

IV. Environmental Impact Analysis

G. Land Use

1. Introduction

This section of the Draft EIR provides an analysis of the proposed Project's potential impacts with regard to land use. Specifically, this section analyzes the proposed Project's consistency with relevant land use plans, policies, and regulations and evaluates the relationship of the proposed Project with surrounding land uses.

2. Environmental Setting

a. Regulatory Framework

(1) Local

At the local level, several plans and regulatory documents guide development within the City of West Hollywood (City), including the West Hollywood General Plan 2035, and the City of West Hollywood Municipal Code (WHMC), which governs land use through specific development and design standards and building and safety codes. The Project Site is also located within the boundaries of the Sunset Specific Plan. Applicable plans and associated regulatory documents/requirements are described below.

(a) City of West Hollywood General Plan

State law requires that every city and county prepare and adopt a General Plan. A General Plan is a comprehensive long-term document that provides principles, policies, and objectives to guide future development and identifies the community's environmental, social, and economic goals. The City adopted the West Hollywood General Plan in 1988, to establish a comprehensive community vision for the City with regard to land use, housing, circulation, open space/conservation, noise, economic development, public safety, community services and governance.

The West Hollywood General Plan 2035 (General Plan) is an update to the 1988 West Hollywood General Plan. The General Plan was adopted in September 2011 and serves as a comprehensive, long-term plan for future development of the City. The General Plan provides a future vision, policies, and proposed actions to guide decision-makers, developers, businesses, and residents in West Hollywood. Furthermore, the

General Plan informs and is implemented by the City's various ordinances, specific plans, programs, and on-going activities, and sets overall City policy and priorities for how to use and manage its physical, social, and economic resources. The General Plan consists of a series of documents that include the seven state-mandated elements: Land Use (Land Use and Urban Form), Circulation (Mobility), Housing, Conservation (Infrastructure, Resources and Conservation), Open Space (Parks and Recreation), Noise, and Safety. In addition, the City's General Plan includes chapters addressing Governance, Historic Preservation, Economic Development, and Human Services.

The Governance Chapter of the General Plan describes the system of governance in the City and provides goals to: (1) ensure that the community is active and engaged in the decision-making process; (2) to maintain the transparency and integrity in West Hollywood's decision making process; and (3) to provide excellent customer service, including utilization of emerging technologies. The Governance Chapter further includes specific policies to achieve these City goals.

The Land Use and Urban Form Chapter of the General Plan presents the General Plan land use designations, the vision for the City's neighborhoods and commercial corridors, and policies to preserve and enhance the quality of life in the community. The land use designations of the Land Use and Urban Form Chapter indicate the intended use of each parcel of land. Land use designations are developed to provide both a vision of the organization of uses in the City and a flexible structure to allow for changes in economic conditions and community visions. In West Hollywood, the land use designations and locations are compatible with the zoning districts found in the Zoning Ordinance. For each land use designation, the uses allowed and the standards of dwelling unit density for residential designations (as measured in dwelling units per acre) and building intensity for commercial designations (as measured in floor area ratio or FAR) are specified. While the General Plan land use designations are broad, the zoning districts include specific allowances and prohibitions of uses; dimensional requirements, such as building setbacks, parking standards; and more refined heights compared to the General Plan. The land use designations are divided into three broad categories—residential, commercial, and public. The designations are intended to protect residential areas from incompatible development, while also allowing for the maintenance and replacement of the aging housing stock. The commercial designations are generally located along the City's corridors and are designed to allow for the existing lower-scale development to evolve into more transit-supportive commercial and mixed-use development. The public designations allow for a wide range of public facilities, including parks, schools, City Hall, and other public uses. New development beyond the base height or density must provide tangible benefits for the community and may be subject to any applicable bonuses described in the Zoning Ordinance. Development standards described in the General Plan are to be considered in conjunction with the Zoning Ordinance, Zoning Map, and applicable state laws.

The Historic Preservation Chapter of the General Plan provides the City's approach to preserving and protecting its cultural resources. The Historic Preservation Chapter's overarching goals are to: (1) expand the base of information on the City's history; (2) continue to identify and evaluate cultural resources; (3) protect cultural resources from demolition and inappropriate alterations; (4) increase the public's awareness of the City's history and cultural resources; (5) promote the preservation of cultural resources through maintenance and rehabilitation incentives and technical assistance; and (6) use historic preservation concepts as tools for economic development. The Historic Preservation Chapter further includes specific policies to achieve these City goals.

The Economic Development Chapter of the General Plan presents the goals and policies to expand the economic diversity and fiscal stability of the community. The Economic Development Chapter describes the existing conditions, key issues and long-term strategies related to economic development in West Hollywood. The economy of West Hollywood is diverse and is centered on the tourism and nightlife, arts and design, and entertainment media industries, as well as general retail and services. The Economic Development Chapter further includes specific goals and policies to achieve this economic diversity.

The Mobility Chapter of the General Plan presents the City's vision for a multi-modal transportation system and includes the required topics of the Circulation Element. The City's mobility strategy is to create a balanced and multi-modal transportation system that meets the needs of the community and to improve the quality of life within West Hollywood, while also serving as an active participant in regional strategies to address regional transportation issues. Therefore, this chapter includes strategies for many different components of the multi-modal transportation system, such as enhancements to the pedestrian and bicycle network, improvements to public transit, land use strategies to improve transit use, transportation demand management, and innovative parking solutions. Together, these strategies are intended to reduce traffic congestion by discouraging the use of single occupancy vehicles on City streets, while creating a more efficient and healthy transportation system.

The Human Services Chapter of the General Plan provides goals and policies for social services, arts and culture, and schools and education. The Human Services Chapter's overarching goals are to: (1) maintain and pursue humane social policies and social services that address the needs of the community; (2) support and encourage arts and cultural in West Hollywood; (3) promote a community with strong social networks and cross-cultural interaction; and (4) support and collaborate with Los Angeles Unified School District (LAUSD) and other educational providers. The Human Services Chapter further includes specific policies to achieve these City goals.

The Parks and Recreation Chapter of the General Plan includes topics required in the Open Space Element and discusses the management and expansion of the City's parks and other community facilities. The Parks and Recreation Chapter's overarching goals are to: (1) improve, enhance, and expand parks throughout the City; (2) provide diverse recreational programs and facilities; and (3) provide high quality, functional, safe, and well-maintained parks, open space, and recreational facilities. The Parks and Recreation Chapter further includes specific policies to achieve these City goals.

The Infrastructure, Resources, and Conservation Chapter of the General Plan describes the City's management and provision of infrastructure resources in a sustainable manner. It covers topics such as water infrastructure and conservation, energy conservation, climate change, storm water, and management of the streets and other public and private infrastructure necessary for a high-quality urban development. This chapter addresses two topics from state-required elements—infrastructure, which is a required topic in the Circulation Element, and conservation of natural resources, which is a required topic in the Conservation Element. This chapter of the General Plan provides background information and policy guidance for these topics, organized as follows: water supply and conservation, energy supply and conservation, green building, climate change, air quality, wastewater infrastructure, stormwater management, recycling and solid waste, transportation infrastructure, and facilities for City operations.

The Safety and Noise Chapter of the General Plan includes a range of topics that impact the health and safety of the community, including police and fire services, emergency management, and noise. It includes the state requirements for the Safety and Noise Elements. The City's tools for protecting public safety include regulating land use planning and other activities, providing police and emergency services, research and monitoring, preparing for potential natural disasters and threats to residents' well-being, community engagement, and enacting other policies that promote public safety and welfare. After discussing statutory requirements for protecting public safety, this chapter organizes policies and background information into the following sections: Environmental Hazards, Noise, Police, and Fire and Emergency Services.

The Housing Chapter of the General Plan includes the state-required Housing Element. The Housing Element includes goals and policies related to the provision of new housing and the preservation of existing housing, including affordable housing. The relevant goals and policies in the General Plan are presented in Table IV.G-1 on page IV.G-17 below as part of the impact analysis of the proposed Project's consistency with the General Plan.

(b) Sunset Specific Plan

The Project Site is located in the Sunset Specific Plan (SSP). Adopted in July 1996, the SSP specifically encompasses the Sunset Boulevard corridor located in the City, known as “The Strip,” and extends for approximately 1.2 miles in an east/west direction. The Sunset Boulevard corridor is bordered by the City of Beverly Hills to the west and the City of Los Angeles to the east. The Sunset Boulevard corridor is regional hub that draws commercial businesses and visitors from the surrounding cities with boutiques, outdoor cafes, specialty stores, gourmet restaurants, hotels, nightclubs, and other entertainment venues.

The SSP supplements the General Plan and the West Hollywood Zoning Code and guides future development for properties located along the Sunset Boulevard corridor. The goals of the SSP are to: (1) preserve the eclectic character of Sunset Boulevard; (2) manage and direct growth; and (3) promote responsible development. The SSP provides land use and development policies, urban design standards, density strategies, and cultural resource guidelines that promote and preserve the unique qualities of the Sunset Boulevard corridor. Specifically, the SSP development guidelines are related to economic development, density and height, urban design, open space, mixed land use, transportation and parking, billboards and art advertising, cultural resources, and arts programs that are intended to preserve the character of Sunset Boulevard.

The SSP is divided into eight geographic areas: 1—Eastern Gateway, 2—Hart Park, 3—Kings to Queens, 4—La Cienega Gateway, 5—Sunset Plaza, 6—Holloway Triangle, 7—San Vicente to Doheny, and 8—West End. Each geographic area map identifies sites, Target Sites, heights, and conceptual designs.

The relevant goals and policies in the SSP are presented in Table IV.G-2 on page IV.G-31 below as part of the impact analysis of the proposed Project’s consistency with the SSP.

(c) West Hollywood Municipal Code

The City’s Zoning Code (Title 19 of the WHMC) implements the goals, objectives, and policies of the General Plan by classifying and regulating the uses of land and structures within the City. The northern portion of the Project Site is currently zoned as part of the SSP, and the southern portion is zoned R4B (Multi-family High Density Residential) and PK (Parking Overlay). Development and land uses within the SSP zoning district are required to comply with the design standards and criteria specified in the SSP.

(d) City of West Hollywood Green Building Program

The West Hollywood Green Building Manual, adopted by the City in June 2007, provides guidance and strategies for all future projects to incorporate sustainable techniques to reduce energy use, improve health, and use resource efficiently. With the adoption of the mandatory Citywide Green Building Program, minimum green building requirements are contained in Section 19.20.060 of the WHMC. The Green Building Program Manual provides descriptions of green building program components, recommendations for the implementation of green design features, and provides a guideline for the review process of green building requirements. Green Building Program requirements include LEED[®] certification¹ for new public buildings; implementation of minimum Green Building requirements; and compliance with the Green Building Point System and preparation of a Green Features manual. This program is discussed in its respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR.

(2) Regional

Regional land use plans that govern the Project area include the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), Compass Growth Vision Report, and Regional Comprehensive Plan (RCP); and the Los Angeles County Congestion Management Program (CMP), which regulates regional traffic issues and is administered by the Los Angeles County Metropolitan Transportation Authority (Metro). In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan (AQMP), which addresses the attainment of state and federal ambient air quality standards throughout the South Coast Air Basin (Air Basin). These plans are described below.

(a) Southern California Association of Governments

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

¹ *Leadership in Energy and Environmental Design (LEED[®]) is a green building certification program that recognizes best-in-class building strategies and practices that aim to help building owners and operators to be environmentally responsible and use resources efficiently. To receive LEED[®] certification, building projects must satisfy pre-requisites and earn points to achieve different levels of certification.*

(i) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

SCAG’s 2016–2040 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016–2040 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.”² The 2016–2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region’s future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill (SB) 375, requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing and environmental planning.³ Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTAs), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life.⁴ HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.⁵ Livable Corridors are arterial roadways where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways. Neighborhood Mobility Areas are areas with roadway networks where Complete Streets and sustainability policies support and encourage replacing single and multi-occupant automobile use with biking, walking, skateboarding, and slow speed electric vehicles. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.⁶ The Project Site is located within an HQTA as designated by the 2016–2040

² SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. iii, adopted April 2016.

³ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 166, adopted April 2016.

⁴ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 2, adopted April 2016.

⁵ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189, adopted April 2016.

⁶ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 76, adopted April 2016.

RTP/SCS.^{7,8} The proposed Project's consistency with the relevant goals and policies in the 2016–2040 RTP/SCS are presented in Table IV.G-3 on page IV.G-39 below as part of the impact analysis of the proposed Project's consistency with the 2016–2040 RTP/SCS.

(ii) Southern California Compass Growth Vision

In an effort to maintain the region's prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting as a whole, SCAG has collaborated with interdependent sub-regions, counties, cities, communities, and neighborhoods in a process referred to by SCAG as Southern California Compass, which resulted in the development of a shared Compass Growth Vision for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG began the Compass program in 2002, spearheaded by the Growth Visioning Subcommittee, which consists of civic leaders from throughout the region. The shared regional vision sought to address issues, such as congestion and housing availability, which may threaten the region's livability.

The underlying goal of the growth visioning effort is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income. To organize the strategies for improving the quality of life in the SCAG region, a series of principles was established by the Growth Vision Subcommittee. These goals are contained in the Growth Vision Report adopted in June 2004. The four principles are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. Decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies also are provided as a way to achieve each of the principles. The proposed Project's consistency with the relevant policies and planning strategies in the Growth Vision Report are presented in Table IV.G-4 on page IV.G-39 below as part of the impact analysis of the proposed Project's consistency with Growth Vision Report.

(iii) Regional Comprehensive Plan

SCAG prepared and issued an updated Regional Comprehensive Plan (RCP) in 2008 in response to SCAG's Regional Council directive in SCAG's 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The RCP is an advisory document that describes future conditions if current

⁷ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77, adopted April 2016.

⁸ Los Angeles County Metropolitan Transportation Authority (Metro), "High Quality Transit Areas—Southwest Quadrant."

trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The RCP incorporates principles and goals of the Compass Growth Vision and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness.

The 2008 RCP replaced SCAG's 1996 Regional Comprehensive Plan and Guide for use in SCAG's Intergovernmental Review process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the RCP is not used in SCAG's Intergovernmental Review process. Rather, SCAG reviews new major regional projects based on consistency with the 2016–2040 RTP/SCS and Compass Growth Vision, described above.⁹ The proposed Project's consistency with the relevant goals and policies in the RCP are presented in Table IV.G-4 on page IV.G-44 below as part of the impact analysis of the proposed Project's consistency with the RCP.

(b) South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan

SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms to federal and state air pollution standards. In conjunction with SCAG, SCAQMD has prepared an AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South Coast Air Basin. Refer to Section IV.B, Air Quality, of this Draft EIR for an analysis of the proposed Project's consistency with the AQMP.

(c) Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Management Program

Metro administers the Los Angeles County Congestion Management Program (CMP), a state-mandated program designed to provide comprehensive long-range traffic

⁹ *Prior to publication of the 2008 RTP, projects considered to be regionally significant based on the SCAG criteria were required to provide an analysis of consistency with the 1996 Regional Comprehensive Plan and Guide goals and policies. However, SCAG now considers the Regional Comprehensive Plan and Guide defunct.*

planning on a regional basis. The CMP, revised in 2010, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. The CMP guidelines specify that those designated roadway intersections to which a project could add 50 or more trips during either the A.M. or P.M. peak hour be evaluated. The guidelines also require the evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. Refer to Section IV.J, Traffic, Access, and Parking, of this Draft EIR, for further discussion of the proposed Project's consistency with the CMP.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is comprised of approximately 20,241 square feet and is currently developed with a 19,670-square-foot, two-story commercial building with surface parking available on the southern portion of the site and 2.5 levels of subterranean parking accessible from the Project Site's only driveway along Hilldale Avenue. The existing building is occupied by a retail store and café on the ground floor and office space and a gym/fitness center on the second floor. A large monument sign is located directly outside the northwest corner of the existing building. Landscaping within the Project Site is limited to ornamental shrubs and small trees planted in concrete planter boxes along Sunset Boulevard and Hilldale Avenue. There are three small ornamental street trees along the northern boundary of the Project Site on Sunset Boulevard and one Canary Island date palm along the western boundary of the Project Site on Hilldale Avenue.

(2) Land Use Designations and Zoning

Pursuant to the City's General Plan, and as shown in Figure IV.G-1 on page IV.G-11, the current land use designation for the Project Site is SSP on the northern approximately 100 feet of the Project Site fronting Sunset Boulevard and R4B on the southern approximately 60 feet of the Project Site.

Similarly, as shown in Figure IV.G-2 on page IV.G-12, the northern portion of the Project Site is currently zoned SSP, and the southern portion is zoned R4B and PK. The SSP designation imposes a height limit of 40 feet and an FAR of 1.5:1. In addition, according to the SSP, the northern portion of the Project Site is located within Geographic Area 7—San Vicente to Doheny, which extends westward from San Vicente Boulevard to Doheny Avenue; this geographic area is further divided into five sites—Sites 7-A through

City of West Hollywood General Plan Land Use Designations

Residential Districts	Residential, Multi-Family High Density	Specific Plan Districts		
<ul style="list-style-type: none"> Residential, Single-Family or Two-Unit Low Density R1A - 25' 2 Stories - 1 du/lot R1B - 25' 2 Stories 2 du/lot of less than 8499 SF 3 du/lot between 8,500 and 11,999 SF 1 add'l du/lot for each 3,500 SF thereafter R1C - 15' 1 Story 1 du/lot 	<ul style="list-style-type: none"> R4A - 35' 3 Stories - 1 du/872 SF of lot area R4B - 45' 4 Stories - 1 du/872 SF of lot area R4B-C - 45' 4 Stories - 1 du/872 SF of lot area w/maximum 1.0 FAR commercial 	<ul style="list-style-type: none"> SSP - Sunset Specific Plan MSP - Movietown Specific Plan PDCSP - Pacific Design Center Specific Plan 		
<ul style="list-style-type: none"> Residential Low Density R2 - 25' 2 Stories 2 du/lot of less than 4000 SF 3 du/lot between 4000 and 7999 SF 4 du/lot between 8000 and 9999 SF plus 1 additional unit/lot for each 2000 SF or fraction thereof in excess of 9999 SF 	<th>Commercial Districts</th> <th>Density (FAR)</th> <th>Height</th>	Commercial Districts	Density (FAR)	Height
<ul style="list-style-type: none"> Residential, Multi-Family Medium Density R3A - 25' 2 Stories - 1 du/1210 SF of lot area R3B - 35' 3 Stories - 1 du/1210 SF of lot area R3C - 45' 4 Stories - 1 du/1210 SF of lot area R3C-C - 45' 4 Stories - 1 du/1210 SF of lot area w/maximum 1.0 FAR commercial 	<ul style="list-style-type: none"> CN1 - Commercial, Neighborhood 1 CN2 - Commercial, Neighborhood 2 CC1 - Commercial, Community 1 CC2 - Commercial, Community 2 CA - Commercial, Arterial CR - Commercial, Regional Center 	<ul style="list-style-type: none"> 1.0 1.0 1.5 2.0 2.5 3.0 	<ul style="list-style-type: none"> 25 ft 25 ft 35 ft 45 ft 60 ft 90 ft 	
		<th>Other Districts</th> <td>du = Dwelling Unit</td>	Other Districts	du = Dwelling Unit
		<ul style="list-style-type: none"> Transit Overlay PF - Public Facilities Mixed-Use Incentive Overlay Zone 		



Figure IV.G-1
Land Use Designations on the Project Site

City of West Hollywood Zoning Districts

Residential Zoning Districts

- Residential, Single-Family or Two-Unit Low Density**
- R1A - 25' 2 Stories - 1 du/lot
 - R1B - 25' 2 Stories - 2 du/lot of less than 8499 SF
 - R1C - 15' 1 Story - 1 du/lot
- Residential, Low Density**
- R2 - 25' 2 Stories - 2 du/lot of less than 4000 SF
 - 3 du/lot between 4000 and 7999 SF
 - 4 du/lot between 8000 and 9999 SF
 - plus 1 additional unit/lot for each 2000 SF or fraction thereof in excess of 9999 SF
- Residential, Multi-Family Medium Density**
- R3A - 25' 2 Stories - 1 du/1210 SF of lot area
 - R3B - 35' 3 Stories - 1 du/1210 SF of lot area
 - R3C - 45' 4 Stories - 1 du/1210 SF of lot area
- Residential, Multi-Family High Density**
- R4A - 35' 3 Stories - 1 du/872 SF of lot area
 - R4B - 45' 4 Stories - 1 du/872 SF of lot area

Combination Zones

- SSP - Sunset Specific Plan
- SSP CN - Sunset Specific Plan Commercial, Neighborhood
- SSP R2 - Sunset Specific Plan Residential, Low Density
- SSP R4 - Sunset Specific Plan Residential, Multi-Family High Density

Commercial and Public Zoning Districts

	Density (FAR)	Height
CN1 - Commercial, Neighborhood 1	1.0	25 ft/2 stories
CN2 - Commercial, Neighborhood 2	1.0	25 ft/2 stories
CC1 - Commercial, Community 1	1.5	35 ft/3 stories
CC2 - Commercial, Community 2	2.0	45 ft/4 stories
CA - Commercial, Arterial	2.5	60 ft/5 stories
CR - Commercial, Regional Center	3.0	90 ft/8 stories

Overlay Zoning Districts

- Mixed-Use Incentive Overlay Zone
- PK - Parking Overlay
- Development Agreement Overlay
- Commercial-Only Overlay Zone

Other Zoning Districts

- PDCSP - Pacific Design Center Specific Plan
- PF - Public Facilities
- MSP - Movietown Specific Plan

du = dwelling unit

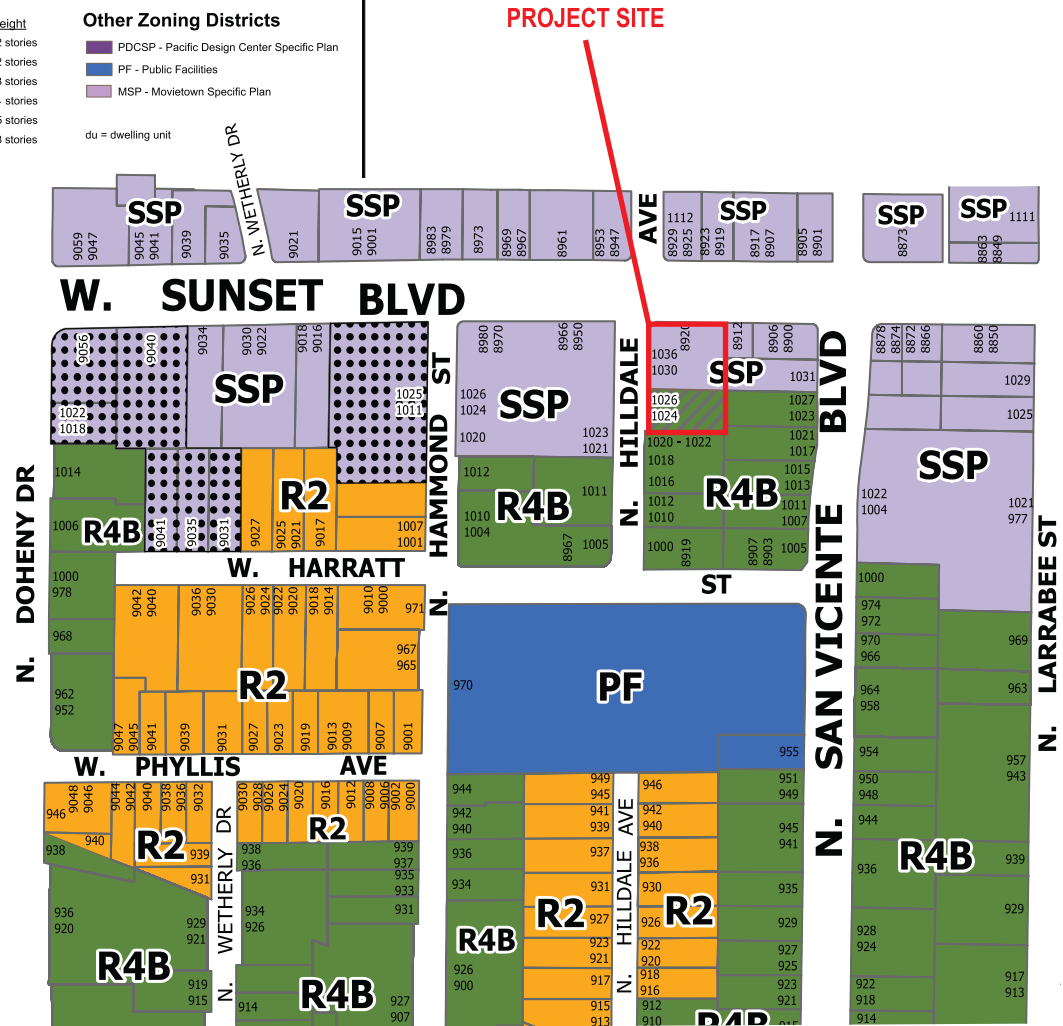


Figure IV.G-2
Zoning Designations on the Project Site

7-E. The northern portion of the Project Site is located in Site 7-B, which is divided into two SSP Geographic subareas; 7-B East and 7-B West, but it is not specifically designated as a “Target Site” (i.e., sites that have been identified as suitable for increased density and/or height). As determined by the WHMC, the SSP zoning permits commercial uses, neighborhood uses, and low- and high-density residential uses. Development and land uses within the SSP zoning district are required to comply with the design standards and criteria specified in the SSP.

The R4B zoning district allows high-density multi-family housing, including apartments and condominiums and is consistent with the R4B residential land use designation of the General Plan. The R4B designation allows for densities of 50 units per acre (one dwelling unit per 872 square feet of lot area) with a maximum building height of four stories and 45 feet in height and no maximum FAR.

The PK overlay zoning district identifies sites within residential zoning districts where non-residential parking lots and parking structures may be established or maintained. The PK zoning allows for the development of any land use normally permitted in the primary zoning district, in compliance with the permit requirements and development standards of the WHMC. The PK overlay zoning district can be combined with any residential zoning district located contiguous to a commercially zoned site, and the City applies the PK zone to properties it has determined are suitable to provide commercial serving parking and, thus, are integral to adjacent commercially zoned parcels.

(3) Surrounding Uses

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Draft EIR, the Project Site is located in a highly urbanized area with a mix of commercial and residential uses, which include office, multi-family and single-family residential, retail, hotel, institutional, restaurant, night club and entertainment-related uses.

Land uses surrounding the Project Site include one-, two-, and three-story commercial and office structures to the north (designated and zoned SSP); surface parking areas and one-story commercial structure to the east (designated and zoned SSP), the Sunset Oil Gas Station at the northwestern corner of Sunset Boulevard and San Vicente Boulevard (designated and zoned SSP); one-, two-, and three-story residential uses to the east (designated and zoned SSP and R4B); one-, three-, and four-story residential uses to the south (designated and zoned R4B); and graded lots to the west (designated and zoned SSP), which are being developed into a six-story mixed-use structure with hotel, restaurant, bar, and spa uses.

3. Project Impacts

a. Methodology

The analysis of potential land use impacts considers both the consistency of the proposed Project with applicable plans, policies, and regulations that govern land use on the Project Site and the compatibility of proposed uses with surrounding land uses. The determination of consistency with applicable land use policies and regulations is based upon a review of the previously identified planning and zoning documents and ordinances that regulate land use or guide land use decisions pertaining to the Project Site. Projects are considered consistent if they are compatible with the general intent of the General Plan provisions, zoning regulations, specific plan, and general land use policies. The compatibility analysis evaluates whether the proposed Project would be compatible in terms of use, size, density, intensity, scale, and other physical and operational factors with surrounding land uses and development. The compatibility analysis is based on aerial photography, land use maps, and field surveys and an analysis of the site plans for the proposed Project presented in Section II, Project Description, of this Draft EIR. In the determination of the significance of a land use impact, consideration is given to the type of land uses within the area, the extent an area would be impacted, the nature and degree of impacts, and the extent to which existing communities or land uses would be disrupted, divided, or isolated by the proposed Project. State CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans that the decision-makers should address.

A project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.¹⁰ More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan. If a project is determined to be inconsistent with specific objectives or policies of a land use plan, but not inconsistent overall with the land use goals of that plan and would not preclude the attainment of the primary intent of the plan, that project would be considered generally consistent with the plan on an overall basis.

¹⁰ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with respect to land use and planning. Therefore, in the context of these questions from the CEQA Guidelines, a significant impact related to land use and planning would occur if the proposed Project would:

- Physically divide an established community.
- 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.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impacts on the environment pursuant to CEQA ordinarily focus on changes in the physical environment. In itself, an inconsistency between a project and a plan is a policy or legal determination rather than a physical impact on the environment. Where a plan or policy is adopted for the sole purpose of avoiding or mitigating a physical impact on the environment, an inconsistency may be evidence that the proposed Project may result in a significant effect on the environment.¹¹

With regard to the above questions from Appendix G of the CEQA Guidelines, as evaluated in Section VII, Effects Found Not to Be Significant, of this Draft EIR, the proposed Project would not physically divide, disrupt, or isolate an established community. Additionally, the Project Site is located in a highly urbanized area, and no habitat conservation plans or natural community conservation plans apply to the City. Therefore, no impacts with respect to these issues would occur, and no further analysis of these issues is provided herein.

c. Project Design Features

No specific project design features beyond those discussed in Section II, Project Description, of this Draft EIR are proposed with regard to land use.

¹¹ *Stephen L. Kosta and Michael H. Zischke, Practice Under the California Environmental Quality Act, Continuing Education of the Bar, October 2006, Chapter 12, Section 12.36, pp. 611–612.*

d. Analysis of Project Impacts

(1) Consistency with Local Plans and Applicable Policies

Various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the proposed Project's consistency with the goals of the General Plan and the SSP, and the requirements of the WHMC. Based on the analysis provided below, the proposed Project would be consistent with the applicable goals of these local plans and requirements of the WHMC that govern development on the Project Site. As such, land use impacts associated with the proposed Project would be less than significant, and no mitigation measures would be required.

(a) City of West Hollywood General Plan

The proposed Project's general consistency with the applicable goals and policies set forth in the General Plan is analyzed in Table IV.G-1 on page IV.G-17.

(i) Land Use and Urban Form Element

As detailed further in Table IV.G-1, the proposed Project would support the relevant goals of the Land Use Element Chapter. First and foremost, the proposed Project would contribute to the maintenance of Sunset Boulevard as a regional, national, and international destination for entertainment, and the primary economic engine to the City (LU-15). The proposed Project would also: (1) maintain an urban form and land use pattern that enhances the quality of life and meets the community's vision for its future (LU-1); (2) provide for an urban environment oriented and scaled to the pedestrian (LU-4); (3) encourage a high level of quality in architecture and site design (LU-5); (4) create a network of pedestrian-oriented, human-scale, and well-landscaped streets (LU-6); (5) seek to expand urban green spaces and sustainable landscapes (LU-7); (6) maintain and enhance residential neighborhoods (LU-8); and (7) maximize the iconic urban design value and visual creativity in West Hollywood (LU-16).

The proposed Project would serve as the U.S. West Coast home of the Arts Club, a historic private membership club originally founded in London that has served as a forum and meeting place for those involved in the arts. The proposed Project would contain a mix of commercial uses accessible to members of the Arts Club and their guests, including restaurants, lounges, bars, 15 guestrooms, screening rooms, a supper club, fitness center/spa facilities, and a rooftop deck that would include a swimming pool, changing rooms, and a bar and dining space. In addition, the first four levels of the building would be open to the public and would include ground floor retail and an art gallery, with creative office space located on Levels 2 through 4. These uses would serve to enhance and support the community's vision for the Sunset Strip as a high-quality international

**Table IV.G-1
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035**

Goal/Policy	Analysis of Project Consistency
Land Use and Urban Form Element	
<p>Goal LU-1: Maintain an urban form and land use pattern that enhances quality of life and meets the community’s vision for its future.</p>	<p>Consistent. The underlying purpose of the proposed Project is to maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space. These uses complement the variety of existing uses along Sunset Boulevard and would contribute to and expand the diversity of entertainment and cultural venues along the Sunset Strip and would enhance and support the community’s vision of the Sunset Strip as a high-quality international entertainment destination. The proposed Project would add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment. In particular, the proposed Project would provide new cultural uses to enhance the area, including an art gallery and a membership-based social venue (the Arts Club), which would contribute to the community’s quality of life and enhance its character by adding entertainment and creative arts-related establishments to the Project Site. In addition, the ground level of the proposed building would incorporate a landscaped community plaza and pedestrian promenade, with hedges, trees and planters to enhance the pedestrian experience along this portion of Sunset Boulevard and engage the street and the neighborhood community. Furthermore, the proposed Project would be located in an area well-served by public transit with stops along Sunset Boulevard, San Vicente Boulevard, Santa Monica Boulevard, and Melrose Avenue, the nearest of which are located approximately one block of the Project Site at the intersections of Sunset Boulevard and Hammond Street to the west and Sunset Boulevard and San Vicente Boulevard to the east within 200 feet of the Project Site. Therefore, the proposed Project would add to the diversity of visitor-serving uses available in the area through its provision of publicly-accessible retail and art gallery uses. The proposed Project would also provide bicycle parking in compliance with the requirements of the WHMC. As such, the proposed Project would provide a new mixed-use development (commercial, retail, restaurant, and entertainment) along a corridor that is well-served by transit and is already functioning as a commercial/entertainment center for the surrounding neighborhoods and the community. Accordingly, development of the proposed</p>

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
	Project would maintain an urban form and land use pattern that would enhance the quality of life and meet the community's vision for its future.
<p>Goal LU-2: Maintain a balanced mix and distribution of land uses that encourage strategic development opportunities and mobility choices within the City.</p>	<p>Consistent. As discussed in the consistency analysis for Goal LU-1 above, the proposed Project would provide a new mixed-use development (commercial, retail, restaurant, and entertainment) along a corridor that is well-served by transit. More specifically, public transit is provided by Metro, including eight Metro bus lines (five local bus lines, two limited bus lines, and one Rapid bus line) and two CityLine routes (Blue Route and Orange Route) with stops along Sunset Boulevard, San Vicente Boulevard, Santa Monica Boulevard, and Melrose Avenue. The nearest public transit stops are located approximately one block of the Project Site at the intersections of Sunset Boulevard and Hammond Street to the west and Sunset Boulevard and San Vicente Boulevard to the east within 200 feet of the Project Site. In addition, the proposed Project would be located in an area that is already functioning as a commercial/entertainment center to encourage mixed-use development opportunities in an area with multiple mobility choices within the City.</p>
<p>Goal LU-4: Provide for an urban environment oriented and scaled to the pedestrian.</p>	<p>Consistent. The ground level of the proposed building would incorporate a landscaped community plaza and pedestrian promenade along Sunset Boulevard and Hilldale Avenue, with hedges, trees and planters incorporated, to enhance the pedestrian experience along this portion of Sunset Boulevard. In addition, valet services and parking would be fully enclosed, with access via Hilldale Avenue only with limited public view so as not to detract from the pedestrian experience on Sunset Boulevard. Minimizing vehicle intrusions would enhance and activate the walkability of the Project Site's street frontage along the Sunset Strip. Uses on the ground floor level would be oriented and scaled to the pedestrian and attract visitors and pedestrian traffic to the Site by establishing a public art gallery and retail shops. These ground floor uses would support and enhance the pedestrian experience along Sunset Boulevard as well as the overall urban environment. In addition, the Project Site itself would serve to enable visitors, guests, employees, and Arts Club Members access to mass-transit opportunities available within the vicinity, thereby reducing the necessity to use a vehicle.</p>
<p>Goal LU-5: Encourage a high level of quality in architecture and site design in all construction and renovation of buildings.</p>	<p>Consistent. The proposed Project's unique architectural features, including dynamic building façades that reflect and expose the project program, would result in a building</p>

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
	<p>with a high level of quality in architecture and site design. The exterior design would be streamlined and made transparent, with aluminum perforated panels that would be individually water-jet cut using software to optimize the building skin. Complementing the streamlined exterior design, terraces and pockets of the façade would utilize decorative panels that reference vintage art deco styles of historic Hollywood. The building skin system would incorporate vertical fins that would visually appear to undulate and rotate although fixed in position. This element of the design of the façade is intended to create subtle, wave like impressions. Upper levels of the proposed Project would feature open-air terraces. The ground level would be comprised of a landscaped community plaza and pedestrian promenade, with hedges, trees and planters that engages the streets and neighborhood community, while upper levels would engage outdoor terraces that would be visually interactive with the street. In addition, the proposed Project would be designed using methods and materials that would achieve a high level of sophistication and modern style on the building exterior. By removing the existing surface parking on the Project Site and locating all parking within an underground and partial subterranean parking structure, the proposed Project would support the policies underlying this Goal by discouraging surface parking lots. Finally, the new building would incorporate environmentally sustainable building features and materials that do not require excessive maintenance.</p>
<p>Goal LU-6: Create a network of pedestrian oriented, human-scale and well-landscaped streets and civic spaces throughout the City.</p>	<p>Consistent. See consistency analysis for Goal LU-4 above.</p>
<p>Goal LU-15: Maintain Sunset Boulevard as a regional, national, and international destination for entertainment, and the primary economic engine of the City.</p>	<p>Consistent. The proposed Project would be developed in and complement an area characterized by widely-known destination hotels, restaurants, retail establishments, bars, night clubs, and music venues within two blocks of the Project Site, including The Roxy Theatre, Whisky A Go Go, and the Viper Room. The addition of the Arts Club, along with the proposed Project's mix of commercial uses and its proposed art gallery to this portion of Sunset Boulevard would contribute to the character of the Sunset Strip as a regional, national, and international destination for entertainment and key economic hub of the City. The addition of new creative offices, restaurant and retail space, art gallery and entertainment uses, bars, guestrooms, and fitness and spa facilities, would help to support the economic future and vitality of Sunset Strip and supply the area with greater employment options. Finally, the proposed Project would add to the eclectic</p>

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
	urban environment of Sunset Boulevard by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment.
Goal LU-16: Maximize the iconic urban design value and visual creativity of signage in West Hollywood.	Consistent. The proposed Project would add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment. Proposed signage would include monument or mounted Project identity signage and general ground-level wayfinding pedestrian signage, as permitted by the WHMC.
Goal LU-17: Ensure that on-site signs are an asset to the City.	Consistent. The City has the principal responsibility for approving the proposed Project, including Project design. Prior to approval, the City would review the design of on-site signs to ensure compliance with the requirements of the WHMC and that on-site signs are consistent with other signage in the area and an asset to the City.
Historic Preservation Element	
Goal HP-3: Protect cultural resources from demolition and inappropriate alterations.	Consistent. As evaluated in Section VII, Effects Found Not to Be Significant, of this Draft EIR, the existing building on-site is not considered a cultural resource, and no known cultural resources would be affected by the proposed Project. Nonetheless, the proposed Project would be required to comply with regulatory standards as set forth in Section 21083.2 of the California Public Resources Code (PRC) and Section 15064.5(c) of the CEQA Guidelines, including a determination of whether any such potential unique archaeological resource would be preserved in place or left in an undisturbed state. Compliance with these regulatory standards would ensure the appropriate treatment and handling of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities and protection of these resources from destruction. Therefore, potential impacts to these resources would remain less than significant.
Economic Development Element	
Goal ED-1: Maintain a diverse and resilient economy.	Consistent. As discussed in the consistency analysis for Goal LU-15 above, the proposed Project would accommodate the U.S. West Coast home of the Arts Club, a membership club founded in London in 1863. The Arts Club was a hub of the arts in 19th-century London and continues to promote art, architecture, fashion, film, literature, music, performance, photography, science, theatre, and television/media to this day. Accordingly, the proposed Project would contribute to supporting the arts and cultural events in West Hollywood. In addition, the

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
	proposed Project would include retail spaces and an art gallery, creative office space, restaurants, lounges and bars, private dining areas, dining terraces, a supper club, 15 guest rooms, fitness room/spa, and a pool, changing rooms, sun deck, and a bar on the roof top. These various uses would all serve to diversify the economic base of the City, increase employment opportunities, support the economic future and vitality of the City, and enhance commercial activity. The proposed Project would strengthen the economic vitality of the Site by redeveloping and revitalizing an underutilized site in the City.
Goal ED-2: Expand the City's tax base to support fiscal stability.	Consistent. See the consistency analysis for Goals LU-15 and ED-1 above.
Goal ED-5: Maintain West Hollywood's status as a regional hub and innovator in the fashion, arts, and design sector.	Consistent. See the consistency analysis for Goals LU-15 and ED-1 above.
Goal ED-6: Provide citywide access to neighborhood-serving retail and services.	Consistent. See consistency analysis for Goal LU-15 above.
Mobility Element	
Goal M-3: Maintain and enhance a pedestrian-oriented City.	Consistent. See consistency analysis for Goals LU-1 and LU-4 above. In addition, the proposed Project is located in a designated transit priority area on an infill site and constitutes an "employment center project" under CEQA. The proposed Project's characteristics (e.g., its location, proximity to transit, access to other nearby destinations, pedestrian connections, bicycle amenities, etc.) would encourage visitors, guests, employees, and members of the Arts Club to use non-auto modes of transportation and reduce transportation related impacts.
Goal M-8: Manage parking supply to serve residents, businesses and visitors.	Consistent. As evaluated in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, the proposed Project's peak parking demands would be accommodated within the proposed Project's on-site supply of 354 parking spaces. In addition, the proposed Project would implement Project Design Feature J-2, which involves a Parking Management Plan, to manage peak parking demands to avoid potential parking impacts on the street network and surrounding community.
Human Services Element	
Goal HS-2: Support and encourage arts and culture in West Hollywood.	Consistent. The proposed Project would accommodate the U.S. West Coast home of the Arts Club, which would continue to promote art, architecture, fashion, film, literature, music, performance, photography, science, theatre, and television/media to this day since its founding

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
	in 1863. In addition, the proposed Project would include a publicly-accessible art gallery on the ground floor level to support and encourage arts and culture in West Hollywood.
Parks and Recreation Element	
Goal PR-1: Improve, enhance, and expand parks throughout the City.	Consistent. Section 19.64.020 of the WHMC requires applicants for new development within the City to pay Public Open Space fees for non-residential development in the amount set by the City's Fee Resolution. ¹² In addition, the proposed Project would remove the existing building and surface parking on-site and replace a portion of such area with a landscaped community plaza on the ground level, thereby increasing the amount of publicly-accessible open space on-site.
Infrastructure, Resources, and Conservation Element	
Goal IRC-3: Reduce water use and ensure a long-term water supply.	Consistent. The proposed Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the West Hollywood Green Building Ordinance and the California Green Building Standards Code (CALGreen) to reduce water usage and help minimize the impact on the water supply and infrastructure. With respect to water usage, the design flowrate of Project fixtures would be more efficient than the CALGreen flowrate. While the proposed Project is projected to consume more water than 10 dwelling units, as discussed in Section IV.K.1, Utilities and Service Systems-Water Supply and Infrastructure, adequate water supplies are available from the City of Beverly Hills during average year, single-dry year, and multiple-dry years through 2040 (the City of Beverly Hills' planning horizon under the 2015 Urban Water Management Plan). These projections account for residential and commercial growth within the City of Beverly Hills service area, which includes the Project Site. As further discussed therein, the City of Beverly Hills is projected to have adequate water supplies to serve the 36 related projects in its service area in addition to the proposed Project. Therefore, adequate water supplies are available to serve the proposed Project through the 2040 planning horizon.

¹² *City of West Hollywood, City of West Hollywood General Plan Final EIR, October 2010.*

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
<p>Goal IRC-4: Reduce the total and per capita amount of energy used in the City.</p>	<p>Consistent. The proposed Project has been designed to incorporate environmentally sustainable building features and construction protocols required by the West Hollywood Green Building Ordinance and CALGreen. In addition, the proposed Project would comply with the requirements of the Title 24 of the CCR, which establishes building energy efficiency standards and would be designed to achieve a LEED Gold standard equivalency. These standards would reduce energy and help minimize the impact on natural resources and infrastructure. Specific measures that the proposed Project may implement to achieve LEED Gold status include, but are not limited to, shading and ventilation, installation of tankless water heaters, installation of solar panels, and use of energy star lighting.</p> <p>In addition, as discussed in Section IV.K.4, Utilities and Service Systems—Energy, of this Draft EIR, the proposed Project would provide the community greater proximity to neighborhood services and jobs that would be well-served by existing public transportation, including bus lines. Therefore, the proposed Project's location in proximity to a various public transportation opportunities would minimize transportation fuel consumption through the reduction of vehicle trip miles traveled.</p>
<p>Goal IRC-7: Improve air quality and reduce emissions of air pollution.</p>	<p>Consistent. As discussed in Section IV.B, Air Quality, of this Draft EIR, the proposed Project would incorporate project design features to support environmental sustainability. While these features are designed primarily to reduce GHG emissions, they would also serve to reduce criteria pollutant emissions and improve air quality. In particular, the proposed Project would achieve 90 points in the City's Green Points System, which exceeds the 60 points required for compliance, and would achieve Leadership in Energy and Environmental Design (LEED) Gold, or would otherwise satisfy equivalent green building standards. In addition, the proposed Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles traveled. Accordingly, the proposed Project would not exceed any SCAQMD thresholds during construction and operation, which would help improve overall respiratory health for residents in West Hollywood.</p>
<p>Safety and Noise Element</p>	
<p>Goal SN-1: Reduce injury and damage from natural hazards.</p>	<p>Consistent. As discussed in Section VII, Effects Found Not to Be Significant, of this Draft EIR, the proposed Project is not located in a designated flood hazard zone</p>

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
	<p>and is not prone to seiches, tsunamis, or mudflows. Furthermore, the Project Site is not within an area designated by the City as a very high, high, or moderate wildland fire hazard zone. These hazards are unlikely to cause injury or damage at the Project Site.</p> <p>The most likely natural hazard at the Project Site is a seismic event, such as an earthquake. As discussed in Section IV.C, Geology and Soils, of this Draft EIR, the proposed Project would comply with all applicable policies and regulations related to natural seismic hazards. Additionally, the proposed Project would fully implement the recommendations of the design level geotechnical report that would ensure building safety. These measures would reduce injury and damage from seismic events.</p>
<p>Goal SN-2: Minimize exposure to hazardous materials.</p>	<p>Consistent. As discussed in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions, thus minimizing exposure to hazardous materials. In addition, applicable laws and regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. Adherence to these requirements would minimize the public's exposure to hazardous materials.</p>
<p>Goal SN-5: Create a healthy physical environment related to noise.</p>	<p>Consistent. As discussed in Section IV.H, Noise, of this Draft EIR, the estimated noise levels from the outdoor uses, including, but not limited to, dining terraces and pool bar, would be below the significance threshold at all off-site noise-sensitive receptors (including the immediately adjacent multi-family residential building to the south). As such, noise impacts from the proposed Project's outdoor dining and pool bar would be less than significant without mitigation measures.</p>
<p>Goal SN-7: Utilize law enforcement, fire protection, and emergency medical services in a proactive and preventative way.</p>	<p>Consistent. As discussed in Section IV.I.1, Public Services—Sheriff Protection, of this Draft EIR, the proposed Project would include various project design features to ensure safety within and immediately surrounding the Project Site. More specifically, Project Design Feature I.1-2 would establish access controls in the forms of private 24/7 on-site security and an Internet Protocol (IP) based security camera system. Project Design Feature I.1-3 would establish member and guest access control throughout the proposed Project; various points throughout the building would be access-controlled, including, but not limited to, the loading dock, elevator cabs, emergency exit doors, security room, storage areas, swimming pool, and roof access. Project Design Features</p>

Table IV.G-1 (Continued)
Project Consistency with Applicable Goals of the West Hollywood General Plan 2035

Goal/Policy	Analysis of Project Consistency
	<p>I.1-4 and I.1-5 would establish sufficient lighting to maximize visibility of building entries, walkways, and parking, and reduce areas of concealment and enhance visual transparency to ensure public safety. These proactive measures are intended to reduce the need for police protection services on-site.</p> <p>Similarly, as discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, all areas of the building would be covered by a hydraulically designed automatic sprinkler system. These proactive measures are intended to reduce the need for fire protection services on-site.</p>
<p>Source: <i>Eyestone Environmental, 2017.</i></p>	

entertainment destination, including widely-known night clubs and music venues, such as The Roxy Theatre, Whisky A Go Go, and the Viper Room, along with the numerous hotels, restaurants, retail establishments, and bars located within the immediate vicinity of the Project Site. In addition, the proposed Project would add to the eclectic urban environment by creating a building that enhances the Sunset Boulevard experience and its dynamic urban environment that is characterized by these widely-known entertainment and leisure destinations by redeveloping the Project Site with a new mixed-use building, including retail uses, an art gallery, dining areas, lounges and bars, screening rooms, guest rooms, fitness/spa facilities, an outdoor pool, and a historically-renowned international social membership club, all contained within a vibrant vertical campus with a distinctive design that stimulates visual interest. Development of the proposed Project would support a broad range of retail businesses, employment opportunities, cultural and entertainment venues, and other urban uses within the City. Notably, the proposed Project would provide for new cultural uses unique for the area, including an art gallery and a membership-based social venue (the Arts Club), which would contribute to the City's economy and enhance its character.

The proposed Project's design would incorporate unique architectural features, including dynamic building façades that reflect and expose the project program. The building skin system would be comprised of vertical fins that would visually appear to undulate and rotate although fixed in position. This element of the design of the façade is intended to create subtle, wave like impressions. Further transparency and light transmittance would be achieved utilizing perforated panels along with the open-air terraces on the upper levels of the building. The building's façade would also utilize decorative panels that reference the vintage art deco styles of historic Hollywood. In

addition, the massing, scale, placement, and height of the proposed Project is designed to reflect and be consistent with the massing, scale, and height of nearby development along the Sunset Strip. The ground level of the building would incorporate a landscaped community plaza and pedestrian promenade, with hedges, trees and planters, and the upper levels of the building would include outdoor terraces that would be visually interactive with the street. Parking would be fully enclosed, with access via Hilldale Avenue only with limited public view so as not to detract from the pedestrian experience on Sunset Boulevard. The proposed Project's parking system would utilize an innovative and technologically-advanced automated system, which would be almost entirely valet-only, allowing for streamlined and efficient drop-off and pick-up parking services for visitors and guests.

Furthermore, the proposed Project, which would provide new commercial, retail, restaurant, and entertainment uses, would be located in an area well-served by public transit provided by Metro, including eight Metro bus lines (five local bus lines, two limited bus lines, and one Rapid bus line) and two CityLine routes (Blue Route and Orange Route) with stops along Sunset Boulevard, San Vicente Boulevard, Santa Monica Boulevard, and Melrose Avenue. The nearest public transit stops are located approximately one block of the Project Site at the intersections of Sunset Boulevard and Hammond Street to the west and Sunset Boulevard and San Vicente Boulevard to the east within 200 feet of the Project Site. In addition, the proposed Project would be located along a corridor that is already functioning as a commercial/entertainment center to encourage mixed-use development opportunities in an area with multiple mobility choices within the City.

Therefore, the proposed Project would be consistent with the applicable goals set forth in the General Plan Land Use and Urban Form Element Chapter.

(ii) Historic Preservation Element

As detailed in Table IV.G-1 on page IV.G-17, the proposed Project would support the goal (Goal HP-3) of the General Plan Historic Preservation Element Chapter, which focuses on the protection of cultural resources. As discussed in Section VII, Effects Found Not to be Significant, of this Draft EIR, the existing building on the Project Site is not considered a cultural resource, and no known cultural resources would be affected by the development of the proposed Project. In addition, the proposed Project would adhere to all applicable regulations to ensure potential impacts to previously unidentified archaeological and paleontological resources would be less than significant. Therefore, the proposed Project would be consistent with the applicable goal set forth in the General Plan Historic Preservation Element Chapter.

(iii) Economic Development Element

The proposed Project would support the relevant goals of the General Plan Economic Development Element Chapter, which focus on: (1) maintaining a diverse and resilient economy; (2) expanding the City's tax base by supporting the City's major revenue-generating industries, including the arts/entertainment and tourism; (3) maintaining the City's status as a regional hub and innovator in the fashion, arts, and design sector; and (4) providing citywide access to neighborhood-serving retail and services. Since the proposed Project would accommodate the U.S. West Coast home of the Arts Club, which would promote art, architecture, fashion, film, literature, music, performance, photography, science, theatre, and television/media, and provide ground floor retail/restaurant uses and an art gallery, the proposed Project would contribute to supporting the primary goals of the General Plan Economic Development Element Chapter. The proposed Project would also enhance the number of new permanent jobs generated by the addition of new creative offices, restaurant and retail space, art gallery and entertainment uses, bars, guestrooms, and fitness and spa facilities, helping to secure a strong and continuous tax base for the City and supply the region with greater employment options.

(iv) Mobility Element

The proposed Project would be consistent with the relevant goal (Goal M-3) of the General Plan Mobility Element Chapter, which focuses on maintaining and enhancing a pedestrian-oriented City. The proposed Project would incorporate street trees and landscaping to enhance pedestrian experience and the walkability of the area. In addition, the ground level of the proposed building would incorporate a landscaped community plaza and pedestrian promenade, with hedges, trees and planters to enhance the pedestrian experience along this portion of Sunset Boulevard. Valet services and parking would be fully enclosed with limited public view and with access via Hilldale Avenue only, so as not to detract from the pedestrian experience on Sunset Boulevard. Consistent with the goal of managing parking supply to serve businesses and visitors, the proposed Project would provide sufficient parking to accommodate peak parking demands and implement a Parking Management Plan to manage peak parking demands to avoid potential parking impacts on the street network and surrounding community.

As discussed in greater detail in Sections II, Project Description, and IV.J. Traffic, Access, and Parking, of this Draft EIR, the proposed Project is located in a designated transit priority area on an infill site and constitutes an "employment center project" under CEQA. The proposed Project would be located in an area well-served by public transit, which provided by Metro, including eight Metro bus lines (five local bus lines, two limited bus lines, and one Rapid bus line) and two CityLine routes (Blue Route and Orange Route) with stops along Sunset Boulevard, San Vicente Boulevard, Santa Monica Boulevard, and Melrose Avenue. The nearest public transit stops are located approximately one block

away at the intersections of Sunset Boulevard and Hammond Street and Sunset Boulevard and San Vicente Boulevard within 200 feet of the Project Site. Furthermore, the proposed Project would include bicycle parking spaces in accordance with the WHMC. Thus, the proposed Project's characteristics (e.g., its location, proximity to transit, access to other nearby destinations, pedestrian connections, bicycle amenities, etc.) would encourage visitors, guests, and employees to use non-auto modes of transportation. Therefore, the proposed Project would be consistent with the applicable goal set forth in the General Plan Mobility Element Chapter.

(v) Human Services Element

The proposed Project would support the relevant goal (Goal HS-2) of the General Plan Human Services Element Chapter, which focuses on supporting and encouraging arts and culture in the City. As discussed above, the proposed Project would provide a publicly-accessible art gallery and accommodate the U.S. West Coast home of the Arts Club, which would continue to promote art, architecture, fashion, film, literature, music, performance, photography, science, theatre, and television/media to this day its founding in 1863. Accordingly, the proposed Project would be consistent with the primary relevant goal of the General Plan Human Services Element Chapter.

(vi) Infrastructure, Resources, and Conservation Element

The proposed Project would support the relevant goals of the General Plan Infrastructure, Resources, and Conservation Element Chapter, which focus on ensuring the City's public utility services and infrastructure are adequately maintained and upgraded to meet the demands of the City's population. The primary relevant goals relate to the reduction in water and energy usage in the City and environmentally sustainable stormwater management.

The proposed Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the West Hollywood Green Building Ordinance and CALGreen. These standards would reduce energy and water usage and waste, and thereby reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The proposed Project would achieve 90 points in the City's Green Points System, which exceeds the 60 points required for compliance and would achieve Leadership in Energy and Environmental Design (LEED) Gold or satisfy equivalent green building standards. Specific measures that the proposed Project may implement to achieve LEED Gold status include, but are not limited to, shading and ventilation, installation of tankless water heaters and water efficient fixtures, installation of solar panels, use of energy star lighting, and installation of a Building Energy Management System (BEMS) to monitor, maximize energy efficiency, and control the mechanical and electrical equipment. With respect to water usage, the design flowrate

of Project fixtures would be more efficient than the CALGreen flowrate. Furthermore, the proposed Project would meet the required water standards. Additionally, the proposed Project has targeted an energy performance of 15 percent better than the minimum standards of the California Energy Code. Therefore, the proposed Project would be generally consistent with the applicable goals set forth in the General Plan Infrastructure, Resources, and Conservation Element Chapter.

(vii) Safety and Noise Element

The proposed Project would support the relevant goals of the General Plan Safety and Noise Element Chapter, which focus on the reduction of noise impacts and natural and on-site hazards. The primary relevant goals relate to: (1) reducing injury and damage from natural hazards; (2) minimizing exposure to hazardous materials; (3) minimizing the impact of point source noise and ambient noise levels throughout the City; (4) minimizing transportation-related noise; and (5) utilizing public services (i.e., law enforcement and fire protection services) in a proactive and preventative way.

As discussed in Section IV.C, Geology and Soils, of this Draft EIR, the proposed Project would comply with all applicable policies and regulations related to natural seismic hazards. Additionally, the proposed Project would fully implement the recommendations of the design level geotechnical report that would ensure building safety.

As discussed in Section IV.F, Hydrology, Water Quality, and Groundwater, of this Draft EIR, the Project Site is currently developed with a commercial building and parking, and is estimated to be 99 percent impervious. The proposed development would decrease the existing impervious area by adding planting and landscaping around the site and upper levels. With implementation of the proposed Project, the percent impervious would be reduced to 95 percent and would not substantially increase runoff volumes into the existing storm drain system. In addition, stormwater runoff from the Project Site would be conveyed to the public streets via roof downspouts and podium drains, in a similar manner as the existing drainage. However, the proposed storm drain design would include modular wetland systems or other approved BMPs in order to treat stormwater runoff as required by LACDPW and the City.

As discussed in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions. In addition, applicable laws and regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. Adherence to these requirements would minimize the public's exposure to hazardous materials.

As discussed in Section IV.H, Noise, of this Draft EIR, in addition to considering the potential noise impacts to neighboring noise-sensitive receptors from each specific on-site and off-site noise source (e.g., mechanical equipment, outdoor areas, parking facility, and off-site traffic), an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined) at the analyzed noise-sensitive receptor locations was also performed. This evaluation indicated that the proposed Project would result in an increase in composite noise levels ranging from 2.5 dBA (CNEL) to 4.5 dBA (CNEL) at noise-sensitive receptor locations. The increase in composite noise levels from the proposed Project operation would be below the 5-dBA (CNEL) significance threshold at all off-site noise-sensitive receptor locations. Therefore, composite noise level impacts due to Project operations would be less than significant. In addition, the proposed Project would result in increases in traffic-related noise levels ranging from 0.0 to 2.3 dBA (CNEL) along the analyzed roadway segments. Similarly, these increases in traffic-related noise levels would be below the 3-dBA (CNEL) significance threshold. Therefore, the proposed Project would be consistent with the applicable goals set forth in the General Plan Safety and Noise Element Chapter.

As discussed in Section IV.I.1, Public Services—Sheriff Protection, and Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, the proposed Project would include various project design features to ensure safety within and immediately surrounding the Project Site. More specifically, Project Design Features I.1-2 and I.1-3 would establish Project Site access controls to ensure the security of guests and patrons. Project Design Features I.1-4 and I.1-5 would establish sufficient lighting to ensure public safety. In addition, all areas of the building would be covered by a hydraulically designed automatic sprinkler system. These proactive measures are intended to reduce the need for police and fire protection services on-site.

(b) Sunset Specific Plan

As previously discussed, the northern portion of the Project Site is located within the planning boundary of the SSP. As shown in the comparison of the proposed Project with the applicable goals and objectives of the SSP in Table IV.G-2 on page IV.G-31, the proposed Project would be consistent with land use policies to intensify development along Sunset Boulevard.

A large part of the SSP addresses urban design and the goal of creating a cohesive and integrated design within the context of Sunset Boulevard. As previously discussed, the proposed Project would add to the Sunset Strip's eclectic urban environment by creating a building that enhances the Sunset Boulevard experience and its dynamic urban environment that is characterized by widely-known entertainment destinations. Development of the proposed Project would support a broad range of retail businesses,

**Table IV.G-2
Project Consistency with Applicable Goals and Objectives of the Sunset Specific Plan**

Goals/Objectives	Analysis of Project Consistency
Economic Development	
<p>Goal II: Strengthen the City's economic base through retention, expansion, and attraction of key industries.</p>	<p>Consistent. The proposed Project would expand the commercial uses on the Project Site, which would include retail, restaurant, creative office, a membership club with 15 guest rooms, bars, screening rooms, a supper club, fitness/spa facilities, and an art gallery. These uses would complement existing nearby uses, including widely-known destination night clubs and music venues (i.e., one of the key industries along the Sunset Strip) within two blocks of the Project Site. The proposed Project's mix of uses within an area designed to accommodate vibrant commercial activity would further support tourism and the economic viability of the entertainment, commercial, and tourist activities in the area. In addition, these proposed uses would create new jobs, and provide fiscal benefits to the City which would help strengthen the City's economic base and economic conditions along the western end of the Sunset Strip. In particular, the proposed Project would provide significant new creative office space to enhance the City's supply of modern office environments that cater to and respond to the existing and future needs of businesses that would support the economic future and vitality of the City.</p>
<p>Goal IV: Increase employment opportunities for West Hollywood residents in West Hollywood businesses.</p>	<p>Consistent. See the consistency analysis Goal II under Economic Development above and Goal ED-1 above. In addition to the ground floor retail uses and art gallery, the proposed Project would include creative offices and the Arts Club facilities and amenities (e.g., guest rooms, fitness club/spa, restaurants, and bars) that would provide employment opportunities for West Hollywood's residents.</p>
Development Requirements: Density and Height	
<p>Goal II: Allow increases in density and height at locations where impacts are more easily mitigatable.</p>	<p>Consistent. The proposed Project would be located within the Sunset Strip, where increases in density and height would be compatible with City's vision to develop a strong mix of uses and a base of entertainment-related uses that would strengthen the attractiveness and the economic viability of the portion of Sunset Boulevard, within which the proposed Project is located. The proposed Project would increase the density and height of the development on the Project Site but would be compatible with existing and planned uses in the area, including the 9000 Sunset Boulevard Building located one block west of the Project Site, the 10-story London West Hollywood Hotel located one block east of the Project Site, the planned 6-story hotel project immediately west of the Project Site between Hilldale Avenue and Hammond Street, and other high-rise buildings towards the western end of the Sunset Strip, such as the Sierra Towers (a</p>

Table IV.G-2 (Continued)
Project Consistency with Applicable Goals and Objectives of the Sunset Specific Plan

Goals/Objectives	Analysis of Project Consistency
	condominium building that extends 31 stories in height) and four office/commercial buildings that are between 9 and 14 stories in height, and a mixed-use project with multiple buildings up to 13 stories in height currently under construction at the southeastern corner of Doheny Drive and Sunset Boulevard. Compared to these uses, the proposed Project would be consistent with the scale of these uses along Sunset Boulevard. Furthermore, the proposed Project is consistent with this goal because the City's vision for the Sunset Strip is to enhance Sunset Boulevard as the highest intensity area of West Hollywood, including a vital and varied streetscape with a diverse mix of architectural styles, building heights, and uses, ¹³ where impacts related to density and height are more easily mitigatable.
Goal III: Create a cohesive sense of design, using density and height so that new development feels integrated with existing development.	Consistent. See the consistency analysis for Goal II above.
Urban Design: Standards and Guidelines	
Goal I: Encourage the development of a street that presents a powerful image to visitors while also encouraging use by local residents.	Consistent. See the consistency analysis for Goals LU-1 and LU-2 above. In addition, the Sunset Strip is already well-known locally, nationally, and internationally. The addition of the proposed Project to the western end of the Sunset Strip would contribute to the primary characteristic of Sunset Boulevard as an entertainment destination. The proposed Project would also add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience. Furthermore, the ground level of the building would incorporate a landscaped community plaza and pedestrian promenade to encourage patronage of the ground floor retail and art gallery by local residents and the community.
Goal III: Encourage sensitive design that continues the varied pattern of use, height, and density.	Consistent. See the consistency analysis for Goal LU-2 above. As it relates to the Sunset Strip, the design of the proposed Project would add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience.
Goal VI: Protect and enhance significant public views to the Los Angeles basin and to the hills above Sunset as well as along street corridors	Consistent. Based on the location and height of the proposed building, views of the Los Angeles Basin, Palos Verdes Peninsula, and the Pacific Ocean from areas

¹³ *City of West Hollywood, City of West Hollywood General Plan Final EIR, October 2010.*

Table IV.G-2 (Continued)
Project Consistency with Applicable Goals and Objectives of the Sunset Specific Plan

Goals/Objectives	Analysis of Project Consistency
and within open spaces.	immediately north of Sunset Boulevard would be partially obscured and replaced with views of the north elevation of the proposed building. However, while distant views of these visual resources would be partially blocked, a substantial portion of the view would remain unchanged from other public rights-of-way north of Sunset Boulevard at the base of the Hollywood Hills. In addition, long-range views along east-west roadways, particularly Sunset Boulevard, would continue to be available. Furthermore, as are under existing conditions, views of the identified visual resources would remain intermittent throughout the Project area, as many existing buildings already obstruct views of these resources from surrounding vantage points. Therefore, the proposed Project would not significantly affect public views of these resources.
Open Space and Streetscape	
Goal II: Increase setbacks, where feasible, to provide additional open space and opportunities for uses such as outdoor dining and landscaping, which will enhance the pedestrian environment and allow room for street furniture.	Consistent. Along the northern and western façades (Sunset Boulevard and Hilldale Avenue, respectively), the proposed building would be set back from the adjacent property line by 15 feet to create a landscaped community plaza at the northwestern corner of the Project Site and landscaped pedestrian promenade along Sunset Boulevard and Hilldale Avenue to enhance the pedestrian experience along this portion of Sunset Boulevard.
Use Mix	
Goal I: Include many options so that opportunities exist for the expansion or creation of many use types.	Consistent. See consistency analysis for Goal II under Economic Development above.
Goal II: Consider both daytime and nighttime uses in all geographic areas so that businesses support each other and can share parking.	Consistent. The proposed Project includes daytime uses, such as retail space, an art gallery, and creative offices, as well as nighttime uses that are associated with the Arts Club, including restaurants, lounges, and bars. As evaluated in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, the shared parking analysis conducted for the proposed Project determined that peak daytime and nighttime demands would be accommodated within the proposed Project's on-site supply of 354 parking spaces. In addition, the proposed Project would implement Project Design Feature J-2, which involves a Parking Management Plan, to manage peak parking demands to avoid potential parking impacts on the street network and surrounding community.
Goal IV: Increase pedestrian-friendly uses and nighttime businesses .	Consistent. The proposed Project would include retail uses and an art gallery on the ground floor, which would be accessed from a landscaped community plaza and a pedestrian promenade to encourage pedestrian patronage of these uses. It is anticipated that these

Table IV.G-2 (Continued)
Project Consistency with Applicable Goals and Objectives of the Sunset Specific Plan

Goals/Objectives	Analysis of Project Consistency
	ground floor uses would operate during nighttime hours as well. In addition, the proposed Project would serve as the Arts Club's first U.S. West Coast location, which would provide a social venue for members and their guests, with dining, bars, lounges, and other gathering spaces, all of which would be pedestrian accessible and operational during nighttime hours.
Transportation	
Goal I: Facilitate walking, and enhance the safety and comfort of people who walk to, from, and along Sunset Boulevard.	Consistent. The proposed Project would incorporate landscaping to enhance the pedestrian experience. The ground level of the building would include a landscaped community plaza and a pedestrian promenade along Sunset Boulevard. The proposed Project driveway would be located along Hilldale Avenue only, so as not to detract from the pedestrian experience on Sunset Boulevard and minimize conflict between vehicles entering and exiting the Project Site and pedestrians walking along Sunset Boulevard.
Goal II: Facilitate demand by bicyclists who want to ride to, from, and along Sunset Boulevard.	Consistent. The proposed Project would include bicycle parking spaces in accordance with the WHMC to accommodate Project patrons who want to ride to and from the Project Site and along Sunset Boulevard.
Goal IV: Promote a decrease in automobile use among employees of Sunset Boulevard workplaces.	Consistent. As identified in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, the proposed Project would implement Project Design Feature J-2, which involves a Parking Management Plan, to manage peak parking demands to avoid potential parking impacts on the street network and surrounding community. This Parking Management Plan could include, but not be limited to, the following strategies related to employee trips: <ul style="list-style-type: none"> • Implement Traffic Demand Management (TDM) strategies to encourage members, guests, and employees to reduce parking demand. • Require employees to participate in TDM education and training to shift the automobile culture toward alternative modes of transportation. • Provide incentives to encourage employees and staff to utilize alternate travel options (e.g., discounted transit passes, employee carpooling programs, transit subsidies, guaranteed ride home programs, etc.). • Minimize on-site parking for Project employees during peak parking demand periods. In addition, the proposed Project is located in a designated transit priority area on an infill site and constitutes an "employment center project" under CEQA.

Table IV.G-2 (Continued)
Project Consistency with Applicable Goals and Objectives of the Sunset Specific Plan

Goals/Objectives	Analysis of Project Consistency
	The proposed Project's characteristics (e.g., its location, proximity to transit, access to other nearby destinations, pedestrian connections, bicycle amenities, etc.) would encourage employees to use non-auto modes of transportation.
Billboards and Art Advertising	
Goal IV: Allow for artwork to be incorporated into existing and proposed structures in order to enhance the visual quality of the street and reduce the number of blank walls.	Consistent. The building's design would incorporate the vintage art deco designs of historic Hollywood to enhance the visual quality of Sunset Boulevard. In addition, the ground floor would incorporate visually and physically "penetrable" treatments along the Sunset Boulevard and Hilldale Avenue frontages that feature extensive windows; accordingly, no blank walls would be created by the proposed Project.
Cultural Resources	
Goal VI: Permit further development of significant properties as long as such development is compatible with existing Cultural Resources.	Consistent. As evaluated in Section VII, Effects Found Not to Be Significant, of this Draft EIR, the closest identified historic resources are the Tudor Revival cottages located at 1000 Larrabee Street, just south of Sunset Boulevard and two blocks east (approximately 600 feet) of the Project Site. Due to the distance between the Project Site and these resources, as well as intervening development, no compatibility issue would result from Project implementation.
Urban Arts Program	
Goal III: Further enliven the pedestrian-active atmosphere, and contribute to the concept of Sunset Boulevard as an attractive destination.	Consistent. See the consistency analysis under Goal IV of Use Mix, above. The proposed Project would complement an area of the City along Sunset Boulevard that is characterized by widely-known destination night clubs and music venues, including The Roxy Theatre, Whisky A Go Go, and the Viper Room. The addition of the proposed Project's mix of uses, including retail uses, art gallery space, and the Arts Club, to this portion of Sunset Boulevard would contribute to the character of the Sunset Strip as an attractive destination.
Area 7—San Vicente to Doheny Requirements	
Objective 2: Improve the pedestrian environment by implementing streetscape improvements, which include: planted trees, creating landscaped sidewalk niches, humanizing the ground-floor level of existing buildings, and improving the landscaping and use of existing open spaces.	Consistent. The ground level of the proposed building would incorporate a landscaped community plaza and pedestrian promenade to enhance the pedestrian experience along this portion of Sunset Boulevard. In addition, the proposed Project would include landscaping on the ground level and the ground floor would incorporate visually and physically "penetrable" treatments along the Sunset Boulevard and Hilldale Avenue frontages that feature extensive windows to humanize the ground floor level and encourage pedestrian activities and

Table IV.G-2 (Continued)
Project Consistency with Applicable Goals and Objectives of the Sunset Specific Plan

Goals/Objectives	Analysis of Project Consistency
	create a pedestrian-oriented retail space.
<p>Objective 4: Encourage development and accommodate firms associated with the “creative” industries by permitting additional height and density on larger commercial parcel which are easily accessed by automobile traffic.</p>	<p>Consistent. The establishment of the Arts Club in West Hollywood would result in the continued promotion of art, architecture, fashion, film, literature, music, performance, photography, science, theatre, and television/media. In addition, the proposed Project would include creative office spaces to accommodate firms associated with the “creative” industries. The Project Site’s location along Sunset Boulevard makes it easily accessible by automobile traffic.</p>
<p>Objective 5: New projects shall be designed and massed so as to be sensitive to the adjacent residential neighborhoods, particularly located along Harratt, Hilldale, and Hammond Streets.</p>	<p>Consistent. The proposed Project has been designed with the top two floors stepping down from Sunset Boulevard. In addition, the proposed Project has incorporated outdoor terraces on the middle floors to create vertical and horizontal articulation to break up the building planes and reduce the perceived bulk and mass of the proposed building. Accordingly, the proposed Project has been designed to be sensitive to the adjacent multi-family residential neighborhood to the south along Hilldale Avenue.</p>
<p>Objective 6: Maintain a strong yet human-scaled street wall in this section of Sunset Boulevard.</p>	<p>Consistent. The proposed Project would involve a mixed-use commercial building designed-and oriented to pedestrians with the ground level featuring a landscaped community plaza and pedestrian promenade with hedges, trees, and planters, to enhance the pedestrian experience along this portion of Sunset Boulevard. In addition, the ground floor would incorporate visually and physically “penetrable” treatments along the Sunset Boulevard and Hilldale Avenue frontages that feature extensive windows specifically designed to be human-scaled, which would encourage pedestrian activity to the area. The proposed Project would also develop a pedestrian-oriented retail and art gallery space on the ground floor. Furthermore, the upper levels of the building would include outdoor terraces that would be visually interactive with the street to create a human-scaled street wall.</p>
<p>Source: <i>Eyestone Environmental, 2017.</i></p>	

employment opportunities, entertainment venues, and other supportive urban uses within the City, while increasing pedestrian-friendly uses.

The proposed Project would be located within the Sunset Strip, where increases in density and height would be compatible with City’s vision to strengthen the attractiveness

and the economic viability of the portion of Sunset Boulevard, within which the proposed Project is located. The proposed Project would increase the density and height of the development on the Project Site but would be compatible with existing in the area, as the massing, scale, placement, and height of the proposed Project is designed to reflect and be consistent with the massing, scale, and height of nearby development along the Sunset Strip. Such development includes the 9000 Sunset Boulevard Building located one block west of the Project Site, the 10-story London West Hollywood Hotel located one block east of the Project Site, and other high-rise buildings towards the western end of the Sunset Strip, such as the Sierra Towers (a condominium building that extends 31 stories in height) and four office/commercial buildings that are between 9 and 14 stories in height. In addition, planned uses in the Project area include a 6-story hotel project immediately west of the Project Site between Hilldale Avenue and Hammond Street and a mixed-use project up to 13 stories in height currently under construction at the southeastern corner of Doheny Drive and Sunset Boulevard.

The proposed Project's design would incorporate unique architectural features, including dynamic building façades that reflect and expose the project program. The building skin system would be comprised of vertical fins that would visually appear to undulate and rotate although fixed in position. This element of the design of the façade is intended to create subtle, wave-like impressions. Further transparency and light transmittance would be achieved utilizing perforated panels along with the open-air terraces on the upper levels of the building. The building's façade would also utilize decorative panels that reference the vintage art deco styles of historic Hollywood. In addition, the proposed Project has been designed with the top two floors stepping down from Sunset Boulevard and with outdoor terraces incorporated on the middle floors to reduce the perceived bulk and mass of the proposed building.

The SSP also addresses the safety and comfort of people who walk to, from, and along Sunset Boulevard. The ground level of the building would include a landscaped community plaza and pedestrian promenade with hedges, trees and planters, to increase the pedestrian experience and activity in this portion of Sunset Boulevard. In addition, valet services and parking would be fully enclosed, with access via Hilldale Avenue only with limited public view so as not to detract from the pedestrian experience on Sunset Boulevard. Finally, the proposed Project's parking system would utilize an innovative and technologically advanced automated system, which would be almost entirely valet-only, allowing for streamlined and efficient drop-off and pick-up parking services for visitors and guests.

(c) West Hollywood Municipal Code

The proposed Project would necessitate amending the SSP to allow greater height and density on the Project Site. In addition, the General Plan and Zoning Map would be

amended to include the southern portion of the property in the SSP Land Use Designation and Zoning District. It should be noted that the proposed uses of the proposed Project would be consistent with the SSP land use designations of commercial, residential, retail, institutional, restaurant, and entertainment-related uses in the vicinity of the Project Site.

As discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, while the proposed Project's off-street parking supply would not separately provide parking spaces consistent with the City's WHMC parking requirements for each individual use in the proposed Project, the shared parking demand analysis conducted for the proposed Project (see Appendix H of this Draft EIR) determined that peak periods of parking demand would be accommodated within the proposed Project's on-site supply of 354 parking spaces. Thus, the proposed Project would qualify for shared parking, subject to the approval of a parking use permit in compliance with Chapter 19.56 of the WHMC. In addition, the proposed Project would implement Project Design Feature J-2, which involves a Parking Management Plan, to manage peak parking demands to avoid potential parking impacts on the street network and surrounding community. No surface parking is proposed as part of the proposed Project as the proposed Project would remove the existing surface parking on-site and replace it with a subterranean parking structure. As part of the proposed Project, the Applicant is requesting approval of a reduction in the number of parking spaces based on a shared parking demand study.

In summary, with approval of the requested discretionary actions, the proposed Project would be consistent with all applicable provisions of the WHMC.

(2) Consistency with Regional Plans

(a) Regional Transportation Plan/Sustainable Communities Strategy and Compass Growth Vision

The proposed Project's general consistency with the applicable goals and principles set forth in the 2016–2040 RTP/SCS and the Compass Growth Vision Report is analyzed in Table IV.G-3 on page IV.G-39. As described therein, the proposed Project would be consistent with the applicable goals and principles set forth in the 2016–2040 RTP/SCS and the Compass Growth Vision Report.

(b) Regional Comprehensive Plan

The proposed Project's general consistency with the applicable goals and policies set forth in the RCP is analyzed Table IV.G-4 on page IV.G-44. As described therein, the proposed Project would be consistent with the applicable goals and policies set forth in the RCP.

**Table IV.G-3
Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and Compass Growth Vision**

Goals and Principles	Analysis of Project Consistency
2016–2040 RTP/SCS Goals	
<p>Goal 2: Maximize mobility and accessibility for all people and goods in the region.</p>	<p>Consistent. The proposed Project is an infill development within the urbanized City, which includes a mature network of roads and freeways that provide local and regional access. The proposed Project would be developed within an existing urbanized area located on the Sunset Strip in proximity to other commercial and entertainment uses and public transit opportunities. The availability and accessibility of public transit in the Project area is evidenced by the Project Site's location within a designated High-Quality Transit Area (HQTA). The 2016–2040 RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.¹⁴ The proposed Project would provide bicycle parking spaces in compliance with the requirements of the WHMC to serve the proposed Project and promote walking and use of bicycles. Given the proposed Project's location in proximity to a variety of transportation options, the proposed Project would maximize mobility and accessibility by providing opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking.</p>
<p>Goal 3: Ensure travel safety and reliability for all people and goods in the region.</p>	<p>Consistent. The proposed Project does not include any hazardous design features that could pose safety issues to travelers.</p>
<p>Goal 4: Preserve and ensure a sustainable regional transportation system.</p>	<p>Consistent. The Los Angeles County Congestion Management Program (CMP) addresses the impact of local growth on the regional transportation system, including arterial streets, freeways, and transit. As discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, Project impacts related to the CMP, would be less than significant. Therefore, the proposed Project would not have a significant impact on the regional arterial system or transit system.</p>
<p>Goal 5: Maximize the productivity of our transportation system.</p>	<p>Consistent. The proposed Project would support the use and productivity of the public transportation system by concentrating new development within an HQTA, as discussed above. See the consistency analysis for Goal 2 above.</p>

¹⁴ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

Table IV.G-3 (Continued)
Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and Compass Growth Vision

Goals and Principles	Analysis of Project Consistency
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	Consistent. See the consistency analysis for Goal 2 above.
Goal 7: Actively encourage and create incentives for energy efficiency where possible.	Consistent. The Applicant seeks to develop an energy efficient building that is comparable in terms of performance to industry benchmarks. Accordingly, the proposed Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the West Hollywood Green Building Ordinance and CALGreen. These standards would reduce energy, and thereby reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The proposed Project would achieve 90 points in the City's Green Points System, which exceeds the 60 points required for compliance, and would achieve Leadership in Energy and Environmental Design (LEED) Gold or would otherwise satisfy equivalent green building standards. Specific measures that the proposed Project may implement to achieve LEED Gold status include, but are not limited to, shading and ventilation, installation of tankless water heaters and water efficient fixtures, installation of solar panels, use of energy star lighting, and installation of a BEMS to monitor, maximize energy efficiency and control the mechanical and electrical equipment. Additionally, the proposed Project has targeted an energy performance of 15 percent better than the minimum standards of the California Energy Code.
Goal 8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent. See the consistency analysis for Goal 2 above.
Compass Growth Vision Principles	
Principle 1: Improve mobility for all residents	
Locate new housing near existing jobs and new jobs near existing housing.	Consistent. The proposed Project is located in an urbanized area and in proximity to existing job opportunities. The proposed Project would create new employment opportunities during construction and operation of the proposed Project, including employment opportunities in retail, restaurant, and the entertainment industry, located nearby existing housing.
Encourage transit-oriented development.	Consistent. Although the proposed Project is not a transit-oriented development, it is considered an employment center project located on an infill site in a transit priority area, as defined in PRC Section

Table IV.G-3 (Continued)
Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and Compass Growth Vision

Goals and Principles	Analysis of Project Consistency
	<p>21099(a). The proposed Project would be located in an area well-served by public transit provided by Metro, including eight Metro bus lines (five local bus lines, two limited bus lines, and one Rapid bus line) and two CityLine routes (Blue Route and Orange Route) with stops along Sunset Boulevard, San Vicente Boulevard, Santa Monica Boulevard, and Melrose Avenue. The nearest public transit stops are located approximately one block away at the intersections of Sunset Boulevard and Hammond Street and Sunset Boulevard and San Vicente Boulevard. Thus, employees, guests, and visitors of the proposed Project would be well-served by existing transit services, and the proposed Project's characteristics (e.g., its location, proximity to transit, access to other nearby destinations, pedestrian connections, bicycle amenities, etc.) would encourage the use of non-auto modes of transportation and reduce transportation related impacts.</p>
<p>Promote a variety of travel choices.</p>	<p>Consistent. See the consistency analysis immediately above with respect to "Encourage transit-oriented development."</p> <p>In addition, the proposed Project would include bicycle parking spaces per the requirements of the WHMC.</p>
<p>Principle 2: Foster livability in all communities</p>	
<p>Promote infill development and redevelopment to revitalize existing communities.</p>	<p>Consistent. The proposed Project is an infill development. The underlying purpose of the proposed Project is to maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space. These uses would complement the existing uses along Sunset Boulevard and contribute to and expand the diversity of entertainment and cultural venues on the Sunset Strip and would support the community's vision of the Sunset Strip as a high-quality international entertainment destination. In addition, the proposed Project would add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment.</p>

Table IV.G-3 (Continued)
Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and Compass Growth Vision

Goals and Principles	Analysis of Project Consistency
Promote development that provide a mix of uses	Consistent. See “Promote infill development and redevelopment to revitalize existing communities,” above.
Promote “people scaled,” pedestrian-friendly (walkable) communities.	Consistent. The proposed Project would incorporate landscaping along the ground floor level to enhance the pedestrian experience. The ground level of the building would include a landscaped community plaza and pedestrian promenade with hedges, trees, and planters, and also incorporate visually and physically “penetrable” treatments along the Sunset Boulevard and Hilldale Avenue frontages that feature extensive windows to encourage pedestrian activities and create human-scale frontage design. In addition, valet services and parking would be fully enclosed, with access via Hilldale Avenue only with limited public view so as not to detract from the pedestrian experience on Sunset Boulevard.
Principle 3: Enable prosperity for all people	
Support educational opportunities that promote balanced growth.	Consistent. As discussed in Section VII, Effects Not Found to Be Significant, of this Draft EIR, the Applicant would be required to pay school developer fees to the LAUSD prior to the issuance of building permits pursuant to Senate Bill 50. Payment of school developer fees would ensure consistency with Principle 3.
Ensure environmental justice regardless of race, ethnicity or income class.	Consistent. No aspect of Project development would result in a disproportionate impact to populations that are related to environmental justice issues.
Principle 4: Promote sustainability for future generations	
Focus development in urban centers and existing cities.	Consistent. The proposed Project would focus development in an urbanized city. The proposed Project would enhance and support the community’s vision of the Sunset Strip as a high-quality regional, national, and international entertainment destination.
Develop strategies to accommodate growth that uses resources efficiently, eliminates pollution and significantly reduces waste.	Consistent. The proposed Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the West Hollywood Green Building Ordinance and CALGreen. These standards would reduce energy and water usage and waste, and thereby reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The proposed Project would achieve 90 points in the City’s Green Points System, which exceeds the 60 points required for compliance, and would achieve Leadership in Energy and Environmental

Table IV.G-3 (Continued)
Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and Compass Growth Vision

Goals and Principles	Analysis of Project Consistency
	Design (LEED) Gold or would otherwise satisfy equivalent green building standards. Specific measures the proposed Project may implement to achieve LEED Gold status include, but are not limited to, preservation of existing trees where possible, shading and ventilation, installation of tankless water heaters and water efficient fixtures, installation of solar panels, use of energy star lighting, and installation of a BEMS to monitor, maximize energy efficiency and control the mechanical and electrical equipment. In addition, the Project would use no-VOC paints on interior applications, low-VOC sealants and adhesives, and composite wood with no added urea formaldehyde for counters and cabinets to reduce air pollution.
Utilize "green" development techniques.	Consistent. See "Develop strategies to accommodate growth that uses resources efficiently, eliminates pollution and significantly reduces waste," above.
<hr/> <p><i>Source: Eyestone Environmental, 2017.</i></p>	

(3) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the proposed Project would be consistent with the applicable goals and/or objectives of the local plans local plans and regional plans that govern development on the Project Site. As such, land use impacts related to land use consistency would be considered less than significant.

(4) Land Use Compatibility

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Draft EIR, the Project Site is located in a highly urbanized area characterized primarily by low- to mid-rise buildings occupied by commercial, residential, retail, institutional, restaurant, and entertainment-related uses.

The proposed Project would revitalize the Project Site by building a high quality commercial development that provides a variety of uses to complement the existing uses along Sunset Boulevard and contribute to and expand the diversity of entertainment and cultural venues on the Sunset Strip. Accordingly, the proposed Project would enhance and support the community's vision of the Sunset Strip as a high-quality international entertainment destination. The proposed Project would also add to the eclectic urban

**Table IV.G-4
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan**

Goals and Policies	Project Consistency
Land Use and Housing	
<p>Goal: Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and 2% Strategy:</p> <ul style="list-style-type: none"> • Focusing growth in existing and emerging centers and along major transportation corridors. • Creating significant areas of mixed-use development and walkable, "people-scaled" communities. • Providing new housing opportunities, with building types and locations that respond to the region's changing demographics. • Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations. • Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots. 	<p>Consistent. SCAG's 2004 Growth Vision Report identified 2% Strategy Opportunity Areas, which represented areas of the region that were targeted for growth, where projects, plans, and policies consistent with the Compass Blueprint principles would best serve the goals of the Growth Vision. According to SCAG staff, the 2% Strategy Opportunity Areas were superseded by the HQTAs identified in the 2016–2040 RTP/SCS. The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS. Therefore, by focusing new employment-generating commercial uses in an HQTA, the proposed Project would be consistent with this goal. Additionally, the proposed Project would redevelop a site that contains an older commercial building. Furthermore, as discussed above, the proposed Project would be consistent with the applicable goals and principles set forth in the 2016–2040 RTP/SCS and the Compass Growth Vision Report.#</p>
<p>Policy LU-6.2: Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.</p>	<p>Consistent. The proposed Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the West Hollywood Green Building Ordinance and CALGreen. These standards would reduce energy and water usage and waste, and thereby reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The proposed Project would achieve 90 points in the City's Green Points System, which exceeds the 60 points required for compliance, and would achieve Leadership in Energy and Environmental Design (LEED) Gold or would otherwise satisfy equivalent green building standards. Specific measures the proposed Project may implement to achieve LEED Gold status include, but are not limited to, preservation of existing trees where possible, shading and ventilation, installation of tankless water heaters and water efficient fixtures, installation of solar panels, use of energy star lighting, and installation of a BEMS to monitor, maximize energy efficiency and control the mechanical and electrical equipment.</p>
Open Space and Habitat	
<p>Policy OSC-10: Developers and local governments should promote infill development and redevelopment to revitalize existing</p>	<p>Consistent. The proposed Project represents an infill development within an existing urbanized area. The underlying purpose of the proposed Project is to</p>

Table IV.G-4 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
communities.	maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space. These uses would complement the existing uses along Sunset Boulevard and contribute to and expand the diversity of entertainment and cultural venues on the Sunset Strip.
Policy OSC-11: Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	Consistent. See the consistency analysis for Policy LU-6.2 above.
Policy OSC-12: Developers and local governments should promote water-efficient land use and development.	Consistent. See the consistency analysis for Policy LU-6.2 above.
Policy OSC-13: Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	Consistent. The proposed Project would replace the existing building occupied by a retail store and café on the ground floor and office space and a gym/fitness center on the second floor; with a new mixed-use commercial building that would house the Arts Club, an art gallery, retail, restaurants, and creative offices. Project employees, and visitors would have access to nearby recreational and natural areas, including Greystone Mansion Park located 0.9 mile to the northwest of the Project Site, West Hollywood Park located 0.6 mile southeast of the Project Site, and several other parks and neighborhood parks that are located within a 2-mile radius of the Project Site.
Water	
Policy WA-11: Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	Consistent. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the proposed Project would not require upgrades to the water lines that serve the Project Site. Similarly, as discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the proposed Project would not require upgrades to the existing sewer main serving the Project Site.

Table IV.G-4 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>Policy WA-12: Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.</p>	<p>Consistent. The proposed Project's landscape palette would include drought-tolerant native plants. Also, with respect to water usage by the proposed Project, the design flowrate of Project fixtures would be more efficient than the CALGreen flowrate.</p>
<p>Policy WA-27: Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</p>	<p>Consistent. As discussed in Section IV.F, Hydrology, Water Quality, and Groundwater of this Draft EIR, the Project Site is currently developed with a commercial building and parking, and is estimated to be 99 percent impervious. The proposed development would decrease the existing impervious area by adding planting and landscaping around the site and upper levels. With implementation of the proposed Project, the percent impervious would be reduced to 95 percent and would not substantially increase runoff volumes into the existing storm drain system.</p> <p>Stormwater runoff from the Project Site would be conveyed to the public streets via roof downspouts and podium drains, in a similar manner as the existing drainage. However, the proposed storm drain design would include modular wetland systems or other approved BMPs in order to treat stormwater runoff as required by LACDPW and the City.</p> <p>Based on the above, the proposed Project would increase the amount of pervious surface area on the Project Site to reduce flooding and allow for increased groundwater recharge. The BMPs included in the proposed Project would protect water quality.</p> <p>As discussed in Section VII, Effects Found Not to be Significant, of this Draft EIR, the proposed Project would not result in impacts to any wildlife habitat.</p>
<p>Policy WA-32: Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.</p>	<p>Consistent. See the consistency analysis for Policy LU-6.2 above.</p>
<p>Energy</p>	
<p>Policy EN-8: Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste</p>	<p>Consistent. The proposed Project is a commercial, infill development that would utilize existing infrastructure and is located in proximity to a variety of public transit opportunities.</p>

Table IV.G-4 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips. 	<p>Specifically, eight Metro bus lines (five local bus lines, two limited bus lines, and one Rapid bus line) and two CityLine routes (Blue Route and Orange Route) with stops along Sunset Boulevard, San Vicente Boulevard, Santa Monica Boulevard, and Melrose Avenue operate in the Project vicinity.</p> <p>The proposed Project would also provide bicycle parking in compliance with the requirements of the WHMC.</p> <p>Therefore, Project employees and visitors would have convenient access to public transit and opportunities for biking.</p>
<p>Policy EN-10: Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Using energy efficient materials in building design, construction, rehabilitation, and retrofit. • Encouraging new development to exceed Title 24 energy efficiency requirements. • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at www.energystar.gov/index.cfm?c=Products.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought-tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, 	<p>Consistent. See the consistency analysis for LU-6.2 above.</p>

Table IV.G-4 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>which allow communities to generate their own electricity</p> <ul style="list-style-type: none"> • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20 percent of their electric load from renewable energy. 	
<p>Policy EN-11: Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.</p>	<p>Consistent. As discussed in the Section IV.K.4, Utilities and Service Systems—Energy, of this Draft EIR, Southern California Edison and the Southern California Gas Company were consulted in determining the proposed Project's potential impacts to electricity and natural gas supplies and infrastructure. As discussed therein, existing electricity and natural gas supplies and infrastructure would have capacity to serve the proposed Project.</p>
<p>Policy EN-12: Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.</p>	<p>Consistent. The proposed Project may include solar panels in connection with its achievement of LEED Gold status equivalency and in compliance with the Building Energy Efficiency Standards, the proposed Project would be designed with certain allowances for future photovoltaic (or solar thermal) installations. Space provisions would be made for future inverters and metering equipment and a pathway for routing of conduit.</p>
Air Quality	
<p>Goal: Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.</p>	<p>Consistent. As discussed in Section IV.B, Air Quality, of this Draft EIR, Project development would not have a significant short-term (construction) or long-term (operational) impact on the region's ability to meet state and federal air quality standards. The proposed Project would also comply with SCAQMD Rule 403 and would implement all feasible measures for the control of particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), and nitrogen oxides (NO_x). Therefore, the proposed Project would be consistent with SCAQMD's efforts to attain federal and state air quality standards.</p>
<p>Goal: Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.</p>	<p>Consistent. As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the proposed Project would incorporate sustainability design features to reduce potential impacts with respect to GHG emissions. As identified in Project Design Features D-1 and D-2, the proposed Project would achieve 90 points in the City's Green Points System and a LEED Gold Standard, or equivalent</p>

Table IV.G-4 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
	green building standards. In addition, the proposed Project has targeted an energy performance of 15 percent better than the minimum standards of the California Energy Code. Specific measures that the proposed Project may implement to achieve LEED Gold status include, but are not limited to, shading and ventilation, installation of tankless water heaters and water efficient fixtures, installation of solar panels, and use of energy star lighting. With respect to water usage, the design flowrate of Project fixtures would be more efficient than the CALGreen flowrate.
<p>Goal: Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM₁₀, PM_{2.5}, ultrafine), and carbon monoxide.</p>	<p>Consistent. As discussed in Section IV.B, Air Quality, of this Draft EIR, Project-level and cumulative impacts with regard to air quality would be less than significant with implementation of the regulatory requirements and project design features discussed therein. Therefore, the proposed Project would not increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM₁₀, PM_{2.5}, ultrafine), and carbon monoxide.</p>
<p>Goal: Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.</p>	<p>Consistent. See the consistency analysis for Policy LU-6.2 above.</p>
Solid Waste	
<p>Policy SW-14: Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through: (1) use of building materials that are more durable and easier to repair and maintain; (2) design to generate less scrap material through dimensional planning; (3) increased recycled content; (4) use of 	<p>Consistent. See the consistency analysis for Policy LU-6.2 above for a discussion of the proposed Project's consistency with green building practices. In addition, see Section II, Project Description, of this Draft EIR, which further details the sustainable and green building techniques the proposed Project would integrate.</p> <p>With respect to construction waste, as discussed in Section IV.K.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the proposed Project would comply with all waste diversion requirements. Specifically, during construction, the proposed Project would recycle and/or salvage at least 80 percent of non-hazardous C&D debris. The proposed Project would also use recycled building materials, as feasible.</p> <p>During operation, the proposed Project would comply with all waste recycling requirements. Specifically, the proposed Project would provide for on-site recycling containers for paper, metal, glass and other recyclable materials to comply with AB 341 and</p>

Table IV.G-4 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>reclaimed building materials; and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).</p> <ul style="list-style-type: none"> • Reuse of existing building structure and shell in renovation projects. <p>Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	<p>would arrange for organic waste recycling services to comply with AB 1826.</p>
<p><i>Source: Eyestone Environmental, 2017.</i></p>	

environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment. In addition, the proposed Project would provide a broad range of retail businesses, employment opportunities, cultural and entertainment venues, and other supportive urban uses to the surrounding area and the City. In this way, the proposed Project would be compatible with the types of land uses in the vicinity of the Project Site.

4. Cumulative Impacts

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 191 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses, and include residential, hotel, commercial, office, institution, entertainment, medical uses, as well as mixed-use developments incorporating combinations of such uses. As with the proposed Project, the related projects would be required to comply with relevant land use policies and regulations applicable within each jurisdiction. In addition, any potential Project-level impacts would be site-specific and would not incrementally contribute to cumulative inconsistencies of other related projects in the vicinity of the Project Site with respect to land use plans and zoning standards. Therefore, cumulative impacts with regard to regulatory framework would be less than significant, and no mitigation measures would be required.

With regard to land use compatibility, there are numerous related projects located within a few blocks of the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. These nearby related developments comprise a variety of uses, including: residential, hotel, commercial, office, institution, entertainment, medical uses, as well as mixed-use developments incorporating some or all of these elements. The related developments located nearest the Project Site include Related Project No. 39, a mixed-use project located at 8950 Sunset Boulevard, Related Project No. 40, a mixed-use project located at 9040 Sunset Boulevard, and Related Project No. 15, a condominium project located at 1223 Larrabee Street. The balance of the related projects would not cause cumulative land use impacts related to land use compatibility due to either distance and/or existing intervening development. In any event, based on the mix of uses and buildings that currently exist within the vicinity of the Project Site, as well as the related projects that are proposed, have been approved, or are under construction, as detailed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, the proposed Project would be compatible with the various existing developments and related projects in the immediate vicinity of the Project Site and the surrounding areas. In addition, while the proposed Project, in combination with the related projects, represent a continuing trend of infill development at increased densities, future development, inclusive of the proposed Project, would serve to modernize the Project vicinity and provide sufficient infrastructure and amenities to serve the needs of a growing population. Given the locations of the proposed Project and related projects, such developments are not expected to fundamentally alter the existing land use relationships in the community but, rather, would concentrate development on particular sites and promote a synergy between existing and new uses.

For these reasons, the proposed Project's potential incremental contribution with respect to land use compatibility would not be considered significant, and the cumulative impact of the proposed Project and the related projects on land use compatibility would be less than significant, and no mitigation measures would be required.

5. Mitigation Measures

With the approval of the entitlements sought by the proposed Project, impacts associated with land use compatibility and consistency with zoning and land use designations would be less than significant, and no mitigation measures would be required.

6. Level of Significance After Mitigation

As discussed above, impacts related to compatibility of land uses and consistency with zoning and land use designations would be less than significant with the approval of the entitlements sought by the proposed Project and would not require mitigation.