923-931 North Palm Avenue Senior Congregate Care Facility

Initial Study – Negative Declaration

prepared by
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8300 Santa Monica Blvd.
West Hollywood, CA 90069

prepared with the assistance of
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Initial Study

1 Project Title

923-931 North Palm Avenue Senior Congregate Care Facility

2 Lead Agency Name and Address

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

3 Contact Person and Phone Number

Antonio Castillo, Associate Planner
(323) 848-6854

4 Project Sponsor's Name and Address

Dylan Investments
10585 Santa Monica Boulevard, Suite 130
Los Angeles, CA 90025
(310) 395-9030

5 Project Location

The project site is located at 923-931 N. Palm Avenue in West Hollywood, California, 90069. The 0.44 acre (19,156 square feet) site consists of three contiguous parcels: APN 4339-013-014, 4339-014-012, and 4339-014-013. The project site is located along the west side of N. Palm Avenue to the north of Cynthia Street and south of Haratt Street. The site is regionally accessible from Santa Monica Boulevard or Sunset Boulevard and is located approximately 5.2 miles east of U.S. Route (US) 101, 6.6 miles west of Interstate (I) 405, and approximately five miles north of I 10. Figure 1 shows the location of the site in its regional context and Figure 2 shows the site in its neighborhood context.

6 Existing Setting

The project site is situated on gently sloping terrain and consists of a rectangular area approximately 128 feet deep and 150 feet long with addresses 923, 925, 927, 931, and 933 N. Palm Avenue. The site is currently divided into three contiguous parcels. The two northernmost parcels (927 and 931 N. Palm Avenue) are each developed with a one-story single-family residence and detached garage , and the southernmost parcel (923 N. Palm Avenue) is developed with a single-family residence with a two-story addition at the rear. 923 Palm Avenue and 931 Palm Avenue both have units in addition to the street-facing unit; 923 Palm Avenue has three units in the two-story addition and 931 Palm Avenue has an additional unit in the detached garage. In total, the site currently has seven units.

The original exteriors of the two bungalows at 927 and 931 N. Palm Avenue have been designated as historic by the City of West Hollywood. Figures 3 and 4 show photos of the project site and surrounding area, respectively. Figure 5 shows a survey of the existing site.

7 Surrounding Land Uses and Setting

The project site is surrounded by mostly multi-family residential buildings. A four-level residential building lies directly to the south, a five-level residential building lies directly to the north, and four and five-level residential buildings lie on the east side of N. Palm Avenue. Betty Way dead end-ends at the rear of the project site and is developed primarily with one-story single-family houses. To the north and south of Betty Way are more multi-story residential buildings. Santa Monica Boulevard, a vibrant commercial corridor with many retail, dining, service, and entertainment options, is approximately 730 feet south of the site. Figure 4 shows photos of the surrounding uses.

8 General Plan Designation

The project site is designated as R-4B (High Density Residential, Subcategory B) in the City of West Hollywood's 2035 General Plan (General Plan). The R-4 designation provides for the development of a wide range of high-density multi-family housing, including apartments and condominiums and allows for "building types that are compatible in scale and character with existing structures and the development standards." The R4 designation permits a density of 50 units per acre, and the R4B subcategory limits heights for residential buildings to four stories and 45 feet.

9 Zoning

The project site is zoned R4B (Residential, Multi-Family High Density), which is consistent with the General Plan designation. R4B zoning permits a project density of 50 units per acre and a height of 45 feet and four stories. The maximum average size of all dwelling units in the R4 Zone is limited to 1,200 square feet.

10 Description of Project

The proposed project involves the construction of a new four-story senior living congregate care facility ("main facility") with a subterranean parking level. It would incorporate the two existing historic bungalows on the project site (927 and 931 N. Palm Avenue) to serve as the main facility's entry reception area and as a standalone residential unit. The main facility would form an 'L' whose back wing creates a backdrop for the two historic buildings, while the other wing would run parallel to adjacent residences along an east-west axis and occupy the space formerly occupied by the residence at 923 N. Palm Avenue. Figure 6 shows the proposed site plan and Figure 7 shows elevation renderings of the proposed project.

Except for the two historic bungalows, all existing structures on the project site would be demolished, including all structures at 923 N. Palm Avenue, the two detached garage buildings at 927 and 931 N. Palm Avenue, and the non-original additions at the rear of the two bungalows at 927 and 931 N. Palm Avenue. Figure 8 shows the demolition plan for the project site. The main facility would provide a total of 48 studio units for senior residents who require assistance with activities of daily living and/ or memory care. The subterranean level would provide resident and guest parking and would also house laundry and kitchen facilities and a beauty salon/ barber shop for residents.

The ground floor of the main facility would provide a community space for exercise/ physical therapy, a dining and recreation area for ground-floor residents, and nine residential units. Floors two through four would have nearly identical floor plans with thirteen units and a dining and recreation area for floor residents. Studio units in the main facility would average 388 square feet in size. In total, the indoor floor area of the main facility would be 29,837 square feet, including 18,276 square feet of residential floor area and 4,658 square feet of social and community floor area. Figures 9 through 13 show the proposed floor plans.

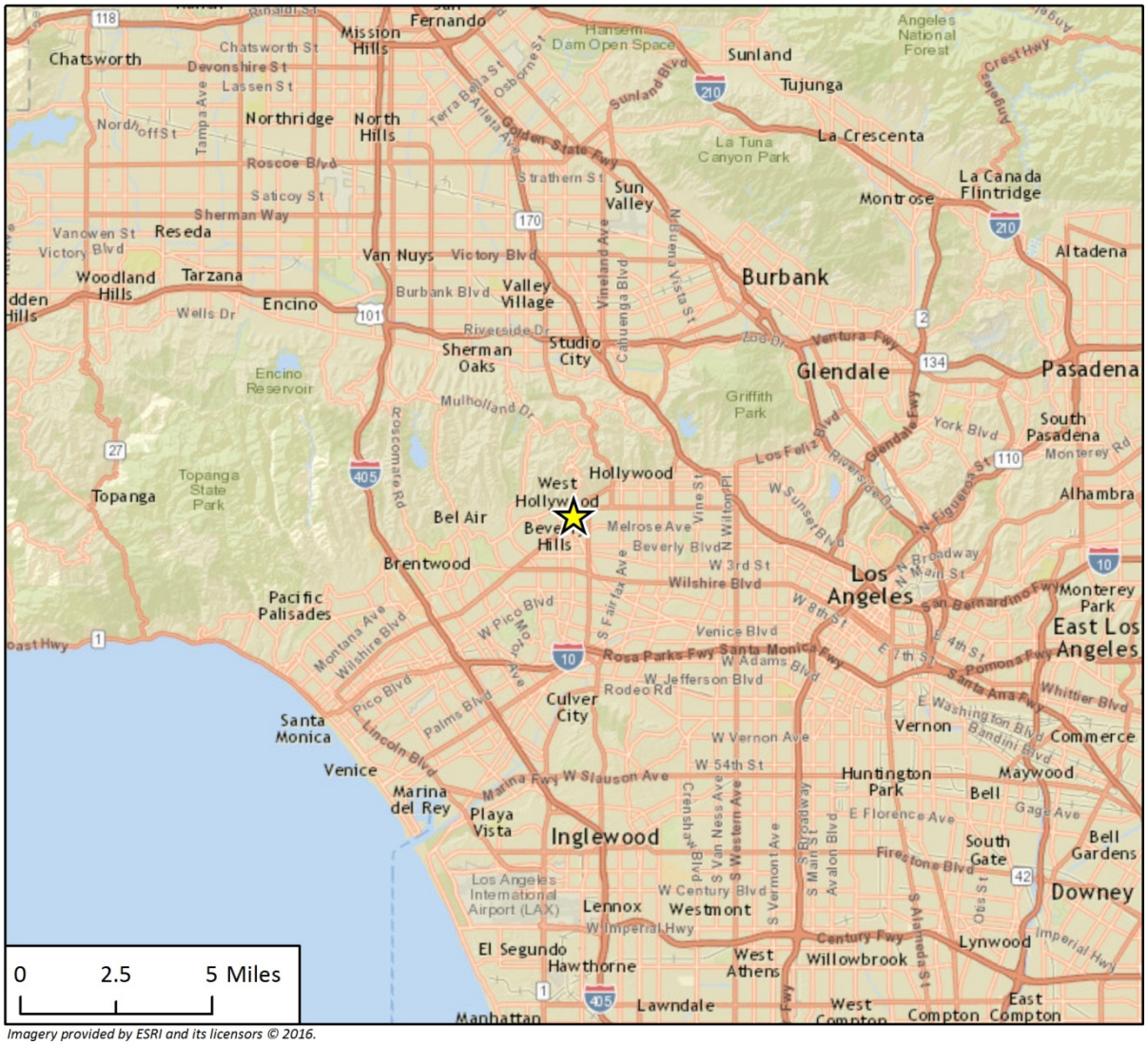
The historically significant elements of the two residential bungalows at 927 and 931 N. Palm Avenue would be retained and rehabilitated as part of the proposed project. The bungalow at 931 N. Palm Avenue would remain as a standalone bungalow for an individual or couple who require less care than residents at the main facility, and the bungalow at 927 N. Palm Avenue would be rehabilitated to serve as the building's public entry and reception room with as much of the original interior retained as possible. The standalone bungalow would provide 716 square feet of residential space, and the 927 N. Palm Avenue bungalow would provide 840 square feet for a reception area and auxiliary uses. Table 1 summarizes the project components.

Table 1 Project Summary

Address	923-931 N. Palm Avenue, West Hollywood, CA 90069
Assessor Parcel Numbers (APN)	4339-013-014, 4339-014-012, 4339-014-013
Lot Area	0.44 acres (19,156 SF[1])
Total Indoor Floor Area (does not include parking)	31,393 SF
Total Units	49
Density	111.4 units/acre
Main Facility	
Height	45 feet 4 floors above grade with one underground level of parking, laundry/ kitchen facilities, and a hair salon/barber shop
Number of Units	48
Unit Type	Studio
Total Indoor Floor Area (does not include parking level)	29,837 SF
Residential Floor Area	18,276 SF (Average of 388 SF per unit)
Social/ Community Floor Area	4,658 SF
Physical Therapy Floor Area	727 SF
927 N. Palm Avenue (detached reception area)	
Reception and Auxiliary Uses Floor Area	840 SF
931 N. Palm Avenue (stand-alone residential unit)	
Residential Floor Area	716 SF
Parking	
Total	25 spaces

[1]SF = square feet

Figure 1 Regional Location



Imagery provided by ESRI and its licensors © 2016.

Project Location

N

Fig 1 Regional Location

Figure 2 Project Location

Imagery provided by Google and its licensors © 2016.

Fig 2 Project Location

Figure 3 Site Photos

Back yard of 927 N. Palm Avenue.

Front view of 927 N. Palm Avenue, facing southwest on N. Palm Avenue.

Front view of 931 N. Palm Avenue, facing southwest on N. Palm Avenue.

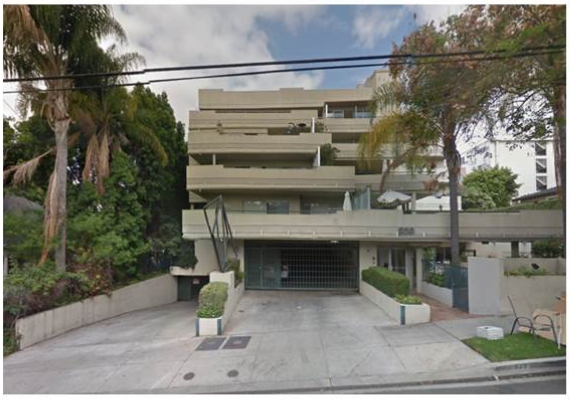
Front view of 931 N. Palm Avenue, facing northwest on N. Palm Avenue.

Photo credits: Historic Resources Group. 2016

Figure 4 Photos of Surrounding Uses

View of 923 N. Palm Avenue and residences south of the project site, facing southwest on N. Palm Avenue.

View of residential buildings east of the project site across N. Palm Avenue, facing northeast on N. Palm Avenue.



Front view of 939 N. Palm Avenue, directly north of the project site.

View of cul-de-sac at rear of project site, facing east on Betty Way.

Photo credits: Google Maps. 2016

Figure 5 Existing Site Survey

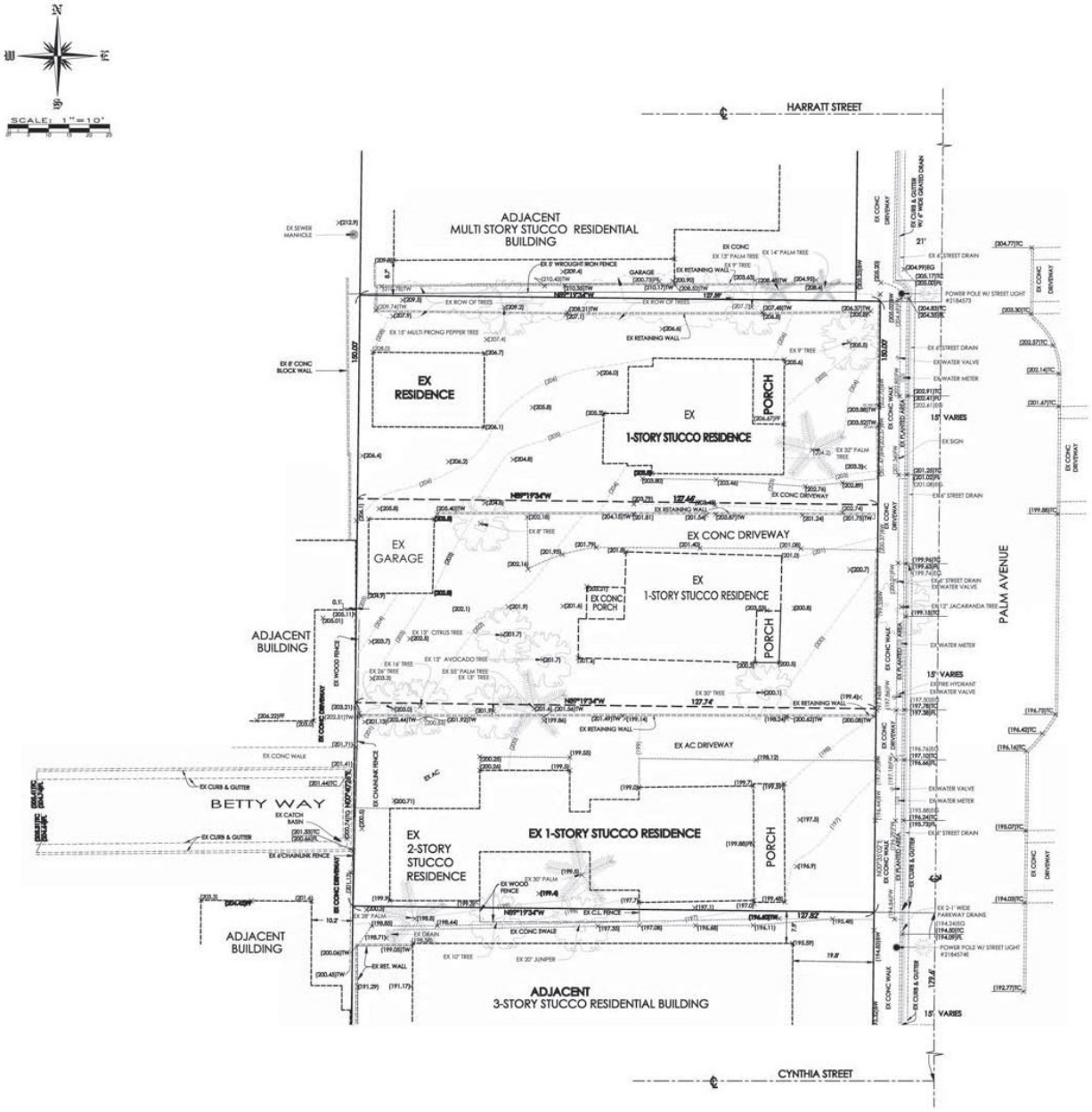


Figure 6 Site Plan

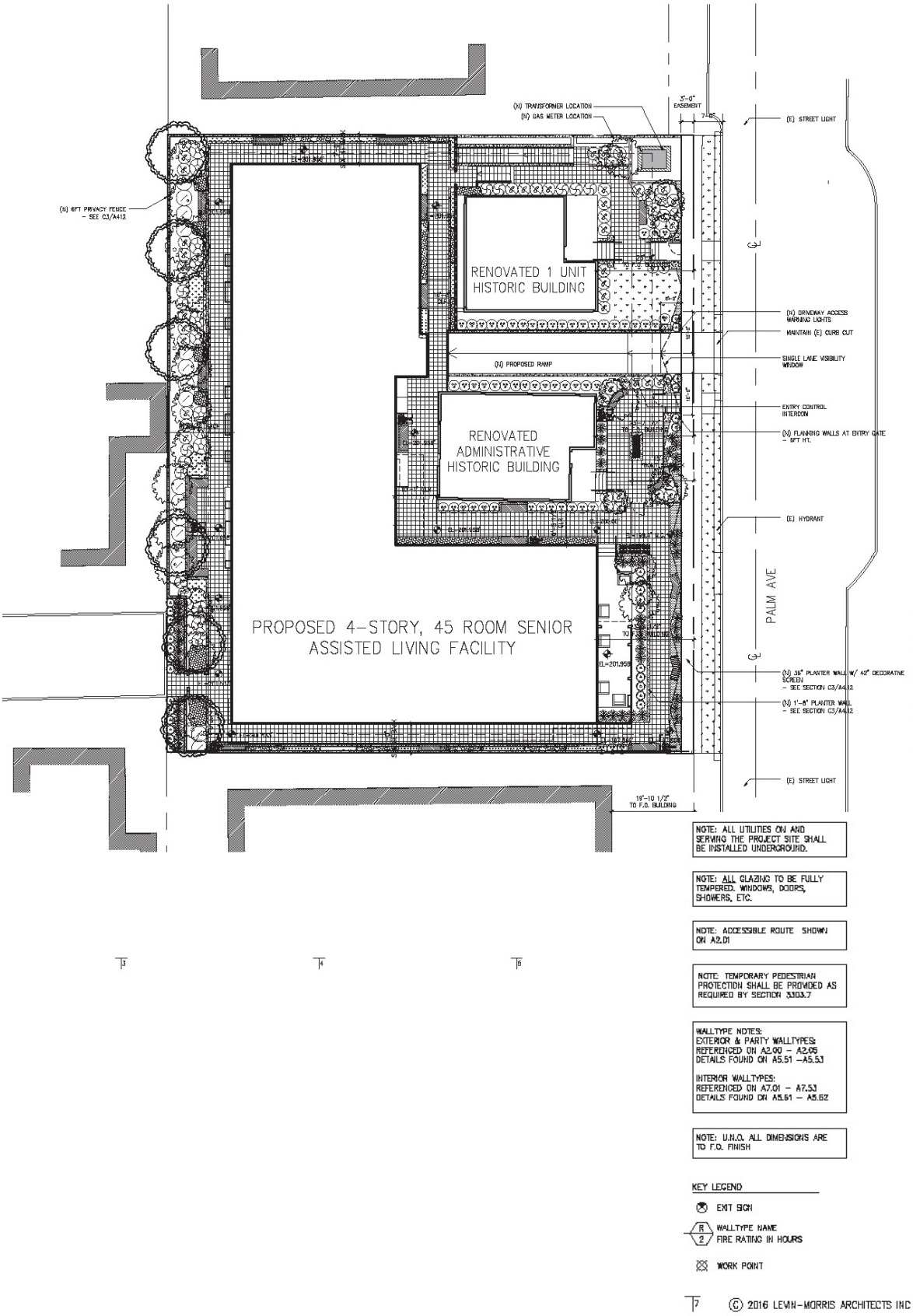


Figure 7 Elevation Renderings

C2 RENDERED EAST ELEVATION
3/32" = 1'-0"

A2 RENDERED SOUTH ELEVATION
3/32" = 1'-0"

Figure 8 Demolition Plan

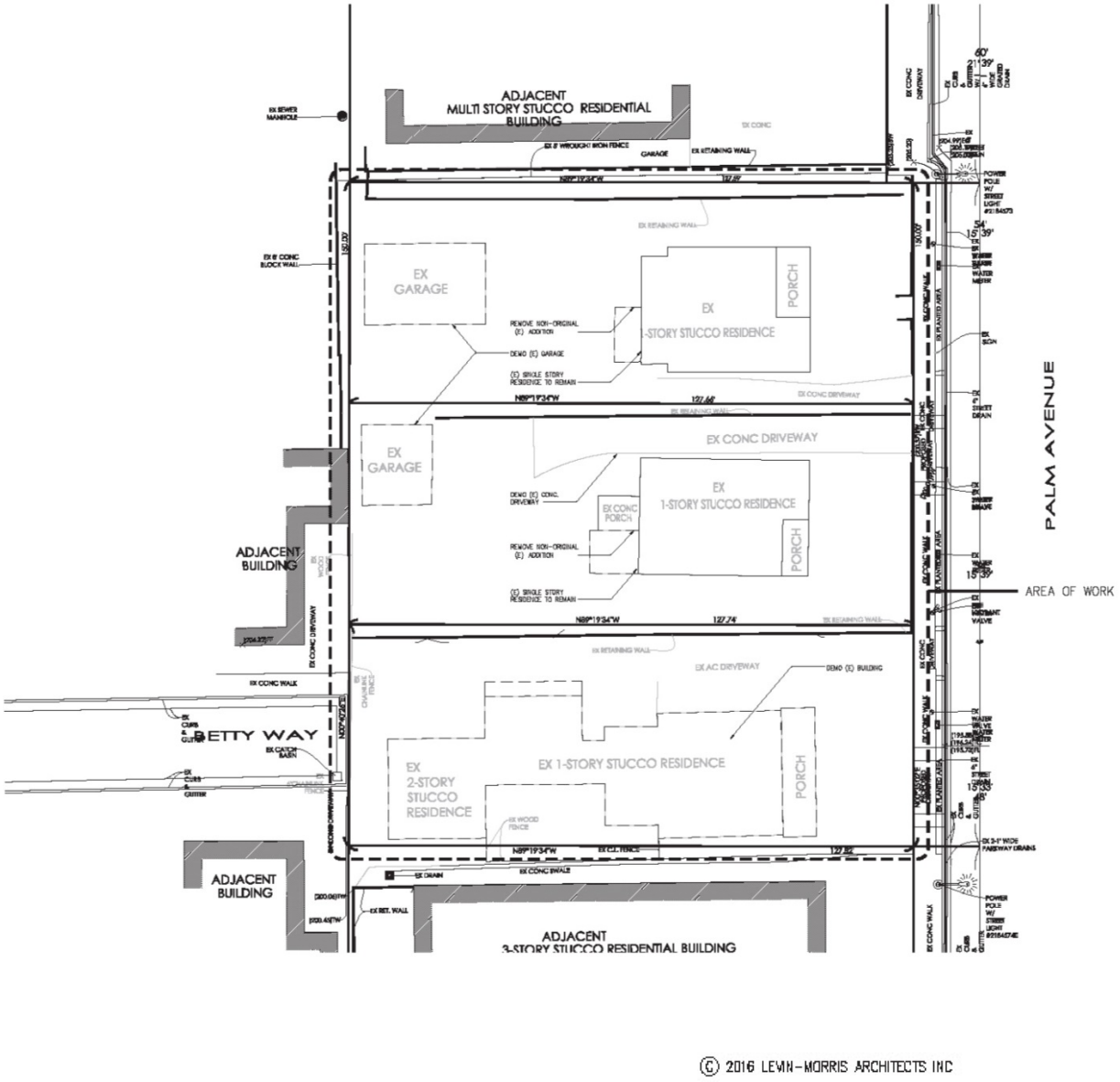


Figure 9 Floor Plans: Parking Level

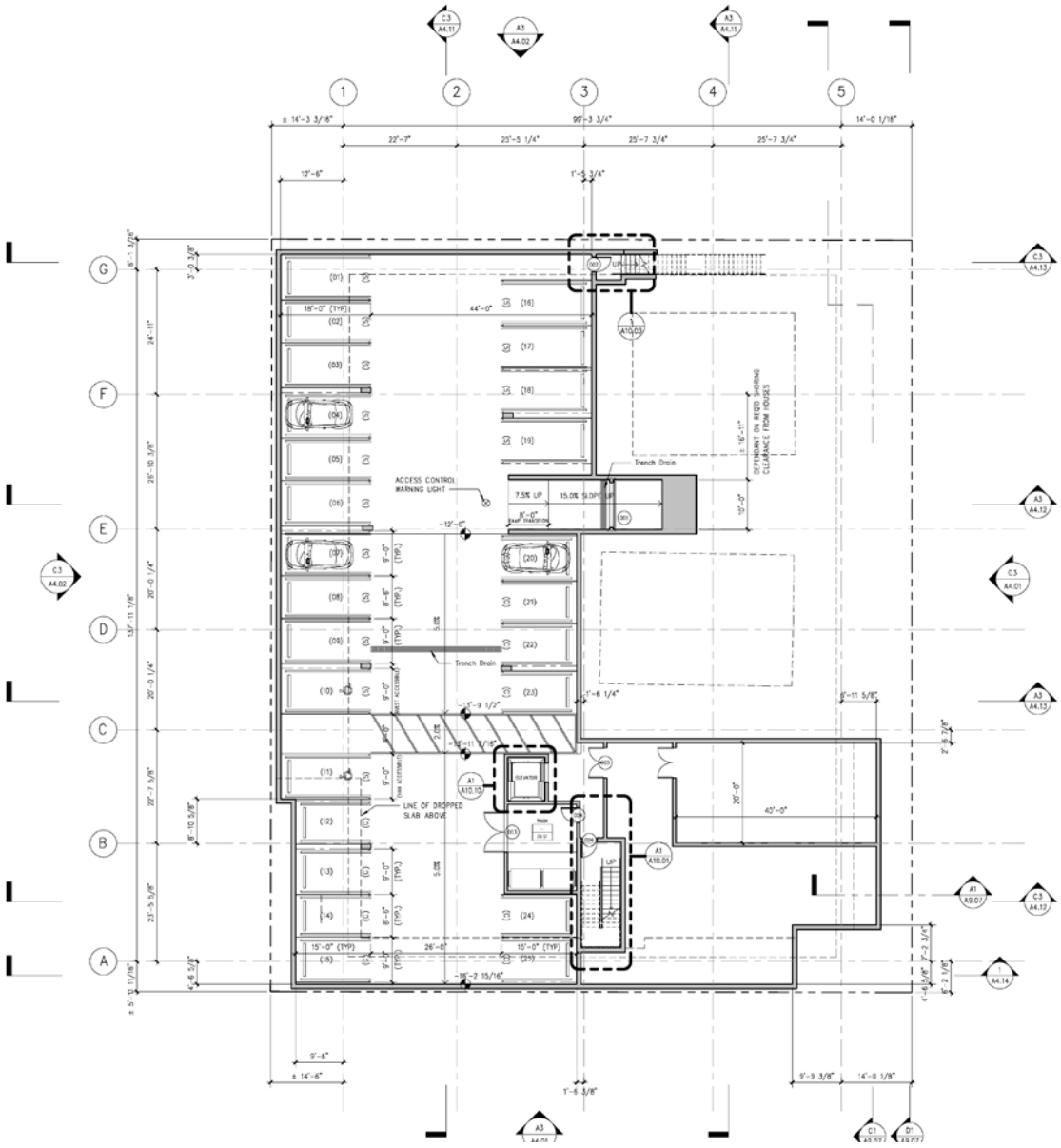


Figure 10 Floor Plans: 1st Floor

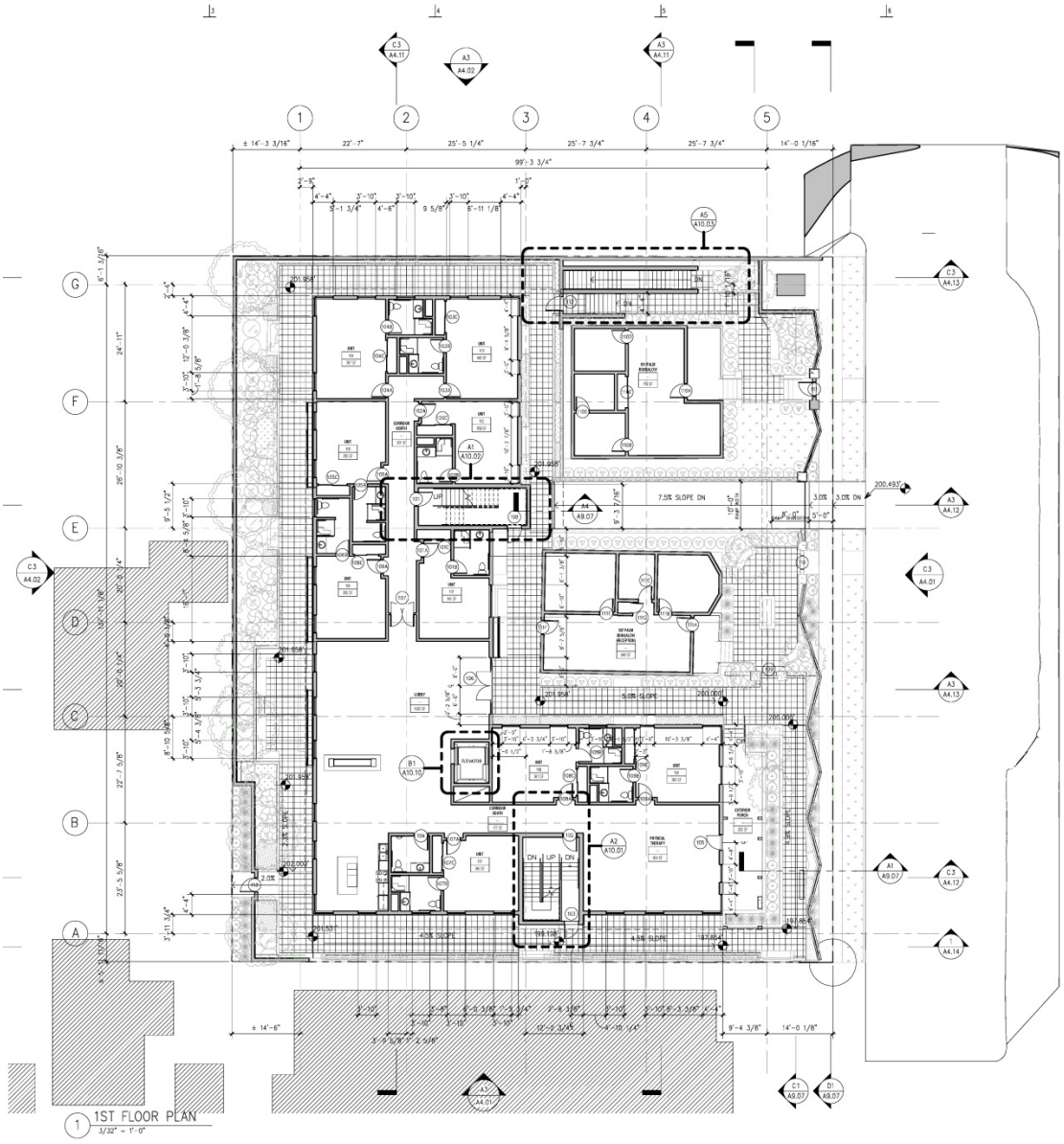


Figure 11 Floor Plans: 2nd Floor

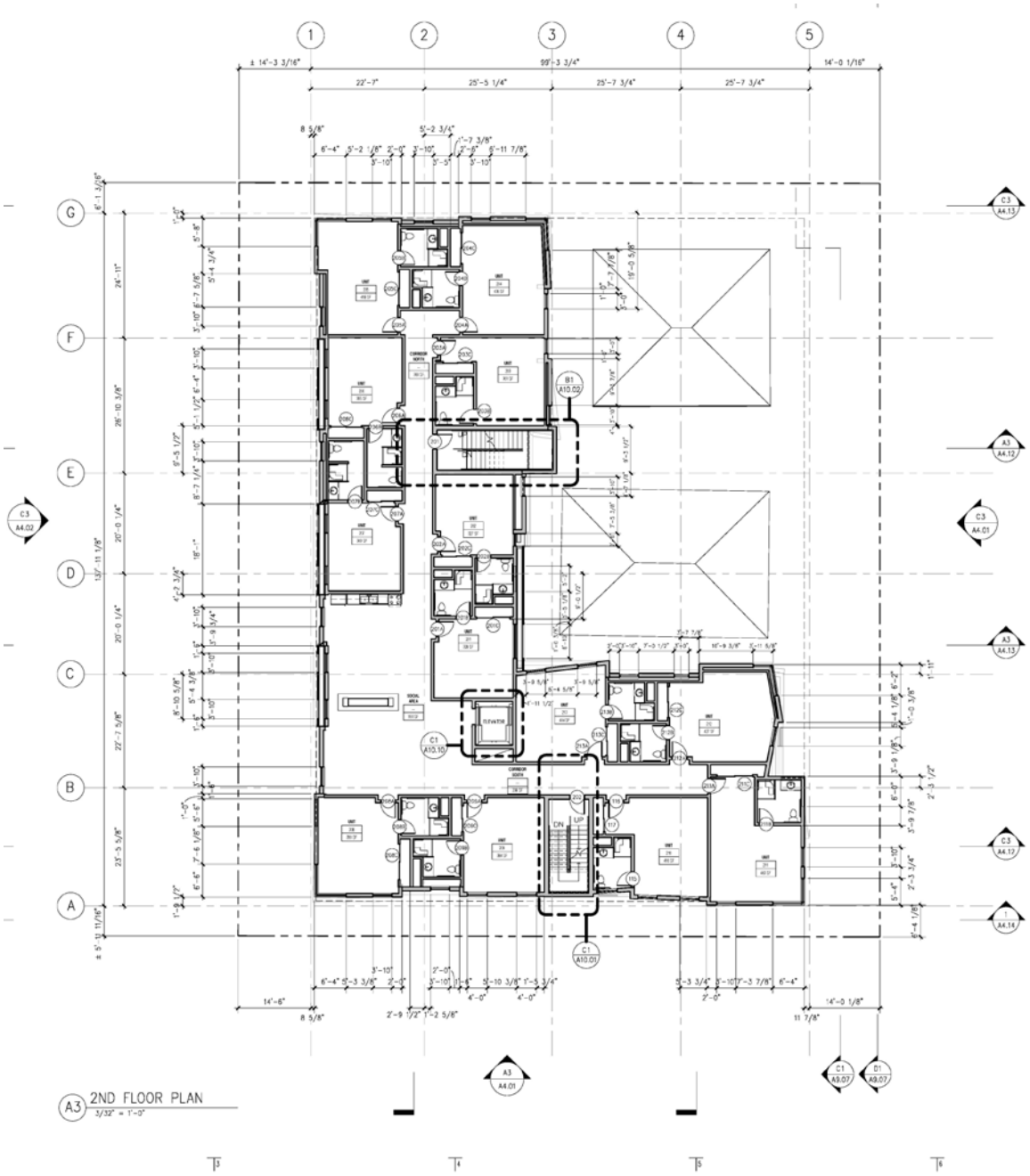


Figure 12 Floor Plans: 3rd Floor

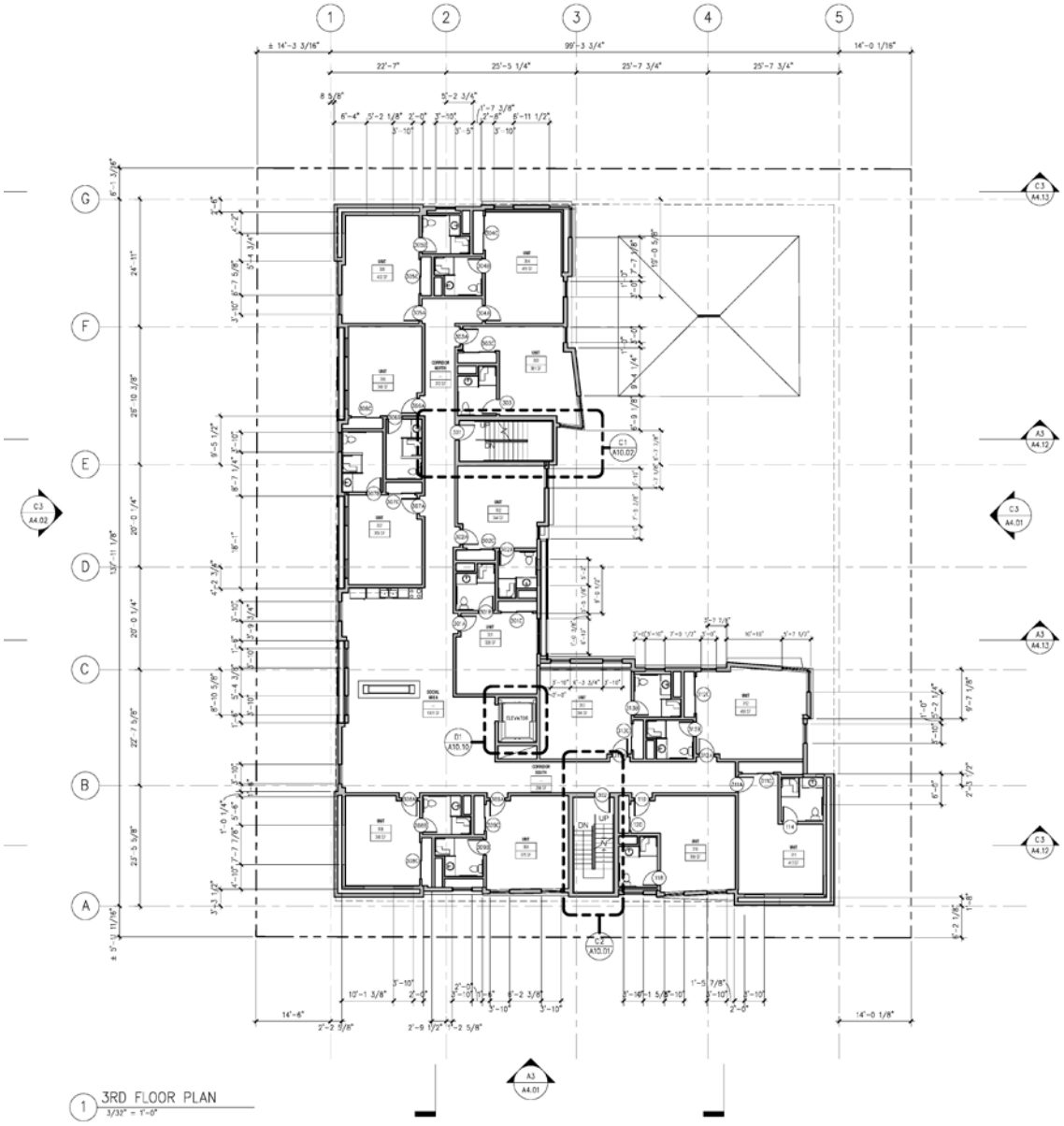
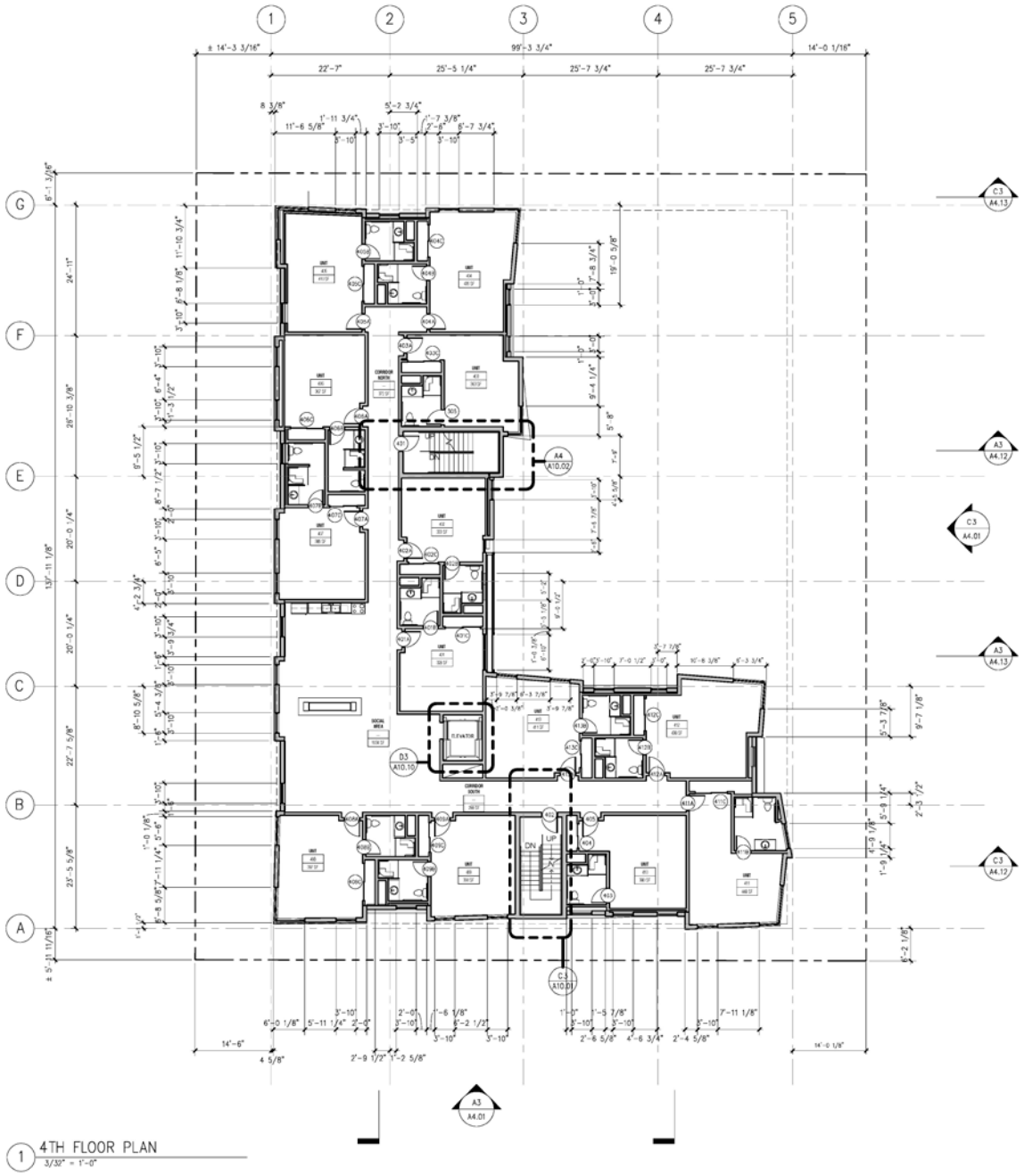


Figure 13 Floor Plans: 4th Floor



1 4TH FLOOR PLAN
3/32" = 1'-0"

Landscape and Open Space

The proposed project would incorporate existing landscaping at the project site, including a mature tree in the front yard of 931 N. Palm Avenue and as much of the extensive landscaping that screens the end of Betty Way as possible (or replaced as required) to help screen the new four-story building from view and retain the character of Betty Way. The front yard would be landscaped in keeping with the site's original landscaping. In addition, the project would include a landscaped exercise path that would loop around the sides and back of the main facility, between the building and the property boundary.

Access and Parking

Vehicular access to the subterranean parking would be provided via a down ramp on N. Palm Avenue situated on the project site between the two historic bungalows. A total of 25 parking spaces would be available for residents and guests.

Sustainability Features

The main facility building would be designed as a high-achieving green building that would earn over 90 points using the City of West Hollywood's Green Building Manual scoring system. The proposed project would be designed as a passive, low-energy building, and would include rooftop solar panels and a below-grade cistern to capture storm water and subsurface water for use in site irrigation.

Construction

For the purpose of this analysis, it is assumed that construction would occur over about five and a half months based on emission model defaults (see Section 3, Air Quality for a more detailed discussion). Excavation for the subterranean parking level would involve the export of approximately 6,600 cubic yards of material.

The project would also include a number of measures to prevent impacts to the historical structures on-site due to ground-borne vibration generated by construction equipment. A Professional Structural Engineer with experience in structural vibration analysis and monitoring for historic buildings and a Project Historical Architect (PHA) will be retained to perform the following tasks:

- Review the project's demolition and construction plans,
- Survey the project site and existing historical bungalows, including geological testing, if necessary prior to start of construction, and
- Prepare and submit a report to the Director of Community Development to include, at minimum, the following:
    - Any information obtained from the survey identified above
    - Any modifications to the estimated vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure that vibration levels would remain below levels potentially damaging to the historical buildings on the project site
    - Specific mitigation measures to be applied during construction to ensure vibration level limits identified by the Professional Structural Engineer (or Caltrans guidelines, in lieu of specific limits) are not exceeded, including modeling to demonstrate the ability of mitigation

measures to reduce vibration levels below set limits. Examples of mitigation that may be applied during demolition or construction include:

- Prohibiting of certain types of construction equipment
- Specifying lower-impact methods for demolition and construction, such as sawing concrete during demolition
- Phasing operations to avoid simultaneous vibration sources
- Installing vibration measure devices to guide decision making

o A monitoring plan to be implemented during demolition and construction that includes post-demolition and post-construction surveys of the historic bungalows and documentation demonstration that the mitigation measures identified in the report have been applied

At the conclusion of vibration-causing activities, the Structural Engineer and the PHA will survey the historic bungalows on the project site, document any damages, and recommend necessary repairs. The project applicant will be responsible for repair of any vibration-caused damage. Repairs will be undertaken and completed in compliance with the Secretary of Interior's *Guidelines for the Treatment of Historic Properties* (36 Code of Federal Regulations [CFR] Part 68) and any other applicable codes, such as the California Historical Building Code (24 CFR Part 8).

11 Required Approvals

The following entitlements are required for the proposed development:

- Development Permit
- Conditional Use Permit
- Rehabilitation Incentives
- Certificate of Appropriateness
- Demolition Permit

12 Other Public Agencies Whose Approval is Required

The City of West Hollywood is the lead agency with responsibility for approving the proposed project. Approval from other public agencies is not required.

Environmental Factors Potentially Affected

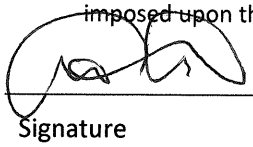
This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

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

Determination

Based on this initial evaluation:

- ■ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

07/11/17

Date

ANTONIO CASTILLO

Printed Name

ASSOCIATE PLANNER

Title

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Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Substantial adverse effect on a scenic vista	☐	☐	■	☐
b. Substantial damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a state scenic highway	☐	☐	☐	■
c. Substantially degrade the existing visual character or quality of the site and its surroundings	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area	☐	☐	■	☐

a. Would the project have a substantial adverse effect on a scenic vista?

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

The proposed project involves construction of a four-story senior congregate care facility and rehabilitation of two historic bungalows. Public views of the Hollywood Hills and Los Angeles Basin around the project site are limited due to the topography of the area, existing trees, and surrounding four- and five-level residential development. Views of the Hollywood Hills to the north and Los Angeles Basin and downtown Los Angeles to the south from streets and sidewalks surrounding the project site are also blocked by existing development and trees. Therefore, the proposed project would not block views of the Los Angeles Basin or the Hollywood Hills and impacts related to scenic vistas would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is not located near any scenic highways and would therefore not be visible from a scenic highway. The site is located approximately 5.2 miles east of US 101, 6.6 miles west of

Interstate I 405, and approximately five miles north of I 10. The project site is also located approximately 700 feet north of Santa Monica Boulevard and approximately 890 feet south of Sunset Boulevard, but is not visible from either major roadway. The project site is currently developed with three residential bungalows and two detached garages and does not contain any rock outcroppings. The site has an existing mature tree in the front yard of 931 N. Palm Avenue that would be retain. The proposed project would retain, rehabilitate, and integrate historic buildings on the site into the proposed project (see Section 3, *Cultural Resources*). No impact would occur with respect to scenic resources.

NO IMPACT

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

The proposed project is an infill development involving construction of a four-story congregate care facility building and rehabilitation of two existing one-story bungalows on the project site. The proposed facility building would increase the massing and intensity of development on the project site, which currently has three one-story bungalows and two detached garages. As such, the proposed project would represent a change in the visual character of the project site. However, the site is designated as "High Density Residential" in the West Hollywood General Plan (General Plan), which is intended to provide for the development of "a wide range of high-density multi-family housing, including apartments and condominiums" (West Hollywood Municipal Code [WHMC] Section 19.06.020).

The proposed project would be consistent with its designated use and zoning as R4 (High Density Residential with a maximum height of four stories and 45 feet). The proposed project would provide high-density, multi-family housing for seniors requiring living assistance and would obtain a conditional use permit to use the site as a senior congregate care facility. It would also be compatible in scale and character with existing structures and development standards. Surrounding uses include a four-level residential building to the south, a five-level residential building lies to the north, and four and five-level residential buildings to the east, while the proposed project would be four levels. Figure 4 shows photos of surrounding uses and Figure 7 shows a rendering of the proposed project. The proposed project would be 45 feet in height, as permitted by R4 standards, and the average size of studio units would be 388 square feet, well below the permitted maximum unit size of 1,200 square feet (WHMC Section 19.06.040). The proposed project would be eligible for a senior density bonus and rehabilitation incentive density bonus that would permit the proposed density of 111.4 units per acre, which exceeds the standard R4 density of 50 units per acre (1 unit per 872 square feet of site area). See Section 10, *Land Use and Planning*, for further discussion of project consistency with land use policies.

The proposed project would also incorporate existing trees and landscaping that surround the two historic bungalows and landscape the front yard in keeping with the site's original character. Because the proposed project would be consistent with permitted uses on the site, compatible with surrounding uses, would retain historic buildings on the site, and would make efforts to retain the site's existing landscaping, impacts related to visual character would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is in an urbanized area with existing sources of lighting. The existing residential and roadway uses generate light and glare along the site. Primary sources of light on and adjacent to the project site include lighting associated with the existing residential buildings, including building mounted lighting and headlights from vehicles on nearby streets. The primary source of glare on and adjacent to the project site is the sun's reflection from metallic and glass surfaces on vehicles parked on the existing parking lot and adjacent streets. The proposed project would introduce a new four-story structure to the project site. Exterior windows could create new sources of glare by reflecting sunlight during the day. However, the level of glare would be similar to that already experienced at surrounding residences.

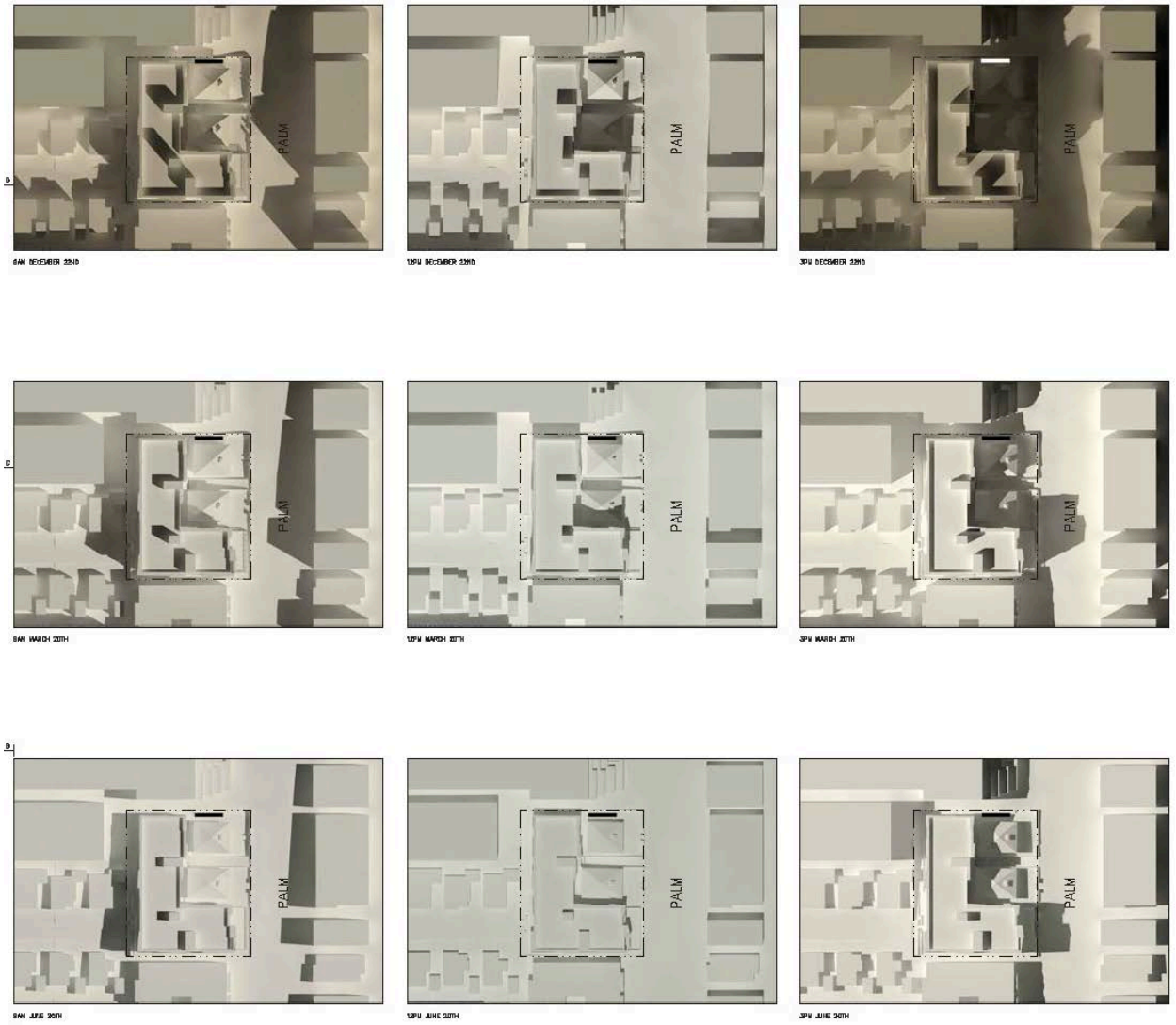
The proposed project would incorporate exterior lighting in the form of pedestrian walkway lighting, building mounted lighting, and other safety-related lighting. These light sources would not have a significant impact on the night sky, as they would only incrementally add to the existing background light levels already created by surrounding urban development. Headlights of vehicles entering and exiting the facility's driveway on N. Palm Avenue at night would be similar to existing conditions and would not substantially affect nearby uses since the driveway is situated at the center of the site, rather than adjacent to neighboring uses, and vehicles would park underground.

Because of the existing, relatively high ambient lighting levels in the vicinity of the project site, project development would not substantially alter light conditions. In addition, the proposed project would be required to comply with WHMC Section 19.20.100, which limits the design, intensity and impacts of outdoor lighting. Outdoor lighting must be designed to prevent glare and light trespass as much as possible and must be directed away from adjacent properties and public rights-of-way. The recommended light level is one foot candle for pathways and outdoor steps, and 0.2 to 0.9 foot candles for parking or pedestrian areas. Further, pursuant to Section 19.46.050 the WHMC, the Design Review Subcommittee would review, comment on and provide recommendations to the Planning Commission with respect to architectural design, including the lighting plans, for proposed development. This section of the WHMC prescribes that specific design elements such as lighting "have been incorporated into the proposed project to further ensure the compatibility of the structures with the character of surrounding development."

Because the proposed structure is four stories in height, it may cast shadows in the immediate area surrounding the buildings. Shadow-sensitive uses include nurseries, outdoor-oriented retail uses (e.g., certain restaurants), or routinely useable outdoor spaces associated with recreational, institutional, or residential land uses. These uses are considered sensitive because sunlight is important to their function, physical comfort, and/or commerce. Shadow-sensitive uses surrounding the project site include the residential uses on all sides of the project site.

In general, shadows cast by buildings are shortest on the summer solstice (June 21) and longest on the winter solstice (December 21). As shown in Figure 14, during summer mornings, shadows would fall to the west and would minimally shade the eastern side of a single-family home and multi-family building behind the project site. As the day progresses, shadows would move eastward. Summer evening shadows would project onto N. Palm Avenue and the two bungalows on the project site. During winter mornings, shadows would project northwest of the project site and shade most of the single-family home and the eastern side of the multi-family building behind the project site. However, no routinely useable outdoor space associated with the residential uses would be affected by shadows. As the day progresses, shadows would move in a northeasterly direction. Winter

Figure 14 Project Shadow Study



evening shadows would project onto N. Palm Avenue and the two bungalows on the project site. Impacts would not be significant.

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

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forest Resources

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract	☐	☐	☐	■
c. Conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

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

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

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

The project site is within an urbanized area in West Hollywood. The City does not contain any agricultural land, agriculturally zoned land, or land under Williamson Act contract (West Hollywood 2011, California Department of Conservation 2016). The proposed project would have no effect on forestland or the conversion of farmland to non-agricultural uses. No impact would occur.

NO IMPACT

3 Air Quality

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

The project site lies within the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether or not the standards are met or exceeded, the Basin is classified as being in "attainment" or "nonattainment." The health effects associated with criteria pollutants upon which attainment of state and federal air quality standards is measured are described in Table 2.

The Basin is a non-attainment area for federal standards for ozone, $PM_{2.5}$, and lead, as well the state standards for ozone, PM_{10}, and $PM_{2.5}$. Thus, the Basin currently exceeds several state and federal ambient air quality standards and is required to implement strategies to reduce pollutant levels to recognized acceptable standards. This non-attainment status is a result of several factors, the primary ones being the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants, the limited capacity of the local airshed to eliminate air pollutants, and the number, type, and density of emission sources within the Basin.

Table 2 Health Effects Associated with Criteria Pollutants

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

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

Source: US EPA 2016

The SCAQMD has adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of state and federal air quality standards. The SCAQMD recommends the use of quantitative thresholds to determine the significance of temporary construction-related pollutant emissions and project operations. These thresholds are shown in Table 3.

The SCAQMD has also developed Localized Significance Thresholds (LST). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size, and distance to the sensitive receptor. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation. LSTs have been developed for NO_X, CO, PM_{10} and $PM_{2.5}$. LSTs do not apply to mobile sources such as cars on a roadway (SCAQMD 2008). As such, LSTs for operational

emissions do not apply to residential development since the majority of emissions would be generated by cars on the roadways.

Table 3 SCAQMD Air Quality Significance Thresholds

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

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

Source: SCAQMD 2015

LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. The proposed project involves 0.44 acres of on-site construction. SCAQMD's *Sample Construction Scenarios for Projects Less than 5 Acres in Size* contains methodology for determining the thresholds for projects that are not exactly 1, 2, or 5 acres in size. This methodology was implemented to determine the thresholds for the proposed project. The project site is located in Source Receptor Area 2 (SRA-2, Northwest Coastal LA County). LSTs for construction on a 0.44 acre site in SRA-2 are shown in Table 4. LSTs are provided for receptors at a distance of 82 to 1,640 feet from the project site boundary. According to the SCAQMD's publication *Final Localized Significant (LST) Thresholds Methodology*, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 meters. The use of LSTs is voluntary, to be implemented at the discretion of local agencies.

Table 4 SCAQMD LSTs for Construction

Pollutant	**Allowable emissions from a 0.44-acre site in SRA-2 for a receptor 82 feet away**
Gradual conversion of NO_X to NO_2	78
CO	414
PM_{10}	3
$PM_{2.5}$	2

Source: SCAQMD 2009

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

Vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. A project may be inconsistent with the AQMP if it would generate population exceeding the forecasts used in the development of the AQMP.

The proposed project would provide 48 studio units and one standalone single-family unit for an individual or couple (49 total units) on a site that currently has seven units; therefore, the project would increase the number of units on the site by a total of 42 residential units. The California State Department of Finance (DOF) estimates the 2016 average household size for West Hollywood to be 1.56 persons per unit. As the proposed project would result in a net increase of 42 dwelling units on the project site, it would increase the local population by approximately 66persons (42 units x 1.56 persons/unit) (DOF 2016a); this is likely a conservative estimate as the proposed project is a senior congregate care facility with small studio units, most likely to be inhabited by single occupants. The proposed project would also employ individuals to provide medical care and other living services (e.g., dining, administrative support, laundry). However, the proposed project is anticipated to draw upon employees already residing in the regional Los Angeles area and therefore, would not induce population growth in the project area through the provision of new job opportunities.

The Southern California Association of Governments (SCAG) projects the population of the City of West Hollywood will be 41,800 in 2040 (SCAG 2016a). According to the City's General Plan EIR (October 2010), the population in General Plan buildout year 2035 is estimated to be 44,182. The current City population is approximately 35,788, according to the most recent (May 2016) DOF estimate (DOF 2016b). Therefore, the proposed project would result in a total population of approximately 35,854 persons (35,788 + 66). The level of population increase associated with the proposed project would be within the SCAG 2040 and City of West Hollywood's 2035 citywide population forecasts. Therefore, the proposed project would not exceed any AQMP thresholds and would not conflict with the AQMP. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

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

The proposed project would generate temporary construction emissions and long-term operational emissions. Emissions associated with the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.1. The model for the proposed project was run assuming the demolition of 3,166 square feet[1] of existing structure on the project site and construction of a senior congregate care facility with 49 units, a floor area of 31,393 square feet (i.e., total floor area for main facility and the two historical bungalows), and an enclosed parking lot with elevator with 25 parking spaces on a 0.44-acre lot. Model defaults for construction phase lengths were modified so the architectural coating phase would begin halfway through building

[1] Structures to be demolished: 923 N. Palm Avenue existing residence (2,050 sf); 927 N. Palm Avenue residence additions (107 sf) and garage (289 sf); 931 N. Palm Avenue residence additions (219 sf) and garage (501 sf).

construction and end one week after paving, rather than after construction to better reflect actual practices. Based on this adjustment and defaults for the other construction phases (site preparation, demolition, grading, building construction, and paving), construction of the proposed project is expected to occur over a five-and-a-half month period. Approximately 6,600 cubic yards of soil would be removed for excavation of the underground parking lot.

It was assumed that the project would comply with applicable regulations, including SCAQMD Rule 1113, which limits VOC content of architectural coatings and SCAQMD Rule 403, which requires watering of the project site to limit fugitive dust emissions. In addition, operational emissions for the existing seven residential units on the project site were not subtracted out of the project's operational emissions. Therefore, the operational emissions presented provide a conservative analysis of the increase in long-term emissions on the project site resulting from the project. Complete CalEEMod results and assumptions can be viewed in Appendix A.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles, as well as reactive organic gases (ROG) released by architectural coatings. Grading, excavation, hauling, and site preparation would involve the largest use of heavy equipment and generation of fugitive dust.

Table 5 summarizes the estimated maximum daily emissions of pollutants during construction on the project site. As shown in Table 5, construction emissions would not exceed SCAQMD regional or localized significance thresholds. Therefore, impacts to regional air quality and local receptors due to construction emissions would be less than significant.

Table 5 Maximum Daily Construction Emissions (pounds/day)

Pollutant	Total Maximum Daily Emissions	SCAQMD Significance Thresholds	Significant Impact?	Total Maximum Daily On-Site Emissions	LSTs	Significant Impact?
ROG	6.1	75	No	4.3	NA	No
NO_x	156.0	100	No	12.8	78	No
CO	39.8	550	No	8.1	414	No
PM_{10}	9.3	150	No	1.2	3	No
$PM_{2.5}$	3.7	55	No	0.9	2	No
SO_x	0.4	150	No	0.3	NA	No

See Appendix A for CalEEMod worksheets.

NA = Not applicable

Operational Emissions

Operational emissions associated with project operation would include emissions from vehicle trips (mobile sources), natural gas and electricity use (energy sources), and landscape maintenance equipment, consumer products and architectural coating associated with onsite development (area sources). As shown in Table 6, operational emissions would not exceed SCAQMD thresholds for any

criteria pollutant. Consequently, operational emissions would have a less than significant impact on regional air quality.

Lead and Asbestos

Due to the age of the existing bungalows on-site (over 100 years old), there is the potential for asbestos and lead to be emitted into the air during their demolition (923 N. Palm Avenue) or rehabilitation (927 and 931 N. Palm Avenue). Demolition of the rear additions to the 923 N. Palm Avenue bungalow and the two rear garages on 927 and 931 N. Palm Avenue may also release lead and asbestos. Lead-based materials are regulated by the California Occupational Safety and Health Administration (Cal OSHA). The California Code of Regulations (CCR), §1532.1, requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal OSHA standards. Under this rule, construction workers may not be exposed to lead at concentrations greater than fifty micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the work day exceeds eight hours. Similarly, CCR §1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

Asbestos is categorized as a hazardous air pollutant by the U.S. EPA (SCAQMD 2017). They are regulated at the federal level under the Clean Air Act, at the state level under Cal OSHA, and at the local level by SCAQMD. Federal asbestos requirements are listed under the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (Code of Federal Regulations [CFR] Title 40, Part 61, Subpart M), and require the control of asbestos during the renovation and demolition of buildings. The asbestos NESHAPs require a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable (U.S. EPA 2016). At the state level, CCR §1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers. At the local level, SCAQMD Rule 1403 establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from being released during renovation and demolition activities. Rule 1403 incorporates NESHAP requirements and SCAQMD has the authority to enforce the federal asbestos NESHAP and is responsible for enforcement at a local level.

The project would be required to comply with all applicable federal, state, and local regulations pertaining to lead and asbestos. This would reduce potential impacts associated with exposure of sensitive receptors to lead and asbestos to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

Table 6 Estimated Project Operational Emissions

	Estimated Emissions (lbs/day)					
Sources	**ROG**	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	0.8	<0.1	4.1	<0.1	<0.1	<0.001
Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.001
Mobile	0.3	1.3	3.8	0.9	0.2	<0.1
Total Emissions (lbs/day)	1.1	1.5	7.9	0.9	0.3	<0.1
SCAQMD Thresholds	55	55	550	150	55	150
Threshold Exceeded?	No	No	No	No	No	No

See Appendix A for CalEEMod worksheets.

Note: numbers may not add up due to rounding. Estimates are conservative as they do not take into account removal of existing uses and associated reduction of vehicle trips, area and energy emissions.

e. Would the project create objectionable odors affecting a substantial number of people?

The proposed senior congregate care facility includes residential uses, as well as facilities needed to provide senior care and support, including administrative, social, dining, kitchen, laundry, and medical and physical therapy, facilities. These uses are not listed on Figure 4-3 of the 1993 *SCAQMD CEQA Air Quality Handbook* as uses that require analysis of odor impacts. Further, residential, medical, office, and restaurant uses are not identified on Figure 5-5, Land Uses Associated with Odor Complaints, of the *Handbook*. Substantial objectionable odors are normally associated with such uses as agriculture, wastewater treatment, industrial facilities, or landfills. The proposed project does not involve those uses. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people. No impact would occur.

NO IMPACT

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4 Biological Resources

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service	☐	☐	☐	■
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service	☐	☐	☐	■
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	☐	☐	☐	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	☐	☐	☐	■
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	☐	☐	☐	■
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

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

The project site is located in an urban area. The project site has been developed, and landscaped by previous property owners and/or tenants. The project site does not contain any riparian habitat, sensitive natural communities, vegetation, or natural biological habitat that might provide habitat for sensitive or special status species.

The project site contains several landscape trees, some of which would be removed to accommodate construction of the new senior congregate care facility. These trees could contain bird nests and birds that are protected under the Migratory Bird Treaty Act (MBTA). Birds protected include all common songbirds, waterfowl, shorebirds, hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts, martins, swallows and others, including their body parts (feathers, plumes etc.), nests, and eggs. If active bird nests are present, a protective buffer must be established to ensure that they are not disturbed until fledglings have left the nest. Compliance with the MBTA by avoiding disturbance of active bird nests would ensure that protected birds are not impacted. No impact would occur.

NO IMPACT

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

The project site is located in an urban setting and no habitat of quality to support native riparian plant/wildlife species or other sensitive natural community is present. Federally protected wetlands or waters as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) do not occur on-site. As a result, there would be no impact to riparian habitat, other sensitive natural community, or wetland.

NO IMPACT

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

As described above, there is no native biological habitat on the project site. In addition, there are no native wildlife nursery sites. The City of West Hollywood is not recognized as an existing or proposed Significant Ecological Area that links migratory wildlife populations, as designated by the County of Los Angeles (West Hollywood 2010a). The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. No impact would occur.

NO IMPACT

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

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

NO IMPACT

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

The project site is not located within an area that is subject to an adopted conservation plan (West Hollywood 2010, USFWS 2016, CDFW 2015). No impact would occur.

NO IMPACT

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5 Cultural Resources

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

a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

The proposed project would involve the demolition of the building at 923 N. Palm Avenue, including rear additions that serve as sheds, as well as the rear detached garages behind 927 and 931 N. Palm Avenue. Adopted by the City of West Hollywood City Council in July 2013, Resolution No. 13-4478 denied the property at 923 N. Palm Avenue as a local cultural resource due to a loss of historic integrity. As a result, 923 N. Palm Avenue is not considered a historical resource for the purposes of CEQA and its demolition would not result in an adverse impact.

Resolution No. 13-4478 also designated the exteriors of the buildings located at 927 and 931 N. Palm Avenue as local cultural resources, finding that they meet the following criteria for designation as part of the Old Sherman Thematic Grouping, pursuant to Chapter 19.58.050 of the West Hollywood Municipal Code. Specifically, the resolution states:

1. Both properties contribute to the significance of Old Sherman, a geographically definable area possessing a concentration of historic properties (Criterion A.2.a);
2. Both properties are part of a thematically related grouping of properties associated with Old Sherman which contribute to each other and are unified aesthetically by plan and physical development (Criterion A.2.b); and
3. Both properties reflect significant geographical patterns associated with different eras of growth and settlement and transportation modes because of their association with the early development of Sherman (Criterion A.3).

As locally designated properties, both buildings are considered historical resources. The proposed project would involve demolition of rear additions and the rear garages, including one residential

unit within a garage structure, but would retain the single-family residences at the front (east) of each lot. Historic Resources Group (HRG) prepared a rehabilitation plan in July 2016 to ensure that any proposed alterations to 927 and 931 N. Palm Avenue would not affect their continued eligibility as historical resources (HRG 2016). Appendix B provides the rehabilitation plan prepared by HRG for the proposed project, as well as a memo by Rincon Consultants indicating that a peer review of the plan found the plan to be adequate with no revisions required. The rehabilitation plan identifies features that define the historic character of the buildings and includes guidance for retaining, repairing, and replacing deteriorated building elements as applicable. Recommendations are consistent with guidance from the Secretary of the Interior's Standards for Rehabilitation (Standards) and are supported by appropriate documentation from the National Park Service (Weeks and Grimmer 1995). In addition, the document identifies alternative standards that are available for qualified historical properties, specifically the California Historical Building Code, which is available for the subject properties would potentially help to retain their historic character while meeting building codes. Following the recommendations of the rehabilitation plan would ensure that the rehabilitation of 927 and 931 N. Palm Avenue would be consistent with the Standards, and would mitigate impacts on both historical resources to a less than significant level.

As defined in the CEQA Guidelines, a project would result in a significant adverse impact on the environment if it materially impaired a historical resource, that is, if it directly or indirectly alters in an adverse manner those characteristics that convey a resource's historical significance (i.e., its character-defining features). Neither the detached garages nor rear additions have been identified as elements contributing to the historic significance of the associated property. A key consideration in determining an element's historical significance is whether or not the element was constructed during the period of significance relevant to the historic designation. The National Park Service defines "period of significance" as the length of time when a property attained the features that qualify it for listing (National Park Service 1997). The Old Sherman Thematic Grouping is significant for their representation of West Hollywood's early development and their evocation of the city's modest beginnings (West Hollywood 2017) and is described as having been built between 1899 and 1907, which can reasonably be extrapolated as the period of significance for all of the properties included in this designation.

Rincon Consultants' examination of Sanborn Fire Insurance Maps indicates that the current rear garages were not constructed until sometime between 1926 and 1955 (Sanborn Map Company, various). Sanborn Fire Insurance Maps also indicate that the rear attached shed on 927 N. Palm Avenue was constructed until some time after 1955. As features that were constructed after the Old Sherman Thematic Groupings' period of significance, neither of the rear detached garages nor the shed addition on 927 N. Palm Avenue define the historical significance of their respective property and their demolition would not result in a significant adverse impact to historical resources.

Sanborn Fire Insurance Maps indicate that a portion of the shed at the rear of 931 N. Palm Avenue was constructed by 1910, suggesting it may have been originally part of the property or built during the period of significance. However, removal of this feature would not impair the ability of the residence to convey its significant associations or be inconsistent with the Standards. As defined in the Standards, rehabilitation is "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values" (Weeks and Grimmer 1995). The property at 931 N. Palm Avenue is significant as a representation of West Hollywood's early development and its evocation of the city's modest beginnings. The shed is a secondary, utilitarian feature of the building that has never been visible

from the public right-of-way and is not critical to the building's historic values or its ability to convey its historic significance. The rehabilitation plan prepared by HRG identifies and preserves those features that define the historic character of the buildings and adherence to the plan would ensure that proposed direct impacts to historical resources would be less than significant.

The project proposes to construct an adjacent four-story, L-shaped building that will extend directly behind (west) of 927 and 931 N. Palm Avenue, as well as new fencing at the front (east). While this would alter the setting of the two historic bungalows relative to the period of significance, it would not substantially alter the setting relative to existing conditions. The setting of both properties during the period of significance consisted primarily of other single-story residences. However, the surrounding neighborhood has changed over the last several decades and now features a high-density setting that is consistent with the R4B zoning. A five-story building is currently located directly to the north of 931 North Palm Avenue and a four-story building is directly to the south of 923 N. Palm Avenue. Other adjacent properties to the west and east are also four stories in height. Although the setting has been substantially altered since the Old Sherman Thematic Grouping's period of significance ended in 1907, these changes do not limit the ability of 927 and 931 N. Palm Avenue to convey their significance or preclude their designation as historical resources. The adjacent proposed four-story building that is proposed as part of the current project is consistent with the current setting of both buildings and would be consistent with Standard No. 10 of the Standards:

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

Both the new building and proposed fence could be removed at a future date without impairment of 927 and 931 N. Palm Avenue or their environment. Therefore, project impacts to historical resources would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

d. Disturb any human remains, including those interred outside of formal cemeteries?

The project site is within an urban area. In addition, it has been previously disturbed to accommodate past and present onsite development and is currently developed with three single-family residences and two detached garages. There is no evidence that archaeological or paleontological resources or human remains are present onsite. In the unlikely event that such resources are unearthed during construction, applicable regulatory requirements pertaining to the handling and treatment of such resources would be followed. If archaeological or paleontological resources are identified, as defined by Section 21083.2 of the Public Resources Code, the site would be required to be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. Compliance

with regulations to protect archaeological and paleontological resources and human remains would reduce potential impacts to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

6 Geology and Soils

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	■	☐
1. 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	☐	☐	■	☐
2. Strong seismic ground shaking	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction	☐	☐	■	☐
4. Landslides	☐	☐	☐	■
b. Result in substantial soil erosion or the loss of topsoil	☐	☐	■	☐
c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse	☐	☐	■	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property	☐	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater	☐	☐	☐	■

a-1. 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?

The project site is not located within an Alquist-Priolo earthquake fault zone as defined by the State Geologist (Beverly Hills Quadrangle, California Department of Conservation, 1986), nor is it located in the vicinity of a known fault. The active fault closest to the site that is capable of surface rupture is the Hollywood fault, located approximately one mile north of the site. A state-designated Alquist-Priolo Earthquake Zone is not established for the active Hollywood Fault. For planning purposes, the City of West Hollywood has established a Fault Precaution (FP) zone along the Hollywood Fault zone. FP Zone 1 requires a site-specific surface fault rupture evaluation and FP Zone 2 requires either a site-specific surface fault rupture evaluation or foundation strengthening to mitigate up to two inches of ground displacement. The project site is not located in FP Zone 1 or FP Zone 2 (West Hollywood 2010b). Therefore, the project would not be exposed to hazards associated with identified surface fault rupture. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a-2. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

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

Onsite structures would be constructed to comply with WHMC Title 13, which adopts the provisions of the Los Angeles County Building Code (Title 26 of the Los Angeles County Code) and the California Building Code (CBC; Title 24 of the California Code of Regulations). With adherence to the WHMC requirements regarding seismic safety, design and construction, the proposed new senior congregate care facility building would be engineered to withstand the expected ground acceleration that may occur at the project site. The existing historic bungalows will also be modified or repaired as needed to comply with building code seismic safety standards as stated in the General Guidelines for Material Conservation included in the project's Rehabilitation Plan (Historic Resources Group 2016). The calculated design base ground motion for the site will take into consideration the soil type, potential for liquefaction, and the most current and applicable seismic attenuation methods that are available. In addition, project construction would be subject to review and approval by City building and safety officials. Seismic hazard impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a-3. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

c. Would the project be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Liquefaction is a condition that occurs when loose, unconsolidated, saturated soils change to a near-liquid state during ground shaking. Liquefaction can result in lateral spreading, which refers to the horizontal movement or spreading of soil down a slope toward unsupported margins. When soils located on a sloping site liquefy, they tend to flow downhill. Subsidence is the sudden sinking or gradual downward settling of the Earth's surface with little or no horizontal movement. Subsidence is typically associated with regional changes in ground surface elevation associated with withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, or hydrocompaction. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft, recent alluvial deposits exist, and in areas with liquefaction risks.

The project site is not in an area experiencing subsidence due to extraction (USGS 2016). However, the site lies in a potential liquefaction zone, as identified in the Beverly Hills Quadrangle of the State Seismic Hazard Zones map (DOC 1999). The site is situated on gently sloping terrain, and is in an area where the groundwater table is high (Los Angeles Regional Water Quality Control Board [RWQCB] 2005). Therefore, the project would be vulnerable to seismic-related ground failure, including liquefaction, liquefaction-induced lateral spreading, and subsidence.

The proposed project would be required to comply with applicable provisions for construction in a liquefaction zone listed in the most recently adopted version of the CBC, as well as the City's requirements for development within hazard zones (WHMC Section 19.32.020). The City requires a soils report by a registered civil engineer in areas susceptible to liquefaction. Where liquefaction potential is identified, the report must include mitigating design features that the applicant is required to incorporate into the building design. Compliance with State and City regulations would reduce impacts associated with seismic ground failure to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

a-4. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

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

The project site is located in an urbanized area on gently sloping terrain. The site is not listed or shown as being in an area prone to slope instability or landslides in the State Seismic Hazards Map (DOC 1999). Therefore, the proposed project would not expose people or structures to adverse effects from landslides. No impact would occur.

NO IMPACT

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

The proposed project involves development of a senior congregate care facility on an urban infill site. Operation of the proposed project would not cause substantial erosion because the project site would be fully developed without exposed soils.

The proposed project involves grading and excavation for the subterranean parking level. The grading and excavation phase when soils are exposed has the highest potential for erosion.

Construction activity would be required to comply with WHMC Section 15.56.090. This section requires storm water runoff containing sediment, construction materials or other pollutants from a construction site to be reduced to the maximum extent practicable. The following requirements would apply to the proposed project:

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

With adherence to WHMC Section 15.56.090 and incorporation of the requirements listed above, temporary erosion-related impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. According to the City's 2035 General Plan FEIR (2010), expansive soils are present in the City and are more prevalent in the southern part of the City, south of Santa Monica Boulevard. The project site is located north of Santa Monica Boulevard. CBC Section 1808.6 requires special foundation design for buildings constructed on expansive soils. If the soil is not removed or stabilized, then foundations must be designed to prevent uplift of the supported structure or to resist forces exerted on the foundation due to soil volume changes or shall be isolated from the expansive soil. Compliance with CBC requirements would protect structures and occupants from impacts related to expansive soils. With compliance with CBC and WHMC requirements, impacts associated with expansive soils would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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

NO IMPACT

7 Greenhouse Gas Emissions

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	☐	☐	■	☐
b. Conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases	☐	☐	■	☐

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

GHGs occur naturally and from human activities. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over by 36 percent, 148 percent, and 18 percent respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Potential impacts of global climate change in California may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CEC 2009).

In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 requires achievement by 2020 of a statewide GHG emissions limit equivalent to 1990 emissions (essentially a 25 percent reduction below 2005 emission levels) and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the governor signed Senate Bill 32, which requires the ARB to ensure that

statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. While the State has adopted the AB 32 Scoping Plan and multiple regulations to achieve the AB 32 year 2020 target, there is no currently adopted State plan to meet post-2020 GHG reduction goals. ARB is currently working to update the Scoping Plan to provide a framework for achieving the 2030 target set forth by SB 32. As a result, State reduction strategies cannot be applied to the project to achieve long-term reductions. Achieving these long-term GHG reduction policies will require State and federal plans and policies for achieving post-2020 reduction goals. Placing the entire burden of meeting long-term reduction targets on local government or individual new development projects would be disproportionate and likely ineffective. Given the recent legislative attention and judicial action regarding post-2020 goals and the scientific evidence that additional GHG reductions are needed through the year 2050, the Association of Environmental Professionals' (AEP) Climate Change Committee published a white paper in 2015 recommending that CEQA analyses for most land use development projects may continue to rely on current adopted thresholds for the immediate future (AEP, *Beyond 2020: The Challenges of Greenhouse Gas Reduction Planning by Local Governments in California*, 2015).

The City of West Hollywood adopted a Climate Action Plan (CAP) in September 2011. The CAP outlines a course of action to reduce municipal and community-wide GHG emissions that contribute to climate change in accordance with AB 32 reduction targets. The CAP includes seven emission reductions strategies: 1) community leadership and engagement, 2) land use and community design, 3) transportation and mobility, 4) energy use and efficiency, 5) water use and efficiency, 6) waste reduction and recycling, and 7) green space. The land use and community design strategy and the transportation and mobility strategy encourage development in areas to promote transit use, walking and bicycling to improve health and decrease driving. According to the CAP, a project-specific GHG analysis "must identify the specific CAP measures applicable to the project and how the project incorporates the measures." If the project is not consistent with the CAP measures or if the measures are not otherwise binding, they must be incorporated as mitigation measures applicable to the project.

The adopted *CEQA Guidelines* provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The 2008 SCAQMD threshold considers emissions of over 10,000 metric tons of carbon dioxide equivalent (MT CO_2e) per year to be significant. However, the SCAQMD's threshold applies only to stationary sources and is expressly intended to apply only when the SCAQMD is the CEQA lead agency. Although not formally adopted, the SCAQMD has a recommended tiered GHG significance threshold (SCAQMD 2008). Under Tier 2, project impacts would be less than significant if a project is consistent with an approved GHG reduction plan, such as a CAP. Therefore, GHG emissions associated with the proposed project would be less than significant if it is consistent with the City of West Hollywood CAP. If the proposed project is not consistent with the CAP (or if no adopted GHG reduction plan exists) then projects may be evaluated based on the SCAQMD recommended Tier 3 screening level quantitative thresholds. SCAQMD has a recommended screening level quantitative threshold for residential and commercial land uses of 3,000 MT CO_2e /year (SCAQMD 2010).

This analysis is based on the methodologies recommended by the California Air Pollution Control Officers Association (CAPCOA) *CEQA and Climate Change* white paper (January 2008). The analysis focuses on CO_2, N_2O, and CH_4 as these are the GHG emissions that onsite development would generate in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF_6, were also considered for the analysis. However, because the project would involve commercial and residential development, the

quantity of fluorinated gases would not be substantial since fluorinated gases are primarily associated with industrial processes. Calculations were based on the methodologies discussed in the CAPCOA white paper (January 2008) and included the use of the California Climate Action Registry General Reporting Protocol (January 2009). Emissions analyzed are for net new commercial uses associated with the new commercial building.

Emissions associated with the proposed project were estimated using CalEEMod, version 2016.3.1, as previously described in Section 3, *Air Quality*. Complete CalEEMod results and assumptions can be viewed in Appendix A.

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

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

GHG emissions associated with construction emissions and operational emissions from the proposed project are discussed below.

Construction Emissions

Construction activities would contribute GHG emissions primarily from the combustion of fossil-fuel based fuels by construction equipment. As shown in Table 7, construction of the proposed project would generate an estimated 120 MT CO_2e of GHG emissions. When amortized over a 30-year period (the assumed life of the project), construction emissions would be approximately 4.5 MT CO_2e per year.

Table 7 Estimated Construction GHG Emissions

Year	Project Emissions MT/yr CO_2e
Total	136.3
Total Amortized over 30 Years	4.5

See Appendix A for CalEEMod worksheets.

Operational Emissions

Operational GHG emissions would be emitted due to area sources (consumer products, landscape maintenance equipment, and painting), energy use (electricity and natural gas), solid waste disposal, water use, and transportation associated with the proposed project. Because CalEEMod does not calculate N_2O emissions related to mobile sources, N_2O emissions were calculated based on the proposed project's vehicle miles traveled (VMT) using calculation methods provided by the California Climate Action Registry General Reporting Protocol (January 2009); calculations are provided in Appendix A. As shown in Table 8, operation of the proposed project would generate approximately 340 MT CO_2e per year of GHG emissions. In total, the proposed project would generate approximately 345 MT CO_2e each year.

Table 8 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2e)
Operational	
Area	0.8
Energy	117.0
Solid Waste	22.5
Water	24.8
Mobile	
CO_2 and CH_4	168.2
N_2O	7.5
Total Operational	340.8
Total Construction	4.5
Combined Total	345.3

See Appendix A for CalEEMod worksheets.

Consistency with GHG Reduction Plans

The City of West Hollywood CAP outlines a course of action to reduce municipal and communitywide GHG emissions that contribute to climate change. According to the CAP, a project-specific GHG analysis "must identify the specific CAP measures applicable to the project and how the project incorporates the measures." If the project is not consistent with the CAP measures or if the measures are not otherwise binding, they must be incorporated as mitigation measures applicable to the project. Table 9 compares the proposed project to applicable CAP measures. The proposed project would implement applicable GHG reduction measures and therefore would be consistent with the CAP. Impacts would be less than significant and mitigation would not be required.

Senate Bill 375, signed in August 2008, requires the inclusion of sustainable communities' strategies (SCS) in regional transportation plans (RTPs) for the purpose of reducing GHG emissions. In April 2012, SCAG adopted the *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS), and on April 7, 2016, SCAG adopted an update to the 2012 RTP/SCS, the 2016-2040 RTP/SCS. A goal of the RTP/SCS is to "encourage land use and growth patterns that facilitate transit and active transportation." The proposed project would be infill development that would also be located within walking distance of residential, commercial, and recreational activities as well as public transportation (within 0.3 mile of bus stops on Santa Monica Boulevard for Metro Lines 10/48, 30/330, 2/302, 4, 105, 704, 705, and Cityline X), thereby reducing vehicle trips. Therefore, it would be consistent with the goal of the RTP/SCS. Another goal of the RTP/SCS is to "create more compact neighborhoods and place everyday destinations closer to homes and closer to one another." The proposed project would place residential development within 700 feet of a busy commercial corridor, thereby meeting this RTP/SCS goal.

Table 9 Project Consistency with West Hollywood Climate Action Plan

Measure	Project Consistency
Land Use and Community Design	
LU-1.1: Facilitate the establishment of mixed-use, pedestrian- and transit-oriented development along the commercial corridors and in Transit Overlay Zones.	**Consistent** The proposed project is a residential project located near transit and the Santa Monica Boulevard West commercial district.
Transportation and Mobility	
T-1.1: Increase the pedestrian mode share in West Hollywood with convenient and attractive pedestrian infrastructure and facilities.	**Consistent** The project site is located within walking distance of retail facilities, restaurants, and public transportation and would encourage walking for residents and employees.
Energy Use and Efficiency	
E-2.2: Require all new construction to achieve California Building Code Tier II Energy Efficiency Standards (Section 503.1.2).	**Consistent** The proposed project would meet Title 24 California Building Code Energy Efficiency standards.
E-3.2: Require the use of recycled materials for 20% of construction materials in all new construction.	**Consistent** The proposed project would utilize reinforced concrete with recycled aggregate and about 15 percent fly ash in the main building structure. In addition the wall framing would be steel studs, which are typically at least 25 percent post-consumer recycled content.
Water Use and Efficiency	
W-1.1: Reduce per capita water consumption by 30% by 2035.	**Consistent** To reduce water use, the proposed project would comply with CalGreen building standards, including low-flow plumbing fixtures, and other City regulations, such as Section 19.26.070, Irrigation and Water Conservation, and Chapter 15.54, Water Conservation Landscaping.
W-1.2: Encourage all automated irrigation systems installed in the City to include a weather-based control system.	**Consistent** The proposed project would utilize a drip-irrigation system for landscaping. Minimal irrigation would be required.
Waste Reduction and Recycling	
SW-1.1: Establish a waste reduction target not to exceed 4.0 pounds per person per day.	**Consistent** The City of West Hollywood's Public Works Department is responsible for complying with AB 939. The City has enacted numerous programs to achieve the mandated diversion rates. In 2015, the per person daily disposal rate in West Hollywood was 4.2 pounds (CalRecyle 2016). This exceeds CalRecycle's target of 7.7 pounds per employee per day and is close to the RTP/SCS target of 4.0 pounds per person per day (CalRecycle 2012). The proposed project would include space for the collection and storage of recyclables. In addition, at least 80% of construction and demolition waste would be diverted in accordance with WHMC Section 19.20.060. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
Urban Forest	
G-1.1: Increase and enhance the City's urban forest to capture and store carbon and reduce building energy consumption.	**Consistent** The proposed project would include a landscaped exercise path around the perimeter of the buildings and would incorporate existing trees and landscaping that surround the two historic bungalows and the rear of the property.

Executive Order (EO) S-3-05 was issued by the Governor in June 2005 and established a long-range GHG reduction target of 80 percent below 1990 levels by 2050, as well as a short-term reduction target of 1990 levels by 2020. Assembly Bill 32, the "California Global Warming Solutions Act of 2006," codified the short-term reduction target and established a framework for the adoption of rules and regulations to achieve the target of 1990 levels by 2020. On September 8, 2016, California passed SB 32, which codified a mid-term reduction target of 40 percent below 1990 levels by 2030, following along the same trajectory as AB 32. The City's CAP would allow the City to meet and exceed AB 32 goals. The City conducted a GHG inventory in 2008 to establish baseline emissions and estimated that a 15 percent reduction from 2008 emission levels would be needed to achieve 1990 levels. The CAP put West Hollywood on track to achieve estimated emission reductions of 16.9 percent by 2020, which surpasses AB 32 requirements. As the proposed project would be developed and operational prior to 2020, consistency with the City's CAP indicates that the project would be consistent with AB 32 and, therefore, also SB 32, which continues the trajectory set by AB 32.

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

LESS THAN SIGNIFICANT IMPACT

8 Hazards and Hazardous Materials

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located in 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 near a private airstrip, would it result in a safety hazard for people residing or working in the project area	☐	☐	☐	■
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	☐	☐	■	☐
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands	☐	☐	☐	■

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

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

The proposed project would involve demolition of an existing single-family residence and two detached garages and development of a new senior congregate care facility. Construction of the proposed project would involve routine handling of small quantities of hazardous or potentially hazardous materials, such as gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment and vehicles. This handling of hazardous materials will be a temporary activity and coincide with the short-term construction phase of the proposed project. Removal and disposal of hazardous materials from the project site would be conducted by a permitted and licensed service provider. Any handling, transporting, use, or disposal would comply with all applicable federal, state, and local agencies and regulations.

As previously discussed in Section 3, Air Quality, demolition and rehabilitation of structures on the project site has the potential to release lead-based materials and asbestos due to the age of the existing structures. However, lead exposure is regulated at the state level under CCR §1532.1 by Cal OSHA, and asbestos exposure is regulated at the federal, state, and local level under CFR Title 40, Part 61, Subpart M, CCR §1529, and SCAQMD Rule 1403, respectively. The project would be required to comply with all applicable regulations, which would reduce potential impacts due to accidental release of lead and asbestos to a less than significant level.

Operation of the proposed use, an assisted living facility, would not involve the routine transport, use or disposal of hazardous substances other than minor amounts typically used for maintenance and landscaping. Some medicines and medical supplies would also be used on-site, but of limited type and quantity (Oakmont Senior Living 2015). In the unlikely scenario that licensed vendors or tenants bring hazardous materials to and from the project site, they would be required to provide all appropriate documentation for all hazardous materials that are transported in connection with project-site activities (as required by the WHMC). This would achieve compliance with the existing hazardous materials regulations. In addition, any hazardous wastes produced onsite would be subject to requirements associated with accumulation time limits, proper storage locations and containers, and proper labeling. As part of any removal of any hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company that must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. Required compliance with applicable regulations would reduce impacts associated with the use, transport, storage, sale of hazardous materials, and foreseeable accidents involving hazardous materials to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The project site is located approximately 0.25 mile southeast of West Hollywood Elementary School, which is a part of the Los Angeles Unified School District, and 0.22 mile southwest of the Pacific Hills School, a small, private school serving grades 6-12. As mentioned above, operation of the proposed project would not involve the use or transport of hazardous materials and the project would be

required to comply with federal, state, and local regulations to control exposure to lead and asbestos. Therefore, impacts to schools from hazardous emissions would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The following databases compiled pursuant to Government Code Section 65962.5 were checked (January 2, 2017) for known hazardous materials contamination at the project site:

- U.S. EPA
  - Superfund Enterprise Management System database
- California State Water Resources Control Board
  - Geotracker search for leaking underground storage tanks (LUST) and other Cleanup Sites
- California Department of Toxic Substances Control (DTSC)
  - Cortese list of Hazardous Waste and Substances Sites
  - Envirostor: Cleanup Site and Hazardous Waste Facilities Database

The project site is not located on or near a Superfund site or any hazardous sites listed on the DTSC Cortese List. A search on the Envirostor database identified a single hazardous material cleanup site located at 8787 Santa Monica Boulevard (Santa Palm Car Wash), approximately 700 feet from the project site. In 1989, Sunlin Inc. took actions to remediate groundwater contamination from leaked gasoline at the site and to prevent further groundwater contamination and release of gas and excessive gas vapors at the site in response to a Consent Order by the Department of Health Services. Therefore, any potential hazards remaining at this site would have a less than significant impact.

A search on the GeoTracker database identified three leaking underground storage tank (LUST) sites and one cleanup site within 1,000 feet of the project site: Southern California Rapid Transit District (RTD) (8800 Santa Monica Boulevard), Pacific Bell (8759 Santa Monica Boulevard), LA County Fire Department (958 Hancock Avenue), and Canyon Cleaner Facility (8725 Santa Monica Boulevard), respectively. The Southern California RTD site remains open, but is eligible for closure, and the two other LUST sites have completed cleanup and their cases have been closed. The Canyon Cleaner Facility, a former dry cleaning business, has been remediated for soil impacts and groundwater well monitoring for minor amounts of tetracholoroethylene (PCE) is ongoing, with a final remedy under evaluation. The cleanup site lies approximately 785 feet southeast of the project site. Because all the hazardous sites identified have been successfully remediated or are well into the process of being remediated, impacts from hazardous sites near the project site would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

f. For a project near a private airstrip, would it result in a safety hazard for people residing or working in the project area?

The project site is located approximately 6 miles northeast of the Santa Monica Airport and 7.5 miles northeast of the Los Angeles International Airport (LAX), which are the nearest airports or

airstrips to the project site. As the site is not located within an airport land use plan or near an airstrip, there would be no impact to people residing or working in the project area due to airport or air traffic.

NO IMPACT

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

The proposed project involves infill development in a highly urbanized area of West Hollywood. Project implementation would not alter or otherwise interfere with public rights-of-way and, therefore, would not interfere with emergency response or evacuation. The proposed project would be required to comply with applicable California Fire Code requirements. The proposed project would have a less than significant impact on implementation of emergency response plans.

LESS THAN SIGNIFICANT IMPACT

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

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

NO IMPACT

9 Hydrology and Water Quality

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Violate any water quality standards or waste discharge requirements	☐	☐	■	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	■	☐
d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite	☐	☐	■	☐
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff	☐	☐	■	☐
f. Otherwise substantially degrade water quality	☐	☐	■	☐
g. Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map	☐	☐	☐	■

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
h. Place structures in a 100-year flood hazard area that would impede or redirect flood flows	☐	☐	☐	■
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam	☐	☐	☐	■
j. Result in inundation by seiche, tsunami, or mudflow	☐	☐	☐	■

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

c. 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 that would result in substantial erosion or siltation on- or off-site?

d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite

e. Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

f. Would the project otherwise substantially degrade water quality?

The proposed project involves the construction of a senior congregate care facility on a site that has been previously developed in an urban environment. It would not involve alteration of a stream or river, substantially alter drainage patterns in the area, or result in any unauthorized discharge of waste into the municipal storm water system. Construction activities, such as grading, could temporarily alter the drainage pattern onsite and result in erosion. However, construction activities would comply with WHMC Section 15.56.090, which requires storm water runoff containing sediment, construction materials or other pollutants from a construction site, to be reduced to the maximum extent practicable. The proposed project would also comply with WHMC Section 19.20.190, Storm Drainage and Storm Water Runoff, which provides regulations to minimize runoff and contamination of storm water. Adherence to existing City code would reduce project impacts on drainage, runoff, and water quality to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

The proposed project involves the construction of 49 residential units on a site that currently has seven residential units. Therefore, the proposed project would incrementally increase the City's water consumption. Water would be provided by the City of Beverly Hills. About 90 percent of Beverly Hills' water supply is purchased from the Metropolitan Water District (MWD), which receives its supply from the State Water Project (SWP) and the Colorado River. Beverly Hills obtains the remaining 10 percent of its water from groundwater in the Hollywood Basin. Due to the highly-regulated nature of groundwater resources in water-limited Southern California, the proposed project would not result in substantial depletion of groundwater supplies. In addition, the project site is in an urban environment that is largely paved and provides little groundwater recharge. The proposed project would incorporate permeable surfaces, such as a landscaped exercise path and landscaped front yard. Impacts to groundwater recharge and supplies would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

h. Would the project place in a 100-year flood hazard area structures that would impede or redirect flood flows?

The project site is located in Federal Emergency Management Agency (FEMA) flood zone Zone X (FEMA Flood Insurance Rate Map (FIRM) Map # 06037C1585F; September 26, 2008). Zone X is characterized as having a less than 0.2 percent annual chance for a flood. Therefore, the proposed project would not place housing or structures in a 100-year flood hazard area and there would be no impact.

NO IMPACT

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding including that occurs as a result of the failure of a levee or dam?

The project site lies outside of a dam inundation hazard area, as indicated in Figure 10-3 of the General Plan (West Hollywood 2011b). Therefore, the project would not expose people or structures to risks resulting from dam failure. There would be no impact.

NO IMPACT

j. Would the project result in inundation by seiche, tsunami, or mudflow?

The project site lies outside of a tsunami inundation area as indicated on the Tsunami Inundation Map for Emergency Planning, Beverly Hills Quadrangle (Cal EMA, CGS, and USC 2009). In addition, the project site does not lie near a large body of water that could experience a seiche and would not be vulnerable to mudflow since it is located in an urban area without identified risk for landslides. Therefore, the proposed project would have no impact due to inundation by seiche, tsunami, or mudflow.

NO IMPACT

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10 Land Use and Planning

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

a. Would the project physically divide an established community?

The proposed project involves a new senior congregate care facility on an infill site in an urbanized area. The development does not include new roads or other components that would divide an established community. Rather, the project would blend into the fabric of the community. No impact would occur.

NO IMPACT

b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The project site is zoned and has a General Plan land use designation of R4B (High Density, Residential, Subcategory B). The R4 designation provides for the development of a wide range of high-density multi-family housing, including apartments and condominiums and allows for "building types that are compatible in scale and character with existing structures and the development standards." The R4 designation permits a density of 50 units per acre, and the R4B subcategory limits heights for residential buildings to four stories and 45 feet. The maximum average size of all dwelling units in the R4 Zone is limited to 1,200 square feet. Assisted senior housing is permitted in residential zones with a conditional use permit.

The project is eligible for a number of bonus density and parking reduction incentives. The City provides development incentives to meet the high demand for senior residences, which are outlined in WHMC Section 19.36.110, Congregate Care and Senior Residential Projects, and include parking and density incentives. The proposed project is eligible for a 10 percent parking reduction because it is within 750 feet of a transit stop and an additional 10 percent parking reduction because it

provides an on-site beauty salon/ barber shop for residents. The proposed project is also eligible for a 30 percent density bonus because it provides on-site outdoor recreation facilities in the form of a landscaped exercise trail (10% reduction) and an on-site beauty salon/ barber shop for residents (20% reduction).

The City also provides incentives to offset the burdens of rehabilitating existing structures under WHMC Section 19.58.150. Incentives are discretionary and may include reduction in development standards, as well as permit fee waivers and approval for non-zoned uses. The project applicant is proposing 20 additional units beyond the permitted R4 density standard with a senior density bonus, which allows for 29 units, as well as projections into the allowable front, rear, and side setbacks due to the façade design.

Table 10 compares the project to applicable zoning ordinance requirements. The proposed project would be consistent with all applicable requirements with approval of requested incentives. In addition, the proposed project would be consistent with other applicable policies and plans to mitigate or reduce environmental impacts as discussed under other resource area sections (e.g., Aesthetics, Geology and Soils, Hydrology, Air Quality, Greenhouse Gas Emissions, Hydrology, Noise, Transportation, Utilities and Service Systems). Impacts related to conflicts with land use plans would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Table 10 Consistency with Zoning Requirements

Requirement	Allowed		Actual Provided by Proposed Project
Minimum Lot Area	5,000 square feet		**Consistent** 19,156 SF
Density	R4B Allowed Density: 50 units/acre Senior Density Bonus: 30% Rehabilitation Incentive (discretionary) Total Allowed	21.97 units 6.6 units 20 units 49 units	**Consistent with Approval[1]** 49 units
Setbacks	Front, 1st Story	Minimum of 7.5 feet or average of front setbacks of the two structures closest to the front property lines on the 2 adjacent parcels. **Required setback = 20 feet**	**Consistent with Approval[2]** 15 feet
	Front, 2nd and upper stories	An additional 6 feet for 2nd and upper stories. **Required setback = 26 feet**	**Consistent with Approval[2]** 15 feet
	Sides	5 feet for lots with structures up to 2 stories. An additional 1 foot setback is required for each story above the 2nd story. 4 stories = 5 feet (1st story) + 2 feet (3rd-4th stories) **Required setback = 7 feet**	**Consistent with Approval[2]** Approx.7 feet at minimum. However, articulated side projections break into setback space creating a minimum side setback. of 5 feet and 10 ½ inches.

Requirement	Allowed		Actual Provided by Proposed Project
	Rear	15 feet. For lots with a depth less than 75 feet, 20% of the average lot depth, but not less than 10 feet. Project lot depth = approx. 99"4'. **Required setback = 15 feet**	**Consistent with Approval[2]** Approx. 15 feet, 6 inches. However, articulated facade projections break into setback space creating a minimum rear setback of 14 feet and 3 ¾ inches.
Building Height	R4B Allowed Height: 45 feet, 4 stories		**Consistent** 45 feet, 4 stories
Unit Area	R4B Maximum Allowed Unit Area: 1,200 square feet		**Consistent** Main Facility: Average of 388 square feet Standalone Bungalow: 716 square feet
Parking Spaces	Senior housing and congregate care projects 0.5 resident spaces per unit 0.1 guest spaces per unit Total *Parking Incentive(-20%)* **Total Required**	 24.5 spaces 4.9 spaces 29.4 spaces -5.9 spaces **24 spaces**	**Consistent** 25 spaces
Education, Recreational, and Social Facilities	Requirements to obtain Senior Density and Parking incentives: -Minimum of 5% of total indoor floor area for education, recreational, and social facilities - Provide common laundry facilities		**Consistent** - 4,658 square feet recreational facilities/ 31,393 square feet indoor area = 15 % - Common laundry facilities provided

[1] The proposed project is requesting an additional 20 units as a discretionary Rehabilitation Incentive.

[2] The proposed project is requesting a discretionary Rehabilitation Incentive to allow angled "boxes" that are part of façade to encroach into setbacks .

Sources: WHMC 19.06.040 (Residential and Zoning District General Development Standards, 19.36.110 (Senior Housing and Congregate Care Projects), and 19.20.040 (Distance Between Structures).

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

The project site is located in an urbanized area. As previously discussed in Section 4*, Biological Resources,* the project site does not support and habitats or natural communities and is not subject to any habitat conservation plan or natural community conservation plan (USFWS 2016, CDFW 2015). Therefore, the proposed project would not conflict with any such plan and there would be no impact.

NO IMPACT

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11 Mineral Resources

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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

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

NO IMPACT

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12 Noise

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	☐	☐	■	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels	☐	☐	■	☐
c. A substantial permanent increase in ambient noise levels above those existing prior to implementation of the project	☐	☐	■	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above those existing prior to implementation of the project	☐	☐	■	☐
e. For a project located in 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 near a private airstrip, would it expose people residing or working in the project area to excessive noise	☐	☐	☐	■

Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance, while noise from a point source typically attenuates at about 6 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm that breaks the line-of-sight reduces noise levels by 5 to 10 dBA. The construction style for dwelling units in California generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows (Federal Highway Administration [FHWA] 2006).

The City of West Hollywood adopted the 2035 General Plan Safety and Noise Element in September 2011. The Noise Element provides a description of existing noise levels and sources and incorporates comprehensive goals, policies, and implementing actions. The Noise Element includes several policies on noise and acceptable noise levels. These policies address unnecessary, excessive, and annoying noise levels and sources such as vehicles, construction, special sources (e.g., radios, musical instrument, animals, etc.), and stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.). The Noise Element also establishes land use compatibility categories for community noise exposure. The maximum "normally acceptable" noise level for the exterior of residential areas is 60 dBA CNEL or Ldn.[2]

To implement the City's noise policies, the City adopted a Noise Ordinance. The City of West Hollywood Noise Ordinance has no numerical standards, but restricts unnecessary or excessive noise within the City limits. Radios, musical instruments or similar devices operated between 10:00 PM and 8:00 AM may not be operated at a level to be plainly audible at a distance of 50 feet (Section 9.08.050[a]); the operation of any motor may not be audible at more than 50 feet from the source (Section 9.08.050[c]); loading and unloading activities are generally prohibited from 10:00 PM to 8:00 AM (Section 9.08.050[e]); and commercial activities may not be plainly audible at any residence between 10:00 PM to 8:00 AM (Section 9.08.050[k]). The City Manager has responsibility to enforce these noise regulations, with the assistance of the Sheriff's Department if necessary (Section 9.08.070).

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

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses. The project

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

site would be a senior congregate care facility, which is considered a noise-sensitive land use, and is surrounded by residences in all directions, which are also considered sensitive receptors.

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

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

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

On January 10, 2017, Rincon Consultants, Inc. performed three 15-minute weekday noise measurements using an ANSI Type II integrating sound level meter in the vicinity of the project site. All measurements were taken during the p.m. peak hour, between approximately 5:40 and 6:30 pm. Vehicle counts were also obtained while the noise measurements were being conducted. Noise measurements and vehicle count results are summarized in Table 11. Appendix C provides noise measurement data sheets and a map of measurement locations. These noise measurements and vehicle counts serve as a baseline for existing peak hour noise conditions in the vicinity of the project site.

Table 11 Noise Monitoring Results

Measurement Number	Measurement Location	Primary Noise Source	Sample Time	Leq [15] (dBA)	Vehicle Counts
1	In front of 930 N. Palm Avenue, facing west to the road and project site	Vehicles, pedestrians, dog barking	5:43-5:58 p.m.	61.7	61[1]
2	In front of 931 N. Palm Avenue, facing east to N. Palm Avenue	Vehicles, pedestrians, dog barking	5:58-6:13 p.m.	63.1	92[1]
3	At end of cul-de-sac in Betty Way, facing west to the road	Noises typical of residential uses	6:13-6:28 p.m.	46.2	0

[1]All vehicles observed were light-duty passenger vehicles.

Source: Field visit using ANSI Type II Integrating sound level meter, January 10, 2017. Appendix C provides noise measurement data sheets and measurement locations.

Construction Noise

Noise from construction of the proposed project would be generated by construction of the structure and traffic noise from construction vehicles. Nearby noise-sensitive land uses, including residences immediately adjacent to the project site, would be exposed to temporary construction noise. Noise impacts are a function of the type of activity being undertaken and the distance to the receptor location. Construction activity is expected to occur over a period of approximately five and a half months. Typical noise levels generated by construction equipment during different phases of construction are provided in Appendix C, Table C-1.

Construction of the proposed project would cause a temporary increase in ambient noise levels at the project site and adjacent properties. Project construction noise was modeled by construction phase to estimate the levels of noise that would be generated by construction activities at adjacent

residential uses. Noise was modeled by estimating the combined noise levels produced by specific equipment in each phase of construction. Typical noise levels for construction equipment were obtained from the Federal Highway Administration's *Construction Noise Handbook* (FHWA 2006) and the type of equipment utilized during each phase were based on defaults in CalEEMod to model emissions, as construction equipment details have not yet been finalized for the project. CalEEMod construction equipment defaults are listed in Appendix A worksheets, and construction noise model worksheets are provided in Appendix C. It was assumed that, on average, construction equipment would be located 50 feet from adjacent uses as it is unlikely that construction equipment would operate from one location or operate exclusively along the project boundary near adjacent residential uses. This assumption is further supported by the fact that the City's 2035 General Plan EIR Mitigation Measure 3.9-2 requires that construction contractors "locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors."

Table 12 Construction Noise Levels During Different Phases of Construction

	Combined Maximum Hourly Noise Levels During Different Phases of Construction at 50 feet	
Phase	**Leq (dBA)**	**CNEL (dBA)**
Demolition	85	81
Site Preparation	83	79
Grading	86	82
Building Construction	83	79
Paving	82	78
Architectural Coating	73	69

See Appendix C for calculations. Based on standard attenuation rate of 6 dBA per doubling of distance.

As shown in Table 12, construction noise impacts would vary at different phases of construction. Grading is expected to be the loudest phase of construction, generating noise levels of approximately 86 Leq dBA, or 82 CNEL dBA, at adjacent residences. Building construction would be the longest phase, lasting approximately 100 days, and would generate noise levels of approximately 83 Leq dBA, or 79 CNEL dBA. In all phases of construction, construction equipment would increase ambient noise levels at adjacent receptors to levels above the maximum "normally acceptable" exterior noise level for residential areas of 60 dBA (West Hollywood 2011a), as well as above existing ambient noise levels (see Table 11). Mitigation Measure 3.9-2 from the West Hollywood 2035 General Plan FEIR (2010) requires construction contractors to apply certain measures to reduce impacts of construction noise. These measures, shown below, apply to all new construction in the City and would be a Condition of Approval for the proposed project.

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

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

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

Use of a sound barrier with an STC rating of 25 or greater would reduce construction noise levels by at least 8 to 15 dBA and use of manufacturer-certified mufflers associated with construction equipment would reduce noise levels generally by 5 dBA, but has the potential to reduce noise levels by up to 8 dBA (West Hollywood 2014). Together, these two measures would reduce sound levels during construction by ~~16~~13-23 dBA.

The City of West Hollywood's plan check process also requires preparation of a Construction Period Mitigation Plan (CPMP). All developers in West Hollywood are required to prepare a CPMP to address issues such as truck routing, dust control, construction worker parking, hours of operation, noise, and materials storage. The CPMP would ensure that there is no major disruption to the neighborhood. The CMP must describe the construction schedule and phasing and specific noise mitigation measures. With adherence to WHMC construction timing restrictions and conditions of approval listed above, construction would not substantially increase existing ambient noise levels and impacts related to temporary construction noise would be less than significant.

Operational Noise

The proposed project would create a new senior congregate care facility on the project site that would incorporate two existing historical bungalows. The proposed project would include a new four-story building as well as underground parking and a landscaped exercise path that would surround most of the main facility. Existing uses near the project site may periodically be subject to noises associated with operation of the proposed project, including noise that is typical of residential development, such as conversations, music, delivery trucks, and noise associated with rooftop ventilation and heating systems. The closest sensitive receptors are the residences located adjacent to the project site to the north, south, east, and west.

Rooftop ventilation and heating systems would be onsite noise generators. Noise levels from commercial heating, ventilation and air conditioning (HVAC) equipment can reach 100 dBA at a distance of three feet without shielding (EPA 1971). This equipment usually has noise shielding

cabinets placed on the roof or is located within mechanical equipment rooms. The location of the HVAC system for the four-story senior congregate care facility has not yet been determined, but is assumed to be on the rooftop based on proposed floor plans. WHMC Section 19.20.090 requires that mechanical equipment be enclosed or incorporate other elements to prevent adverse noise impacts. Therefore, with adherence to this requirement, operational noise impacts from HVAC equipment would be less than significant.

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

The proposed project would include 25 parking spaces that would all be located in an enclosed, subterranean parking garage. As such, sounds typical of a parking area, such as car honking, car alarms, and conversations, would be contained and would not be audible to adjacent sensitive receptors. Access to the lot would be provided along N. Palm Avenue near the center of the project site so movement of cars in and out of the parking lot would not occur directly alongside adjacent uses. Therefore, operational noise associated with the proposed underground parking lot would not exceed noise ordinance standards.

Roadway Noise

The most common sources of noise in the project site vicinity are transportation-related, such as automobiles, trucks, buses and motorcycles. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to areas sensitive to noise exposure. Senior congregate care facilities generate fewer vehicle trips than typical residential uses. Using trip generation rates for senior congregate care facilities (see Section 16, Transportation), the proposed project is expected to generate approximately 101 new daily trips, with approximately eight trips during the PM peak hour. Vehicle counts taken along the stretch of N. Palm Avenue near the project site that there are approximately 61 to 92 vehicle trips every 15 minutes during the PM peak hour, which translates to 244 to 368 vehicle trips in an hour.Thus, the proposed project would increase vehicle traffic by about 2.2 to 3.3 percent during peak hour. The project would not substantially increase roadway noise since a doubling of traffic is required to result in a change in noise level perceptible to the human ear (an incrase of 3 dBA). Therefore, the proposed project would not result in significant impacts to roadway noise levels.

With adherence to City requirements for construction noise and HVAC systems, short-term and long-term noise impacts caused by the proposed project would not result in noise levels exceeding City standards, or result in a substantial permanent or temporary increase in ambient noise levels. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the U.S. The City has not adopted any thresholds or regulations addressing vibration. The vibration velocity level threshold of perception for humans is approximately 65 VdB.

The Federal Railroad Administration (FRA) provides the following thresholds for assessing ground-borne vibration impacts:

- 65 VdB where low ambient vibration is essential for interior operations, such as hospitals and recording studios
- 72 VdB for residences and buildings where people normally sleep, including hotels
- 75 VdB for institutional land uses with primary daytime use, such as churches and schools
- 95 VdB for physical damage to extremely fragile historic buildings
- 100 VdB for physical damage to buildings

In addition to the ground-borne vibration thresholds outlined above, the Federal Transit Administration (FTA) has outlined human response to different levels of groundborne vibration and set guidelines for evaluating human response to vibration shown in Table 13. Guidelines are based on the frequency of events as well as the receiving uses. Onsite uses and surrounding uses, which are all residences, fall into receiving land use Category 2, “Residences and buildings where people normally sleep.” Thus, vibration levels would be considered significant if they exceed 72 VdB for frequents events, 75 VdB for occasional events, or 80 VdB for infrequent events.

The project site contains two historical bungalows that would be retained and incorporated into the proposed project. The bungalows have been serving as habitable residences (Rincon site visit, January 10, 2017) and thus would not be considered “extremely fragile” historic buildings that would be vulnerable to vibration levels at 95 VdB. Caltrans provides thresholds for vibration damage potential to structures based on a structure’s type and condition that provide useful guidance in determining whether there would be a potential impact to the historic bungalows on the project site. These criteria are provided in Table 14. The thresholds for “Historic and some old buildings” are the most applicable to the historic structures onsite, which were constructed in 1902 and designated as historic, but are not fragile. Thus, vibration impacts to the onsite historic bungalows would be significant if vibration levels would exceed 102 VdB from transient sources and 96 VdB from continuous/frequent intermittent sources.

Table 13 Ground-Borne Vibration Impact Criteria for Human Annoyance

	Threshold Vibration Impact Level (VdB) for:		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primary daytime use	75	78	83

[1] Frequent events is defined as more than 70 vibration events of the same source per day.

[2] Occasional events is defined as between 30 and 70 vibration events of the same source per day.

[3] Infrequent events is defined fewer than 30 vibration events of the same source per day.

Source: FTA 2006

Residential uses, including senior congregate care facilities, are not typically associated with the generation of substantial vibrations. Consequently, operation of the proposed project would not perceptibly increase ground-borne vibration or ground-borne noise on the project site above existing conditions. However, certain types of construction equipment generate substantial levels of vibration, which could result in significant impacts to nearby residents and structures during construction of the proposed project. Table 15 provides vibration levels associated with construction equipment of potential concern. Construction of the proposed project would utilize construction equipment typical of residential development in urbanized area and would not utilize pile drivers, which have particularly high levels of vibration impact.

Table 14 Caltrans Guideline Vibration Damage Potential Threshold Criteria

	Maximum VdB[1]	
	Transient Sources	Continuous/ Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	90	86
Fragile buildings	94	88
Historic and some old buildings	102	96
Older residential structures	102	98
New residential structures	108	102
Modern industrial/commercial buildings	114	102

[1] Caltrans provides threshold criteria in PPV (in/sec) at a distance of 25 feet. These were converted to VdB using methods provided in *Transit Noise and Vibration Assessment* (US DOT 1995).

Source: Caltrans 2004

Table 15 Vibration Source Levels for Construction Equipment

	Approximate VdB[1]		
Equipment	**50 feet**	**25 feet**	**10 feet**
Pile Driver (impact)-typical	95	104	116
Pile Driver (impact)-upper range	103	112	124
Pile Driver (sonic)-typical	84	93	105
Pile Driver (sonic)-upper range	96	105	117
Clam shovel drop (slurry wall)	85	94	106
Hydromill (slurry wall)- in soil	57	66	78
Hydromill (slurry wall)- in rock	64	75	85
Vibratory Roller	85	94	106
Large Bulldozer	78	87	99
Caisson drilling	78	87	99
Loaded trucks	77	86	98
Jackhammer	70	79	91
Small Bulldozer	48	58	69

[1]FTA provides equipment vibration levels in approximate vibration levels (Lv VdB) at a distance of 25 feet. These were converted to VdB at other distances using methods provided in *Transit Noise and Vibration Assessment* (US DOT 1995).

Source: FTA 2006

Construction activities could also potentially adversely affect the two historic bungalows located on the project site. For the purpose of this analysis, it is assumed that construction equipment would maintain, on average, a distance of at least ten feet from either bungalow. At such a close distance, typical construction equipment, such as large bulldozers and loaders, would potentially generate vibration levels exceeding 98 VdB, which would exceed the Caltrans threshold for potential damage to historic buildings from continuous/ frequent intermittent vibration sources (96 VdB).

The project will prevent substantial vibrational impacts to the historical structures on-site by retaining a Professional Structural Engineer with experience in structural vibration analysis and monitoring for historic buildings and a Project Historical Architect (PHA) to perform the following tasks:

- Review the project's demolition and construction plans,
- Survey the project site and existing historical bungalows, including geological testing, if necessary, prior to start of construction, and
- Prepare and submit a report to the Director of Community Development to include, at minimum, the following:
    - Any information obtained from the survey identified above
    - Any modifications to the estimated vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure that

vibration levels would remain below levels potentially damaging to the historical buildings on the project site

- Specific mitigation measures to be applied during construction to ensure vibration level limits identified by the Professional Structural Engineer (or Caltrans guidelines, in lieu of specific limits) are not exceeded, including modeling to demonstrate the ability of mitigation measures to reduce vibration levels below set limits. Examples of mitigation that may be applied during demolition or construction include:
  - Prohibiting of certain types of construction equipment
  - Specifying lower-impact methods for demolition and construction, such as sawing concrete during demolition
  - Phasing operations to avoid simultaneous vibration sources
  - Installing vibration measure devices to guide decision making
- A monitoring plan to be implemented during demolition and construction that includes post-demolition and post-construction surveys of the historic bungalows and documentation demonstration that the mitigation measures identified in the report have been applied

At the conclusion of vibration-causing activities, the Structural Engineer and the PHA will survey the historic bungalows on the project site, document any damages, and recommend necessary repairs. The project applicant will be responsible for repair of any vibration-caused damage. Repairs will be undertaken and completed in compliance with the Secretary of Interior's Guidelines for the Treatment of Historic Properties (36 Code of Federal Regulations [CFR] Part 68) and any other applicable codes, such as the California Historical Building Code (24 CFR Part 8).

These measures would prevent substantial vibrational impacts to historical buildings on-site and would reduce vibration resulting from project construction to a level that would not cause structural damage to buildings on or off-site. In addition, construction activities are not permitted between the hours of 7:00 PM and 8:00 AM on weekdays and Saturdays, or at any time on Sundays or City holidays. Therefore, vibration impacts would occur primarily during the day when most residents are away from home and would not interfere with residents' sleep. Impacts due to vibration would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise?

The project site is not located near an airport or private airstrip. The nearest airport or airstrip is the Santa Monica Airport, located approximately 6 miles to the southwest. Therefore, the proposed project would not expose residing or working in the project site to excessive noise levels associated with air traffic. There would be no impact.

NO IMPACT

13 Population and Housing

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)	☐	☐	■	☐
b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere	☐	☐	■	☐
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere	☐	☐	■	☐

a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project would replace three street-facing single-family houses plus four rear units within accessory structures and later additions with 48 studio units and one standalone unit for seniors needing assistance with daily living and/or memory care. The California State Department of Finance (DOF) estimates the 2016 average household size for West Hollywood to be 1.56 persons per unit. As the proposed project would result in a net increase of 42 dwelling units on the project site, it would increase the local population by approximately 66 persons (42 units x 1.56 persons/unit) (DOF 2016a); this is likely a conservative estimate as the proposed project is a senior congregate care facility with small, studio units, most likely to be inhabited by single occupants. The proposed project would also employ individuals to provide medical care and other living services (e.g., dining, administrative support, laundry). However, the proposed project is anticipated to draw upon employees already residing in the regional Los Angeles area and therefore, would not induce population growth in the project area through the provision of new job opportunities.

The Southern California Association of Governments (SCAG) projects the population of West Hollywood will be 41,800 in 2040 (SCAG 2016). According to the City's General Plan EIR (October 2010), the population in General Plan buildout year 2035 is estimated to be 44,182. The current City population is approximately 35,788 according to the most recent (May 2016) DOF estimate (DOF 2016b). Therefore, the proposed project would result in a total population of approximately 35,854 persons (35,788 + 66). The level of population increase associated with the proposed project would be within the SCAG 2040 and City of West Hollywood's 2035 citywide population forecasts. In addition, the proposed project is urban infill so it would not indirectly induce population growth by providing new infrastructure, for example. Therefore, project impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

The proposed project is infill development that would provide 49 residential units on a site currently developed with seven residential units. The proposed project would not displace substantial numbers of existing housing or people and would increase the number of available residential units at the project site. It would not necessitate the construction of replacement housing. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

14 Public Services

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection	☐	☐	■	☐
2 Police protection	☐	☐	■	☐
3 Schools	☐	☐	☐	■
4 Parks	☐	☐	■	☐
5 Other public facilities	☐	☐	■	☐

a-1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services for the City of West Hollywood, which is within LACFD's Battalion 1 service area. The LACFD operates six fire stations within the Battalion 1 area with two fire stations (No. 7 and No. 8) located within West Hollywood. The closest fire station to the project site is Fire Station No. 7, located at 864 N. San Vicente Blvd, approximately 0.2 mile southwest of the project site. As identified in Section 14.04.010 of the WHMC, the City of West Hollywood has adopted the Los Angeles County Title 32 (Fire Code), an amended California Fire Code (2010 edition), and an amended International Fire Code (2009 edition). The City's Fire Code is based primarily on the Los Angeles County Fire Code and supplemented by the other fire codes previously identified. The Fire Code contains regulations related to construction, maintenance and design of buildings and land uses. The proposed project would be required to adhere to all Fire Code requirements.

The proposed project would construct a new senior congregate care facility with 49 residential units on a site with seven residential units. The proposed project would increase the residential density on the project site, which would incrementally increase demand for fire protection services. However, the proposed project is infill development within the existing service area of the LACFD

and population growth due to the proposed project would be within 2035 population forecasts provided in the City's General Plan. According to the 2010 General Plan EIR, forecast development in West Hollywood would not affect response times or service ratios such that new or expanded fire facilities would be needed (West Hollywood 2010a). Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a-2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Law enforcement services in West Hollywood are provided by contract with the Los Angeles County Sheriff's Department (LACSD). Protection services include emergency and non-emergency police response, routine police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement. The LACSD has established the West Hollywood Sheriff's Department and operates two stations: the headquarters for West Hollywood, located at 780 N. San Vicente Boulevard, and a sub-station at Universal City Walk. LACSD has mutual aid agreements with the City of Los Angeles and the City of Beverly Hills police departments.

The proposed project would increase the number of residential units on the project site by 42 units, which would incrementally increase demand for police protections services compared to existing uses. According to the City's General Plan FEIR, the City has a ratio of 3.6 sworn officers per 1,000 residents, which exceeds the average for cities in the Western United States of 1.7 officers per 1,000 residents. Population growth due to the proposed project would be within 2035 population forecasts provided in the City's General Plan. According to the 2010 General Plan EIR, forecast development in West Hollywood would not affect service ratios such that new or expanded police facilities are needed. (City of West Hollywood G2010a). Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a-3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

The proposed project would involve a net increase of 42 residential units on the project site. However, all residential units would be occupied by seniors (i.e., age 55 +) requiring living assistance and would not generate new students for the Los Angeles Unified School District (LAUSD), which provides public school services to West Hollywood residents. Nevertheless, in accordance with State law, the applicant would be required to pay school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." The project would have no environmental impacts resulting from the provision of new or physically altered government facilities to support local school services.

NO IMPACT

a-4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

The proposed project would involve the addition of an estimated 66 residents and would include a landscaped exercise path onsite, as well as indoor activity areas to serve residents' recreational needs. The proposed project would nominally increase the demand for usage of existing parks in the City (see Section XV, *Recreation*). The City assesses Quimby Act and public open space development fees for new residential and non-residential development (WHMC Chapter 19.64). These fees are intended to be used for the acquisition, improvement, and expansion of public parks and/or recreational facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a-5. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

The proposed project would be served by the West Hollywood Library, located approximately 0.4 mile south of the project site at 625 N San Vicente Boulevard. The West Hollywood library belongs to the County of Los Angeles Public Library system, which is financed in part by a dedicated share of property tax from its service area (S. Su, pers. comm. October 2016). Because the proposed project would contribute to the financing of library services through property taxes, the proposed project would mitigate the need for new or physically altered government facilities that support library use. Environmental impacts due to the need for expanded library services would be less than significant.

The proposed project would contribute incrementally to impacts to City public services and facilities, such as storm drain usage (discussed in Section IX, *Hydrology and Water Quality*), public parks (discussed above in this section), solid waste disposal (discussed in Section XVII, *Utilities and Service Systems*), water usage and wastewater disposal (discussed in more detail in Section XVII, *Utilities and Service Systems*). The project's contribution would be offset through payment of fees that are used to fund storm drain improvement, for example, as well as by the project-specific features described in the individual resource section analyses described in this Initial Study. The project's contribution, taking into account existing capacities and assuming compliance with existing ordinances, would be less than significant.

Overall, the proposed project would have less than significant impacts resulting from the provision of new or physically altered government facilities.

LESS THAN SIGNIFICANT IMPACT

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15 Recreation

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated	☐	☐	■	☐
b Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment	☐	☐	■	☐

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

West Hollywood has six parks totaling 15.3 acres of parkland (West Hollywood 2010a). The park closest to the project site is the West Hollywood Park located approximately 0.3 mile south of the project site. Using the City's current population of 35,788, this amounts to a park ratio of 0.43 acres per 1,000 residents. West Hollywood does not specify a park acreage standard. However, the desired standard stated in the 1975 Quimby Act is 3 acres per 1,000 residents. By this standard, West Hollywood is park deficient.

The proposed project would involve a net increase of 42 units, increasing the City population by an estimated 66 residents (see Section XIII, *Population and Housing*). The proposed project would incrementally increase the use of and demand for parks and recreational facilities. However, the proposed project includes onsite recreational amenities, such as a landscaped exercise path and indoor activity areas that would offset some of the demand for West Hollywood park facilities. In addition, the project applicant would be required to pay Quimby Act and Public Open Space Development fees that would be used by the City to acquire parkland as it becomes available and/or to expand and maintain existing recreational facilities (WHMC Chapter 19.64). Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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16 Transportation

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a. Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	■	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	■	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	■
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
e. Result in inadequate emergency access?	☐	☐	■	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	■	☐

a. *Would the project conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?*

b. *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Compared with other residential land-uses, senior developments generate substantially less traffic on a per-unit basis. To analyze the proposed project's traffic impacts, trip generation for the proposed project was estimated using trip generation rates for senior congregate care facilities (item no. 253) provided in the *Trip Generation Manual, 9th Edition* (ITE 2012). The project would generate an estimated 2.15 trips per unit per day and 0.17 trips per unit during the PM peak hour. Thus, the proposed project is expected to generate a total of 105 daily trips, and approximately 8 trips during the PM peak hour (ITE 2012). Because the project would operate 24 hours a day, seven days a week, with various shifts for care staff, it is anticipated that many project-generated trips would occur outside of peak traffic periods.

The City of West Hollywood has set screening thresholds for determining the significance of a proposed project's traffic impacts. Projects that would generate fewer than 500 daily trips and/or 60 peak hour trips have less than significant impacts and do not require a traffic impact study (West Hollywood 2015). Project traffic would fall below these thresholds. Therefore, the proposed project would have less than significant impacts on circulation and congestion.

WHMC Section 19.28.040 provides the minimum off-street parking requirements for new developments. Senior housing and congregate care projects are required to provide 0.5 space per unit for residents and 0.1 space for guests. The proposed project would provide 49 senior residential units and would be required to provide 29 spaces without any incentives. However, the proposed project would be eligible for a 20 percent parking reduction as it is within 750 feet of a transit stop and provides a beauty salon/barber shop onsite, which would reduce the number of required spaces to 24. The proposed project would provide 25 parking spaces and would be consistent with City parking requirements.

The proposed project would not substantially affect roadway levels of service and would comply with applicable parking requirements. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

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

NO IMPACT

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

The proposed project would comply with CBC standards and would not include any design features that would increase circulation hazards. Operation of a senior congregate care facility would not result in roadway uses that would be incompatible with the existing land uses surrounding the area. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project result in inadequate emergency access?

The proposed project would be required to conform to traffic and safety regulations that specify adequate emergency access measures, such as those contained in the City's Fire Code and CBC. The project would involve residential development that would comply with Zoning Code design standards and would not result in any new structures that would hinder emergency access or result in road closures. Adherence to existing state and federal regulations would reduce potential impacts related to emergency access to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

The project site and surrounding area is served by pedestrian, bike, and public transit facilities. The pedestrian network in the vicinity of the project site consists of crosswalks, pedestrian crossings, and sidewalks, and sidewalks exist along both sides of N. Palm Avenue. The area of Santa Monica Boulevard in the vicinity of the project site also provides a Class II bike lane (Los Angeles County 2012). Numerous bus stops are located within 0.3 mile of the project site along Santa Monica Boulevard, including Metro Lines 10/48, 30/330, 2/302, 4, 105, 704, 705, and Cityline X. There are no public transit or bike facilities directly adjacent to the project site. The proposed project would not modify pedestrian, bicycle facilities, or transit facilities or alter access to any existing facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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17 Tribal Cultural Resources

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	■	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe.	☐	☐	■	☐

a., b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is (a) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or (b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1?

Tribal cultural resources are defined in Public Resources Code 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either:

- Included or determined to be eligible for inclusion in the California Register of Historical Resources
- Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

The project site is in an urban setting and is currently developed with seven residential units. Therefore, the site has been previously disturbed and developed and it is unlikely that development of the proposed project would affect a tribal cultural resource listed or eligible for listing in the state or local register of historical resources, or determined by the lead agency to be significant to a

California Native American tribe. In addition, the City of West Hollywood has not received a formal request from a Native American tribe for notification of projects in the area of the project site, which would initiate tribal consultation for the project under AB 52. Therefore, impacts to tribal cultural resources would be less than significant. However, the following measure is recommended should ground-disturbing activities during project construction result in the unanticipated discovery of a tribal cultural resource:

- In the event that archaeological resources of Native American origin are identified during Project construction, a qualified archaeologist should consult with the City to begin Native American consultation procedures. As part of this process, it may be determined that archaeological monitoring may be required; a Native American monitor may also be required in addition to the archaeologist.

LESS THAN SIGNIFICANT IMPACT

18 Utilities and Service Systems

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

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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

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

The sewage collection system within West Hollywood consists of City-owned local sewers and County-owned trunk sewer links. Within the City, there are 39 miles of gravity-driven piping that provides sewer service to every parcel in the City. None of the regional trunk sewers are at or near capacity (West Hollywood 2010). Wastewater from the City is carried to the Hyperion Treatment Plant (HTP) in Playa Del Rey. This wastewater treatment plant provides full secondary treatment (Los Angeles Bureau of Sanitation 2016). The HTP has a dry-weather flow capacity of 450 million gallons per day (MGD) for full secondary treatment and an 850 MGD wet-weather capacity. On average, 275 million gallons of wastewater enters the HTP on a dry weather day (Los Angeles Bureau of Sanitation 2016). Therefore, the current available capacity of the HTP is approximately 175 MGD.

Table 16 Estimated Wastewater Generation

Land Use	Quantity	Generation Factor	Daily Generation (gpd)
Proposed Uses			
Residential- Multi-Unit	48 dwelling units	156 gallons/dwelling unit/day	7,488
Residential-Single Family	1 dwelling unit	260 gallons/dwelling unit/day	260
	1,567[1] SF	300 gallons/1,000 SF/day	470
Total			**8,218**
Existing Uses			
Residential-Single Family	3 dwelling units	260 gallons/dwelling unit/day	780
Residential- Multi-Unit	4 dwelling units	156 gallons/dwelling unit/day	624
Total			(1,404)
Net Wastewater Generation			**6,814**

gpd = gallons per day

SF = square feet

[1]Total reception/medical space: 727 SF (physical therapy area in main facility) + 840 SF (927 Palm Ave, i.e. reception area and auxiliary uses) = 1567 SF

Source: Los Angeles County Sanitation Districts 2016

The proposed project would increase the number of residential units on the project site, which would increase wastewater generation. As shown in Table 16, the proposed project would generate a net increase in site wastewater generation of 6,814 gallons per day. This increase would require approximately 0.004 percent of the HTP's remaining daily capacity. Therefore, the proposed project would not adversely affect the City's wastewater treatment system or result in the construction of new treatment facilities. In addition, the City requires developers to pay a wastewater mitigation

fee to offset any net increases in wastewater flow from new construction and finance any needed improvements to the wastewater conveyance system. Project impacts on wastewater facilities and wastewater treatment would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Storm drain infrastructure in the city is owned and operated by the City of West Hollywood or the County of Los Angeles. The City is a co-permittee under the Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach (Order No. R4-2012-0175, NPDES Permit No. CAS004001, 2012). Under the NPDES permit, the proposed project would be required to prepare a Standard Urban Storm Water Mitigation Plan (SUSMP) and incorporate stormwater mitigation measures into design plans for City review and approval. The proposed project also would comply with Chapter 15.56 and Section 19.20.190 of the WHMC, which provide measures to minimize stormwater runoff and contamination of runoff. With adherence to applicable regulations, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Water service for the project would be provided by the City of Beverly Hills. During average years, Beverly Hills purchases approximately 90 percent of its water supply from the Metropolitan Water District, which is supplied by the State Water Project and the Colorado River. Approximately 10 percent of Beverly Hills' water supply comes from groundwater pumped from the Hollywood Basin totaling approximately 1,500 acre-feet per year (AFY) (City of Beverly Hills, Urban Water Management Plan, 2010; West Hollywood 2010).

The City of Beverly Hills addresses issues of water supply in its Urban Water Management Plan (UWMP). As detailed in the most recent UWMP, adopted in June 2016, the City analyzed supply reliability through 2040 for two scenarios: 1) normal year, and 2) single dry year and multiple dry years. Water demand was projected based on historical per capita water use rates under each of the two hydrological conditions and SCAG 2016 RTP population growth forecasts. For forecasting purposes, water supplies were set to meet water demand with the amount of imported water purchased from MWD varying based on predicted availability under each hydrological scenario. Projected water supplies include supplies from two new projects: development of three new groundwater wells in the Central Basin La Brea Sub Basin (LBSA), and development of shallow groundwater sources from the Hollywood Basin.

Table 17 shows the City of Beverly Hills' projected supply and demand through 2040 under the single dry year and multiple dry year scenario, as well as the proposed project's water use in relation to projected supply/demand. Assuming that water use is 120 percent of wastewater generation, the proposed project would use approximately 8,900 gallons of water per day, or 9.98 AFY, which represents approximately 0.08 percent of projected water supply/demand for the City of Beverly Hills. The UWMP projections utilize SCAG 2016 RTP population forecasts to estimate future demand through 2040 and population growth induced by the proposed project would fall within

2040 SCAG forecasts for West Hollywood (see Section 13, Population and Housing). Therefore, the proposed project's water use is accounted for in UWMP demand projections. The 2015 UWMP states that City of Beverly Hills can reliably meet the projected water demand under each of the hydrological conditions through 2040 (Beverly Hills 2016). Therefore, the proposed project would have a less than significant to water supplies.

Table 17 City of Beverly Hills Projected Water Demand and Supply[1] (2020-2040) and Project-Related Water Demand

Water Sources		2020	2025	2030	2035	2040
Imported Water (AF)		9,659	8,041	8,125	8,211	8,299
Groundwater (AF)	Hollywood Basin	2,000	2,000	2,000	2,000	2,000
Groundwater (AF)	LBSA[2] of Central Basin	–	1,700	1,700	1,700	1,700
Total (AF)		11,659	11,741	11,825	11,911	11,999
Project Water Use (AF)				9.98		
Project Percent of Total Water Supply				0.08		

[1]Projected water demand and supplies are given for the single dry year and multiple dry year hydrological scenario.

[2]LBSA = La Brea Sub Basin

Source: Beverly Hills 2016

In January 2014, California Governor Brown declared a drought State of Emergency and called on Californians to voluntarily reduce water consumption by 20 percent. In the past two years, the City of West Hollywood has intensified efforts to use less water and to promote conservation. The City has launched a water conservation campaign aimed at encouraging residents and businesses to make adjustments in their daily routines in order to conserve water (http://weho.org/city-hall/city-departments/public-works/environmental-services/water-conservation). The City of Beverly Hills has also made efforts to reduce water consumption, including tiered pricing and public outreach. As a result, water use for the City of Beverly Hills' service population decreased a cumulative 19.3 percent in the first nine recording months (June 2015 through March 2016) relative to year 2013 water usage. These efforts would further decrease projected water demand and project impacts on water supplies.

LESS THAN SIGNIFICANT IMPACT

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

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

The City of West Hollywood contracts with Athens Services, a private company, to collect, transport, and dispose of solid waste for all residential and commercial uses (West Hollywood 2010). Solid waste from West Hollywood is collected by Athens Services and taken to a recycling center or resource recovery facility. Food waste is processed and delivered to their compost facility, American Organics, in Victorville. Waste that cannot be recycled or otherwise diverted is disposed of at a landfill. Table 18 summarizes the main destinations of solid waste generated by West Hollywood in 2015, the amount of waste received by each facility, permitted daily throughput and remaining

capacity for each facility; the four facilities included in Table 18 accounted for 95 percent of the City's disposed waste in 2015.

Table 18 Solid Waste Disposal Facilities

Facility	Amount of Waste Received from West Hollywood (tons/year)	Permitted Daily Throughput (tons/day)	Remaining Capacity (cubic yards)
Azusa Land Reclamation County Landfill	5,030	8,000	51,512 (as of 2012)
Chiquita Canyon Sanitary Landfill	1,724	6,000	8,617,126 (as of 2016)
Mid-Valley Sanitary Landfill	17,040	7,500	67,520,000 (as of 2009)
San Timoteo Sanitary Landfill	2,552	2,000	13,605,488 (as of 2012)

Source: CalRecycle 2015

The proposed project would increase the amount of solid waste generated on the project site by 165 pounds (0.08 tons) of solid waste per day during operation, as shown in Table 19. This represents less than 0.0004 percent of the combined permitted daily throughput for the four landfills that receive the majority of the City's waste. Therefore, the project would be served by landfills with adequate capacity to dispose of its operational waste.

The proposed project would also generate waste during construction activities and from demolition of the existing residence at 923 N. Palm Avenue, the two detached garage buildings at 927 and 931 N. Palm Avenue, and the non-original additions at the rear of the two bungalows at 927 and 931 N. Palm Avenue. However, construction and demolition (C & D) waste would be temporary and would comply with the City's Green Building Ordinance, which requires that all projects divert a minimum of 80 percent of all construction and demolition waste away from landfills (WHMC Section 19.20.060(1)). The proposed project would also comply with other applicable state and local regulations, such as CALGreen requirements that new development provide areas for recycling of paper, glass, plastics, metals, and organic waste. As the proposed project would be served by landfills with sufficient capacity to serve the project's disposal needs and would comply with state and local regulations to manage solid waste, the proposed project's impacts due to solid waste would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Table 19 Estimated Solid Waste Generation

Use	Quantity	Daily Solid Waste Generation Rate[1]	Daily Solid Waste Generation (pounds/day)	Annual Solid Waste Generation (pounds/year)
Proposed Uses				
Multi-family Residential	48 units	4 pounds/unit[1]	192	70,080
Single-family Residential	1 unit	10 pounds/unit[1]	10	10
Office	1,520 SF	0.006 pounds/ SF[2]	9	3,329
Total			211	77,059
Existing Use				
Single-family Residential	3 units	10 pounds/unit[1]	30	10,950
Multi-family Residential	4 units	4 pounds/unit[1]	16	5840
Total			181	16,790
Net Waste Generated			165	60,269

Source: CalRecycle 2016. Estimated Solid Waste Generation Rates. As cited by CalRecycle, waste generation rates come from the following sources: 1. City of LA Dept. of City Planning document "EIR Manual for Private Projects", 2. City of LA Bureau of Solid Waste, 1989

19 Mandatory Findings of Significance

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

a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As noted under Section 4, *Biological Resources,* and Section 5, *Cultural Resources,* implementation of the proposed project would have no impact on biological resources and a less than significant impact on two historic bungalows located on the project site, which would be rehabilitated and incorporated into the proposed project. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As described in the discussion of environmental checklist Sections 1 through 18, the proposed project would have no impact or a less than significant impact with respect to all environmental issues. Some resource areas (i.e., agricultural, biological, mineral) were determined to have no impact relative to existing conditions; therefore, the project would not contribute to cumulative impacts for these areas. Other issues (e.g., geology, hazards and hazardous materials) are inherently site-specific in nature and an impact at one site does not create additive effects at another site. In addition, there are no other planned or pending projects in the immediate vicinity of the project site. As such, additive effects would not occur with respect to construction-related traffic, noise, or air pollutant emissions or with respect to long-term impacts such as aesthetics. Finally, because the proposed project would be consistent with the 2035 General Plan and City zoning, its contribution to cumulative impacts is within that forecast in the 2035 General Plan FEIR. As such, cumulative impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in the preceding responses, the proposed project would not result, either directly or indirectly, in adverse hazards related to air quality, hazardous materials or noise. However, under Section 6, Geology and Soils, the project site was found to be potentially exposed to liquefaction risk. The proposed project would be required to comply with provisions for construction in a liquefaction zone listed in the most recently adopted version of the CBC, as well as the City's requirements for development within hazard zones (WHMC Section 19.32.020). The City requires a soils report by a registered civil engineer in areas susceptible to liquefaction. Where liquefaction potential is identified, the report must include mitigating design features that the applicant is required to incorporate into the building design. Compliance with State and City regulations would reduce impacts associated with seismic ground failure to a less than significant level. Compliance with CBC requirements would further ensure impacts associated with liquefaction, settlement, lateral spreading, subsidence, and collapse would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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