CHAPTER 4
CUMULATIVE EFFECTS

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

4.1 CEQA REQUIREMENTS

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

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

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

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

4.2 RELATED PROJECTS

The geographic area that could be affected by implementation of The Bond Project (proposed project) in combination with other projects varies depending on the type of environmental resource being considered. For instance, cumulative aesthetics or noise impacts are more localized; whereas, cumulative air quality and greenhouse gas emissions impacts occur on a broader regional

or global scale. Table 4-1 describes the geographic scope of cumulative impact analysis for each environmental resource category. Also described is the method of evaluation for each category.

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

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

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

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
City of West Hollywood				
1	1048 North Curson Avenue	Condominium	5	d.u.[2]
2	900 Fairfax Avenue	Mid-Rise Residential with 1st-Floor Commercial	6	d.u.
		Shopping Center	0.93	k.s.f.[2,3]
		High Turnover Sit-Down Restaurant	2.32	k.s.f.
3	511 Flores Street	Multifamily Housing (Low-Rise)	10	d.u.
4	1216 Flores Street	Multifamily Housing (Mid-Rise)	14	d.u.
5	1264 Harper Avenue	Multifamily Housing (Mid-Rise)	14	d.u.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
6	1041 Formosa Avenue	General Office Building	100	k.s.f.[4]
7	1123 Formosa Avenue	Multifamily Housing (Low-Rise)	5	d.u.
8	947 Genesee Avenue	Multifamily Housing (Low-Rise)	10	d.u.
9	1003 Hancock Avenue	Multifamily Housing (Low-Rise)	3	d.u.
10	8583 Melrose Avenue	Shopping Center	9.545	k.s.f.
11	8650 Melrose Avenue	Shopping Center	14.571	k.s.f.
		Multifamily Housing (Low-Rise)	7	d.u.
12	829 Larrabee Street	Multifamily Housing (Mid-Rise)	13	d.u.
13	7914 Norton Avenue	Multifamily Housing (Low-Rise)	8	d.u.
14	8550 Santa Monica Boulevard[5]	Supermarket	25	k.s.f.
		General Office Building	11.998	k.s.f.
		High Turnover Sit-Down Restaurant	1.319	k.s.f.
		Health/Fitness Club	4	k.s.f.
15	1001 Ogden Drive	Multifamily Housing (Low-Rise)	5	d.u.
16	1153 Ogden Drive	Multifamily Housing (Low-Rise)	6	d.u.
17	1150 Orange Grove	Multifamily Housing (Low-Rise)	7	d.u.
18	507 Orlando Avenue	Multifamily Housing (Low-Rise)	9	d.u.
19	923 Palm Avenue[6]	Senior Housing - Attached	49	d.u.
20	1016 Martel Avenue	Multifamily Housing (Mid-Rise)	11	d.u.
21	8497 Sunset Boulevard[7]	Quality Restaurant	9.775	k.s.f.
		General Office Building	11.52	k.s.f.
22	7965–7985 Santa Monica Boulevard[8]	Shopping Center	1.345	k.s.f.
		High Turnover Sit-Down Restaurant	14.252	k.s.f.
		General Office Building	54.645	k.s.f.
		Drinking Place	2.746	k.s.f.
23	8430 Sunset Boulevard[9]	Multifamily Housing (High-Rise)	125	d.u.
		Shopping Center	35	k.s.f.
24	1253 Sweetzer Avenue	Multifamily Housing (Low-Rise)	8	d.u.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
25	1040 N La Brea Avenue	Multifamily Housing (Low-Rise)	8	d.u.
		High Turnover Sit-Down Restaurant	5.24	k.s.f.
		Hotel	91	r.m
26	600 N La Cienega Boulevard	Multifamily Housing (Low-Rise)	5	d.u.
		Shopping Center	5.355	k.s.f.
		High Turnover Sit-Down Restaurant	7.094	k.s.f.
		Museum	15.727	k.s.f.
27	624 N La Cienega Boulevard	Multifamily Housing (Low-Rise)	6	d.u.
		Shopping Center	54.209	k.s.f.
28	1136 N La Cienega Boulevard	Multifamily Housing (Mid-Rise)	23	d.u.
29	7401 Santa Monica Boulevard	Shopping Center	0.92	k.s.f.
30	7617 Santa Monica Boulevard	Multifamily Housing (High-Rise)	71	d.u.
		Shopping Center	4.821	k.s.f.
		High Turnover Sit-Down Restaurant	4.419	k.s.f.
31	8445 Santa Monica Boulevard	Multifamily Housing (High-Rise)	79	d.u.
		Shopping Center	5.102	k.s.f.
		High Turnover Sit-Down Restaurant	9.441	k.s.f.
		Hotel	88	r.m
		Drinking Place	3.078	k.s.f.
32	8555 Santa Monica Boulevard[10]	Multifamily Housing (Low-Rise)	97	d.u.
		Multifamily Housing (Mid-Rise)	12	d.u.
		Shopping Center	15.68	k.s.f.
		High Turnover Sit-Down Restaurant	282	k.s.f.
		General Office Building	6.08	k.s.f.
		Hair Salon	3.72	k.s.f.
33	1236 N Fairfax Avenue	Multifamily Housing (Low-Rise)	7	d.u.
34	1250 N Fairfax Avenue	Multifamily Housing (High-Rise)	53	d.u.
35	1301 N Fairfax Avenue	Multifamily Housing (Low-Rise)	10	d.u.
36	8465 Melrose Avenue	Shopping Center	4.122	k.s.f.
37	1027 N Gardner Street	Multifamily Housing (Low-Rise)	5	d.u.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
38	1150 N Clark Street	Multifamily Housing (Low-Rise)	7	d.u.
39	1011 N Crescent Heights Boulevard	Multifamily Housing (Mid-Rise)	12	d.u.
40	1317 N Crescent Heights Boulevard	Multifamily Housing (High-Rise)	75	d.u.
41	1139 N Detroit Street	Multifamily Housing (Low-Rise)	5	d.u.
42	1141 N Detroit Street	Multifamily Housing (Low-Rise)	5	d.u.
43	1138 N Detroit Street	Multifamily Housing (Low-Rise)	10	d.u.
44	1201 N Detroit Street	Multifamily Housing (Low-Rise)	10	d.u.
45	1221 N Detroit Street	Multifamily Housing (Low-Rise)	10	d.u.
46	1251 N Detroit Street	Multifamily Housing (Low-Rise)	5	d.u.
47	1006 N Edinburg Avenue	Multifamily Housing (Low-Rise)	10	d.u.
48	528 N Flores Street	Multifamily Housing (Low-Rise)	4	d.u.
49	1159 N Formosa Avenue	Multifamily Housing (Low-Rise)	5	d.u.
50	1227 N Formosa Avenue	Multifamily Housing (Low-Rise)	5	d.u.
51	800 Fountain Avenue	Multifamily Housing (Mid-Rise)	30	d.u.
52	8210 Fountain Avenue	Multifamily Housing (Low-Rise)	9	d.u.
53	1250 N Fuller Avenue	Multifamily Housing (Low-Rise)	3	d.u.
54	938 N Genesee Avenue	Multifamily Housing (Low-Rise)	5	d.u.
55	1005 N Genesee Avenue	Multifamily Housing (Low-Rise)	5	d.u.
56	1046 N Genesee Avenue	Multifamily Housing (Low-Rise)	5	d.u.
57	1006 Hancock Avenue	Multifamily Housing (Low-Rise)	6	d.u.
58	1223 N Hayworth Avenue	Multifamily Housing (Mid-Rise)	12	d.u.
59	621 Huntley Drive	Multifamily Housing (Low-Rise)	3	d.u.
60	634 Huntley Drive	Multifamily Housing (Low-Rise)	3	d.u.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
61	649 Huntley Drive	Multifamily Housing (Low-Rise)	3	d.u.
62	812 Huntley Drive	Multifamily Housing (Low-Rise)	5	d.u.
63	933 Huntley Drive	Multifamily Housing (Low-Rise)	5	d.u.
64	621 N Kings Road	Multifamily Housing (Low-Rise)	4	d.u.
65	1220 Larrabee Street	Multifamily Housing (Mid-Rise)	22	d.u.
66	1041 N Martel Avenue	Multifamily Housing (Mid-Rise)	25	d.u.
67	1052 N Martel Avenue	Multifamily Housing (Low-Rise)	5	d.u.
68	8008 Norton Avenue	Multifamily Housing (Low-Rise)	8	d.u.
69	8017 Norton Avenue	Multifamily Housing (High-Rise)	34	d.u.
70	8116 Norton Avenue	Multifamily Housing (Low-Rise)	8	d.u.
71	901 N Ogden Drive	Multifamily Housing (Low-Rise)	4	d.u.
72	950 N Ogden Drive	Multifamily Housing (Low-Rise)	10	d.u.
73	1008 N Ogden Drive	Multifamily Housing (Low-Rise)	7	d.u.
74	1019 N Orange Grove Avenue	Multifamily Housing (Low-Rise)	9	d.u.
75	7905 Romaine Street	Multifamily Housing (High-Rise)	35	d.u.
		Shopping Center	0.9	k.s.f.
		General Office Building	0.9	k.s.f.
76	948 N San Vicente Boulevard	Multifamily Housing (Mid-Rise)	18	d.u.
77	972 N San Vicente Boulevard	Day Care Center	72	Students
78	8760 Shoreham Drive	Multifamily Housing (Mid-Rise)	11	d.u.
79	1011 N Sierra Bonita Avenue	Multifamily Housing (Low-Rise)	5	d.u.
80	1017 N Sierra Bonita Avenue	Multifamily Housing (Low-Rise)	5	d.u.
81	1030 N Sierra Bonita Avenue	Multifamily Housing (Low-Rise)	5	d.u.
82	939 N Spaulding Avenue	Multifamily Housing (Mid-Rise)	22	d.u.
83	1013 N Spaulding Avenue	Multifamily Housing (Low-Rise)	5	d.u.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
84	1041 N Spaulding Avenue	Multifamily Housing (Mid-Rise)	14	d.u.
85	1236 N Spaulding Avenue	Multifamily Housing (Low-Rise)	3	d.u.
86	943 N Stanley Avenue	Multifamily Housing (Low-Rise)	5	d.u.
87	545 N Sweetzer Avenue	Multifamily Housing (Low-Rise)	9	d.u.
88	1257 N Sweetzer Avenue	Multifamily Housing (Mid-Rise)	12	d.u.
89	1280 N Sweetzer Avenue	Multifamily Housing (Low-Rise)	9	d.u.
90	1035 N Vista Street	Multifamily Housing (Low-Rise)	4	d.u.
91	852 West Knoll Drive	Multifamily Housing (Low-Rise)	6	d.u.
92	8553 West Knoll Drive	Multifamily Housing (Low-Rise)	5	d.u.
93	8557 West Knoll Drive	Multifamily Housing (Low-Rise)	6	d.u.
94	629 Westbourne Drive	Multifamily Housing (Low-Rise)	3	d.u.
95	916 Westbourne Drive	Multifamily Housing (Low-Rise)	8	d.u.
City of Los Angeles				
96	1502 N Gardner Street	Supermarket	32.435	k.s.f.[3]
97	1118 N McCadden Place	Senior Housing - Attached	100	d.u.
		Senior Housing - Attached	92	d.u.
		General Office Building	17.040	k.s.f.
		Shopping Center	29.650	k.s.f.
98	7000 Melrose Avenue	Multifamily Housing (Mid-Rise)	40	d.u.
		Shopping Center	7.565	k.s.f.
99	320 N Fairfax Avenue	General Office Building	28.341	k.s.f.
100	6901 Santa Monica Boulevard	Multifamily Housing (High-Rise)	231	d.u.
		High Turnover Sit-Down Restaurant	5	k.s.f.
		Shopping Center	10	k.s.f.
101	7107 W Hollywood Boulevard	Multifamily Housing (High-Rise)	410	d.u.
		Shopping Center	5	k.s.f.
		High Turnover Sit-Down Restaurant	5	k.s.f.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
102	1233 N Highland Avenue	Multifamily Housing (Mid-Rise)	72	d.u.
		Shopping Center	17.830	k.s.f.
103	904 N La Brea Avenue	Multifamily Housing (High-Rise)	169	d.u.
		Shopping Center	40	k.s.f.
104	925 N La Brea Avenue	Shopping Center	15.265	k.s.f.
		General Office Building	46.527	k.s.f.
105	8150 W Sunset Boulevard	Multifamily Housing (High-Rise)	249	d.u.
		Shopping Center	110	k.s.f.
106	7120 W Sunset Boulevard	Multifamily Housing (Mid-Rise)	44	d.u.
		Shopping Center	2.9	k.s.f.
107	927 Highland Avenue	Elementary School	100	Students
108	859 Highland Avenue	Coffee/Donut Shop with Drive-Through Window	0.806	k.s.f.
109	6677 W Santa Monica Boulevard	Multifamily Housing (High-Rise)	695	d.u.
		High Turnover Sit-Down Restaurant	4	k.s.f.
		Coffee/Donut Shop without Drive-Through Window	5.5	k.s.f.[6]
		Shopping Center	15.4	k.s.f.
110	1411 N Highland Avenue	Multifamily Housing (High-Rise)	76	d.u.
		Shopping Center	2.5	k.s.f.
111	316 N La Cienega Boulevard	Multifamily Housing (Mid-Rise)	45	d.u.
		Shopping Center	3.8	k.s.f.
		Coffee/Donut Shop without Drive-Through Window	0.800	k.s.f.[6]
112	375 N La Cienega Boulevard	Multifamily Housing (High-Rise)	125	d.u.
		Shopping Center	17.4	k.s.f.
113	915 N La Brea Avenue	Multifamily Housing (High-Rise)	179	d.u.
		Supermarket	33.5	k.s.f.
114	7901 W Beverly Boulevard	Multifamily Housing (High-Rise)	71	d.u.
		Shopping Center	11.454	k.s.f.
115	7002 W Clinton Street	Day Care Center	120	Students
		Elementary School	60	Students

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
116	936 N La Brea Avenue	General Office Building	33.19	k.s.f.
		Shopping Center	19.923	k.s.f.
117	8418 Sunset Boulevard	Multifamily Housing (High-Rise)	138	d.u.
		Shopping Center	75	k.s.f.
118	6701 W Sunset Boulevard	Multifamily Housing (High-Rise)	950	d.u.
		Hotel	308	Rm
		Shopping Center	120	k.s.f.
		Quality Restaurant	35	k.s.f.
		High Turnover Sit-Down Restaurant	35	k.s.f.
119	7219 W Sunset Boulevard	Hotel	93	Rm
		Shopping Center	2.8	k.s.f.
120	7500 W Sunset Boulevard	Multifamily Housing (High-Rise)	219	d.u.
		Shopping Center	20	k.s.f.
		High Turnover Sit-Down Restaurant	10	k.s.f.
121	7300 W Hollywood Boulevard[3]	Synagogue	-	-
122	7900 W Hollywood Boulevard	Multifamily Housing (Mid-Rise)	50	d.u.
123	8052 W Beverly Boulevard	Multifamily Housing (High-Rise)	102	d.u.
		General Office Building	15	k.s.f.
		Shopping Center	1	k.s.f.
		Synagogue	5	k.s.f.
124	8000 W Beverly Boulevard	Multifamily Housing (Mid-Rise)	48	d.u.
		Shopping Center	7.4	k.s.f.
125	8001 W Beverly Boulevard	High Turnover Sit-Down Restaurant	22.6	k.s.f.
		General Office Building	11.358	Total
126	431 N La Cienega Boulevard	Multifamily Housing (Low-Rise)	72	d.u.
127	1610 N Highland Avenue	Multifamily Housing (High-Rise)	248	d.u.
		Shopping Center	12.785	k.s.f.
128	1403 N Gardner Street	Assisted Living	44	Beds
129	750 Edinburgh Avenue	Single Family Residential	8	d.u.
130	8000 W 3rd Street	Multifamily Housing (Mid-Rise)	45	d.u.
		Affordable Housing (Family)	5	d.u.
		Shopping Center	6.252	k.s.f.

Table 4-2
Related Projects

Project Number	Location	Project Description - Land Use	Intensity	Units
131	7007 W Romaine Street	General Office Building	28.486	k.s.f.
		High Turnover Sit-Down Restaurant	4.694	k.s.f.
132	6753 W Selma Avenue	Multifamily Housing (Mid-Rise)	51	d.u.
		Shopping Center	0.438	k.s.f.

Sources: Appendix F
Notes: d.u. = dwelling unit; s.f. = square feet; k.s.f. = 1,000 square feet of floor area

4.3 CUMULATIVE IMPACT ANALYSIS

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

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

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

4.3.1 Aesthetics

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

Visual Character/Quality

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

potentially result in cumulative impacts to visual resources when considered in combination with the proposed project.

Three related projects are located within close proximity of the site. These projects consist of the following:

- 901 Ogden Drive (4 dwelling units), 950 Ogden Drive (10 dwelling units), 1001 Ogden Drive (5 dwelling units), 1008 Ogden Drive (7 dwelling units), and 1153 Ogden Drive (6 condominium units)
- 1150 North Orange Grove Avenue (7 dwelling units), 1019 North Orange Grove Avenue (9 dwelling units)
- Additionally, along Santa Monica Boulevard, several larger-scale projects are planned in both the City of West Hollywood and the City of Los Angeles, including projects located at 8550 Santa Monica Boulevard, 7965–7985 Santa Monica Boulevard, 7617 Santa Monica Boulevard, 8445 Santa Monica Boulevard, 8555 Santa Monica Boulevard, 6901 Santa Monica Boulevard, and 6677 Santa Monica Boulevard.

Within the block of the proposed project site, the projects planned on Ogden Drive and Orange Grove Avenue, in combination with the proposed project, would visually change the existing character in the immediate vicinity of the site. However, the projects on both Ogden Drive and Orange Grove Avenue are substantially smaller in scale and similar to the existing multifamily residential character of both of these residential streets.

Along the Santa Monica Boulevard corridor in the City, larger-scale mixed-use development are being proposed and/or constructed. As these projects are implemented, this is creating a more dense and urban character along the corridor. However, these related projects are all situated in an area that has already been subject to urban development. Land use intensification at these sites would not substantially degrade the visual character or quality of the viewshed.

Additionally, Santa Monica is a major transportation corridor and an area that the City recognizes to be a transit priority area. A transit priority area is defined in PRC Section 21099 to be the area within 0.5 miles of a Major Transit Stop, which is defined as the intersection of two or more bus routes with a frequency of service interval of less than 15 minutes during the morning and evening peak commute times (PRC Section 21064.3). In accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone as defined by this section, aesthetic impacts cannot be considered significant, and therefore, the analysis in the EIR makes no judgment of the significance of any possible impacts under CEQA. Similarly, aesthetic impacts for related projects in this transit area cannot be considered significant under CEQA.

As such, in accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone as defined by this section, aesthetic impacts cannot be considered significant, and therefore, this analysis makes no judgment of the significance of any possible impacts under CEQA.

Light

Cumulative effects of lighting are visible over a wide area, due to the potential for lighting from a number of projects to create skyglow. Nearby related projects would, in most cases, create additional sources of light, since many of the related projects increase the development intensity on their respective sites. However, the proposed project and the related projects are located in a highly developed and already well-lit area. Skyglow is an existing condition of the greater Los Angeles metropolitan area that would not be substantially affected by the related projects. As such, the development of the related projects would not represent a substantial change in the lighting environment of the area to the extent that nighttime views that are currently available would become unavailable. As with the related projects, the proposed project would involve additional lighting on site. All proposed lighting on site would be designed in accordance with the West Hollywood Municipal Code in order to prevent glare, light trespass, and sky glow as much as possible. All exterior lighting would be appropriately shielded and directed away from public rights-of-way and all signage would be designed in compliance with a Comprehensive Sign Program consistent with Section 19.34.070 of the City's Municipal Code. It is expected that the related projects would incorporate similar practices in their lighting design as the proposed project, in compliance with the City's Municipal Code. In accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone as defined by this section, aesthetic impacts cannot be considered significant, and therefore, this analysis makes no judgment of the significance of any possible impacts under CEQA.

Glare

Development of related projects has the potential to create glare from reflective surfaces and nighttime lighting to the extent that such projects may cause visual contrast between lighting and nearby darker areas, such as the night sky. The design of the project and many of the related projects would include surfaces that are potentially reflective, such as windows and metals. The proposed project and related projects may also create lit surfaces that protrude above the surrounding urban context. However, unlike lighting, which can be visible over a wide area, glare is more site specific. Residential areas separate the proposed project from this project and other related projects within the cumulative impact area for aesthetics. As discussed above, the proposed project would be required to comply with West Hollywood Municipal Code Section 19.10.060 regarding the use of reflective materials, by incorporating clear, un-tinted glass at the street level commercial uses and along the façade. It is expected that related projects would incorporate similar practices in their use of materials as the proposed project, in compliance with the City's Municipal Code. In accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone as defined by this

section, aesthetic impacts cannot be considered significant, and therefore, this analysis makes no judgment of the significance of any possible impacts under CEQA.

Shade/Shadow

Many of the related infill development projects involve smaller-scale residential developments in the area, either on already developed or vacant sites. Increases in height and/or massing would result at vacant sites relative to the structures that previously existed on the related project sites, which have the potential to create shade and shadow effects. Such effects are highly localized, since they are limited to the boundaries of the shade and shadows created by each new structure. As such, the related projects that could produce a cumulatively significant effect when combined with the proposed project are limited to those within the immediate vicinity of the project site. However, the most proximate related projects involve small-scale multifamily residential buildings and are therefore not expected to cast shade/shadow within the immediate vicinity of the project site. Thus, due to the distance from the project site and its size, it is not expected that this related project cast shade/shadow within the immediate vicinity of the project site. In accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone as defined by this section, aesthetic impacts cannot be considered significant, and therefore, this analysis makes no judgment of the significance of any possible impacts under CEQA.

4.3.2 Air Quality

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

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

Construction Emissions

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

Regarding localized impacts, construction activities on each individual site would generate emissions in excess of the site-specific LST for PM_{10}. Diesel equipment would be subject to the CARB ATCM for in-use off-road diesel fleets, which would minimize diesel particulate matter emissions. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. However, the project would not exceed significance thresholds. As such, the proposed project would not have a considerable contribution to the SCAB's nonattainment designation for PM_{10} and $PM_{2.5}$, and therefore the project would not cause a new cumulatively significant impact. Cumulative impacts involving localized effects of construction emissions on sensitive receptors would therefore be less than significant.

Operational Emissions

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

4.3.3 Cultural Resources

Historical Resources

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

No previously recorded historical resources were identified within the project area as a result of the records search. However, two previously unrecorded built environment resources were identified within the project area: the commercial building at 7811 Santa Monica Boulevard (built in 1924), and a small multifamily residence (built in 1949) located at 1125–1127 N. Ogden Drive. As a result of the historic resources evaluations performed, both resources were found not eligible for listing in the California Register of Historic Resources and local landmark designation due to a lack of important historical associations and architectural significance, and compromised integrity. These buildings are not considered historical resources under CEQA. Further, there are no adjacent resources that would be indirectly impacted by the proposed project. Therefore, construction and operation of the proposed project would not cause a substantial change in the significance of an historical resource as defined in CEQA Guidelines Section 15064.5, and impacts are considered less than significant. Because no project-specific impacts to cultural resources would occur, the project would not contribute to, or result in cumulative impacts.

Archaeological/ Paleontological Resources/Human Remains

Development of related projects could affect archaeological resources, paleontological resources, and/or human remains if such projects destroy or adversely affect such resources. This could happen, for example, if ground-disturbing activities during construction uncover buried resources, and such resources are significant but become destroyed, lost, or otherwise adversely affected during construction. This is most likely to occur where buried but previously unknown resources or remains exist. Such effects are highly localized, since they are limited to the boundaries of ground disturbing activities. As such, the related projects that could produce a cumulatively significant effect when combined with the proposed project are limited to those within the immediate vicinity where ground disturbing impacts could affect similar archaeological or paleontological resources or human remains.

As discussed in Section 3.3, Cultural Resources, no known archaeological resources or human remains have been identified on the project site. However, according to the records search results letter from the Natural History Museum of Los Angeles County (LACM), past construction-related grading and trenching activities in the area surrounding the project site encountered paleontological resources. Given the proximity of past fossil discoveries in the surrounding area and the underlying alluvial fan deposits, the project site is moderately to highly sensitive for supporting paleontological resources. In the event that intact paleontological resources are located on the project site, ground-disturbing activities associated with construction of the proposed project, such as grading during site preparation, have the potential to destroy a unique paleontological resource or site. Paleontological resources were discovered south of the project site, during construction of The Grove; from Park La Brea to the south; near the intersection of Third Street and Edinburgh Avenue; along San Vincente Avenue between Third Street and Colgate Avenue, southwest of the project site; and near the intersection of La Cienega Boulevard and

Oakwood Avenue, west-southwest of the project site. As such, it is possible that at least some fossilized remains could be encountered during grading within the project site and grading for the related projects in this area. Mitigation measure MM-CUL-3 requires a Paleontological Monitor to temporarily halt and/or divert grading activity to allow recovery of paleontological resources in the event of a find.

Each of the identified related projects would undergo separate CEQA review. During the CEQA process, the potential presence or absence of known archaeological resources, paleontological resources, and/or human remains would be revealed through records searches, site surveys, and communication with Native American tribes. Further, related projects involving ground disturbance have the potential to uncover previously unknown archaeological resources, paleontological resources, and/or human remains during construction. Standard measures are typically applied to most ground-disturbing projects, usually as mitigation measures or conditions of approval, which require construction to be stopped in the vicinity of any archaeological resource, paleontological resource, and/or human remains that are discovered. Such measures or conditions of approval require involvement of a qualified archaeologist, paleontologist, and/or Native American monitor. State laws also protect human remains and require certain actions be taken if resources and/or remains are discovered. These standard measures and regulations that are generally put in place for related projects would also apply to the proposed project (MM-CUL-1 and MM-CUL-2). In addition, because the project site is located in an area likely underlain by fill materials, mitigation measure MM-CUL-3 would require Paleontological Monitor to temporarily halt and/or divert grading activity to allow recovery of paleontological resources in the event of a find. It is expected that other related projects in the area would implement similar standard mitigation measures, and additional measures if located in areas of known paleontological resources. As such, cumulative impacts to archaeological resources, paleontological resources, and human remains would be less than significant with mitigation incorporated.

4.3.4 Greenhouse Gas Emissions

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

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

While the project would result in emissions of GHGs during construction and operation, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. However, it is generally the case that an individual project is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. Thus, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective (CAPCOA 2008). As indicated in Section 3.4, Greenhouse Gas Emissions, the project would result in an increase in GHG emissions relative to existing conditions. However, implementation of the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Projects included in Table 4-2, Related Projects, would be required to demonstrate compliance with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, such as the City's CAP. The project was found to be consistent with the City's CAP to reduce GHG emissions. Additionally, the proposed project would be constructed and designed in accordance with the City's Green Building Ordinance which would include implementing energy efficient systems and appliances, installing a solar water heating system for domestic hot water and pool heating, installing a 0.5 pt/KW photovoltaic system, including low-flow plumbing fixtures, and using water efficient irrigating systems. Furthermore, several statewide GHG reduction measures would reduce GHG emissions associated with motor vehicles and electrical generation over time. For these reasons, and as described in detail in Section 3.4, the project would not result in a significant GHG impact and would not create a considerable contribution to a cumulative impact. Cumulative impacts are therefore less than significant.

4.3.5 Hazards and Hazardous Materials

Transport, Use, or Disposal of Hazardous Materials

Construction of the proposed project and related projects would involve the transport, use, and disposal of hazardous materials such as fuels and lubricants, in association with construction vehicles and equipment. However, such materials are not considered acutely hazardous and are routinely used during construction throughout the City and neighboring jurisdictions. Furthermore, there are regulations governing the use of hazardous materials with which the proposed project and related projects would be required to comply. As a result, development of the proposed project and the related projects would occur in accordance with adopted plans and regulations. Further, none of the related projects in close proximity to the project site involve sites identified as

containing hazardous materials. For these reasons, the transport, use and disposal of hazardous materials typical during the construction process by the project and the related projects would not result in a significant cumulative impact. Through compliance with applicable regulations, cumulative impacts would be less than significant.

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

Release of Hazardous Materials

The release of hazardous materials to the environment could occur in association with the use, transport, or disposal of such materials, which is addressed above. Additionally, the release of hazardous materials can also occur during excavation of contaminated soils on site and during demolition of buildings containing asbestos-containing material (ACM), lead-based paint (LBP), and/or other hazardous building materials. Because many of the related projects are infill development, some many involve demolition and/or renovation of buildings containing hazardous building materials. As identified in Section 3.5, Hazards and Hazardous Materials, excavation activities on the project site are not anticipated to result in releases of hazardous materials into the environment. Further, existing buildings on the project site also have the potential to contain ACM and LBP. However, as discussed in Section 3.5, there are local, state, and federal laws that govern the removal of such substances and the proper treatment of contaminated soils. Compliance with these laws would prevent the release of ACM, LBP, and/or other hazardous building materials resulting from demolition on the project site, and the sites of related projects in the immediate vicinity, and prevent releases of hazardous materials form soils on the project site or related project sites into the environment. Through compliance with these applicable regulations by the proposed project and related projects, cumulative impacts would be less than significant.

Hazardous Materials Near Schools

The project site is immediately adjacent to Fountain Day School, a private preschool. This school is located immediately north of the project site along Orange Grove Avenue. Other schools in the surrounding vicinity, but greater than 0.25 miles from the project site, include Laurel Span Elementary School, Beverly Hills Montessori School, ABC Little School, Larchmont Charter School, and Fairfax Senior High School. As discussed above, the proposed project would adhere to all existing requirements and regulations during construction and operations. Compliance with these laws would prevent the release of ACM, LBP, and/or other hazardous building materials resulting from demolition on the project site, and the sites of related projects in the immediate vicinity, and prevent releases of hazardous materials form soils on the project site or related project sites into the environment. Through compliance with these applicable regulations by the proposed project and related projects, cumulative impacts would be less than significant.

4.3.6 Noise

Due to the localized nature of noise impacts, the analysis of cumulative noise impacts focuses on the related projects located within the immediate vicinity of the project site. There are several related projects located nearby, as detailed below.

- **1150 North Orange Grove Avenue** – a multifamily residential development, located 300 feet north of the proposed project site
- **1001 Ogden Drive** – a multifamily residential development project, located 747 feet south of the proposed project
- **French Market Project (7965–7985 Santa Monica Boulevard)** – a mixed use development project located 1,300 feet west of the project site

The proposed project and the related projects would all be subject to applicable noise standards (see Section 3.6, Noise, for a description of the standards applicable in the City of West Hollywood). Cumulative impacts related to temporary increases in ambient noise, permanent increases in ambient noise, and vibration impacts are discussed below.

Temporary/Periodic Increases in Ambient Noise Levels

The proposed project would result in temporary noise increases during the construction period. The proposed project's construction period would have the potential to overlap with the related projects' construction processes. As such, the proposed project and the nearby projects listed above would have the potential to create a cumulatively significant temporary or periodic increase in ambient noise levels. However, there are physical barriers (buildings, etc.) and significant distance between most of the related projects and the proposed project site, which would limit the potential for cumulative noise impacts during construction. The closest related

projects to the project site are the condo developments located at 1153 Ogden Drive, located approximately 300 feet northeast of the project site, on the north side of Santa Monica Boulevard, and development at 1150 North Orange Grove Avenue, located approximately 300 feet north of the project site, on the north side of Santa Monica Boulevard. However, due to the distance of these projects to the project site, and the small size of these projects, limited construction-related (i.e., temporary) cumulative noise impacts are expected to occur as a result of this project in combination with the nearby projects.

As described in Section 3.6 of this EIR, anticipated construction noise level increases of the proposed project as experienced by sensitive receptors (adjacent residences and Fountain Day School) range between 17 to 26 dBA L_{eq} above ambient levels. Thus, the project would exceed the 10 dBA temporary noise increase threshold. With incorporation of Applicant Proposed Construction Noise Controls, and mitigation measures MM-NOI-1 through MM-NOI-4, these construction-related noise effects of the proposed project would be reduced to a level of less than significant.

Due to the type of development, construction fleet and type of activities for nearby related projects, such as 1153 Ogden Drive and 1150 North Orange Grove Avenue, would be much smaller scale when compared to those of the proposed project. In the event that construction of the proposed project and these two nearby projects were to occur simultaneously, it is possible that sensitive receptors such as nearby residences and Fountain Day School could experience increased noise levels from simultaneous operation of construction equipment. However, the noise impacts would be localized, and the magnitude of impacts would be highly dependent on the location and type of the construction equipment at each site.

As explained in Section 3.6, mitigation measures MM-NOI-1 through MM-NOI-4 would be applied to the proposed project to reduce construction-related noise effects to below a level of significance. MM-NOI-1 requires construction noise control efforts such as ensuring that equipment is fitted with effective mufflers, shutting off idling equipment, placing stationary equipment and staging areas as far as practical from noise sensitive receptors, and using temporary barriers around individual equipment generating particularly high noise levels. MM-NOI-2 and MM-NOI-3 capture and refine the construction noise controls proposed by the Applicant by carefully outlining how construction would be done to reduce impacts to adjacent noise-sensitive receptors. MM-NOI-4, also required to reduce potentially significant noise impacts, provides further requirements for noise reduction in regard to stationary construction equipment. Considering Municipal Code restrictions, Applicant-proposed noise reduction measures, and with implementation of MM-NOI-1 through MM-NOI-4, temporary construction-related noise impacts would be reduced to less than significant with mitigation. In the event construction of the nearby residential projects were to occur simultaneously with the proposed project, there is the potential for significant noise impacts. However, due to the temporary and sporadic nature of these noise impacts, and that with implementation of the project's noise mitigation measures, cumulative noise impacts would be reduced to less than significant.

Permanent Increase in Ambient Noise Levels

Development of the proposed project in combination with related projects would generally increase the land use intensity at the related project sites, resulting in increased ambient noise levels. At the project site, long-term operational noise would result from operations of the proposed project such as noise from residences, hotel operations, retail uses (art gallery), dining, proposed subterranean garage, conversations from people gathering in the project's outdoor areas, the use of outdoor amplified sound systems in the project's outdoor areas, and other on-site noise sources.

As discussed above, six related projects located within the immediate proximity of the proposed project. All of these projects are situated such that there are intervening buildings and major roadways between the proposed project and the respective related project sites. However, two projects (1153 Ogden Drive and 1150 North Orange Grove Avenue) are located extremely close to the project site. The project site is separated from these two nearby related project by small intervening buildings. These intervening structures, as well as distance between the project site and these related projects, would reduce the potential for on-site noise sources from the project to combine with those from the related projects to create a cumulative effects on the nearby Fountain Day School and adjacent residences. Further, the two related projects would consist of small residential developments in an already developed residential area and thus are not expected to add substantial noise levels above existing conditions.

To ensure that noise levels from the proposed project do not exceed applicable thresholds such that significant noise impacts would occur, mitigation measures MM-NOI-5 and MM-NOI-6, which require restrictions for loading dock hours and restrictions and calibrations on the outdoor amplification system, are required. The related projects would be required to comply with these same City noise standards. Compliance with the City's Noise Control Ordinance and implementation of these mitigation measures would reduce the proposed project's contribution to potential cumulative impacts involving a permanent increase in ambient noise levels attributable to on-site noise sources. Due to compliance with the City's Noise Control Ordinance and implementation of project-specific mitigation measures when required, cumulative impacts would be less than significant with mitigation incorporated.

Off-Site Traffic Noise

The project would generate traffic along adjacent roadways including Santa Monica Boulevard, North Ogden Drive, North Fairfax Avenue, North Genesee Avenue and North Orange Grove Avenue. Although related projects would also increase traffic, the related projects located within the closest proximity to the project site are small scale residential developments that would not contribute to a great increase in vehicle trips. When calculating future traffic impacts, the traffic analysis considered 63 additional projects (see Section 3.8, Transportation, and Appendix F). Thus, the future traffic results with and without the proposed project already

account for the cumulative impacts from the list of related projects contributing to traffic increases. As shown in Table 3.6-9, Traffic Noise (Existing and Cumulative-Plus-Project Noise Levels), in Section 3.6.5, Impact Analysis, of the Draft EIR, cumulative with project conditions were already reflected in the impacts. As shown in this table, no significant increases in noise would result under the Cumulative-with-Project scenario. As such, increases would be below the significance threshold of 5 dB and cumulative impacts would be less than significant.

Vibration

The proposed project and related projects may generate vibration during the construction process. Ground vibration generated by construction equipment spreads through the ground and diminishes greatly in magnitude with increases in distance, on the order of approximately 25 feet. Since none of the related projects are located within 25 feet of the proposed project, cumulative vibration impacts would not occur. Thus, due to the distances between the project and the related projects, and the brief and sporadic nature of vibration-causing construction activities, cumulative impacts related to vibration would be less than significant.

4.3.7 Public Services

Fire and Police

Development of the proposed project in combination with related projects in the City of West Hollywood would generally increase the land use intensities in the City. Incremental increases in land use intensity that would be caused as the related projects are developed could lead to incremental increases in the number of calls for fire and police protection services. As discussed in Section 3.7, Public Services, the project site would be served by LACFD for fire protection services and the Los Angeles County Sheriff's Department (Sheriff's Department) for police protection services. The proposed project and related projects would be required to be developed in accordance with applicable fire codes and emergency access requirements (Section 3.7 includes a list with a number of these requirements that apply to the proposed project). Compliance with these requirements would help prevent and/or ameliorate fire emergencies (automatic sprinkler systems and fire alarms) and would help facilitate more expedient emergency response (adequate fire flows, turning radii, width of emergency accesses). Further, the proposed project and related projects are infill projects and therefore involve replacement of existing structures with new structures. New structures are subject to modern standards for fire protection. As such, infill projects generally result in development of structures that are less likely to cause or contribute to an urban fire hazard when compared with structures that were built in accordance with outdated fire protection requirements. Development of the proposed project and related infill projects would incrementally reduce the potential for urban fire hazards within the City. Additionally, LACFD reviews fire station placement and fire services through its annual budget process, and resources are expanded or reassigned as necessary to meet increases in service demands.

Similarly, the proposed project has been designed to improve public safety and alleviate any potential increases in demands for police services that may occur as a result of increasing the land use intensity of the site. As described in Section 3.7, temporary security measures would be put in place during construction at the project site. During operation, the project site would have security gates to separate ground level parking available for commercial users from basement parking utilized by hotel guests and building residents below. These aspects of the project would lessen the demand for police protection services at the project site. It is expected that related projects in the City of West Hollywood would incorporate similar design elements that would reduce each project's incremental effect on police services by preventing emergencies and facilitating expedient access and response. Further, the Sheriff's Department evaluates its service needs on an annual basis to keep pace with projected growth.

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

Schools

The need for new school facilities is typically associated with an increase in residential population and housing. The proposed project would involve construction of 70 new residential units in the City. Utilizing the state's Student Yield Factor for Unified School Districts, the project is expected to generate approximately 49 new students. Utilizing the City of West Hollywood 2035 General Plan EIR, the project would generate approximately 29 new students (City of West Hollywood 2010). Several of the related projects in Table 4-2 also involve residential development. However, each related project would undergo CEQA review. In addition, per California Code Section 65995, developer fees paid to the LAUSD, the provider of school services within the City, by the proposed project or related project developers would offset impacts to schools from increased student enrollment. As such, cumulative impacts would be less than significant.

4.3.8 Transportation

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

As discussed in Section 3.8, Transportation, future traffic conditions take into account a total of future traffic conditions take into account a total of 63 related projects in the cities of West Hollywood and Los Angeles as well as general traffic growth in the area (i.e., "background" traffic growth). The 63 related projects are all located within an approximate 1.5-mile radius from the project site and were considered to potentially contribute measurable traffic volumes

to the study area during the future analysis period. The related projects used to formulate the cumulative traffic scenario (i.e., future traffic conditions) are listed in Table 3.8-7, Area/Cumulative Projects Trip Generation. As part of the traffic analysis, future traffic conditions were added to the proposed project traffic to formulate a "future-plus-project" scenario. This scenario was then analyzed relative to the applicable traffic impact criteria established by the City of West Hollywood, City of Los Angeles, and the County CMP. Impacts of the proposed project under the "future-plus-project" traffic conditions would not result in significant traffic impacts at any roadway segment, during construction and operation of the project. As such, the cumulative impacts related to inconsistences with established performance measures and with the CMP would be less than significant.

Road Safety

The proposed project would result in an increase in the number vehicles that enter and exit the project site. The proposed project would provide two driveways with north-bound turning egress restrictions, one on Orange Grove Avenue, and another residential-only driveway on Ogden Drive. A third ingress-only driveway would be provided along Santa Monica Boulevard. The three driveways would be designed per City standards and the project would not add incompatible uses to the project area.

The proposed project and immediately adjacent projects could lead to an overall increase in pedestrian activity in the area. While the increased traffic and pedestrian activity associated with related projects may combine to increase overall pedestrian hazards in the area, the proposed project is not expected to significantly exacerbate any pedestrian hazards in the area. Overall, the existing sidewalk network, traffic signals at major intersections, and the pedestrian-oriented nature of the project and surrounding neighborhood provide a safe local pedestrian travel network. As such, the proposed project in combination with nearby related projects would not substantially exacerbate existing pedestrian safety issues, and cumulative impacts would be less than significant.

Alternative Transportation

Development of the proposed project in combination with related projects is anticipated to incrementally increase the use of transit, bicycle, and pedestrian facilities in the area because the projects would increase land use intensity and would include design elements that encourage increased use of alternative transportation. At the local and regional level, increased use and enhancement of alternative transportation modes is being encouraged and successfully implemented. Infill and redevelopment projects, such as the proposed project and most if not all of the related projects, are anticipated to increase the use of alternative transportation modes by developing services and residential dwellings within the vicinity of existing and future alternative transportation facilities. Development in the area, including the proposed project and related

projects, would be required to comply with applicable adopted policies, plans, or programs regarding public transit, bicycle, and pedestrian facilities. Due to the infill nature of the proposed project and related projects, the urbanized nature of the project area and existing access to alternative transportation, as well as required compliance with applicable plans and policies pertaining to alternative transportation, cumulative impacts would be less than significant.

4.3.9 Utilities and Service Systems

Water Supply

Development of the proposed project in combination with related projects would increase land use intensities in the area, resulting in increased water usage. The proposed project and related projects would be served by the Los Angeles Department of Water and Power (LADWP). As such, development of the proposed project and related projects would increase the amount of water used in the LADWP's service area. The LADWP Urban Water Management Plan describes the total annual water demand in LADWP's Service Area in 2015 was over 500,000 acre-feet. This equates to approximately 162 billion gallons per year, or 446 million gallons per day. The LADWP Urban Water Management Plan states that LADWP and other water agencies in Southern California have planned for provision of regional water for the growing population, including drought scenarios for its service area. The plan includes a new water demand forecast prepared for the major categories of demand, and uses regional population, demographic projections, the dry climate, historical water use to develop these forecasts.

As such, to the extent that related projects are generally consistent with regional growth patterns and projections, the projects would not be expected to result in increased water usage causing the need for new entitlements, resources, and/or treatment facilities that are not already being planned to accommodate regional growth forecasts. The City of Los Angeles also has an Integrated Water Resources Plan (IRP), which includes capital improvement programs for wastewater and stormwater, and a recycled water master plan. The IRP allowed the City to develop a vision for meeting 2020 needs in a more cost-effective and sustainable way, by addressing and integrating all its water resources (LADWP 2015). Further, in response to dry conditions affecting the City's imported water supplies, the City prepared the Sustainable City Plan (pLAn), calling for a 20% reduction in water use by 2017 and 25% by 2035 (LADWP 2015).

The proposed project, in combination with cumulative development listed in Table 4-2, would meet this 25% reduction in water use by 2035 through water conservation methods. For projects located in the City of West Hollywood, the Infrastructure, Resources, and Conservation (IRC) Element of the General Plan requires a 40% less than baseline conditions for all new buildings, with the exception of single-family homes. The IRC Element also requires a reduction in water consumption for outdoor landscape irrigation, consistent with the most recent City policy. For projects located in the City of West Hollywood and City of Los Angeles, the LADWP's integrated water resources

management approach includes development of additional local supplies to reduce dependence on purchased imported supplies based on recommendations from prior program-level planning initiatives. This includes consideration of recycled water, groundwater system improvements, stormwater capture, and studies of conservation potential. In addition to the circumstances already considered in the UWMP, the proposed project and related cumulative projects would implement sustainable design features that would reduce water use during operation compared to traditional building and operational practices.

Lastly, compliance with the California Green Building Code would be required for new development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on redevelopment sites. In addition, California Green Building Code standards require mandatory reduction in outdoor water use, in accordance with the California Department of Water Resources' Model Water Efficient Landscape Ordinance. This would ensure that many of the related projects, as well as the proposed project, do not result in wasteful or inefficient use of limited water resources and may, in fact, result in an overall decrease in water use per person.

Due to water planning efforts, water conservation standards, and the urban infill/redevelopment nature of the proposed project and many of the related projects, cumulative impacts would be less than significant.

Wastewater

The proposed project and each related project listed in Table 4-2 would incrementally increase the amount of wastewater that is being generated in the area. However, as described in Section 3.9, Utilities and Service Systems, the existing sewer lines that serve the project site have the capacity to convey the estimated peak flow generated from the proposed project (more than 50% inclusive of the proposed project). Similar to the existing project, the capacity of receiving sewer lines associated with cumulative project development would be determined on a project-specific basis. In the event that sewer upgrades are required, all construction work within the city public right-of-ways would be subject to local municipal code requirements. Other than the lateral connections from the related project sites to existing sewer mains, these related projects are not expected to require or result in construction or expansion of off-site infrastructure. As a result, indirect cumulative impacts associated with upgrades of sewer lateral connections to related project sites would not be cumulatively considerable. Impacts would be less than significant.

Solid Waste

Development of the proposed project in combination with related projects would increase land use intensities in the area, resulting in increased solid waste generation in the service area for Los Angeles County landfills. However, the proposed project and related projects are urban infill

and/or redevelopment projects. As such, solid waste is already being generated at the proposed project site and the majority, if not all, of the related project sites. Further, Assembly Bill 939, or the Integrated Waste Management Act of 1989, mandates that cities divert from landfills 50% of the total solid waste generated to recycling facilities. In order to maintain state requirements of diverting 50% of solid waste and to offset impacts associated with solid waste, the proposed project and all related projects would be required to implement waste reduction, diversion, and recycling during both demolition/construction and operation. (Specifically, during construction, the City requires diversion of 80% of construction and demolition waste.)

In 2011, the City of West Hollywood adopted a waste reduction measure within the Climate Action Plan (CAP). This measure aims at reducing solid waste to less than 4 pounds per person per day for residents and employees of businesses in the City. This reduction would equate to a 23% reduction in residential waste sent to landfills and 35% reduction in commercial waste streams. In addition, the CAP states that the City is working with the County, neighboring cities, and other organizations to develop a low-waste plan and provide public education on low-waste strategies and implementation.

Through compliance with City and state solid waste diversion requirements and due to the recycling collection features that would be part of the proposed project design and the design of many typical urban infill projects, cumulative impacts would be less than significant.

Electric Power, Natural Gas, and Telecommunication

The cities of West Hollywood and Los Angeles are built out and upgrades in electrical power, natural gas, and telecommunication capabilities are anticipated primarily due to development in the form of revitalization of outdated or underserved areas, and redevelopment of specific properties that will increase density and require more sophisticated technology, such as the proposed project. However, such upgrades would generally be confined to the lateral connections to the individual project sites and not any centralized facilities. Upgrades to centralized power, natural gas, and telecommunication facilities would be determined by each of the power, gas, and telecommunications providers, as build-out continues within the region. Individual projects would be required to provide for the needs of their projects. As a result, cumulative impacts associated with upgrades of electric, natural gas, and telecommunication facilities not be cumulatively considerable. Impacts would be less than significant, and no mitigation is required.

4.3.10 Energy

The proposed project and related projects would incrementally increase energy demand in the area. As described in Section 3.10, Energy, there are numerous requirements that apply to the proposed project and to related projects which would reduce energy demand of new development and redevelopment in the area. For example, all future projects, including the proposed project, would be required to meet the California Building Energy Efficiency Standards. The California Building

Energy Efficiency Standards that were applicable through 2016 were the 2013 standards. Buildings constructed in accordance with the 2013 standards use 25% less energy for lighting, heating, cooling, ventilation, and water heating than buildings constructed in accordance with the 2008 standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, will become effective in January 1, 2020. In general, residential structures built to the 2016 standards are anticipated to use about 28% less energy than those built to the 2013 standards, and nonresidential buildings built to the 2016 standards will use an estimated 5% less energy than those built to the 2013 standards (see Section 3.10 for details). As described in Section 3.10, although electricity and natural gas consumption would increase at the project site due to the implementation of the proposed project, the project would comply with the City's mandatory green building ordinance through implementing energy-efficiency measures. It should be noted that although the proposed project meets these standards, it can also exceed these standards. In addition, the proposed project is expected to exceed energy standards set by Title 24 by 10%. The proposed project is expected to result in a 28% decrease in annnual natural gas usage per square foot when compared to the existing site conditions. Due to the urbanized nature of the City and surrounding areas, many of the related projects are expected to result in a similar pattern—while the overall use of electricity and natural gas on the site increases, the energy use per square foot is expected to decrease due to compliance with modern standards and incorporation of modern technologies and design standards. A development pattern of increased density combined with increased efficiency is less energy intensive when compared with new development located on previously undeveloped land away from urban centers. As such, while the proposed project and related projects would result in increasing energy consumption in the region, they would also result in increased energy efficiency.

Specifically regarding petroleum use, the proposed project and related projects would require petroleum during construction for off-road equipment, truck trips, and worker vehicle trips. However, construction of the proposed project and related projects would be temporary.

4.4 REFERENCES CITED

CAPCOA (California Air Pollution Control Officers Association). 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January 2008.

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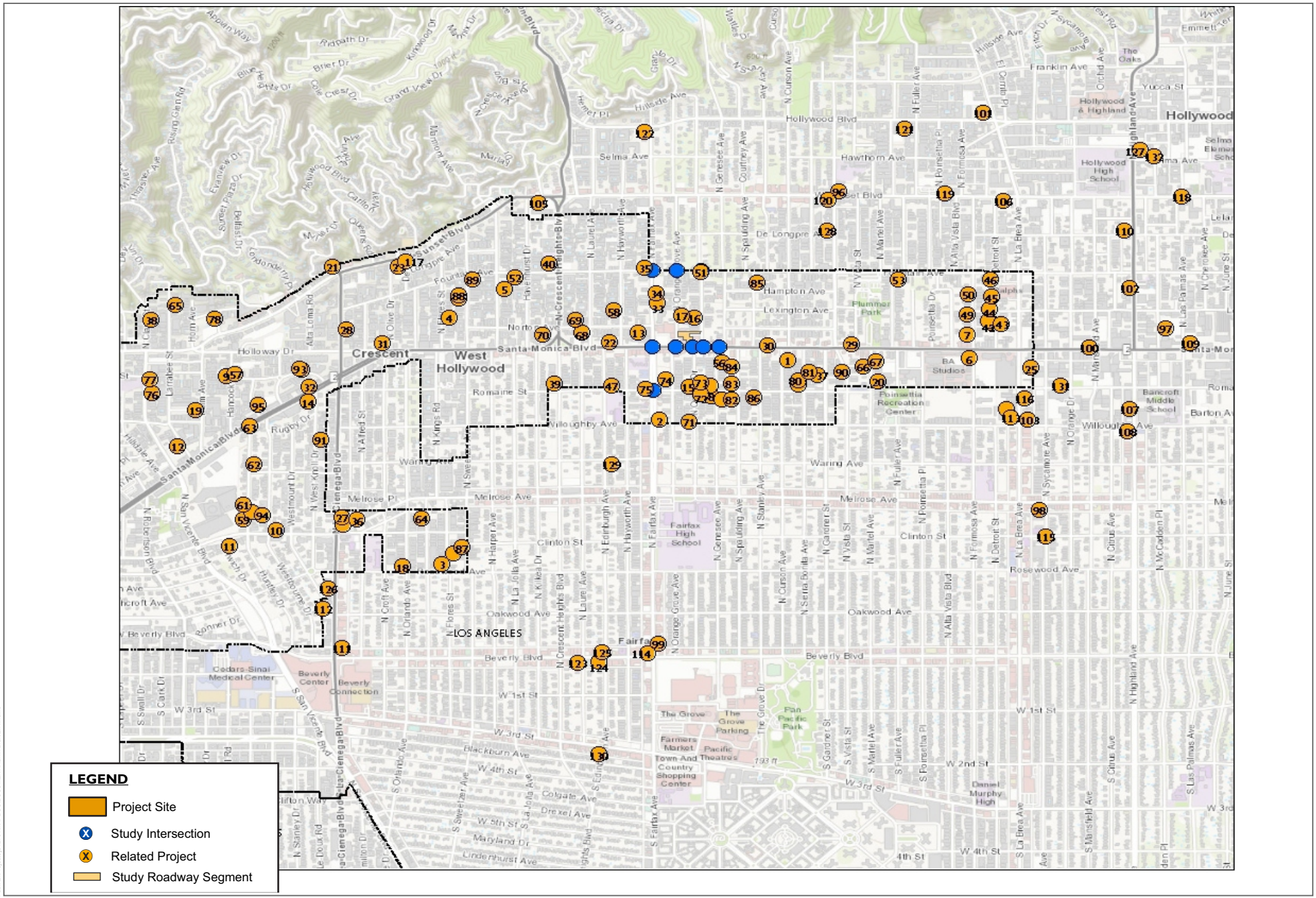

SOURCE: KOA, 2019

FIGURE 4-1

Locations of Cumulative Projects

The Bond Project

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