetscape design at the pedestrian scale, and how would it establish a precedent for the streetscape on Robertson Boulevard and La Peer Drive? Concerns about lighting of the structure relative to the urban village goals set forth in the General Plan. Concerns about impacts of construction on nearby businesses, such as Bossa Nova.

Noise. How would the proposed use of the roof decks and mechanical equipment on the structure be controlled to the extent that these uses do not interfere with adjacent neighborhoods (specifically, the neighborhoods of West Hollywood West and those north of Santa Monica Boulevard). Comments regarding existing problems with noise from The Factory caused by opening of a door on the roof during nighttime hours.

Recreation. Why is recreation not being examined further in the EIR, especially potential impacts to West Hollywood Park? Would West Hollywood Park be impacted, especially considering the proximity of the project site to the park and the changes that are currently occurring at the park? Request to examine potential recreation issues in the EIR.

Traffic and Transportation. Concerns expressed about traffic during construction, particularly truck traffic and truck traffic associated with concrete pours. Request for the City to establish a notification system to let citizens know when construction processes and increased construction-related traffic is going to occur. Concerns regarding parking impacts during construction. Concerns expressed regarding parking for The Abbey and how this parking will be accommodated. How does this project fit into any City proposals for parking in the Melrose

February 2015

Triangle to support new development in the area? How would the design of the project work with the proposed closure of Robertson Boulevard?

Cumulative Effects. Requests to evaluate cumulative effects of the proposed project plus the Melrose Triangle project, the nearby La Peer project, and other projects that have already been proposed and/or passed. Request to examine all issue areas in the cumulative analysis. Concerns about cumulative parking demand in terms of public parking in the greater Melrose Triangle, parking for Boys Town, and parking that may be required to accommodate this proposed project, visitors to the project, future projects that may be attracted by this project, and the nearby proposed La Peer hotel. Concern about the potential cumulative effects of numerous 10-story buildings in the area, if the project were to set a precedent for taller buildings in the vicinity.

Scoping Report for the Robertson Lane Hotel Project

Notice of Preparation

ORIGINAL FILED

DEC 1 1 2014

LOS ANGELES, COUNTY CLERK

1

Date:

December 11, 2014

To:

State Clearing House

Governor's Office of Planning and Research

1400 Tenth Street

Sacramento, California 95814

-AND-

Agencies, Organizations, and Interested Parties

From:

City of West Hollywood

Community Development Department

8300 Santa Monica Boulevard West Hollywood, California 90069

Subject:

Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR)

for the Robertson Lane Hotel Project

The City of West Hollywood (City) is the Lead Agency under the California Environmental Quality Act (CEQA) for preparation of an Environmental Impact Report (EIR) for the Robertson Lane Hotel Project (proposed project), described below. The City is soliciting input regarding the views of views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. To the extent that your agency has authority to issue permits or take other actions related to the project, your agency will need to use the EIR prepared by our agency when considering your permitting decisions or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study is also attached.

The City will accept comments on the NOP regarding the scope of the EIR between December 11, 2014, and January 23, 2015. Due to the time limits mandated by state law, written comments must be sent via mail, e-mail, or fax no later than 5:00 PM on January 23, 2015. Please send your comments at the earliest possible date to:

Jennifer Alkire, AICP Senior Planner 8300 Santa Monica Boulevard West Hollywood, California 90069

Fax: 323-848-6569

Email: jalkire@weho.org

As part of the EIR scoping process, the City will hold a public scoping meeting on January 7, 2015, at 6:30 pm at Plummer Park, located at 7377 Santa Monica Boulevard in West Hollywood.

Project Location:

The 1.94-acre project site is located within the City of West Hollywood in Los Angeles County between North Robertson Boulevard (Robertson Boulevard) and North La Peer Drive (La Peer Drive). The project site consists of the following addresses: 645, 647, 653, 655, 657, 661, 665 and 681 Robertson Boulevard and 648, 650, 652 and 654 La Peer Drive. The site is generally bound by Robertson Boulevard to the east, La Peer Drive to the west, and commercial development to the north and south. The project site has approximately 400 feet of street frontage along Robertson Boulevard and approximately 200 feet of street frontage along La Peer Drive. The width of the site, measured as the distance between the La Peer Drive frontage and the Robertson Boulevard frontage, is approximately 280 feet. The commercial properties abutting the north side of the project site are situated along Santa Monica Boulevard. The project site is currently occupied by four one- to two-story commercial buildings and three surface parking lots. The commercial buildings have a total square footage of approximately 42,100 square feet and the surface parking lots have total square footage of approximately 41,332 square feet.

Project Description:

The proposed project would involve construction and operation of an approximately 509,000 square foot building (calculated per the Building Code, with parking areas included). As calculated per the Zoning Code (i.e., without the parking included in the total square footage), the proposed building would occupy approximately 252,700 gross square feet, consisting of a hotel and commercial uses (proposed hotel/commercial building) that would be bisected by a pedestrian walkway (Robertson Lane). Construction of the proposed project would involve demolition of three of the existing commercial buildings on the site and all three of the existing surface parking lots. The commercial building located at the southeastern-most end of the project site would remain in place (645 Robertson Boulevard). Because the proposed project would exceed the currently allowable height and floor area ratio of the project site's general plan and zoning designations, the project would require approval of the proposed Robertson Lane Specific Plan. If approved, the specific plan would replace the current general plan land use and zoning designations for the site and would establish new height limits, allowable density, and design standards for the project site.

The proposed hotel/commercial building would include space for restaurants, retail stores, a wholesale design showroom, and a 251-room hotel with associated amenities such as a spa, pools, and a club. The pedestrian walkway, Robertson Lane, would extend northeast-southwest across the project site with entrances at North La Peer Drive and North Robertson Boulevard. The walkway would be approximately 30 feet wide, and approximately three-quarters of its length would be open to the sky, with the remaining portion passing beneath the hotel. Retail

December 11, 2014 2

uses and restaurants would front the walkway on its north and south sides. The design of the proposed hotel/commercial building incorporates stepbacks, architectural design features, and articulations so that the highest portions of the structure are set back from North Robertson Boulevard. As a result, the proposed building would be a maximum of approximately 46 feet in height (4 aboveground levels) along North Robertson Boulevard and a maximum of approximately 103 feet in height (8 aboveground levels) along North La Peer Drive.

The proposed project would also include a four-level subterranean parking garage providing approximately 1,048 parking spaces and 6 off-loading spaces. The parking lot would be situated on levels P4 through P1 of the building, with P4 being the lowest in elevation. The ground level (Level 1) would contain restaurants, retail spaces, the hotel lobby, wholesale design showroom space, hotel back-of-house uses, outdoor dining space, and Robertson Lane. All retail uses would front Robertson Lane or North Robertson Boulevard. The street level uses fronting North La Peer Drive would consist of the hotel restaurant at the southernmost end of the building, an entrance to Robertson Lane, the hotel porte cochere and entry court, and an entrance to the subterranean parking garage. Level 2 would consist of a variety of hotel uses, including a hotel restaurant, three hotel meeting rooms, a hotel lobby, a hotel gym and fitness area, hotel back-of-house uses, and an outdoor terrace area overlooking North Robertson Boulevard. Level 3 would consist of 41 hotel rooms, a small hotel restaurant with an outdoor dining area, hotel back-of-house uses, two hotel outdoor gardens, and private terraces for hotel guests. Level 4 would consist of 51 hotel rooms, private terraces for hotel guests, a hotel pool and deck, hotel gardens, an outdoor event area, several areas for mechanical uses, and hotel back-of-house uses. Level 5 through Level 7 would primarily contain hotel rooms, with each of these three floors containing approximately 53 rooms. Level 8 (Rooftop Level) would contain restaurant space and an associated outdoor dining area, a pool, and hotel back-of-house uses. The project would provide a total of approximately 70,800 square feet of outdoor areas, consisting of Robertson Lane, outdoor dining areas, gardens, private terraces for hotel rooms, and two pool areas. Approximately 10,000 square feet of this outdoor area would be landscaped. The proposed floor area ratio of the proposed building is approximately 2.9:1.

Construction of the proposed project is anticipated to take approximately 30 months to complete, starting in fall 2016 and ending in spring 2019. It is estimated that the project site would be occupied and in operation by March 2019.

Potential Environmental Effects of the Proposed Project:

The potential environmental effects of the proposed project to be addressed in the Draft EIR will include, but may not be limited to, the following:

- Aesthetics
- Air Quality
- Cultural Resources

- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation and Traffic
- Utilities and Service Systems
- Other CEQA-mandated analyses including Alternatives, Cumulative Effects, and Growth Inducement

A discussion of the project's potentially significant effects is provided in the attached Initial Study.

Date: 12/11/14 Signature: Juliu

Attachments: Initial Study



CITY OF West Hollywood

CITY HALL 8300 SANTA MONICA BLVD. WEST HOLLYWOOD, CA 90069-6216

> Tel: (323) 848-6475 Fax: (323) 848-6575

TTY: For hearing impaired (323) 848-6496

COMMUNITY DEVELOPMENT DEPARTMENT Date:

December 19, 2014

To:

State Clearing House

Governor's Office of Planning and Research

1400 Tenth Street

Sacramento, California 95814

-AND-

Agencies, Organizations, and Interested Parties

From:

City of West Hollywood

Community Development Department

8300 Santa Monica Boulevard West Hollywood, California 90069

Subject:

Public Scoping Meeting Location for the Robertson Lane Hotel

Project (SCH #2014121026)

The location of the public scoping meeting for the Robertson Lane Hotel Project that was indicated on the Notice of Preparation has been changed.

The public scoping meeting will now be held at the West Hollywood Library Community Meeting Room located at 625 San Vicente Boulevard in West Hollywood. The public scoping meeting will remain at the same date and time indicated on the Notice of Preparation (January 7, 2015, at 6:30 pm).

Sincerely,

Jennifer Alkire, AICP

IKUL

Senior Planner



NOP Distribution List

Ron Parsons
Office of Historic Preservation
P.O. Box 942896

Sacramento, CA 94296

Terri Pencovic

Department of Transportation Planning

P.O. Box 942874, MS 32 Sacramento, CA 94274

Frank Roddy Division of Water Quality State Water Resources Control Board P.O. Box 806 (1001 "I" Street) Sacramento, CA 95812

Debbie Treadway

Native American Heritage Commission

1556 Harbor Blvd

West Sacramento, CA 95691

Grace Robinson Hyde

County Sanitation Districts of Los Angeles

County

P.O. Box 4998 Whitter, CA 90607

Chief Frank Vidales

Los Angeles County Fire Department

5823 Rickenbacker Road Commerce, CA 90040

Susan Healy Keene Department of Community Development

City of Beverly Hills

455 North Rexford Drive, 1st Floor

Beverly Hills, CA 90210

George Chavez, Director

City of Beverly Hills Public Works Department

345 Foothill Road

Beverly Hills, CA 90210

CEQA Review Coordination

Metropolitan Transportation Authority

One Gateway Plaza Los Angeles, CA 90012 Josh Grover

DFW Environmental Services Division

146 Ninth Street, 13th Floor Sacramento, CA 95814

Dianna Watson
Caltrans, District 7
100 South Main Street
Los Angeles, CA 90012

Kathie Schievelbein Chief of Planning &

Environmental Analysis

Department of Toxic Substances Control P.O. Box 806 (1001 "I" Street), MS 11A

Sacramento, CA 95812

CEQA Coordinator

Housing & Community Development 1800 Third Street, Room 430

Sacramento, CA 95814

Gary T.K. Tse, Director Facilities Planning Bureau

Los Angeles County Sheriff Headquarters

4700 Ramona Boulevard Monterey Park, CA 91754

Matthew Dubiel

Los Angeles County Department of Public Works

900 S. Fremont Avenue Alhambra, CA 91803

Los Angeles Department of Transportation

100 S. Main Street, 9th Floor Los Angeles, CA 90012

Ian MacMillan, Program Supervisor CEQA Inter-

Governmental Review

SCAQMD

21865 East Copley Drive Diamond Bar, CA 91765

Adrian Scott Fine Directory of Advocacy

Los Angeles Conservancy 523 West Sixth Street, Suite 826

Los Angeles, CA 90014

Suzann Ikeuchi

California Highway Patrol

701 N. 7th Street

Sacramento, CA 95811

Cathi Slaminski Legal Office/CEQA Unit

Air Resources Board 1001 "I" Street

Sacramento, CA 95814

Teresa Rodgers

Los Angeles Regional Water Quality Board

320 West 4th Street, Suite 200 Los Angeles, CA 90013

Paul McCarthy

Los Angeles County Dept of Regional Planning

320 West Temple Street Los Angeles, CA 90012

Captain Gary Honings West Hollywood Station

Los Angeles County Sheriff 780 N. San Vicente Boulevard West Hollywood, CA 90069

Melissa McCollum Acting Library Manager

West Hollywood Library

625 North San Vicente Boulevard West Hollywood, CA 90069

Metro Development Review

Los Angeles Department of Transportation

100 S. Main Street, 9th Floor Los Angeles, CA 90012

Inter-Governmental Review

Southern California Association of Governments

818 West 7th Street, 12th Floor

Los Angeles, CA 90017

West Hollywood West Residents Association

P.O. Box 691427

West Hollywood, CA 90069



STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Memorandum

Date:

December 10, 2014

To:

All Reviewing Agencies

From:

Scott Morgan, Director

Re:

SCH # 2014121026

Robertson Lane Hotel Project

Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **January 23, 2015** to accommodate the review process. All other project information remains the same.

cc:

Jennifer Alkire

City of West Hollywood 8300 Santa Monica Boulevard West Hollywood, CA 90069

Document Details Report State Clearinghouse Data Base

SCH# 2014121026

Project Title Robertson Lane Hotel Project
Lead Agency West Hollywood, City of

Type

NOP Notice of Preparation

Description

NOTE: Review Extended

The project would involve construction and operation of an approximately 509,000 sf building (including parking areas). Without parking areas, the proposed building would occupy approximately 252,700 gsf, consisting of a hotel and commercial uses that would be bisected by a pedestrian walkway extending across the site from North Robertson Boulevard to North La Peer Drive. Construction would involve demolition of three existing one- to two-story commercial buildings on the site. The proposed building would include space for restaurants, retail stores, a design showroom, and a 251-room hotel with associated amenities. The proposed building would be approximately 46 feet in height along its North Robertson Boulevard frontage and 103 feet in height along its North La Peer Drive frontage.

Lead Agency Contact

Name Jennifer Alkire

Agency City of West Hollywood

Phone 323 848 6487

email

Address 8300 Santa Monica Boulevard

City West Hollywood

Fax

State CA Zip 90069

Project Location

County Los Angeles

City West Hollywood

Region

Cross Streets Santa Monica Boulevard and North Robertson Boulevard

Lat/Long 34° 4' 57" N / 118° 23' 10" W

Parcel No. numerous

Township Range Section Base

Proximity to:

Highways Hwy 2

Airports No

Railways No

Manways INC

Waterways No.

Schools numerous

Land Use Commercial/Commercial, Neighborhood 2 and Commercial, Community 2

Project Issues

Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies

Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report State Clearinghouse Data Base

Date Received 12/09/2014

Start of Review 12/09/2014

End of Review 01/23/2015



STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Notice of Preparation

December 9, 2014

To: Rev

Reviewing Agencies

Re:

Robertson Lane Hotel Project

SCH# 2014121026

Attached for your review and comment is the Notice of Preparation (NOP) for the Robertson Lane Hotel Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jennifer Alkire City of West Hollywood 8300 Santa Monica Boulevard West Hollywood, CA 90069

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely

Scott Morgan

Director, State Clearinghouse

Attachments cc: Lead Agency

Document Details Report State Clearinghouse Data Base

SCH# 2014121026

Robertson Lane Hotel Project Project Title

Lead Agency West Hollywood, City of

> NOP Notice of Preparation Type

The project would involve construction and operation of an approximately 509,000 sf building Description

> (including parking areas). Without parking areas, the proposed building would occupy approximately 252,700 gsf, consisting of a hotel and commercial uses that would be bisected by a pedestrian walkway extending across the site from North Robertson Boulevard to North La Peer Drive. Construction would involve demolition of three existing one- to two-story commercial buildings on the

> site. The proposed building would include space for restaurants, retail stores, a design showroom, and a 251-room hotel with associated amenities. The proposed building would be approximately 46 feet in height along its North Robertson Boulevard frontage and 103 feet in height along its North La Peer

Drive frontage.

Lead Agency Contact

Name Jennifer Alkire

City of West Hollywood Agency

Phone 323 848 6487

email

8300 Santa Monica Boulevard Address

West Hollywood Citv

State CA Zip 90069

Fax

Project Location

Los Angeles County

> West Hollywood City

Region

Santa Monica Boulevard and North Robertson Boulevard Cross Streets

34° 4' 57" N / 118° 23' 10" W Lat / Long

Parcel No. numerous

Section Base Township Range

Proximity to:

Highways Hwy 2

No Airports

Railways No

Waterways No

> numerous Schools

Commercial/Commercial, Neighborhood 2 and Commercial, Community 2 Land Use

Project Issues

Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing;

Landuse; Cumulative Effects

Reviewing Agencies

Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4



January 21, 2015

Jennifer Alkire, AICP Senior Planner 8300 Santa Monica Boulevard West Hollywood, CA 90069-6219

> RE: Notice of Preparation of a Draft Environmental Impact Report – Robertson Lane Hotel Project

Dear Ms. Alkire:

Thank you for the opportunity to comment on the Notice of Preparation for the Draft Environmental Impact Report (EIR) for the Robertson Lane Hotel Project (Project). Included in this letter is a list of issues the City of Beverly Hills (City) would like studied in the draft EIR that is to be completed for the Project. It is our understanding that the Project includes properties addressed 645, 647, 653, 655, 657, 661, 665 and 681 Robertson Boulevard and 648, 650, 652 and 654 La Peer Drive. The project would include hotel and commercial uses and construction of the project would involve the demolition of three existing commercial buildings on the site.

Due to the project's close proximity to the City boundary there is a potential that the City of Beverly Hills and its residents could experience negative impacts both during the construction of this project and as a result of operation thereafter. The City of Beverly Hills requests that the potential for any environmental impact, including the following specific issues be studied in the draft EIR.

TRAFFIC

a. Please conduct traffic analysis for the following intersections located in the City of Beverly Hills near the project site. This list should be considered as the minimum amount of analysis to conduct to estimate traffic impacts from the project.

Robertson Lane Hotel Project NOP January 21, 2015 Page 2 of 3

- 1. Santa Monica Boulevard and Doheny Drive
- 2. Santa Monica Boulevard and Beverly Boulevard-Palm Drive
- 3. Robertson Boulevard and Burton Way (include Bike counts)
- 4. LaPeer Drive and Burton Way (include Bike counts)
- 5. Doheny Drive and Beverly Boulevard

We are requesting that the intersections be studied using the ICU method, Beverly Hills thresholds and methodology, as well as West Hollywood thresholds and methodology. Please contact the City's Transportation Division at (310) 285-2556 for the methodology and thresholds of significant impact criteria.

b. Please estimate cumulative traffic generated from all projects (approved/pending) within a one mile radius of the project site. The City of Beverly Hills Transportation Division maintains up to date lists of all major projects occurring and pending in the City of Beverly Hills. The Transportation Division can be reached at (310) 285-2556.

INFRASTRUCTURE

As noted in the Project Initial Study, water service on west side of West Hollywood, including the project site, is provided by Beverly Hills and the proposed project would be expected to increase demand for potable water supplies. The City requests that the draft EIR study the potential impacts of the proposed project on the water infrastructure as well as the water supply, taking into consideration the cumulative impacts of pending and approved projects in the vicinity.

CONSTRUCTION IMPACTS

The City of Beverly Hills has concerns regarding potential impacts resulting from demolition, excavation, and delivery/hauling of construction materials and waste. If any haul route comes through the City of Beverly Hills, dust control, safety, and construction traffic must be addressed.

All construction related issues for the proposed project should be studied in detail, and when applicable, mitigation measures should be proposed. This includes, but is not limited to all of the following:

- a. Heavy haul routing,
- b. Frequency of hauling trips,
- c. Truck size.
- d. Hours of construction,

Robertson Lane Hotel Project NOP January 21, 2015 Page 3 of 3

- e. Location of construction ramps and driveways,
- f. Construction parking supply and demand,
- g. Duration of the project and calendar,
- h. Dust control and truck wheels washing practice,
- i. Pavement quality control, and
- j. Any other construction related issues and information that could impact City of Beverly Hills neighborhoods.

Thank you again for this opportunity to provide input on the environmental review of this project. If you have any questions regarding this letter, please feel free to contact me at (310) 285-1122 or by email at ttway@beverlyhills.org.

Sincerely,

FIMOTHEA TWAY,

Associate Planner, Community Development

cc: Mahdi Aluzri, Interim City Manager Susan Healy Keene, AICP, Director of Community Development Aaron Kunz, AICP, Deputy Director Transportation



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998 Telephone: (562) 699-7411, FAX: (562) 699-5422 www.lacsd.org

GRACE ROBINSON HYDE Chief Engineer and General Manager

January 16, 2015

Ref File No.: 3169533

Ms. Jennifer Alkire, Associate Planner Community Development Department City of West Hollywood 8300 Santa Monica Boulevard West Hollywood, CA 90069-6216

Dear Ms. Alkire:

Robertson Lane Hotel Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on December 10, 2014. The proposed development is located within the jurisdictional boundaries of District No. 4. We offer the following comments regarding sewerage service:

- 1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Sherman Relief Trunk Sewer, located in San Vicente Boulevard at Beverly Boulevard. This 21-inch diameter trunk sewer has a design capacity of 6.8 million gallons per day (mgd) and conveyed a peak flow of 4.0 mgd when last measured in 2013.
- 2. Wastewater generated by the proposed project will be treated by the City of Los Angeles Hyperion Treatment System. Questions regarding sewerage service for the proposed project should also be directed to the City of Los Angeles' Department of Public Works.
- 3. The expected increase in average wastewater flow from the proposed project, a 251 room hotel with 34,400 square feet of restaurant space, 24,400 square feet of retail, and a 7,923 square foot showroom, is 65,688 gallons per day, after all structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
- 4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is

DOC: #3206151.D04

issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Graee Robinson Hyde

Adriana Raza

Customer Service Specialist Facilities Planning Department

AR:ar

cc:

M. Tremblay

J. Ganz



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY FIRE CHIEF FORESTER & FIRE WARDEN

December 23, 2014

Jennifer Alkire, Senior Planner City of West Hollywood Community Development Department 8300 Santa Monica Blvd. West Hollywood, CA 90069

Dear Ms. Alkire:

NOTICE PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "ROBERTSON LANE HOTEL PROJECT," THE PROPOSED PROJECT INVOLVES CONSTRUCTION AND OPERATION OF AN APPROXIMATELY 509,000 SQUARE FOOT BUILDING, 645, 647, 653, 655, 657, 661, 665 & 681 ROBERTSON BLVD. AND 648, 650, 652, AND 654 LA PEER DRIVE, WEST HOLLYWOOD (FFER 201400234)

The Notice Preparation of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION

4.14 Public Services

Fire Protection

The first sentence in the paragraph under this section should be corrected as follows:

Fire services in the City are provided by <u>the Los Angeles County Fire Department</u> (LACFD). The City is also within the <u>also known as the</u> Consolidated Fire Protection District of the County of Los Angeles <u>County</u>. which provides immediate access to <u>Fire protection services provided to</u>

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

<u>the City include fire, emergency medical, urban search and rescue, and hazardous materials teams prevention and response, air operations, and other emergency response resources.</u>

LAND DEVELOPMENT UNIT

- 1. The statutory responsibilities of the County of Los Angeles Fire Department's Land Development Unit are to review and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract cities. The County of Los Angeles Fire Department's Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division which may create a potentially significant impact to the environment.
- 2. The County of Los Angeles Fire Department's Land Development Unit's comments are general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.
- The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
- 4. Every building constructed shall be accessible to the Fire Department's apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
- 5. The maximum allowable grade for private fire apparatus access roads shall not exceed 15%. Where grades exceeding 15% are necessary due to topographical conditions, a grade percentage of 15.1% 20% is allowed for a maximum length of 150 feet, the overall average grade shall not exceed 17%. Private fire apparatus access roads with a grade percentage of 15.1% 20% and greater in length than 150 feet, shall provide a 100 lineal foot grade break area that does not exceed a 10% differential for each 150 foot length. The overall average grade shall not exceed 17%. When determining the average grade, the entry

apron, fire apparatus turnaround area, garage driveway area, etc. shall not be considered in the percentage calculation.

- 6. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, the Fire Department's requirements for access, fire flows, and hydrants are addressed during the subdivision tentative map stage.
- 7. The Fire Department's requirements for access, fire flows, and hydrants are addressed during the building permit stage.
- 8. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.
- 9. The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
- 10. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and midblock.
 - e) A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use.
- 11. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. The Fire Department approved turning

area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.

- 12. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall comply with Appendix D, Section D 105.3 which requires at least one of the required access routes meeting this condition shall be located within a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official.
- 13. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
 - a) Provide 34 feet in-width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
 - b) Provide 42 feet in-width when parallel parking is allowed on each side of the access roadway/driveway.
 - c) Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map and final building plans.
 - d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with the Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for the Fire Department use.
- 14. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. The Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
- 15. All on-site driveways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The 28-foot width does not allow for parking and shall be designated as a "Fire Lane" and have appropriate signage. The centerline of the

on-site driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building.

- 16. All access devices and gates shall meet the following requirements:
 - a) Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width, clear-to-sky.
 - b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
 - c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
 - d) All limited access devices shall be of a type approved by the Fire Department.
 - e) Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.
- 17. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation.
- 18. Notify the County of Los Angeles Fire Department's Battalion Headquarters at Fire Station No. 7 and (310) 358-3430, at least three days in advance of any street closures that may affect Fire/Paramedic responses in the area.
- 19. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.
- 20. Submit three sets of water plans to the County of Los Angeles Fire Department's Land Development Unit. The plans must show all proposed changes to the fire

protection water system such as fire hydrant locations and main sizes. The plans shall be submitted through the local water company.

- 21. The County of Los Angeles Fire Department's Land Development Unit's comments are general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.
- 22. The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.
- 23. Architectural features, artistic elements attached to building exteriors shall not obstruct required the Fire Department's access and shall require additional Fire Department review.
- 24. Structures and outdoor storage underneath High Voltage Transmission Lines (66 kilovolts or greater) shall comply with Fire Code 316.6 and County of Los Angeles Fire Department Regulation 27. Any proposed construction or land use within 100 feet of the drip line of high voltage Transmission lines shall be subject to review by the Fire Marshal.

FORESTRY DIVISION - OTHER ENVIRONMENTAL CONCERNS

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

HEALTH HAZARDOUS MATERIALS DIVISION

1. A phase I should be prepared for this project and if the Phase I indicates use or storage of hazardous materials/wastes, the project site should be assessed/mitigated under oversight of an authorized local or State governmental agency prior to grading activities.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

FRANK VIDALES, CHIEF, FORESTRY DIVISION

PREVENTION SERVICES BUREAU

Frak Vidde

FV:ad



County of Los Angeles Sheriff's Department Headquarters



4700 Ramona Boulevard Monterey Park, California 91754-2169

January 28, 2015

Jennifer Alkire, Senior Planner City of West Hollywood 8300 Santa Monica Boulevard West Hollywood, California 90069

Dear Ms. Alkire:

REVIEW COMMENTS INITIAL STUDY AND NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT ROBERTSON LANE HOTEL PROJECT (SCH 2014121026)

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the December 11, 2014 Initial Study (IS) and Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Robertson Lane Hotel Project (Project). The proposed Project is located on North Robertson Boulevard and La Peer Drive, between Santa Monica Boulevard and Melrose Avenue, in the City of West Hollywood. The proposed Project will demolish existing buildings and parking lots (83,432 square feet) on the 1.94 acre site, and construct a commercial complex (509,000 square feet) consisting of a hotel (251 rooms), retail/restaurant uses (66,723 square feet), and subterranean parking structure (1,048 spaces).

The proposed Project is located with the service area of the Department's West Hollywood Station (Station). Accordingly, the Station reviewed the IS/NOP and authored the attached response (see correspondence, dated January 14, 2015, from Captain Gary S. Honings).

For future reference, the Department provides the following updated contact information for all requests for review comments, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
1000 South Fremont Avenue
Building A9-East, 5th Floor, Unit 47
Alhambra, California 91803

Attention: Lester Miyoshi, Departmental Facilities Planner

Should you have any questions for the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to Facilities Planning Bureau Tracking No. E14-067. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

JIM McDONNELL, SHERIFF

Tracey Jue, Director

Facilities Planning Bureau

761551N25A - SH-AD-32A (2/72)

COUNTY OF LOS ANGELES

SHERIFF'S DEPARTMENT

A Tradition of Service

JAAN 2 20 2015/5

DATE:

January 14, 2015

DAMNISTRATIVE SERVICES DIVISION

CORRESPONDENCE

FILE NO.

FROM:

GARY S. HONINGS, CAPTAIN WEST HOLLYWOOD STATION TO: GARY TSE, ASSISTANT DIRECTOR ADMINISTRATIVE AND TRAINING DIVISION

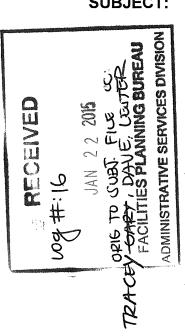
SUBJECT:

REVIEW COMMENTS ON THE INITIAL STUDY AND NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ROBERTSON LANE HOTEL PROJECT; SCH 2014121026

The West Hollywood Station (Station) reviewed the Initial Study (IS) and Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR), dated December 11, 2014, for the Robertson Lane Hotel Project (Project). The proposed Project is located on North Robertson Boulevard and La Peer Drive, between Santa Monica Boulevard and Melrose Avenue, in the City of West Hollywood. The proposed Project will demolish existing buildings and parking lots (83,432 square feet) on the 1.94-acre site, and construct a commercial complex (509,000 square feet) consisting of a hotel (251 rooms), retail/restaurant uses (66,723 square feet), and subterranean parking structure (1,048 spaces).

According to the IS, the proposed Project could result in more calls for law enforcement services than currently generate by existing land uses. The DEIR will evaluate this issue further, and will include mitigation measures to reduce potential impacts to a level which is considered to be less than significant (see Section 4.14, Public Services, pages 49-50). We generally concur that increased intensification of the Project site could affect the Station, however, we must review proposed mitigation measures contained in the DEIR before assessing the Project's potential impacts to our resources and operations.

The Station is also concerned that continued development within the City will ultimately contribute to a significant cumulative impact on our ability to provide an adequate level of law enforcement services to our service area. Meeting the anticipated growth in demand will require the dedication of additional resources, which would likely include patrol deputies, other sworn deputies, support personnel, and attendant assets (patrol vehicles, other support vehicles, communications equipment, weaponry, office furniture, computer hardware, etc.). Also, the Station itself is an aged and undersized facility that has been operating above capacity for many years. In order to accommodate additional staff and assets, the Station will require substantial modernization and/or expansion.



The Station has no further comment to submit at this time, but we reserve the right to do so upon subsequent reviews of the proposed Project.

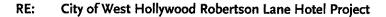
Thank you for including the Station in the environmental review process for the proposed Project. Should you have any questions of the Station regarding this matter, please contact me or Sergeant Charles Braden at (310) 855-8850.

GSH:CKB:ckb

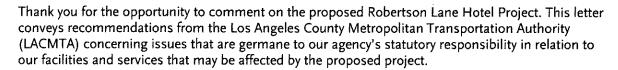


January 14, 2015

Jennifer Alkire AICP Senior Planner 8300 Santa Monica Boulevard West Hollywood, CA 90069



Dear Ms. Alkire,



Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

- 1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
- 2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- 3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
- 4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.



Robertson Lane Hotel Project – LACMTA COMMENTS January 14, 2015 Page 2

If you have any questions regarding this response, please contact Xin Tong at 213-922-8804 or by email at DevReview@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review One Gateway Plaza MS 99-18-3 Los Angeles, CA 90012-2952

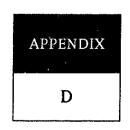
Sincerely,

Win Tong

Xin Tong

Development Review Coordinator, Countywide Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis



GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- ☐ Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- ☐ Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- ☐ Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
 If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
 Mainline freeway monitoring locations where the project will add 150 or more trips, in
- either direction, during either the AM or PM weekday peak hours.

 Caltrans must also be consulted through the Notice of Propagation (NOP) process to
- ☐ Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of <u>Trip Generation</u>, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

2010 Congestion Management Program for Los Angeles County

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

The	Intersection	Capacity	Utilization	(ICU)	method	as	specified	for	CMP	highway
mon	itoring (see A	Appendix A	A); or							
The	Critical Move	ment Ana	ılysis (CMA)	/ Circ	ular 212 1	met	hod.			

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

- **D.8.3 Freeway Segment (Mainline) Analysis.** For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.
- **D.8.4 Transit Impact Review.** CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:
- ☐ Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ☐ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ☐ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - ➤ Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

☐ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \ge 0.02$), causing LOS F (V/C > 1.00); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \ge 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.

Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

	Any project	contribution	to the improv	ement, and
--	-------------	--------------	---------------	------------

☐ The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

- 1. Traffic Access and Impact Studies for Site Development: A Recommended Practice, Institute of Transportation Engineers, 1991.
- 2. Trip Generation, 5th Edition, Institute of Transportation Engineers, 1991.
- 3. Travel Forecast Summary: 1987 Base Model Los Angeles Regional Transportation Study (LARTS), California State Department of Transportation (Caltrans), February 1990.
- Traffic Study Guidelines, City of Los Angeles Department of Transportation (LADOT), July 1991.
- 5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
- 6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
- 7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
- 8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
- 9. Encouraging Public Transportation Through Effective Land Use Actions, Municipality of Metropolitan Seattle, May 1987.

December 17, 2014

Jennifer Alkire, AICP, Senior Planner City of West Hollywood Community Development Department 8300 Santa Monica Boulevard West Hollywood, CA 90069

Notice of Preparation of a CEQA Document for the Robertson Lane Hotel Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts

when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD CEQA Air Quality Handbook
- SCAQMD's CEQA web pages at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.
- SCAQMD's Rule 403 Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance-document.pdf?sfvrsn=4.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (http://www.aqmd.gov).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at <u>jbaker@aqmd.gov</u> or call me at (909) 396-3176.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

LAC141210-01 Control Number

Subject: FW: Robertson Lane proposed project

From: Andrea Bardack

Sent: Thursday, January 22, 2015 2:42 PM

To: Jennifer Alkire

Subject: Robertson Lane proposed project

Dear Senior Planner, Mayor, and Council members:

This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT (and senior-housing) advocates. Do not demolish The Factory, adapt and re-use it.

The proposed development plan is entirely **too massive** for the the existing infrastructure. The streets that surround this project are single lane, each way and cannot possible handle the increased traffic. Please consider scaling back this project and using the existing structure for adaptive re-use. West Hollywood continues to demolish its history, thus destroying the unique aspects of the city. They projects in the pipeline not only are increasing traffic immensely but changing the look of the city to the blandness of the Santa Clarita Valley.

Please reconsider demolishing this building and how it can be incorporated into a new design.

Sincerely, Andrea Bardack, LCSW West Hollywood business owner for over 10 years.

Subject: FW: The Factory

From: mikecaffey2002@aol.com

Sent: Sunday, January 11, 2015 7:51 AM

To: Jennifer Alkire Subject: The Factory

Dear Ms. Alkire:

It has come to my attention that one of the most historic and nostalgic sites in West Hollywood is at risk of demolition. For many of my generation, this was Studio One. But beyond that, the Mitchell Camera factory represents one important facet of this city's motion picture heritage. Certainly it can be saved. Certainly there is a use for such a remarkable building and site. Once gone, it can never be recaptured. That touchstone to so much of what makes We Ho special and important is wrapped up in this building. I urge you to respectfully reconsider and save it.

Thank you for your time.

Respectfully,

John Michael Caffey

author, The Coming Out Party

Subject: FW: Robertson Lane proposed project

From: Kim Cooper

Sent: Thursday, January 22, 2015 12:45 PM

To: Jennifer Alkire

Subject: Robertson Lane proposed project

Dear Senior Planner, Mayor, and Councilmembers:

This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT (and senior-housing) advocates. Do not demolish The Factory, adapt and re-use it.

best regards, Kim Cooper West Hollywood native daughter / Los Angeles historian

Subject: FW: Robertson Lane proposed project - DEIR

From: Kate Eggert

Sent: Friday, January 23, 2015 6:25 PM

To: Jennifer Alkire

Cc: Dead History Project; Krisy Gosney

Subject: Robertson Lane proposed project - DEIR

Dear Senior Planner and City Councilmembers,

At the EIR scoping meeting 2 weeks ago, I spoke against the Robertson Lane project because it involves the demolition of The Factory, a LGBT landmark.

After speaking some facts, my emotions got the best of me and I was overwhelmed with the following thoughts –

This is my history. This is our history. This is your history.

What else could I say?

The Factory represents everything we have fought for – freedom, equality, a voice.

Onto the facts -

The Factory was built in 1929 by Mitchell Camera Company. By 1940, 85% of films worldwide were shot on cameras designed and built at their West Hollywood factory.⁴

In fact, Citizen Kane, said to be one of the most influential films of all time was shot on a Mitchell BNC in 1940, designed and built at the West Hollywood factory. Its cinematographer, Greg Toland, was influential in the design of the camera. The Mitchell BNC was released in 1934; the Mitchell NC was released in 1932, and by 1940, most of the major studios were using them - Samuel Goldwyn, RKO, United Artists, and Warner Brothers.

To name a few – Citizen Kane, Casablanca, Ivan the Terrible, Wuthering Heights, and even Stanley Kubrick's Barry Lyndon used the Mitchell BNC designed and built at the West Hollywood factory.¹

Mitchell also won an Academy Award for Technical Achievement in 1939 for the BNC and later two more Oscars; George Mitchell won an Academy Honorary Award in 1952 for life achievement.

The West Hollywood Chamber of Commerce even designated The Factory ("the original home of Mitchell Camera Co.") as a "famous landmark." On November 30, 1978, they had a ceremony and placed a plaque on the sidewalk in front of the building.⁵

The greats we think of today – Spielberg, Lucas, Scorsese, Kubrick – all have shot with modified BNC cameras handmade at the Factory in West Hollywood.

I do love Hollywood history but it's the LGBT history that gets my heart.

When Scott Forbes started Studio One in 1975, he designed the club to fill a void in the community. According to Bill Miles, Forbes' life-partner - "Scott thought it right that gays have a place to go to that was a dynamic spot, a place of prominence in the community."

"Studio One was planned, designed and conceived for gay people, gay male people," Forbes told the LA Times. "Any straight people here are guests of the gay community. This is gay!"²

Bars and clubs were the places we went to meet others like us. They were and continue to be our safe places. They were also the catalysts (not coincidently) for the gay liberation movement – Cooper's Doughnuts in downtown Los Angeles, Black Cat in Silverlake, and the Stonewall Inn in West Village.

But at Studio One, Forbes took the gay bar to another level- a place where the gays were in, and society was out (and desperately wanting in).

In 1978, Scott Forbes facilitated the first Gay Day at Disneyland with Studio One playing a prominent role. Forbes booked the Gay Day for the "Los Angeles Bar and Restaurant Association" and neglected to state that the association was made up of primarily gay-clientele businesses. It was too late for Disneyland to fight back – the contracts were signed. That fist Gay Day brought in over 15,000 gays and it was a party.³

A quick note regarding the previous nomination of The Factory as a Local Cultural Resource-

I believe the CHAB (Cultural Heritage Advisory Board) approved The Factory to become a Local Cultural Resource. But the City Council denied it.

I do not know if that is totally true because we have requested the nomination materials, and staff report twice from City Hall but have been told each time that it was there but could not be located. Otherwise, I would remark on why it was possibly denied.

In closing, Krisy Gosney and I hope that the Roberson Lane EIR will include options, which will include the adaptive reuse, and restoration, of The Factory. As of right now, the plans need a re-design – to incorporate The Factory – built by Mitchell Camera Company and formerly the epic Studio One.

Many thanks for your time and consideration.

Best,

Kate Eggert, Krisy Gosney

West Hollywood residents

1/23/2015

¹ Mario Raimondo-Souto, H., Motion Picture Photography, A History, 1891-1960

² LA Times 1/7/2002, "Scott Forbes, 57, Ran Dance Palace"

³ LA Times , 7/14/1985, "Disney at 30: the Unofficial History – Gay-Day-Land"

⁴ Mitchell 16mm Professional Brochure

⁵LA Times, 11/30/1978, "Ceremony Set for Landmark Designation in West Hollywood"

Subject: FW: Robertson Lane proposed project

From: Roger Garcia

Sent: Saturday, January 24, 2015 5:58 AM

To: Jennifer Alkire

Subject: Robertson Lane proposed project

Dear Senior Planner, Mayor, and Councilmembers,

This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT (and senior-housing) advocates. Do not demolish The Factory, adapt and re-use it.

In addition, I'd like to add that the vigorous efforts in recent years to reinvent the City I love is appalling. The accumulation of so many new structures promises to be the "strip mall" of the future. Where, in time, we'll look back and wonder why so many uninteresting buildings were allowed to mar the once iconic landscape of a great city like West Hollywood. By then, it will be to late.

Sincerely, Roger Garcia

Subject: FW: Robertson Lane project and The Factory

From: JK Gladu

Sent: Tuesday, January 13, 2015 3:22 PM

To: Jennifer Alkire

Subject: Robertson Lane project and The Factory

Dear Senior Planner, Mayor, and Councilmembers,

This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Historic Mitchell Camera Factory should be made into a County Historic Landmark, not demolished for another frou frou hotel. I have worked in the hospitality industry for 25 years, and there are plenty of hotels around the area. Demolition of a historic and cultural landmark like this is completely unnecessary! This building has been adapted and re-purposed numerous times over the last 85 years, and can continue to do so. Please DECLINE any sort of demolition request!

Respectfully,

Jeff Gladu

Subject: FW: Robertson Lane proposed project

From: Lucas John

Sent: Wednesday, January 21, 2015 12:24 PM

To: Jennifer Alkire

Subject: Robertson Lane proposed project

Dear Senior Planner, Mayor, and Councilmembers: This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT (and senior-housing) advocates. Do not demolish The Factory, adapt and re-use it.

Lucas John

Subject:

FW: Robertson Lane proposed project

From: Armando Juarez

Sent: Thursday, January 22, 2015 11:40 AM

To: Jennifer Alkire

Subject: Robertson Lane proposed project

Dear Senior Planner, Mayor, and Councilmembers: This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory.

I grew up in the 80's and Studio One was our little haven and home away from home. My friends and I spent many a weekday and weekends there making memories. Studio One/Axis/The Factory was a place to escape the daily struggles of being bullied at school and it was a place were we felt comfortable being ourselves, please do not destroy those memories.

The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT (and senior-housing) advocates.

Do not demolish The Factory, adapt and re-use it.

Save The Factory West Hollywood!!

Sincerely,

Armando Juarez

Subject:

FW: The Factory Building at 661 N. Robertson Blvd.

From: rick nordin

Sent: Friday, January 23, 2015 1:52 PM

To: Jennifer Alkire

Subject: The Factory Building at 661 N. Robertson Blvd.

I write to ask that this project be modified to retain a structure with historic importance to both Hollywood and the gay community in Los Angeles.

Specifically, that the historic factory building be retained as part of the proposed development.

Thank you very much.

Richard M. Nordin Founder LA Histories

626-437-5808

Subject: FW: Robertson Lane proposed project

From: Art Rojas

Sent: Friday, January 23, 2015 2:13 PM

To: Jennifer Alkire

Subject: Robertson Lane proposed project

Dear Senior Planner, Mayor, and Council members:

This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT (and senior-housing) advocates. Do not demolish The Factory, adapt and re-use it.

Sincerely, Art Rojas

Subject: FW: Save The Factory

From: Stephen Russo

Sent: Friday, January 23, 2015 4:22 PM

To: Jennifer Alkire

Subject: Save The Factory

Hello Jennifer,

Please save The Factory. Significant history and reuse can be achieved successfully. Thank you for your consideration.

Stephen Russo 4177 Del Mar Avenue Long Beach, CA 90807 562-810-3238

Subject: FW: The Factory must not be demolished

From: Anastasia Shamshurina

Sent: Thursday, January 08, 2015 11:05 PM

To: Jennifer Alkire

Subject: The Factory must not be demolished

Dear Senior Planner, Mayor, and Council Members: This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT and senior-housing advocates. Do not demolish The Factory, adapt and re-use it.'

Subject: FW: Robertson Lane proposed project

From: Dave Thompson

Sent: Wednesday, January 21, 2015 11:51 AM

To: Jennifer Alkire;

Subject: Robertson Lane proposed project

Dear Senior Planner, Mayor, and Councilmembers: This is regarding the proposed 'Robertson Lane' project that calls for the demolition of The Factory. The Factory must not be demolished. It is a historic landmark (Mitchell Camera, Studio One). It is also vital to LGBT history and memory, and to the city that was founded by LGBT (and senior-housing) advocates. Do not demolish The Factory, adapt and re-use it.

David Thompson

Sent from my iPad

Subject: FW: The Factory - Reuse - Preservation

From: Tony Villanueva

Sent: Sunday, January 18, 2015 3:01 PM

To: John D'Amico Cc: Jennifer Alkire

Subject: The Factory - Reuse - Preservation

Dear Mayor John D'Amico, and Council Members,

I attended the meeting yesterday at the West Hollywood library. Because of the destruction of so many historic building in Los Angeles I have made a commitment to be more involved. I thought the meeting yesterday was fascinating.

I am very concerned about the possibility of losing The Factory building. Is it not possible for the developer to consider reuse as an alternative to demolition? I travel the world for work I can tell you from my experience as a tourist that I make a much greater effort to search out the History and areas of town that have character than visiting new generic construction.

The Factory building is such a prominent anchor in the City of West Hollywood. In terms of the Homosexual community it is a landmark and a place holder in our history where very few exist. There is also the link to the film industry with the Mitchell Camera Co.

As the Mayor of West Hollywood and the Council Members for West Hollywood I am asking you to please help us preserve this building. Can you identify the importance of this structure in our community? Where the developer has options and alternatives there is no option for history.

Yesterday I heard you mention "Green" many times in relation to development. Nothing can be greener that reuse. Reuse could be the perfect compromise on so many levels. In 10 years it would be great to look back and say look what we saved for the future, rather than that horrible feeling of regret over what we lost.

Thank You,

Tony Villanueva

TO: Jennifer Alkire FROM: David Warren DATE: January 22, 2015

SUBJ: EIR scope for Robertson hotel project

My suggestions for the EIR are:

- 1. The Alternatives should be realistic development options that the Council could choose if they want to reduce one or more impacts to less-than-significant levels. That way, the Council and the public can see the trade-offs involved in approving a project with unmitigated significant impacts (assuming the EIR identifies such impacts). I would suggest the following alternatives:
 - a. A hotel scaled to keep traffic impacts to a less-than-significant level (some preliminary traffic analysis may be needed to define the hotel's size in this alternative)
 - b. A hotel that preserves and adaptively reuses the Factory building
 - c. A hotel that is built within existing zoning rules
- 2. The traffic analysis (and garage design) should consider a scenario in which Robertson is not available for ingress or egress. It seems likely that, when the streetscape work is done, Robertson will be closed at certain times of the week or perhaps even full-time.
- 3. The traffic analysis should look at how nearby intersections actually operate today and how those operations will be affected by the project:
 - a. Look at the actual operations, lane widths, queuing space, turn pocket lengths, etc. of the intersections at SMB/Robertson, SMB/La Peer, Melrose/Robertson, and Melrose/La Peer, taking into account planned streetscape modifications (including turn lane removals) and traffic from the other La Peer hotel. Regardless of what a traffic model may say, the actual operation of the Robertson intersections (and the resulting queuing) is already a problem at many times of day.
 - b. Look at the impact on northbound Almont at SMB when traffic from the two hotels is combined with Melrose Triangle traffic.
 - c. Look at where U-turns are likely to be made at nearby intersections and how that will affect other drivers and pedestrians in crosswalks.
 - d. Look at the length of the turn pocket from westbound SMB to La Peer.
- 4. The traffic analysis should consider, as mitigation, opportunities to shift traffic from Robertson to the wider San Vicente. One way might be to add a protected left-turn signal at SMB/San Vicente for north-to-west and south-to-east movements.
- 5. The traffic analysis should consider not just the car trips generated by the hotel and related uses, but also the trips associated with (what I assume are) extra parking spaces in the hotel garage. Given the area's existing parking constraints, the number of cars that can come to the area is limited. If the hotel is built with significant extra parking, it will enable more car trips to the area for current and future uses. It is, therefore, an impact of the proposed development.

Thank you for considering my suggestions.



Submitted by email

Jennifer Alkire, AICP Community Development Department City of West Hollywood 8300 Santa Monica Boulevard West Hollywood, CA 90069 Email: jalkire@weho.org

Re: Notice of Preparation for the Robertson Lane Hotel Project

January 23, 2015

Dear Ms. Alkire,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Robertson Lane Hotel Project, including the proposed demolition of the former Mitchell Camera Company building at 661 North Robertson Boulevard. The Conservancy believes that the building qualifies as an historical resource for its associations with the motion picture industry and West Hollywood's pioneering gay community, and it should be treated as such throughout the environmental review process.

As the proposed project would cause a significant impact to a cultural resource, the Conservancy urges the City to mandate consideration of a range of preservation alternatives to demolition in the Draft Environmental Impact Report (DEIR).

I. The DEIR should acknowledge 661 North Robertson Boulevard as an "historical resource" under CEQA

Built in 1929, the structure located at 661 North Robertson Boulevard embodies a number of significant historical patterns in West Hollywood, from the development of the entertainment industry to the rise of nightlife visibly catering to the gay community. The Mitchell Camera Company, founded in 1919 as the National Motion Picture Repair Company, originally constructed the three story steel-frame building to house manufacturing operations for its motion picture cameras, selecting a site across the street from its business office. When the company broke ground on the building in West Hollywood, the *Los Angeles Times* declared that "the beginning of an industrial era in that district has passed."

¹ "Company Will Make Cameras in New Plant," Los Angeles Times, March 10, 1929.



523 West Sixth Street, Suite 826 Los Angeles, CA 90014

213 623 2489 OFFICE 213 623 3909 FAX laconservancy.org For decades, Mitchell cameras were mainstays of Hollywood studios. Within a year of the Robertson Boulevard factory's completion, the company reported annual sales of \$1 million, contributing to the rise of Hollywood as a center for manufacturing in the film industry.² Because William Fox, founder of the Fox Film Corporation, held a fifty percent stake in the company, Mitchell Camera was often at the center of Fox's disputes with its competitors. In 1941, the company constructed a new wing on the factory in order to increase its production capacity and meet current demand for the cameras.³ The expansion extended the building to La Peer Drive, where a second entrance to the building is located.

With the onset of World War II, many of the country's manufacturing operations were redirected towards the war effort, and, by some accounts, the Mitchell Camera factory may have played a significant role in developing new military technology, including the infamous Norden bombsight used in the atomic bombing of Hiroshima in 1945.⁴ Although evidence related to the Norden technology is thin, references to the camera factory's role in wartime manufacturing have surfaced over time.

In 1946, Mitchell Camera Company relocated its operations to a factory in Glendale, and the West Hollywood factory building was converted to a military salvage depot and, later, a furniture factory. By the early 1960s, the site had been abandoned. In 1967, architect, attorney, and artist Ron Buck purchased the building and transformed it into an exclusive, invitation-only nightclub, naming it The Factory. It quickly earned a loyal following of A-list guests, who were attracted to the live entertainment, gourmet food, and exuberant décor. Above all, it was a place to be seen, leading the *Times* to remark, "It specializes in celebrity watchbirds you are usually watching *you*."⁵

The Factory featured multiple performance stages and four rooms reminiscent of movie sets, divided by repurposed stained glass windows, and guests sat on an array of furniture, including recycled church pews. Buck converted the lower floor into an art gallery, which has since seen a range of uses, including a cabaret theater and a hardware store.

Despite its initial popularity, interest in The Factory had faded by the early 1970s, causing the club to close its doors in 1972. Over the next several years, the building was home to a series of new tenants before reopening as Studio One in 1975, a transformative discotheque within West Hollywood's gay community. Owner Scott Forbes, a Beverly Hills optometrist turned party promoter, envisioned the club as a visible nexus in the heart of the community. He told a reporter in 1976, "Studio One was planned, designed and conceived for gay people, gay male people...Any straight people here are guests of the gay community. This is gay!"

⁶ Jack Slater, "Discotheques Dance to Another Tune," Los Angeles Times, August 11, 1976.



² "Film Equipment Production Centered Here: Manufacturers Favor Hollywood Locations," *Los Angeles Times*, August 24, 1930.

³ "Millions Pour into Los Angeles for Industrial Development," *Los Angeles Times*, April 13, 1941.

⁴ Gustave Heully, "Ever Wonder: Was the Factory a Factory?" WEHOville, September 23, 2013.

⁵ Joyce Haber, "New Fun Run," Los Angeles Times, September 14, 1967.

The disco music and dance scene first emerged within the context of New York's gay bar subculture in the 1970s. Debuting at the height of the disco era, Studio One was open seven days a week and reflected national trends in nightlife and entertainment. Its name a nod to its Hollywood history, the club could accommodate up to 1,000 guests, who were drawn in each night by the glamorous mirrored disco balls, elaborate sound and lighting systems (including the use of strobe lights, neon, and lasers), and the always-packed dance floor. Although Studio One was occasionally criticized for door policies that excluded many women and non-white patrons, the club nonetheless stood out as an important anchor in West Hollywood's gay community, hosting numerous philanthropic events and establishing a handful of traditions, such as "Gay Day" at local amusement parks, that continue today. Owner Forbes positioned Studio One as a natural successor to the popular clubs of the early '70s, telling the *Times*, "Disco to a gay person is very much a social necessity. It's where a gay person can meet people."

Studio One remained in operation until 1988 and was widely recognized during its tenure in the former camera factory as one of the most successful discotheques in the United States. Since the business's closure, the building at 661 North Robertson Boulevard has continued to function as a nightclub, including successful stints under two influential lesbian proprietresses. Today, the building stands as a rare and tangible link to West Hollywood's early motion picture industry, as well as the embodiment of the city's gay community and cultural identity in the 1970s and '80s.

II. The DEIR should acknowledge a significant impact to a cultural resource and provide a range of preservation alternatives

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history." To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."

Courts often refer to the EIR as "the heart" of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts. ¹⁰ CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of the basic project objectives but would avoid or "substantially lessen" the project's significant adverse environmental effects. The lead agency cannot merely adopt a

¹⁰ County of Inyo v. Yorty (1973) 32 Cal.App.3d 795; Laurel Heights Improvement Association v. Regents of the University of California (1993) 6 Cal.4th 1112, 1123.



⁷ Dennis Hunt, "Disco Clubs: Down But Not Out," Los Angeles Times, April 8, 1980.

⁸ Public Resources Code §21001 (b), (c).

⁹ Sierra Club v. Gilroy City Council (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.¹¹

As currently proposed, the project would raze several structures on the subject site, including the historic building at 661 North Robertson Boulevard, for a 252,700 square foot mixed-use development. It is undisputed that the proposed project, including demolition of an historical resource, would cause significant and irreversible adverse impacts to cultural resources. The DEIR should consider a range of alternatives that reuse the historic building for uses consistent with the project description and incorporate it into new construction elsewhere on the site. The proposed alternatives should comply with the *Secretary of the Interior's Standards for Rehabilitation* and maintain 661 North Robertson Boulevard's eligibility as an historical resource.

We urge the City of West Hollywood to uphold its historic preservation goals outlined in its General Plan by incorporating the former Mitchell's Camera Company building into the proposed Robertson Lane Hotel Project. Fronted on both Robertson and La Peer with entrances on all sides, the building has a long history of reinvention that makes it a prime candidate for reuse as part of the proposed project. It provides a unique opportunity to create a dynamic and walkable urban center with a mix of building heights and styles of both historic and new construction.

The West Hollywood Historic Preservation Commission may be able to provide assistance on this project and should be consulted early for valuable input and recommendations. Further, the Commission may be able to provide suggestions on crafting appropriate alternatives that would reuse the historic building at 661 North Robertson Boulevard while retaining its eligibility as an historical resource.

III. Conclusion

Thank you for the opportunity to comment on the NOP for the Robertson Lane Hotel Project. We believe that creative reuse options exist for the historic building at 661 North Robertson Boulevard and that it can be integrated successfully into a larger development project. The proposed project should consider adapting the former factory and nightclub for commercial hotel and retail use and incorporating it into the full project as a distinctive anchor of the West Hollywood community.

We urge the City to require a thoughtful and thorough consideration of preservation alternatives in the upcoming DEIR. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

About the Los Angeles Conservancy:

¹¹ PRC §§ 21081; Friends of Sierra Madre v. City of Sierra Madre (2001) 25 Cal.4th 165, 185.



The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine Director of Advocacy

cc: West Hollywood Historic Preservation Commission West Hollywood Preservation Alliance





January 23, 2015

Submitted electronically

Attn: Jennifer Alkire, AICP, Senior Planner Community Development Director City of West Hollywood Hall 8300 Santa Monica Boulevard West Hollywood, CA 90069-6216 Email: jalkire@weho.org

Re: Notice of Preparation of D-EIR for the Robertson Lane Hotel Project

Dear Ms. Alkire,

On behalf of the West Hollywood Preservation Alliance (WHPA), we submit these comments on the Notice of Preparation for the Draft Environmental Impact Report (D-EIR) for the Robertson Lane Hotel Project located between Robertson Boulevard and La Peer Drive. The West Hollywood Preservation Alliance is a non-profit benefit organization working to identify, protect and preserve the historic, architectural, and cultural resources of West Hollywood and adjacent areas through education, advocacy, and assistance. The WHPA has the following concerns and comments regarding the building at 661 N. Robertson Boulevard, currently known as "The Factory," in preparation of the D- EIR for the Robertson Lane Hotel Project:

1. The D-EIR should identify the building currently known as "The Factory" at 661 N. Robertson Boulevard as eligible for both local and California cultural resource designation. We believe the building at 661 N. Robertson Boulevard to be a cultural resource for its association with the Mitchell Camera Company as well as its later association as a place of significance for the LGBT community. Built in 1929, the Michell Camera Factory served as a major industrial facility for the motion picture business, producing cameras and motion picture equipment. After the camera company ended production at this location, the building was later bought in 1968 and repurposed into a night club. In the early 1970s the club was transformed into "Studio One" and has been associated with the gay rights movement throughout its history.

2. The D-EIR should evaluate a range of reasonable preservation alternatives to eliminate a significant impact on this cultural resource.

As currently proposed, this project would raze the historic industrial structure for a new construction, mixed use project consisting of subterranean parking, a pedestrian paseo, and a mixed use building including a hotel with retail and restaurant space. A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history"i. CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."iii

We would like to emphasize our concern that proper attention to preservation alternatives by both the lead agency and the developer are thoughtfully evaluated and considered in the D-EIR. We believe that adaptive reuse of this building is a feasible option for the project.

Charitable contributions to West Hollywood Preservation Alliance are tax deductible to the extent allowed by Federal and State tax laws – Federal Non-Profit 501(c) (3) Tax I.D. # 46-1587457

PO BOX 46073, West Hollywood CA 90046-0073

www.westhollywoodpreservationalliance.org



Thank you for the opportunity to comment on the Notice of Preparation for the Robertson Lane Hotel Project. The WHPA looks forward to reviewing and commenting on the forthcoming D-EIR for this project. Please feel free to contact me at jdunbar@westhollywoodpreservation.org should you have any questions.

Sincerely,

Jen Dunbar

President, West Hollywood Preservation Alliance

Charitable contributions to West Hollywood Preservation Alliance are tax deductible to the extent allowed by Federal and State tax laws – Federal Non-Profit 501(c) (3) Tax I.D. # 46-1587457

¹ Los Angeles Times; March 10, 1929; pg E9.

ii Public Resource Code, Sec. 21001 (b), (c).

iii Sierra Club v. Gilroy City Council (1990) 222 Cal. App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1

Robertson Lane Hotel Project EIR Scoping Meeting Comments

(please hand in to City staff at the meeting or mail back by Friday, January 23, 2015)

Name:	TONY VILLANUEVA
Agency/Organization(/	ETHOLLYWOOD PRESERVATION ALLIANCE
Address: Home	3221 TARECO DR
City, State, Zip Code:	Holly Wood CA. 90068
Phone (optional):	
E-mail (optional):	VTONY THE TIGER CLOL. COM
	ain on our mailing list to receive future project updates? Yes No
Comments: DR M5/	ALKIRE,
TONY VILL	ANVERA I ATTENDED PAD SPAKE AT THE EIR
MEETING. I BE	LIEVE STRONGLY THAT REUSE OF THE FACTORY
Ruilline 3H	OULD BE CONSIDERED AS AM ALTERMATIVE TO
DEMOLITION. IT	ENEL THE WORLD FOR WORK I CONTHLY ON FIRST
HAMIN THE AS A	TOURIST THE CHARM DAY APPEAL OF AM INTURESTIAL
STRUCTURE WITH A	I wrong is much more of an ATTROCTION THAN
4 between Box	THAT LOOKS LIKE EVERY OTHER BUILDING CONSTRUCTED
IN-THE LANT 548	3. PLEADE THY TO RECOGNIZE AND I DENTIFY THE
IMPARTAMEE of -	HIS STRUCTURE IN THE NUIGUBOUTHOOD, FOR THE
HONIA SEXUAL COM	money IT HOW a GREAT CONSTRUCTION TO DUR
Por But The	PEPERIOTENTLY OF THOT IT HOW / SMALE CTIONS TO
THE FILM IMPU	may AND A DERSONAL CHONDIER DILITE OWN.
Do yw impl	ING THAT THIS NEW STRUCTURE WOULD EVER BO
DBLE -10 ATTOIN	I THE TYPE IT HISTORY THOT BLOWKETS THE
FACTORY ZVILDI	NH? ITS JUST NOT POSSIDER.

Comments (continued) VERY OFTEN I WOMPER WHAT LOS ANGELES
MOULD BE LIKE IF WE HOD BEEN ABLE TO PRESERVE OUR
LAND MARKES - LAND MORRESTHAT TOURIST CAN ONLY SEE
IN Holly wood. Please Could UN CONSIDER DAD DISCUSS
THE SUBJECT of PEUSE WITH THE DEVELOPER ? INTHE
THE SUBJECT OF TREUSE WITH THE DEVELOPEN? INTHE LONG TERM IT COULD BE SUCH AN I MADE SOLUTION AND THE TRIGHT CHOICE ON MONEY SUBJECT LEVELS.
AND THE RIGHT CHOICE ON MONEY SUBJECT LEVELS.
THOUSE VE
THOUSE YES
Please fold in thirds

Equality

City of West Hollywood Community Development Dept.

Please tape it closed, affix a stamp, and mail by January 23, 2015. Thank you!

8300 Santa Monica Boulevard

West Hollywood, CA 90069

Attn: Jennifer Alkire, Senior Planner

Robertson Lane Hotel Project EIR Scoping Meeting Comments

(please hand in to City staff at the meeting or mail back by Friday, January 23, 2015)

Name:	Valerie & Ross Urquhart
Agency/Organization:	
Address:	4178 Msdison Ave.
City, State, Zip Code:	Culver City, CA 90232
Phone (optional):	310-837-6877
E-mail (optional):	valandross@sbcglobal.net
Would you like to rema	ain on our mailing list to receive future project updates? Yes_X_ No
Comments: We did a	ttend and speak at the EIR meeting, held January 7, 2015.
However we are not	sure that our concerns were made clear. We own the
at 8954 & 8960 San	ta Monica Boulevard. (Corner of Santa Monica and
Robertson) This pr	operty is fifty fee north of the proposed project. It
is occupied by a s	mall tobacco store and Hamburger Haven a restaurant.
Their dining area	is primarily outdoors, with about five stools inside.
The property south	of ours is also a outdoor restaurant. We believe that
proposed project w	ill impede the hours of sunlight on our property and
surrounding proper	ties. We are requesting that a shade and shadow study
be made. We reque	st that we able htto review the findings of this survey
During the constru	ction period our tenants will likely have a decline
in business. Cons	truction vehicle staging that will block acess sto
our parking lot wi	11 only add to the problem. Our major concern is that
height of the proj	ect so close to our property will reduce the market

value of our property. Who would want to purchase a property with high a one hundred twenty foot wall looming close by? As the project								
moves throught the review period, we								
impact to the small property owners.								
and the contract and the contract and	manamananananananananananananananananan							
	× · · · · · · ·							
Please fold	d in thirds							

Mr. & Mrs. J. Ross Urquhart 4178 Madison Ave Culver City CA 90232-3222

ACCOMMENTES CASSO

20 DANIEUS FMAL

City of West Hollywood Community Development Dept. 8300 Santa Monica Boulevard

West Hollywood, CA 90069

Attn: Jennifer Alkire, Senior Planner

Robertson Lane Hotel Project EIR Scoping Meeting Comments

(please hand in to City staff at the meeting or mail back by Friday, January 23, 2015)

Name:	Roy Oldenkamp
Agency/Organization:	West Hollywood Preservation Alliance
Address:	1336 N. Laurel Ave
City, State, Zip Code:	West Hollywood, CA 90046
	cell 323-252-8907
E-mail (optional):	royoldenkamp@gmail.com
	ain on our mailing list to receive future project updates? Yes No
Comments: The Ro	obertson Lane Hotel Project as designed would
	I manto historic and cultural resource, The
	actory minos the entire 20th Centures in
Los angelos an	d West Hollywood, from its origins as the
Mitchell Came	ra Pactory to WWI armament conversion
it's Peter has	whod I hat lack night club inconnation
end its tremer	down importance to be gay community
as Studio On	re, the largest gay sured and operated
disco (1975) in	the entire United States. Historican many
levels, the Fac	tout destruction would adversely import
He history of	West Hollywood on a major scale.
0 -	

mments (continued)	·	

44.4 **********************************		
	J.F.	
	,	
8 90% Spile 		
報 責 (1) (30.39年)		
		÷.
	Place fold in thirds	and the second second
Please tape it closed, affin	rePlease fold in thirds	The same of the sa
and the second second	23 JAN 2015 FM 14 L	

City of West Hollywood Community Development Dept.

8300 Santa Monica Boulevard

West Hollywood, CA 90069

Attn: Jennifer Alkire, Senior Planner

Equality FOREVER E

Robertson Lane Hotel Project EIR Scoping Meeting Comments

(please hand in to City staff at the meeting or mail back by Friday, January 23, 2015)

Name: KVUSY GOSNEWY
Agency/Organization: long time wells residents
Address: 948 Palm Ave, B
City, State, Zip Code: WH 90069
Phone (optional):
E-mail (optional):
Would you like to remain on our mailing list to receive future project updates? Yes No
Comments: There ES a land mark phostoric
building on the site of this proposed
project. It most not be destroy its historic demolished (or aftered to destroy integrity)
Wetto has assembled its usually
players to manuevere the demo of a
ristoric building athrough the process.
this comment is to declare that there

Comments (continued)
is early a strong opposition to the demolition of the historic
and mark—The Factory
The EIR should contain thorought
correct historic into on the Factory.
the EIR should contain thorough t
correct hostoric into on the several
historic perosas of signifigance that
span the life of the Factory.
Again - we oppose the demoletron
Please tape it closed, affix a stamp, and mail by January 23, 2015. Thank you! Affix \$0.49 Stamp

City of West Hollywood Community Development Dept. 8300 Santa Monica Boulevard

West Hollywood, CA 90069

Attn: Jennifer Alkire, Senior Planner

Robertson Lane Hotel Project EIR - Scoping Meeting January 7, 2014

City of West Hollywood

	Name	Agency/Organization	Address	City, State, Zip Code	Add me to the mailing list?	
46.	Tany Villanver		3227 TAREZO ON	Hilly 1000 CA 90068	Yes:	No:
47.	ROSS URQUHART		4178 MADISON AVE	CULVAR CITY OF 90272	Yes:	No:
48.	JAKE RAIAIE		8954 SANTAMONI	CA 8:LD	Yes;	No:
49.	LA Saymour		2815 TOURSCATE Rd	Wroth Le VIIACE	Yes:	No:
50.	STEVEN AFRIAT		4107 MAGNOLIA BLUD	Bullant, at 91505	Yes:	No:
51.	MICHAEL MOJTKHELEMIC		1060 H. SIERRA BOWTH	HESTHALMHOOD 90046	Yes:	No:
52.	TRISTAN ScHUKA	IFT TRISTAN 2015. C	on 7111 SM BWD #522	WETTO, CA 90046	Yes:	No:
53	N. S. C.		1143 N. VISTA ST	WEST ADMINOS FOUR	Yes:	No:
54.	Stephanie HAVK	r sihiziz@aolcom	1139 N. Vistast	· · · · · ·	Yes:	No:
55.	Leslie Karliss		leslieckarliss agmand un	West Hollywood	Yes:	No:
56.	Kevin Burta	1	Eastside	Wetto	Yes:	No:
57.	TERRY BOLD	Keselet	1021 N. 7 bolongh	wella	Yes:	No:
58.	Lauren Marstell		337 Westoure	W. H 90048	Yes:	No:
59.	ROY OLDEVKAN	WHPA	1336 N. LAUREL AND	Wer (46	Ýes:	No:
60.	Anjele Hurz		8929 DOMINGTON	Wello 90048	Yes:	No:

Robertson Lane Hotel Project EIR - Scoping Meeting January 7, 2014

City of West Hollywood

	/ Name	Agency/Organization	Address	City, State, Zip Code	Add me to the mailing list?	
31.	VICTOR MELCE	ENKO WEST	torixwood PRESE	RVATION/ ALLIANCE	CYes:	No:
32			NWEHOR GM	A1L. Com	Yes:	No:
33.	LAURA BOCCALETT	WHPA	Iboccaletti @ Jahoo con	West Hollywood	Yes:	No:
34.	Many Rodriguer			w. Hollyword	Yes:	No:
35.	Pacinos GIBBLOS	WHW IZA		4/570	Yes:	No:
36.	Kete Egge A		9 Katellaine O Kin	n W. Hollyword	Yes:	No:
37.	David Stewart	Weho rosident	david leestevant & hot mo		Yes:	No:
38.	Marcello Vovala		mvavala@laconservancy.org		Yes:	No:
39.	BUDN MAZURKUW		338 WESTBOURNE OF	W. Halhwoon 9000	Yes:	No:
40.					Yes:	No:
41.					Yes:	No:
42.					Yes:	No:
43.					Yes:	No:
44.					Yes:	No:
45.					Yes:	No:

Robertson Lane Hotel Project EIR - Scoping Meeting January 7, 2014

City of West Hollywood

	Name	Agency/Organization	Address	City, State, Zip Code	Add me to the mailing list?	
1.	David Warren		8999 Reith Ave	WH 90069	Yes:	No:
2.	Krish Goshly		948 Palm Ave 3	WH 90069	Yes:	No:
3,	1/2)//	n-er	940 Westbourne	Dr.	Yes:	No:
4.					Yes:	No:
5.					Yes:	No:
6.					Yes:	No:
7					Yes:	No:
8.					Yes:	No:
9.					Yes:	No:
10.					Yes;	No:
11,					Yes:	No:
12.					Yes:	No:
13.					Yes:	No:
14.	ii				Yes:	No:
15.					Yes	No: