7617 Santa Monica Boulevard

Final

Sustainable Communities Environmental Assessment

Prepared for:

City of West Hollywood
Planning and Development Services
8300 Santa Monica Boulevard
West Hollywood, CA 90069

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1.0 INTRODUCTION

Project Title: 7617 Santa Monica Boulevard Project

Project Location: 7617 Santa Monica Boulevard in the City of West Hollywood, California 90046.

Project Applicant: La Terra Development, LLC
1880 Century Park East, Suite 600
Los Angeles, CA 90025

Lead Agency: City of West Hollywood
Department of Planning and Development Services
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1.1 SUMMARY

Previously, the City reviewed the environmental impacts of a project through one of three methods - categorical exemption, negative declaration/mitigated negative declaration (MND/ND), or environmental impact report (EIR). In 2008 the State legislature created an additional document for environmental review called a Sustainable Communities Environmental Assessment (SCEA).

The subject of this SCEA is the proposed demolition of an existing car wash and the construction of a 4-story, mixed-use residential building. The Project is located at 7617 Santa Monica Boulevard in the City of West Hollywood. The Project site is an approximately 31,400-square-foot (0.72 acre) lot. The proposed building would contain 71 residential units within 48,975 square feet of residential floor area and approximately 9,240 square feet of ground-floor commercial uses. The entire building would be approximately 63,560 square feet in size and would include a 2-level subterranean parking garage.

The Project would require the approval by the City of West Hollywood Planning Commission of a demolition permit, development permit, and Tentative Tact Map.

On October 24, 2019, the City issued a Notice of Availability to adopt a SCEA and circulated the draft document for a review and comment period lasting through November 25,2019. Response to comments received during the review period are contained in **Section 5.0**, below. The comment letters are provided in full as an Appendix to this document. Prior to approving the Project, the City must consider the proposed SCEA together with any comments received during the public review process and may adopt the proposed SCEA only if it finds on the basis of the whole record before it that there is no substantial evidence that the project will have a significant effect on the environment and that the SCEA reflects the lead agency's independent judgment and analysis.

The California Environmental Quality Act (CEQA) requires State and local agencies to identify potential significant environmental impacts of their actions and where possible avoid or mitigate those impacts. The City of West Hollywood has identified potential significant impacts associated with:

- Cumulative Air Quality and Greenhouse Gas impacts as specified in City's General Plan EIR;
- The potential for inadvertent discovery of subsurface Cultural, Paleontological, and Tribal Cultural Resources; and
- Construction noise impacts

Measures are included in this SCEA that would mitigate these impacts.

1.2 ORGANIZATION OF THE SCEA

This SCEA is organized into four sections as follows:

Section 1.0: Introduction, provides introductory information, such as the Project title, the Project Applicant, and the lead agency for the Project.

Section 2.0: Project Description*,* provides a detailed description of the Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

Section 3.0: Sustainable Communities Environmental Assessment Criteria, describes the regulatory background and criteria for the use of a SCEA in completing the CEQA process for this Project.

Section 4.0: Initial Study, identifies each environmental issue identified in the Initial Study Checklist which contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less than significant level.

Section 5.0: Response to Comments, provides the comments received during the public review period and responses from the City.

Section 6.0: Mitigation Monitoring and Reporting Program identifies the monitoring and enforcing responsibilities for the mitigation measures identified in this SCEA.

In addition, **Appendices** include Project-specific reports and data used to support the analysis in this Initial Study.

2.1 PROJECT LOCATION

The Project site is located at 7617 Santa Monica Boulevard. The Project site is located in the City of West Hollywood Community Plan as shown in **Figure 2.0-1: Regional Location Map**. The City of West Hollywood is located within a dense urban area of Los Angeles County, bound by the City of Los Angeles to the east, north, and south, and by the City of Beverly Hills to the west. The Project site is located on the north side of Santa Monica Boulevard between North Curson Avenue and North Spaulding Avenue as shown in **Figure 2.0-2: Project Location Map**.

2.2 EXISTING SITE CONDITIONS

The Project site encompasses approximately 31,400 square feet, or 0.72 acres, and includes one parcel (Assessor's Parcel Number [APN] 5530-011-037). The Project site is currently developed with an existing 1-story car wash (commonly known as Madison Express Car Wash), which was built in 1970, as shown in **Figure 2.0-3: Existing Conditions**. The existing car wash consists of approximately 4,910 square feet of building area, in addition to other related structures and surface parking area. The Project site is relatively flat and is characterized by limited landscaping, consisting of ornamental trees and shrubs within the site and public right-of-way.

2.3 ZONING AND LAND USE

The Project site is subject to the applicable land use and zoning requirements of the City of West Hollywood General Plan and the West Hollywood Municipal Code. The Project site is designated by the City's General Plan as CC1 (Commercial, Community 1), as shown in **Figure 2.0-4: Land Use and Zoning Map**. The CC1 designation provides for commercial uses and mixed-use development along major corridors, such as Santa Monica Boulevard.[1] Mixed-use development with residential, commercial, and office uses is encouraged near major intersections and in locations with high-frequency transit service.

Consistent with the CC1 land use designation, the Project site is also zoned CC1 (Commercial, Community 1), which is intended to provide a wide variety of commercial opportunities to serve local community needs.[2] The CC1 zoning district allows for a variety of commercial uses, including retail, entertainment, restaurants, and specialty shops; mixing with residential uses is encouraged.

1 City of West Hollywood, General Plan 2035 (adopted September 6, 2011).
2 West Hollywood Municipal Code, tit. 19, art. 19-2, ch. 19.04, sec. 19.10.020.

2.4 SURROUNDING LAND USES

To the south of the project site across Santa Monica Boulevard is a strip of 1-story commercial buildings, including retail shops, a spa, and a community center. These properties are designated as CC1 (Commercial, Community 1) and zoned CC1.

To the east of the project site is a 2-story commercial building consisting of various retail and medical and dentist offices, as well as a related surface parking lot. This property is also designated as CC1 (Commercial, Community 1) and zoned CC1.

Immediately west of the project site is the Los Angeles County Fire Department Station No. 8, which consists of a 3-story building and surface parking. This property is designated as PF (Public Facilities) and zoned PF.

To the north of the project site beyond the adjacent alley are 2-story multi-family residential buildings. These properties are designated as Residential Low Density and zoned R2 (Residential, Low Density).

The Project site is located in an area well served by public transit provided by the City's free Cityline shuttle service and the Los Angeles County Metropolitan Transportation Authority (Metro). The Cityline shuttle service operates two bus lines close to the Project site, with the nearest stations across Santa Monica Boulevard at the intersections of Stanley Avenue and Curson Avenue. Metro operates several local and rapid transit lines on major streets within the City, including Santa Monica Boulevard. The bus lines that run along Santa Monica Boulevard include Lines 4 and 704, which have stations within a block east or west of the Project site; and Lines 217 and 780, with the nearest station approximately 0.25 miles west at the intersection of Fairfax Avenue. Metro also operates the Red Line heavy rail, with the nearest location at the Hollywood/Highland station, approximately 1.25 miles northeast of the Project site. Metro Lines 217 and 780 provide service to the Hollywood/Highland Metro station.

2.5 PROJECT CHARACTERISTICS

As shown in **Figure 2.0-5: Project Rendering**, the proposed Project involves the construction of a new 4-story, mixed-use residential building. The proposed building would contain 71 residential units (including 6 very low income and 5 moderate-income affordable housing units, satisfying the City's inclusionary requirement) and approximately 9,240 square feet of ground-floor commercial uses, as shown in **Figure 2.0-6: Site Plan**. Elements of the proposed Project include a ground-floor lobby and entrance accessible from Santa Monica Boulevard that would also contain leasing and management offices. Additional residential amenities include an outdoor pool and deck; patio areas; a fire pit; and other forms of open space and landscaping. The ground-floor commercial uses would have frontages along Santa Monica Boulevard, with surface parking available on the back of the site.

The residential component of the proposed mixed-use building would contain 21 studios, 31 one-bedroom units, and 19 two-bedroom units, including 11 units designated for affordable housing. The residential component would provide a total of approximately 48,975 square feet of residential floor area. The residential units would be located on floors 2 through 4, with access provided by two elevators and a stairwell located at the core of the building as shown in **Figure 2.0-7: Floor Plan Level 2**, **Figure 2.0-8: Floor Plan Level 3**, **and Figure 2.0-9: Floor Plan Level 4**. The residential floors would be oriented around a center atrium that would contain open space amenities for residents, including tables, grass areas, and landscaping and water features.

The proposed 4-story building would be approximately 63,560 square feet in size and would also include a 2-level subterranean parking garage, as shown in **Figure 2.0-10: Parking Level P1** and **Figure 2.0-11: Parking Level P2**. The proposed mixed-use building would be approximately 45 feet in height to the top of the main roof and would have an allowable floor–area ratio (FAR) of 2.025. The front setback would be a minimum of 10 feet from Santa Monica Boulevard, with 0-foot side setbacks, and a minimum 15-foot setback to provide separation between the commercial uses on the Project site and the adjacent residential uses on the back.

The proposed mixed-use building would be designed in a contemporary architectural style. Architectural materials would include a mix of corrugated metal, fiber-reinforced concrete, metal-framed elements, glass, and plastic glazing. The proposed Project would also provide opportunities for urban art designs on the building's facades.

Open Space and Landscaping

The proposed Project would provide approximately 8,370 square feet of common open space, including landscaped/furnished spaces on the second level, as well as a landscaped rooftop pool and deck on the fourth floor. The proposed Project would also provide approximately 8,520 square feet of private open space for the residential units.

Access, Circulation, and Parking

Access to the Project site would be provided from an ingress/egress driveway located along the eastern boundary of the Project site, as shown in **Figure 2.0-4**. Vehicles would be able to access this driveway directly from Santa Monica Boulevard, with one lane provided in each direction of travel. The proposed driveway would lead to the surface parking spaces behind the commercial frontages, as well as to the entrance of the subterranean parking garage on the western portion of the Project site. A total of 177 parking spaces would be provided between the surface and subterranean parking areas on the Project site, 5 of which would be designated to accommodate electric vehicle (EV) charging. The proposed Project would also provide 21 bicycle parking spaces located on the first level with the surface parking spaces.

2.6 CONSTRUCTION

Construction would last approximately 30 months. Construction will begin in late 2019 and finish in 2022. Construction would include (1) demolition, which would last approximately 1 month; (2) site preparation, which would last approximately 1 month; (3) grading, which would last approximately 6 months; (4) building construction, which would last approximately 18 months; and (5) paving and architectural coating, which would last approximately 3 months. Each phase of construction would result in varying levels of intensity and number of construction personnel.

2.7 APPROVAL ACTIONS

The proposed Project would require the discretionary approval of the City of West Hollywood Planning Commission. No other public agency approval is required. The following approvals would be required:

- A Development Permit to allow the construction of the proposed Project, which involves a new structure that will exceed 10,000 square feet in size;
- A Demolition Permit to allow the demolition of the existing car wash and all related structures on the Project site; and
- A Tentative Tact Map for the subdivision of the site into one ground lot and three airspace lots to contain the residential, commercial, and common use spaces, in accordance with West Hollywood Municipal Code Section 19.36.100 D.

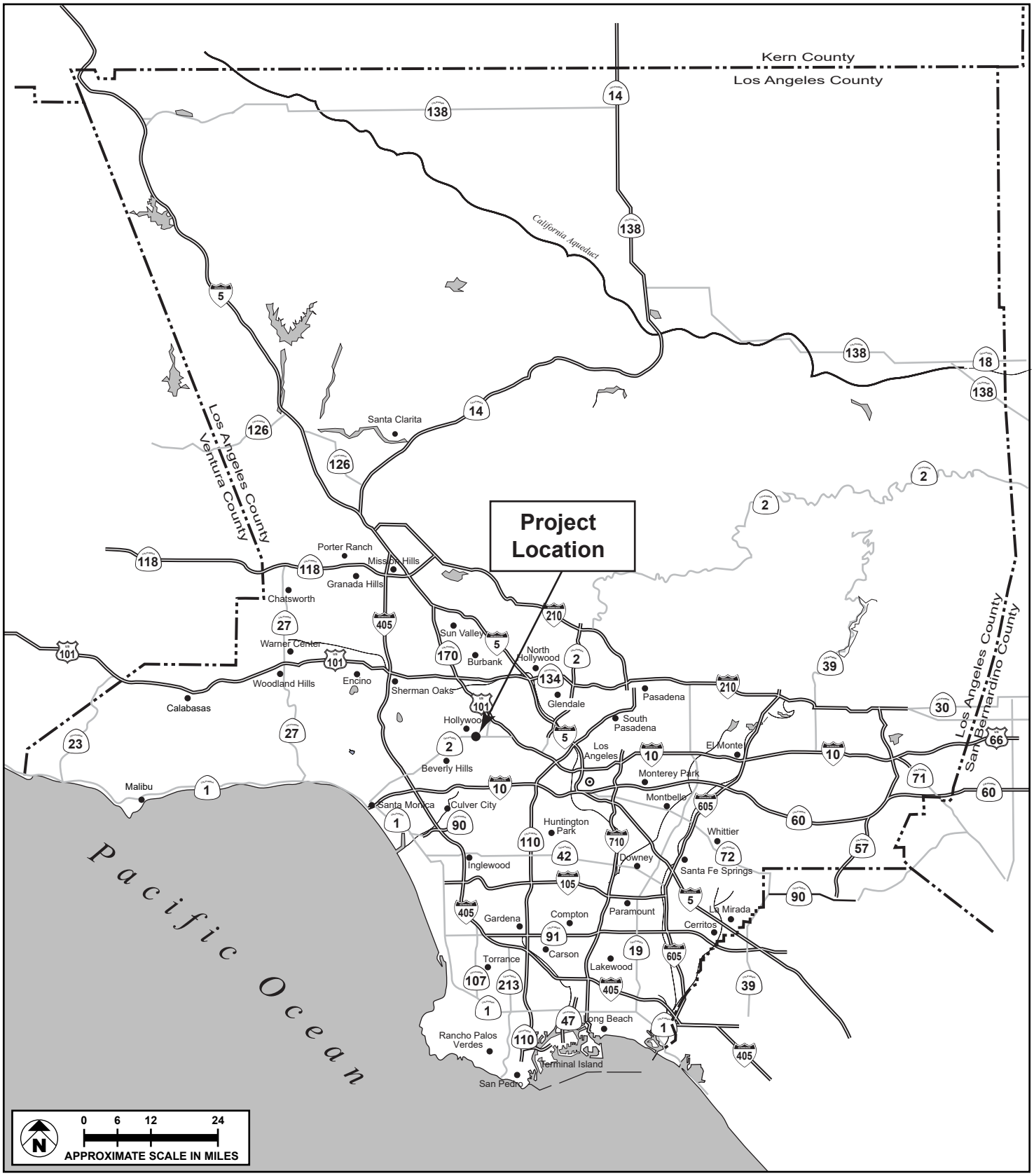

FIGURE **1**

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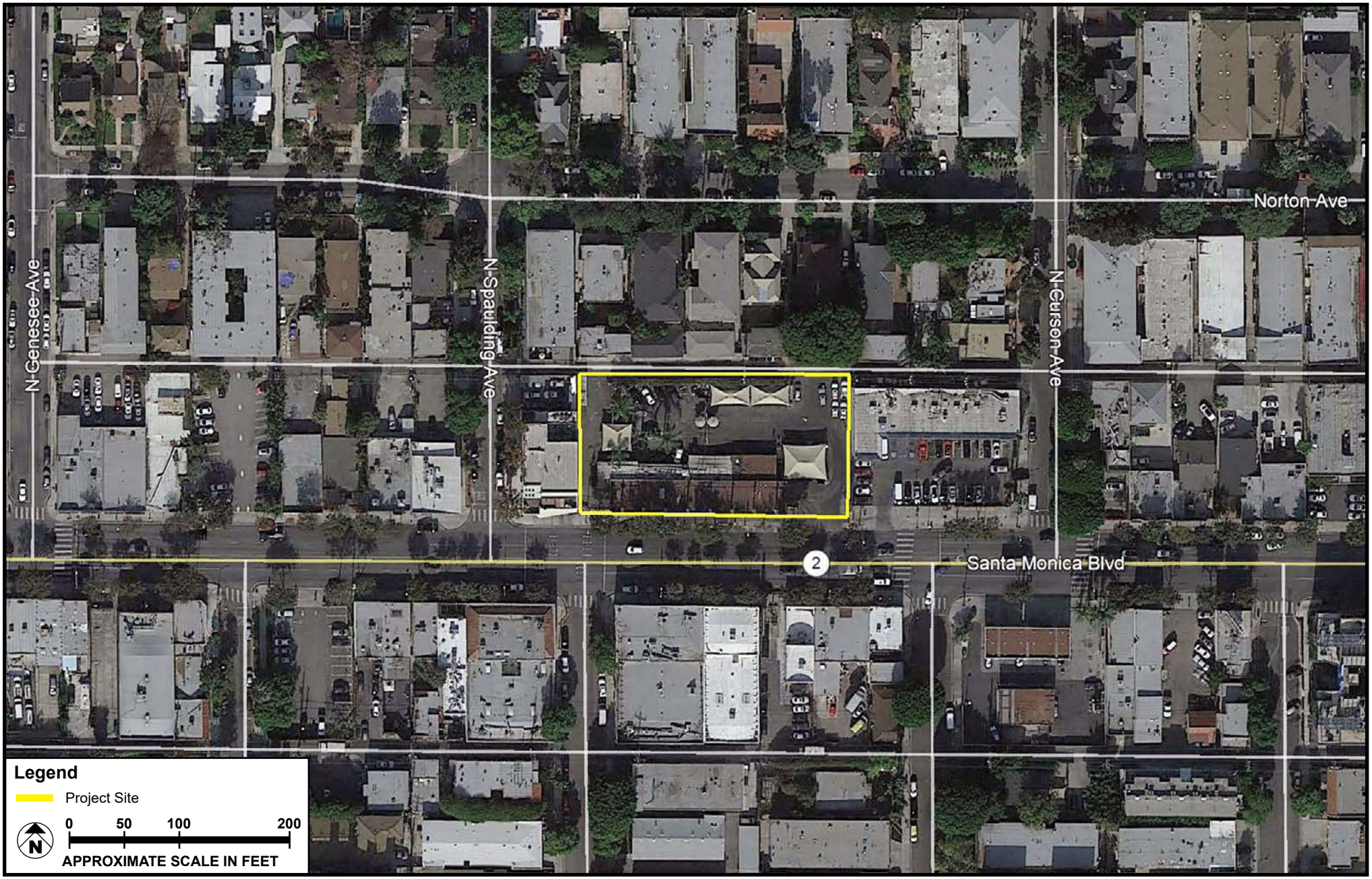
Regional Location Map

214-001-18



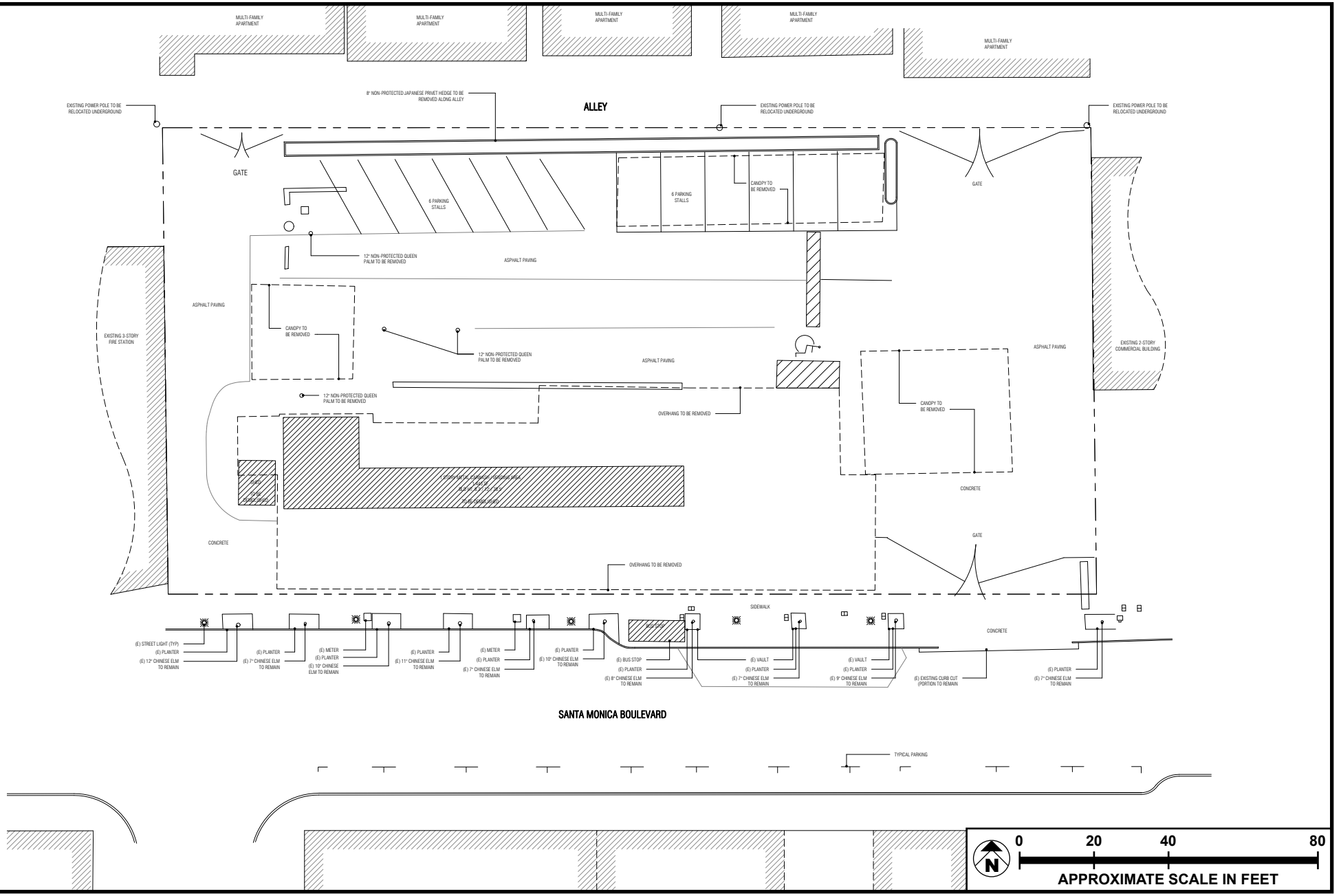
SOURCE: Google Earth - 2018

FIGURE **2**

Meridian Consultants

Project Location Map

214-001-18



SOURCE: R&A Architecture and Design, April 2018

FIGURE **3**

Meridian Consultants

Existing Conditions

214-001-18

SOURCE: City of West Hollywood, General Plan 2035, September 2011

FIGURE **4**

Meridian Consultants

Land Use Map

214-001-18

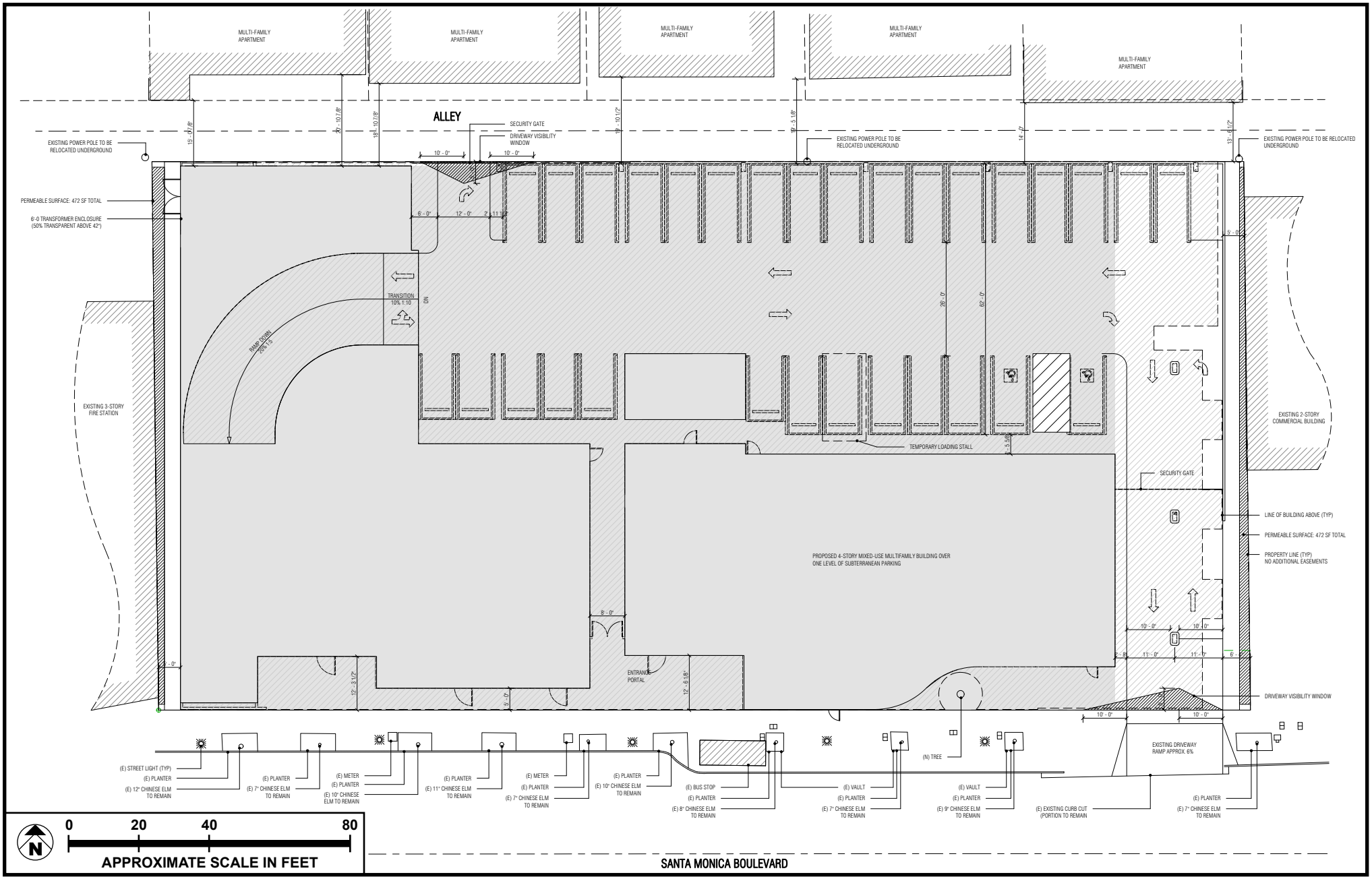
SOURCE: R&A Architecture and Design, April 2018

FIGURE **5**

Meridian Consultants

Project Rendering

214-001-18



SOURCE: R&A Architecture and Design, April 2018

FIGURE **6**

Meridian Consultants

Conceptual Site Plan

214-001-18

SOURCE: R&A Architecture and Design, April 2018

FIGURE **7**

Meridian Consultants

Floor Plan Level 2

214-001-18

SOURCE: R&A Architecture and Design, April 2018

FIGURE **8**

Meridian Consultants

Floor Plan Level 3

214-001-18

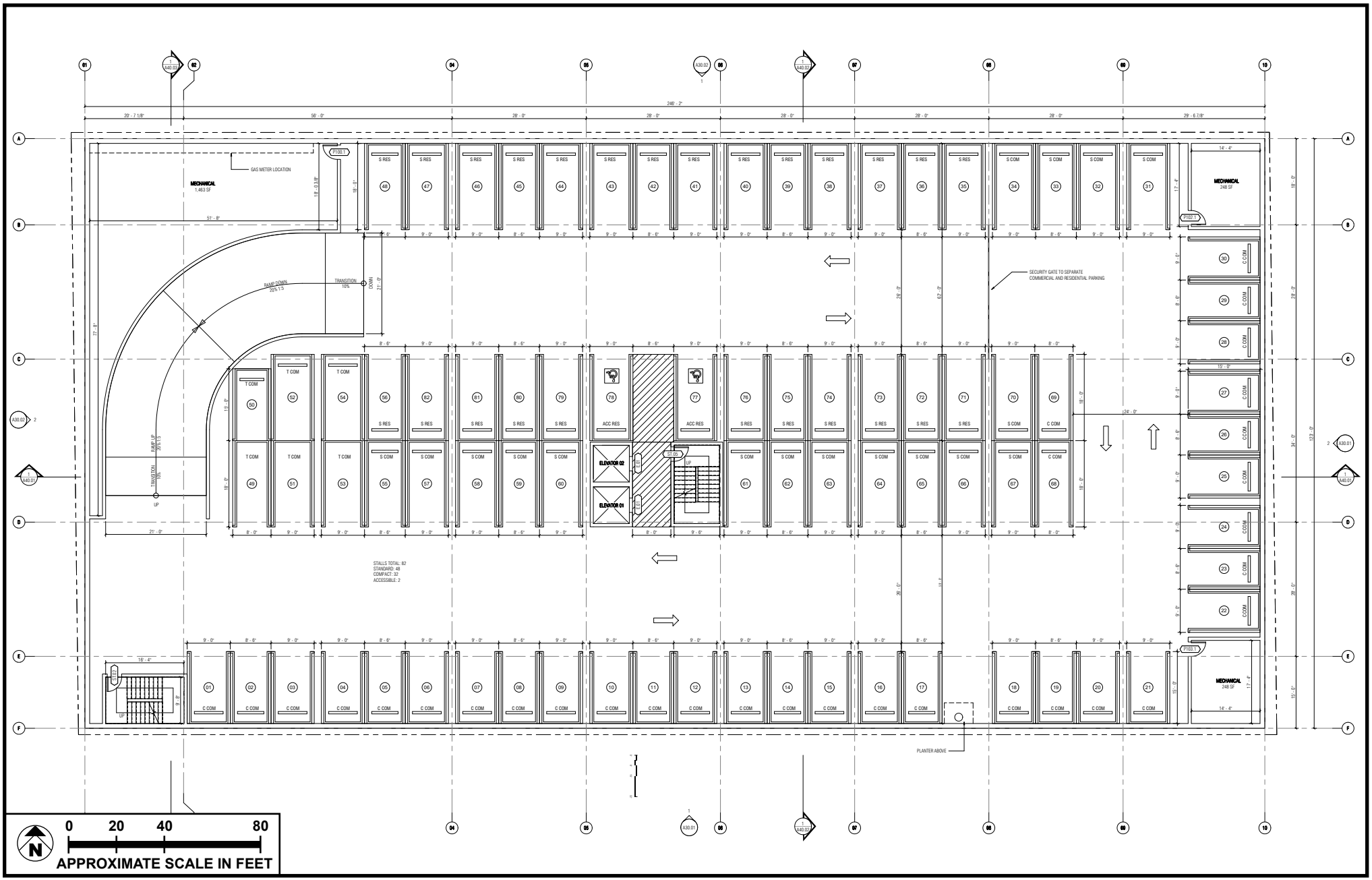
SOURCE: R&A Architecture and Design, April 2018

FIGURE **9**

Meridian Consultants

Floor Plan Level 4

214-001-18



SOURCE: R&A Architecture and Design, April 2018

FIGURE **10**

Meridian Consultants

Parking Level P1

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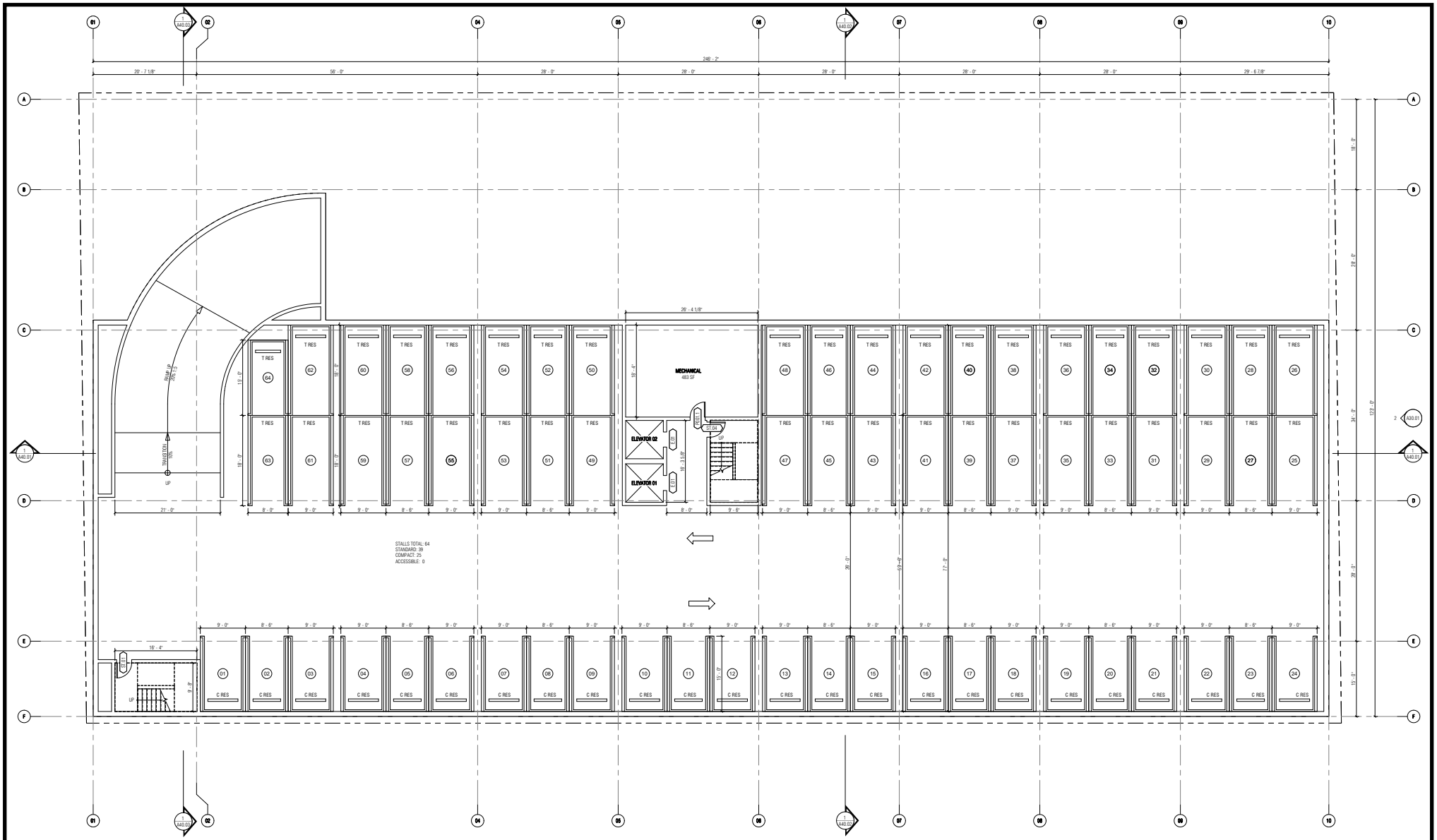

SOURCE: R&A Architecture and Design, April 2018

FIGURE **11**

Meridian Consultants

Parking Level P2

214-001-18

3.0 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT CRITERIA

3.1 REGULATORY BACKGROUND

Through "The Sustainable Communities and Climate Protection Act of 2008," known as Senate Bill 375 (SB 375), the State legislature created a new document for environmental review called a Sustainable Communities Environmental Assessment (SCEA). The intent a SCEA is to encourage projects that would implement regional plans to reduce greenhouse gas emissions (e.g. by building housing near public transit) by providing for streamlined environmental review of "Transit Priority Projects" that are consistent with an adopted sustainable communities strategy. The SCEA provides complete environmental analysis by evaluating the potentially effects of a Project in an Initial Study similar to a Mitigated Negative Declaration with additional requirements specific to a SCEA as described below.

SB 375 sought to integrate transportation and land use planning to reduce greenhouse gas emissions by directing the State's metropolitan planning organizations that prepare regional transportation plans to include in those plans a "sustainable communities strategy" to achieve greenhouse gas emission targets set by the California Air Resources Board.[3,4] The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), which outlines strategies to meet or exceed the greenhouse gas emission targets set by CARB.

SB 375 provided CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain other criteria. Cities acting as lead CEQA agency within the SCAG region can now prepare a SCEA as the environmental CEQA Clearance for "transit priority projects" that are consistent with SCAG's 2016-2040 RTP/SCS. A transit priority project is a project that meets the following four criteria:

- Contains at least 50 percent residential use, based on total building square footage or, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0. 75;
- Provides a minimum net density of at least 20 units per acre; and
- Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.
- Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2016-2040 RTP/SCS;

3 Stats. 2008, ch. 728, § 1; Stats. 2009, ch. 354, § 5.
4 Gov. Code, § 65080, subd. (b)(2)(B)

A transit priority project may be approved using a SCEA if it has been determined to not result in significant and unavoidable environmental impacts. For a SCEA, an initial study shall be prepared to identify all potentially significant impacts.[5] As with an MND, mitigation must be identified for any potentially significant impacts. In addition, for a project to qualify to be evaluated through a SCEA, the project should incorporate all feasible mitigation measures, performance standards and criteria set forth in prior applicable EIRs.[6] This would include the SCAG 2016-2040 RTP/SCS Program EIR and the West Hollywood General Plan EIR. The application of applicable mitigation measures from other EIRs is discussed in the attached Initial Study.

A SCEA need not consider the cumulative effects of the project that have been adequately addressed and mitigated in prior ElRs; growth-inducing impacts are not required to be referenced, described or addressed; and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network need not be analyzed.[7] The SCEA does not analyze alternatives to a project because like with an ND or MND, there are no significant impacts that need to be reduced or eliminated through project alternatives.

A draft of the SCEA will be circulated for public comment for a period of not less than 30 days with notice provided in the same manner as required for an environmental impact report.[8] Prior to acting on the SCEA, the lead agency shall conduct a public hearing and shall review and consider all comments received.[9] While the City will review and consider all comment submitted, CEQA does not require that the lead agency respond in writing to comments received on a SCEA. This is one of streamlining provisions included in SB 375 in order to expedite the process to get housing projects near transit reviewed, approved and built, which is the ultimate goal of the State.

5 PRC §21155.2(b)(1)
6 PRC §21155.2(a)
7 PRC §21159.28
8 PRC §21155.2(b)(3)
9 PRC §21155.2(b)(5)

3.2 CONSISTENCY FINDINGS

As explained below, the proposed Project complies with the requirements of CEQA for using an SCEA as authorized pursuant to PRC Section 21155.2(b).

Residential Density

PRC §21155(b) states a project may be reviewed through a SCEA if the project is a Transit Priority Project that contains at least 50 percent residential use, based on total building square footage or, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0. 75, and provides a minimum net density of at least 20 units per acre. The Project includes the construction of a total floor area of approximately 63,560 square feet of which there would be approximately 48,975 square feet of residential floor area, which is equivalent to approximately 77 percent. The Proposed Project includes 71 new multi-family residential units within a site of approximately 0.72 acres. As such, the proposed Project meets the residential density criteria for a SCEA.

Proximity to Transit

PRC §21155(b) states a project may be reviewed through a SCEA if the project is a Transit Priority Project that is within one-half mile of a major transit stop or a high-quality transit corridor. A high-quality transit corridor is defined as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. The Project area is well served by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood CityLine service. Approximately 119 feet south of the Project site is the Santa Monica/Stanley stop. Metro lines serving the Project periphery are 2-302, 4, 217, 218, 780, 704, and the West Hollywood CityLine Blue-Orange line. There are frequent stops with a new bus line coming every 1 to 10 minutes. Moreover, the 2016-2040 RTP/SCS identifies the Project Site as being within a HQTA. Using the SCAG peak-hour periods of 6 AM – 9 AM and 4 PM – 7PM, Metro Rapid lines 704 and 780 have less than 15-minute headways at the intersection of Fairfax and Santa Monica Boulevard, which is less than ½ mile west of the Project Site.[10] Therefore, the Proposed Project is located within a high-quality transit corridor. As such, the Proposed Project is consistent with this criterion for a SCEA.

RTP/SCS Consistency

PRC §21155(a) states that a project may be reviewed through a SCEA if the project is a Transit Priority Project that is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the Regional Transportation Plan/Sustainable Communities

10 See schedule data for Metro Rapid lines 704 and 780 included as Appendix A to this document.

Strategy (RTP/SCS) prepared by the applicable metropolitan planning organization, in this case the Southern California Association of Governments (SCAG).

General Use Designations

Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban, compact, or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.[11]

The Project site is within an area designated by the 2016-2040 RTP/SCS as "Urban" Land Development Category (LDC) with the highest density and intensity of land development as determined in the 2016-2040 RTP/SCS.[12] The 2016-2040 RTP/SCS describes the Urban LDC as areas often found within and/or directly adjacent to moderate and high-density urban centers, where virtually all new development would be considered infill or redevelopment. Housing tends to be higher density multifamily and attached single-family (townhome) varieties which, overall, consume less water and energy than larger residences in less urban locations. Urban LDC areas have high levels of mobility, particularly for people who choose not to drive or do not have access to a vehicle, seen through the presence of a variety of regional and local transit services and a development pattern that is conducive to walking. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.[13]

The proposed Project would be consistent with the general use designations of the Urban Land Use Development Category as it is an infill redevelopment of higher density multifamily residential in a location with high level of mobility due to its access to transit. The Project is located within a High-Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area as defined by SB 743 that supports transit opportunities. Furthermore, the Project site is within walking distance of many community services and amenities.

Density and Building Intensity

The Project Site is consistent with the Town Mixed Use place type. SCAG defines a Town Mixed Use area as "walkable mixed-use neighborhoods, such as the mixed-use core of a small city or transit-oriented development, with a variety of uses and building types". Within this place type, buildings are typically

11 SCAG, 2016- 2040 RTP/SCS, 20-21.
12 SCAG, 2016-2040 RTP/SCS, 28, 29.
13 SCAG, 2016-2040 RTP/SCS, 20.

"between 3 and 8 stories tall, with ground-floor retail space, and offices and/or residences on the floors above[14]The proposed Project would develop a new, 4-story mixed-use building containing 71 units and approximately 9,240 square feet of ground floor commercial space.

The California State Department of Finance (DOF) average household size for the City of West Hollywood at 1.55 persons per household.[15] The construction of 71 units would result in an increase of approximately 111 residents in the City of West Hollywood. The current DOF estimated City population as of January 2018 is approximately 36,723 people. Therefore, the proposed Project would represent an increase of less than one percent of the City's current population. According to growth estimates from SCAG's 2016–2040 RTP/SCS, the City had an estimated population of 34,800 people in 2012 and is projected to have a population of 41,800 in 2040.[16] The addition of approximately 111 people would be well within the SCAG's population forecasts for the City.

As such, the Project would be consistent with the density and building intensity of the SCAG RTP/SCS place type classification.

Applicable Policies

The proposed Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS, as shown in **Table 3.1: Consistency Analysis 2016–2040 RTP/SCS**.

14 Southern California Association of Governments, *2016-2040 RTP/SCS Background Documentation, Urban Footprint Place Types*, http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf, accessed September 2019.

15 California Department of Finance*, Report E-5: Population and Housing Estimates for Cities, Counties, and the State*, January 1, 2011–2018, with 2010 Benchmark, accessed August 2019, available at http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

16 SCAG, "Demographics and Growth Forecast" (adopted April 2016), http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

Table 3.2-1
Consistency Analysis 2016–2040 RTP/SCS

Goals and Policies	Consistency Analysis
Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.	**Not Applicable**. This Goal is directed towards SCAG and the City of West Hollywood and would not apply to the Project.
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	**Consistent**. The Project site is located in a highly urbanized area in the City of West Hollywood within a High-Quality Transit Area (HQTA) and a Transit Priority Area (TPA), along Santa Monica Boulevard. The Project would develop 71 residential units, including 21 studio units, 31 one-bedroom units, and 19 two-bedroom units. The Project site is well served by public transit with frequency of service intervals of 15 minutes or less during peak commute periods. The Project area is well served by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood CityLine service. Approximately 119 feet south of the Project site is the Santa Monica/Stanley stop. Metro lines serving the Project periphery are 2-302, 4, 217, 218, 780, 704, and the West Hollywood CityLine Blue-Orange line. There are frequent stops with a new bus line coming every 1 to 10 minutes. Moreover, the 2016-2040 RTP/SCS identifies the Project Site as being within a HQTA. Using the SCAG peak-hour periods of 6 AM – 9 AM and 4 PM – 7PM, Metro Rapid lines 704 and 780 have less than 15-minute headways at the intersection of Fairfax and Santa Monica Boulevard, which is less than ½ mile west of the Project Site. The proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this goal.
Goal 3: Ensure travel safety and reliability for all people and goods in the region.	**Not Applicable/Consistent**. While not necessarily applicable on a project-specific basis, the Project would support this goal by improving local access to alternative forms of transportation, with appropriate design considerations to ensure travel safety and reliability.
Goal 4: Preserve and ensure a sustainable regional transportation system.	**Not Applicable**. While not necessarily applicable on a project-specific basis, the Project would support this goal by improving the viability of alternative forms of transportation through higher density development, heightened walkability, and increased bicycle infrastructure. A robust variety of transportation options helps to ensure the mobility need of residents and visitors are met. Additionally, as discussed in the Traffic Study, the Project would create a less than significant impact at all of the study intersections.

Goals and Policies	Consistency Analysis
Goal 5: Maximize the productivity of our transportation system.	**Consistent**. As stated above, the Project includes 71 new multi-family residential units and is located close to a variety of transit options as a mode of transportation to and from the Project site. Additionally, the Project is located along Santa Monica Boulevard in the Santa Monica/Fairfax Transit District. The vision for this district is to expand the area's mix of multi-family residences and commercial uses supporting an evolution over time into a more intense mixed-use transit node that capitalizes on high levels of bus ridership, a potential subway station, a cluster of rehabilitated historic buildings, and artistic and educational institutions. The Project would be consistent with this vision. Thus, the Project would contribute to the productivity and use of the regional transportation system by providing housing near transit. Moreover, as discussed in the Traffic Study, the Project would have a less than significant impact at all of the study intersections.
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent**. The proposed Project would place new residential units in a HQTA and a TPA. The Project site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the proposed Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation. Further, the Project would activate street frontages on the ground floor of the building and introduce new landscaping, seating areas, and street furniture, encouraging pedestrian activity. As mentioned previously, the Project would include new bicycle infrastructure, including 21 bicycle parking spaces, to encourage bicycle use.
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	**Consistent**. The Project would comply with the California Green Building Standards Code (CALGreen), as well as the West Hollywood Green Building Program, and would incorporate eco- friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non- VOC paints/adhesives, drought tolerant planting, and high-performance building envelopment.
Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent**. As stated above, the Project site is located in a highly urbanized area in the City of West Hollywood within a HQTA and a TPA. The Project is located along Santa Monica Boulevard in the Santa Monica/Fairfax district. The Project site is well served by mass transit with more than a dozen of bus lines in walking distance with frequency of service intervals of 15 minutes or less during peak commute periods. The proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. Additionally, the Project would comply with the City's

Goals and Policies	Consistency Analysis
	Transportation Demand Ordinance in Chapter 10.16.050 of the West Hollywood Municipal Code. As such, the location of the Project site encourages a variety of transportation options consistent with this goal.
Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Not Applicable**. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system.
Guiding Policy 1: Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable**. This policy is directed towards SCAG in allocating transportation investments rather than individual development projects.
Guiding Policy 2: Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	**Not Applicable**. This policy is directed towards SCAG in allocating transportation system funding. The Project would contribute to a safe, well maintained, and efficient multimodal transportation system. As discussed in the Traffic Study, the Project would create a less than significant impact at the study intersections and at any CMP monitoring location.
Guiding Policy 3: RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Not Applicable**. This Goal is directed towards SCAG and the City of West Hollywood and does not apply to the Proposed Project. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment.
Guiding Policy 4: Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable**. This policy is directed towards transportation investment by SCAG. However, the Project's location within a TPA promotes the use of public transit and pedestrian activity.
Guiding Policy 5: HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	**Not Applicable**. The policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Nevertheless, the Project's location in a HQTA and TPA would facilitate greater use of public transit and pedestrian activity.
Guiding Policy 6: The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable**. This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. However, the Project would support the policy as it is located within a TPA and would support public transportation and other alternative methods of transportation.
Guiding Policy 7: The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run	**Not Applicable**. This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments.
Guiding Policy 8: Monitoring progress on all aspects of the Plan, including the timely implementation of	**Not Applicable**. This policy directed towards SCAG and the City of West Hollywood and not does apply to the Project.

Goals and Policies	Consistency Analysis
projects, programs, and strategies, will be an important and integral component of the Plan.	
Land Use Policy 1: Identify regional strategies areas for infill and investment.	**Not Applicable**. This policy is directed towards SCAG to identify regional strategic areas. The Project is an infill development in a TPA.
Land Use Policy 2: Structure the plan on a three-tiered system of centers development.	**Not Applicable**. This policy is directed towards SCAG and does not apply to the Proposed Project.
Land Use Policy 3: Develop "Complete Communities"	**Consistent**. SCAG describes the development of "complete communities" to provide areas that encourages households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile. As stated above, the Project would place residential units in a TPA. The Project area is well served by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood CityLine service. Approximately 119 feet south of the Project site is the Santa Monica/Stanley stop. Metro lines serving the Project periphery are 2-302, 4, 217, 218, 780, 704, and the West Hollywood CityLine Blue-Orange line. There are frequent stops with a new bus line coming every 1 to 10 minutes. Moreover, the 2016-2040 RTP/SCS identifies the Project Site as being within a HQTA. Using the SCAG peak-hour periods of 6 AM – 9 AM and 4 PM – 7PM, Metro Rapid lines 704 and 780 have less than 15-minute headways at the intersection of Fairfax and Santa Monica Boulevard, which is less than ½ mile west of the Project Site. Additionally, the Project is located along Santa Monica Boulevard in the Santa Monica/Fairfax Transit District. The vision for this district is to expand the area's mix of multi-family residences and commercial uses supporting an evolution over time into a more intense mixed-use transit node that capitalizes on high levels of bus ridership, a potential subway station, a cluster of rehabilitated historic buildings, and artistic and educational institutions. The Project would be consistent with this vision. The Project site's location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which include walking, cycling, and the use of public transportation. Therefore, the Project would be consistent with SCAG's goals of increasing mixed commercial/residential uses in transit-rich areas near

Goals and Policies	Consistency Analysis
	services, retail, and employment opportunities to reduce vehicles-per- miles traveled.
Land Use Policy 4: Develop nodes on a corridor.	**Not Applicable**. The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and the City goals to identify and develop locations that promote nodes. The Project is located within a TPA and is within walking distance of supermarkets, restaurants, and other convenience retail and services. The Project's mixed-use design and location encourages the use of alternative transportation, walking, and bicycling opportunities.
Land Use Policy 5: Plan for additional housing and jobs near transit.	**Consistent**. As stated above, the Project would provide residential units in a TPA. The Project site is located within a quarter mile of a High-Quality Transit Corridor (HQTC) or a Major Transit Stop (defined as the intersection of two bus stops with 15-minute peak-hour headways or less). The Project site is well served by public transit with frequency of service intervals of 15 minutes or less during peak commute periods. This would promote the use of a variety of transportation options, which includes walking and the use of public transportation.
Land Use Policy 6: Plan for changing demand in types of housing.	**Consistent**. The Project would provide 71 residential units, including 11 units designated as affordable units, within the City of West Hollywood. The proposed Project's units would be contributing to a range of housing choice and available to all persons, including existing employees and residents in the City, with varying size units and in a location that is walkable to services and transit. This moves away from the suburban sprawl housing model and puts urban, denser housing in the locations where the State, SCAG, and the City encourage new housing.
Land Use Policy 7: Continue to protect stable, existing single-family areas.	**Not Applicable**. This policy is not applicable to the Project because there are currently no single-family homes on the Project site. Additionally, the Project site is in an area designated for High Density Residential uses and surrounded by other medium- and high-density mixed residential and commercial development.
Land Use Policy 8: Ensure adequate access to open space and preservation of habitat.	**Not Applicable**. This policy is directed towards SCAG and does not directly apply to the Project. The Project is located within an urbanized area within the City of West Hollywood. Development of the proposed Project would not remove any areas that have significant value as wildlife habitat since the Project Site is fully developed. The Project would provide new outdoor open space including balconies, rooftop garden, and a central green area for large community events.
Land Use Policy 9: Incorporate local input and feedback on future growth.	**Not Applicable**. This policy is directed towards SCAG and does not apply to the Proposed Project.

Goals and Policies	Consistency Analysis
Benefit 1: The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvement, and efficient transportation infrastructure.	**Consistent**. The Project would develop residential units in a TPA. The Project will provide a variety of dwelling units sizes: 21 studio units, 31 one-bedroom units, and 19 two-bedroom units. The Proposed Project is dedicating 15% of proposed units restricted to moderate to very low-income housing.
Benefit 2: The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.	**Not Applicable**. Benefit 2 is directed towards SCAG and not does apply to the Proposed Project. The Project is an infill, mixed use residential project located within a HQTA and a TPA, thereby decreasing time and cost of traveling between places.
Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.	**Consistent**. The Project includes energy-efficient design features, such as ENERGY STAR rated appliances and will comply with the CALGreen Building Code, as well as the City's Green Building Program. The Project's location near various bus and subway lines will provide future residents with affordable transportation options.
Benefit 4: Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.	**Consistent**. The Project would encourage improved access and mobility by providing residential units within an urbanized area of the City of West Hollywood. Shopping, dining and other services on and surrounding the Project site are easily accessible by walking and transit options. The Project would provide new outdoor open space including courtyards and community outdoor spaces.

Source: SCAG, 2016–2040 RTP/SCS, April 2016.

Notes:

Not Applicable: Actions/strategies are those that are not identified for implementation of local jurisdictions. The Project's consistency with any actions/strategies identified for implementation by the local jurisdictions is assessed above.

As shown in the table above, the Project is consistent with the applicable policies specified for the project area in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

Incorporation of Prior Mitigation Measures

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The applicable mitigation measures from the 2016- 2040 RTP/SCS Program EIR and from the City of West Hollywood General Plan EIR are discussed within the appropriate section of the Initial Study that follows.

4.0 INITIAL STUDY

EVALUATION OF ENVIRONMENTAL IMPACTS

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G in the State CEQA guidelines, C.C.R. Title 14, Chapter 3, 15000 – 15387).

Pursuant to the PRC Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports.

A brief explanation for the determination of significance is provided for all impact determinations except "No Impact" determinations that are adequately supported by information sources cited by the Lead Agency (City of West Hollywood) within the discussion for each question. A "No Impact" determination is adequately supported if the referenced information sources show that the impact simply does not apply to the proposed Project (e.g., the Project falls outside a fault rupture zone). A "No Impact" determination includes an explanation of its basis relative to project-specific factors, as well as to general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

Explanations take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

Once the Lead Agency has determined that a particular physical impact may occur, then the checklist indicates whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant.

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact Analysis

Senate Bill (SB) 743 states that a project's aesthetic impacts shall not be considered a significant impact on the environment if the project is a residential, mixed-use residential, or employment center project; and if the project is located on an infill site within a transit priority area (TPA). An infill site is defined as an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. A TPA is defined as an area within one-half mile of major transit stop that is existing or planned.

The project is a mixed-use residential project. The Project area is well served by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood CityLine service. Approximately 119 feet south of the Project site is the Santa Monica/Stanley stop. Metro lines serving the Project periphery are 2-302, 4, 217, 218, 780, 704, and the West Hollywood CityLine Blue-Orange line. There are frequent stops with a new bus line coming every 1 to 10 minutes. Moreover, the 2016-2040 RTP/SCS identifies the Project Site as being within a HQTA. Using the SCAG peak-hour period of 6 AM – 9 AM and 4 PM – 7PM, Metro lines 704 and 780 both intersect at Fairfax and Santa Monica Boulevard and include less than 15-minute headways during peak-hour periods. Therefore, the Proposed Project is located within a high-quality transit corridor.

The proposed Project is located within a High-Quality Transit Area (HQTA) as defined by SCAG, and a TPA as defined by SB 743, which supports transit opportunities and promotes a walkable environment. As such, aesthetic impacts, including but not limited to (1) adverse effects on scenic vistas, (2) damage to scenic resources, (3) degradation of existing visual character, including shade and shadow impacts, and (4) light and/or glare, are not considered significant impacts on the environment.

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

Less Than Significant Impact. Notwithstanding the mandate imposed by SB 743, the following discussion of aesthetic effects of the project is provided for informational purposes. The project site is located in a developed area of West Hollywood. The City does not have clearly defined scenic vistas and no scenic views currently exist on or are available from the project site. The city does not have a view protection ordinance. Scenic public views within the City are generally of the Hollywood Hills and the Los Angeles Basin. The Project site is within the field of view of surrounding mountain ranges; however, the existing level of development on the site and in the surrounding area limits views across and beyond the site from surrounding roadways. In general, local viewsheds are located in the northern portion of the City adjacent to hillside areas. As such, and given that the Project is a residential mixed-use development within a Transit Priority Area, impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. However, as stated above, the City does not have clearly defined scenic vistas and no scenic views currently exist on or are available from the project site. Related projects in combination with the Project are located within designated urban lots planned for development. Views along public streets would not be blocked by the cumulative development of projects that comply with existing height, density and setback requirements. and would not encroach upon public views through street corridors. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any aesthetic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained aesthetic mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant aesthetic effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less Than Significant Impact. Notwithstanding the mandate imposed by SB 743, the following discussion of aesthetic effects of the project is provided for informational purposes. The Project site is not bordered by or within the viewshed of a designated scenic highway. No historic buildings, rock outcroppings, unique geologic features or native or scenic trees exist on the Project site. As such, and given that the Project is a residential mixed-use development within a Transit Priority Area, impacts would be less than significant.

Cumulative Impacts

As stated above, no scenic resources are present on or adjacent to the site. As such, the Project would not have a considerable contribution to a cumulative impact on scenic resources.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any aesthetic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained aesthetic mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant aesthetic effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

c. In non-urbanized areas, would the project substantially degrade the existing quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. Notwithstanding the mandate imposed by SB 743, the following discussion of aesthetic effects of the project is provided for informational purposes. The Project site is designated by the City as CC1 and is also located within a Transit Overlay Zone Designation. The CC1 designation provides for commercial uses and mixed-use development along major corridors. Consistent with the CC1 land use designation, the Project site is also zoned CC1, which is intended to provide a wide variety of commercial

opportunities to serve local community needs. The Project is located within the Santa Monica/Fairfax Transit District. This section of the Santa Monica Boulevard corridor supports diverse commercial uses that fulfill the needs of the adjacent neighborhoods and transit users. The Project is typical in style to the surrounding corridor. It is the current location of a significant number of transit routes and transfer points. The area is characterized by service and retail businesses oriented to the local community. The uses proposed by the Project would be consistent with the uses permitted by the applicable land use and zoning designations. Moreover, the design of the Project would adhere to the applicable City development standards for the site, as dictated by the Design Review Subcommittee of the Planning Commission, including building height, setback, density, floor–area ratio, open space, and parking requirements. As such and given that the Project is a residential mixed-use development within a Transit Priority Area, impacts would be less than significant.

Cumulative Impacts

The Project and any related projects are expected to comply with the City's zoning and design standards, as envisioned by the City's General Plan. As such, the Project would not have a considerable contribution to a cumulative impact on scenic quality.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any aesthetic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained aesthetic mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant aesthetic effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less Than Significant Impact. Notwithstanding the mandate imposed by SB 743, the following discussion of aesthetic effects of the project is provided for informational purposes. As a highly developed, dense urban area, current sources of light and glare in the project area result from the existing building and signage on site and adjacent commercial, residential, and from vehicles on roadways particularly Santa Monica Boulevard. Types of existing lighting include interior and exterior building lighting, street lights and

signals, illuminate signage, automobile headlights, and reflection of light from windows and other reflective surfaces on parked and passing vehicles, as well as on adjacent buildings and structures.

The Project would comply with the WHMC 19.20.100 Section which details guidelines for outdoor lighting. Exterior night lighting would be installed in building entrances and common open space areas, largely to provide adequate night visibility for residents and visitors and to provide a measure of security. In addition to the exterior ground-level nighttime security lighting, interior lighting associated with the Project would provide an additional source of nighttime illumination. The Project's architectural finishes would feature mostly non-glare producing surfaces. Overall, the level of light and glare associated with the project is typical of the existing urban context. Furthermore, given that the Project is a residential mixed-use development within a Transit Priority Area, as per Senate Bill (SB) 743 impacts would be considered less than significant.

Cumulative Impacts

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the WHMC. Since the standards prevent light from impacting neighboring properties, it is not expected that any of the related projects or this project will contribute to significant lighting impacts. Accordingly, the Project's contribution to cumulative impacts would not be considerable.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any aesthetic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained aesthetic mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant aesthetic effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

II. AGRICULTURE AND FORESTRY RESOURCES

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

Impact Analysis

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

No Impact. The City is completely built out and is located within an urbanized area of the County of Los Angeles (County). Designated farmland or zoned agricultural lands do not exist within the City.[17] As such, no portion of the Project site is designated as "Prime Farmland," "Farmland of Statewide Importance," "Unique Farmland," or "Farmland of Local Importance." No impacts would occur.

17 City of West Hollywood, Final Program Environmental Impact Report: City of West Hollywood General Plan and Climate Action Plan [Final PEIR: West Hollywood General Plan and CAP] (October 2010).

Cumulative Impacts

As mentioned previously, the City is built out and located within an urbanized area of the County. No designated farmland or zoned agricultural lands exist within the City. As this Project would not result in a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any agricultural mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained agricultural mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant agricultural effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. The Project site is zoned CC1 (Commercial, Community 1). The General Plan land use designation for the Project site is Commercial Manufacturing. The Project site is not zoned for agricultural use, nor do agricultural uses occur on the Project site. Only land located in an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project site does not contain any lands covered by a Williamson Act contract. Furthermore, no designated agricultural land uses or Williamson Act contracts are in use adjacent to or near the Project site.[18] No impacts would occur.

Cumulative Impacts

As mentioned previously, the Project site is not zoned for agricultural use, nor is it eligible for enrollment under a Williamson Act contract. The City has no land zoned for agricultural use. As such, no cumulative impacts would occur.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West

18 California Department of Conservation, Division of Land Resource Protection, "The Land Conservation (Williamson) Act" (2016), available at http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx.

Hollywood General Plan EIR did not contain any agricultural mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained agricultural mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant agricultural effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. The Project site is not designated or zoned for forest or timberland or used for foresting. As stated previously, the Project site is in a developed area of the City surrounded by various residential and commercial buildings. The site and the surrounding area do not contain any forestland or land zoned for timberland production. Implementation of the proposed Project would not conflict with existing zoning for or cause rezoning of forestland or timberland. No impact would occur.

Cumulative Impacts

As mentioned previously, the Project site is not zoned as forest land. The City has no forest land within its vicinity. As such, no cumulative impacts would occur.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any agricultural mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained agricultural mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant agricultural effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. The Project site is not designated or zoned for forest or timberland or used for foresting. No impacts would occur.

Cumulative Impacts

As mentioned previously, the Project site is not zoned as forest land. The City has no forest land within its vicinity. As such, no cumulative impacts would occur.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any agricultural mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained agricultural mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant agricultural effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. Neither the Project site nor the surrounding area contain agricultural or forestry uses. The Project site is not classified in any Farmland category designated by the state of California. No impacts would occur.

Cumulative Impacts

As mentioned previously, the Project site is not zoned for agricultural use. The City has no agricultural land within its vicinity. The Project would contribute to the urban nature of the City. As such, no cumulative impacts would occur.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any agricultural mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained agricultural mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant agricultural effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

III. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Impact Analysis

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

Less Than Significant with Mitigation Incorporated. The South Coast Air Quality Management District (SCAQMD) adopted an updated air quality management plan (AQMP) in March 2017.[19] This Final 2016 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments; accommodate growth; reduce of pollutants in the South Coast Air Basin ("Basin"); meet federal and State air quality standards; and minimize the fiscal impact of pollution control measures on the local economy. It builds on approaches in the previous AQMP to achieve attainment of the federal ozone air quality standard. These planning efforts have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumption used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

The Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The growth projections form the

19 South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017.

basis for the strategies identified in the AQMP. Using the California State Department of Finance (DOF) average household size for the City of West Hollywood at 1.55 persons per household.[20] The construction of 71 units would result in an increase of approximately 111 residents in the City of West Hollywood. The current DOF estimated City population as of January 2018 is approximately 36,723 people. Therefore, the proposed Project would represent an increase of less than one percent of the City's current population. According to growth estimates from SCAG's 2016–2040 RTP/SCS, the City had an estimated population of 34,800 people in 2012 and is projected to have a population of 41,800 in 2040.[21] The addition of approximately 111 people would be well within the SCAG's population forecasts for the City. This increase would not result in population and housing growth that would cause growth within the City to exceed the SCAG population forecast. Because the AQMP forms the basis for strategies by growth projections, the future development would be consistent with the planned land uses and would not conflict or obstruct implementation with the AQMP.

The SCAQMD has developed specific CEQA air quality significance thresholds to assess potential impacts that may result from construction and operation of projects.[22] The Project site is located within the area where these thresholds apply. Daily emissions of volatile organic compounds (VOC), nitrogen oxides (NOX), carbon monoxide (CO), sulfur oxides (SOX), respirable particulate matter less than 10 microns in diameter (PM10) and fine particulate matter less than 2.5 microns in diameter (PM2.5) should be quantified and assessed on both regional and localized scales, in accordance with SCAQMD methodology.

The United Stated Environmental Protection Agency (USEPA) is responsible for the implementation of portions of the Clean Air Act (CAA) of 1970,[23] which regulates certain stationary and mobile sources of air emissions and other requirements. Charged with handling global, international, national, and interstate air pollution issues and policies, the USEPA sets national vehicle and stationary source emission standards; oversees the approval of all State Implementation Plans;[24] provides research and guidance for air pollution programs; and sets National Ambient Air Quality Standards (NAAQS).[25] NAAQS for the seven common air

20 California Department of Finance, Report E-5: Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011–2018, with 2010 Benchmark, accessed August 2019, available at http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

21 SCAG, "Demographics and Growth Forecast" (adopted April 2016), http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

22 SCAQMD, CEQA Air Quality Handbook.

23 US Environmental Protection Agency, "Clean Air Act Text," https://www.epa.gov/clean-air-act-overview/clean-air-act-text.

24 A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards.

25 The NAAQS were set to protect public health, including that of sensitive individuals; for this reason, the standards continue to change as more medical research becomes available regarding the health effects of the criteria pollutants. The primary NAAQS define the air quality considered necessary, with an adequate margin of safety, to protect the public health.

pollutants, Ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), particulate matter (PM10), fine particulate matter (PM2.5), and lead (Pb), are identified in the CAA.

Construction Emissions

The proposed Project involves the demolition of an existing car wash and related structures, and the construction of a new mixed-use building consisting of residential and commercial uses. Construction would occur through a phased development that would be completed by 2022. Construction activity would include the following phases: (1) demolition, (2) site preparation, (3) grading, and (4) building construction, including application of architectural coatings.

These construction activities would create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities during the demolition/grading/excavation/site preparation phases would primarily generate particle pollution. Particles less than 10 micrometers in diameter (PM10) and particles less than 2.5 micrometers in diameter (PM2.5) would be the primary sources of particle pollution. Mobile sources (such as diesel-fueled equipment on site and traveling to and from the Project Site) would primarily generate nitrogen oxide (NOx) emissions. The application of architectural coatings, such as paint, during the building construction phase would primarily result in the release of volatile organic compound (VOC) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

SCAQMD staff recommends at the minimum use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 3 off- road emission standards. The Applicant has stated that construction would follow this recommendation. As such the following Project Deign Feature is incorporated into the Project:

PDF AQ-1: The Project shall utilize off-road diesel-powered construction equipment that meet or exceeds the CARB and USEPA Tier 3 off-road emissions standards for equipment rated at 50 horsepower or greater during all construction phases. A copy of each unit's certified tier specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

The analysis of daily construction emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod) recommended by the SCAQMD.[26] **Table III-1: Construction Emissions**, identifies daily emissions that are estimated to occur on peak construction days for each construction phase. As shown, construction-related daily emissions associated with the Project would not exceed any regional SCAQMD

26 See Appendix B, Air Quality and Greenhouse Gas Study for the 7617 Santa Monica Boulevard for modeling results and additional discussion

significant threshold for criteria pollutants during the construction phases. Therefore, construction emissions would also not contribute a considerable increase in emissions of the pollutants for which the Basin is currently in nonattainment (NO2, PM10, and PM2.5).

As the Project lies within the jurisdiction of the SCAQMD, compliance with SCAQMD rules and guidelines is required. Among the SCAQMD rules applicable to the Project are Rule 403 (Fugitive Dust), Rule 1113 (Architectural Coatings), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Rule 403 requires the use of stringent best available control measures to minimize PM10 emissions during grading and construction activities. Rule 1113 requires reductions in the VOC content of coatings, with a substantial reduction in the VOC content limit for flat coatings. Compliance with SCAQMD Rule 1403 requires that the owner or operator of any demolition or renovation activity to have an asbestos survey performed prior to demolition and provide notification to the SCAQMD prior to commencing demolition activities.

The emissions calculations assume compliance with the above mentioned Project Design Feature and that appropriate dust control measures would be implemented as part of the Project during each phase of development, as required by SCAQMD Rule 403—Fugitive Dust. Control requirements for Rule 403 include but are not limited to applying water in sufficient quantities (at least three times per day) to prevent the generation of visible dust plumes; applying soil binders to uncovered areas; reestablishing ground cover as quickly as possible; utilizing a wheel-washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site; and maintaining effective cover over exposed areas. In addition, architectural coating would comply with SCAQMD Regulation XI, Rule 1113—Architectural Coating that provides specifications on painting practices as well as regulating the VOC content within paint.

Table III-1
Construction Emissions

Year	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Maximum Emissions	5	49	15	<1	3	1
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Notes: Refer to Modeling in **Appendix B**.*
Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compound; SOx = sulfur oxides.

Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities after the Project is built and occupied. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod as recommended by the SCAQMD. The results of these calculations are presented in **Table III-2: Maximum Operational Emissions**.

As shown in **Table III-2**, the emissions associated with the proposed Project would not exceed the SCAQMD-recommended operational emission thresholds. As such, impacts would be less than significant.

Cumulative Impacts

SCAQMD guidance states that "projects that do not exceed the project specific thresholds are generally not considered to be cumulatively significant."[27] As such, the Project would not have a considerable contribution to a cumulative impact.

Table III-2
Maximum Operational Emissions

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
	pounds/day					
Proposed Maximum	3	6	21	<1	5	<1
Existing Maximum	1	4	9	<1	2	<1
Net Maximum	2	2	12	<1	3	<1
SCAQMD threshold	55	55	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Notes: Refer to Modeling Data in **Appendix B.***
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compound; SOx = sulfur oxides.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs.

27 South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D. Available at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-workinggroup/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4.

The City of West Hollywood General Plan EIR contained Air Quality mitigation measures to address the significant and unavoidable air quality impacts associated with buildout of the General Plan. The following General Plan EIR mitigation measures are therefore incorporated into the Project as mitigation:

3.2-1: The City shall implement the following measures to reduce the amount of fugitive dust that is re-entrained into the atmosphere from parking lots and construction sites.

- Require the following measures to be taken during the construction of all projects to reduce the amount of dust and other sources of PM_{10} in accordance with SCAQMD Rule 403:
  - Dust suppression at construction sites using vegetation, surfactants, and other chemical stabilizers
  - Wheel washers for construction equipment
  - Watering down of all construction areas
  - Limit speeds at construction sites to 15 miles per hour
  - Cover aggregate or similar material during transportation of material
- Adopt incentives, regulations, and/or procedures to reduce paved road dust emission through targeted street sweeping of roads subject to high traffic levels and silt loadings.

3.2-2: The City shall require each project applicant, as a condition of project approval, implement the following measures to reduce exhaust emissions from construction equipment.

- Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas-powered electric generators and equipment.
- Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set).
- To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions
- On-site equipment shall not be left idling when not in use.
- The hours of operation of heavy-duty equipment and or the amount of equipment in use at any one time shall be limited

- Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors
- Before construction contracts are issued, the project applicants shall perform a review of new technology, in consultation with SCAQMD, as it related to heavy-duty equipment, to determine what (if any) advances in emissions reductions are available for use and are economically feasible. Construction contract and bid specifications shall require contractors to utilize the available and economically feasible technology on an established percentage of the equipment fleet. It is anticipated that in the near future, both NOx and PM10 control equipment will be available.

The emissions estimates provided previously did not include the West Hollywood General Plan EIR mitigation listed above. With the incorporation of the West Hollywood General Plan EIR mitigation, the less-than-significant-Project-related emissions would be further reduced.

The SCAG 2016- 2040 RTP/SCS Program EIR contained air quality mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant air quality effects have been identified. Furthermore, the mitigation measures in the SCAG Program EIR are similar to the mitigation identified above from the West Hollywood General Plan EIR. As such, it is not necessary to incorporate the SCAG Program EIR mitigation into the Project.

Mitigation Measures

No additional mitigation measures are necessary.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

Less than Significant Impact. A significant impact could occur if the project would add a considerable cumulative contribution to federal or State nonattainment pollutants. As the Basin is currently in State nonattainment for ozone, NO2, PM10, and PM2.5, related projects plus the Project could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific

impacts.[28] Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed before, the Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. The Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. Impacts would be less than significant.

Cumulative Impacts

The stated above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained the air quality mitigation measures identified under threshold (a) above. The SCAG 2016- 2040 RTP/SCS Program EIR contained air quality mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant air quality effects have been identified.

Mitigation Measures

Mitigation measures from the City of West Hollywood General Plan EIR are identified under threshold (a) above. No additional mitigation measures are necessary.

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

Less than Significant. Project construction activities and operations, as described above, may increase air emissions above current levels. Concentrations of pollutants may have the potential to impact nearby sensitive receptors. Sensitive receptors are defined as schools, residences, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions who would be adversely impacted by changes in air quality. The nearest sensitive receptors to the Project Site are the multifamily residential units immediately north across the alley of the Project site.

28 South Coast Air Quality Management District, *Cumulative Impacts White Paper, Appendix D*. Available at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-workinggroup/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4.

The localized effects from the on-site portion of the missions are evaluated at nearby sensitive receptor location potentially impacted by the Project according to the SCAQMD Final Localized Significance Threshold (LST) Methodology,[29] which relies on on-site mass emission rate screening tables and project-specific dispersion modeling, where appropriate. The LST are only applicable to NOx, CO, PM10, and PM2.5. For NOx, and CO, significance thresholds are based on the ambient air quality standards. For PM10 and PM2.5, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) and Rule 1303 (New Source Review Requirements). The SCAQMD provides mass emission rate screening tables are used for projects which are five acres or less. Projects which are larger than five acres, detailed dispersion modeling is recommended to assess air quality impacts. The Project site is less than one acre; therefore, the screening tables are used to evaluate localized emissions.

The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project site; and (3) the distance between the project site and the nearest sensitive receptors (e.g., residences, schools, hospitals). The SCAQMD provides screening criteria distances of 25, 50, 100, 200, and 500 meters and allows for linear interpolation to estimate the screening criteria between these distances. The Project Site (0.72 acres) is located within Source Receptor Area (SRA) 1, which covers the Central Los Angeles area. The screening criteria are linearly interpolated for a 0.72-acre site with sensitive receptors located adjacent to the site, within the 80 feet (25 meters) minimum distance set by the LST methodology.

On-site emissions from construction activities and Project operation have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in **Table III-3: Localized Significance Threshold (LST) Worst-Case Emissions**, peak daily emissions generated within the Project Site would not exceed the SCAQMD-recommended thresholds. Localized air quality impacts from construction and operational activities to the off-site sensitive receptors would be less than significant.

Carbon Monoxide Hot Spot Analysis

It should be noted that LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling along the roadways. With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any

29 Southern California Air Quality Management District, Final Localized Significance Threshold Methodology, 2008. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed August 2019.

intersection operating at LOS D or worse where the project would increase the volume demand to capacity (V/C) ratio by two percent or more.[30]

As stated in the Transportation Impact Report prepared for this project, attached as **Appendix F**, this project would not worsen the LOS of any of the 9 intersections below C, nor increase the V/C ratio by two percent of more for an intersection rated D or worse. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection.

Toxic Air Contaminants (TAC)

Similar to the Project, the greatest potential for TAC emissions at each related project would involve diesel particulate emissions associated with the operation of heavy equipment operation during demolition activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual cancer risk" is the likelihood that a person exposed to concentrations of TACS over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities at each related project would not result in a long-term (i.e. 70-year) substantial source of TAC emissions because the emissions are from short-term activities. In addition, SCAQMD's guidance does not require a health risk assessment for short-term construction emissions.[31] The Office of Environmental Health Hazard Assessment (OEHHA) has published guidance for Lead Agencies to use in evaluating on short term health risk analysis.[32] The OEHHA Guidance Manual is intended to implement the Air Toxics Hot Spots Information and Assessment Act (AB 2588) and establishes protocols for analysis but does not establish when a project must prepare a cancer risk assessment. The OEHHA Guidance Manual states on page 1-3 that "The Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District (hereinafter referred to as District) determine which facilities will prepare an HRA." California Health and Safety Code Section 44320 states that AB 2588 applies to "Any facility which manufactures, formulates, uses, or releases" toxic air contaminants, carcinogens, total organic gases, particulates, or oxides of nitrogen or sulfur and "any facility which is listed in any current toxics use or toxics air emission survey, inventory, or report released or compiled by a district." The Project does not quality as a "facility" subject to AB 2588. Additionally, SCAQMD has not conducted public workshops or adopted formal guidance for CEQA purposes relating to new OEHHA guidelines. As such, SCAQMD staff will continue to use the previous guidelines for CEQA determinations. Additionally, the diesel emissions from construction equipment are not mutagenic, which according to US EPA guidance,

30 SCAQMD, CEQA Air Quality Handbook, April 199.

31 See http://www.aqmd.gov/home/permits/risk-assessment and http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588/health-risk-assessment.

32 https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

suggests that that the OEHHA guidance is not applicable. It is therefore not required or meaningful to evaluate long-term cancer impacts from construction activities that occur over relatively short durations. As such, cumulative toxic emission impacts during construction would be less than significant.

Cumulative Impacts

SCAQMD guidance states that "projects that do not exceed the project specific thresholds are generally not considered to be cumulatively significant."[33] As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained the air quality mitigation measures identified under threshold (a) above. The SCAG 2016- 2040 RTP/SCS Program EIR contained air quality mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant air quality effects have been identified.

Mitigation Measures

Mitigation measures from the City of West Hollywood General Plan EIR are identified under threshold (a) above. No additional mitigation measures are necessary.

Table III-3
Localized Significance Threshold (LST) Worst-Case Emissions

Source	NOx	CO	PM10	PM2.5
			pounds/day	
Construction				
Total baseline maximum emissions	11	8	1	1
LST threshold	64	577	4	2
Threshold Exceeded?	**No**	**No**	**No**	**No**
Operational				
Project area/energy emissions	1	6	<1	<1
LST threshold	64	577	2	1
Net area/energy emissions	1	6	<1	<1

33 South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D. Available at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-workinggroup/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4.

Source	NOx	CO	PM10	PM2.5
LST threshold	64	577	2	1
Threshold Exceeded?	**No**	**No**	**No**	**No**

*Source: Refer to **Appendix B***
Note: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. A significant impact could occur if objectionable odors are generated that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as in sewage treatment facilities and landfills. As the Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase.

During the construction phase, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings such as paint and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent receptors, they are temporary and intermittent in nature. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the SCAQMD *CEQA Air Quality Handbook,* land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.[34] The proposed Project would not include any of these odor-producing uses. Odors associated with Project operation would be limited to on-site waste generation and disposal. All trash receptacles would be covered and properly maintained in accordance with WHMC Section 19.20.180. Trash rooms would be located within the ground level the parking garage, which would also minimize odors. Impacts would be less than significant.

34 SCAQMD, *Air Quality Handbook*, accessed July 2019, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

Cumulative Impacts

Given the physical separation of the Project from other related projects, cumulative odor impacts would not occur.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained the air quality mitigation measures identified under threshold (a) above. The SCAG 2016- 2040 RTP/SCS Program EIR contained air quality mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant air quality effects have been identified.

Mitigation Measures

Mitigation measures from the City of West Hollywood General Plan EIR are identified under threshold (a) above. No additional mitigation measures are necessary.

IV. BIOLOGICAL RESOURCES

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

Impact Analysis

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

No Impact. The Project site is located in an urbanized area of the City and is currently developed with a car wash and related structures. Landscaping is limited, consisting of ornamental trees and shrubs. Species likely to occur on site are limited to small terrestrial and avian species typically found in developed settings. As stated in the General Plan, "suitable habitat for sensitive mammal, reptile, amphibian, or fish species that occur in the region does not occur within the City".[35] Based on the lack of habitat on the Project site, it is unlikely any special-status species listed by the California Department of Fish and Wildlife (CDFW) or by the US Fish and Wildlife Service (USFWS) would be present on site.[36] As such, the redevelopment of the site would not have substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Cumulative Impacts

As mentioned previously, the City of West Hollywood generally does not contain suitable habitat for sensitive mammal, reptile, amphibian, or fish species. As such, the Project would not contribute to a cumulative impact on species identified as a candidate, sensitive, or special status.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any biological resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained biological resource mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant biological resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

35 City of West Hollywood General Plan Final EIR, Section 3.3, October 2010.

36 California Department of Fish and Wildlife, *California Natural Diversity Database,* "Special Animals List," accessed July 2019, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline.

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

No Impact. The Project site is currently developed with a car wash and related structures. According to the General Plan EIR, no riparian or other sensitive natural community is located on or adjacent to the Project site, or within the City.[37] Implementation of the proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. No Impacts would occur.

Cumulative Impacts

As mentioned previously, the no riparian or other sensitive natural community is located within the City. As such the Project would not result in cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any biological resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained biological resource mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant biological resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

c. Would the project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site is not near, nor does it contain wetland habitat or any kind of natural or altered drainage course. Implementation of the proposed Project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impact would occur.

37 City of West Hollywood General Plan Final EIR, Section 3.3, October 2010.

Cumulative Impacts

According to the City of West Hollywood General Plan EIR, the City does not contain any blueline streams or other wetlands. [38] As such, the Project would not result in cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any biological resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained biological resource mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant biological resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. The Project site is currently developed and is located within an urban area that is highly disturbed. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project site or in the surrounding area.[39] Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. No impacts would occur.

Cumulative Impacts

The Project site and surrounding area is currently developed and highly disturbed. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project site or in the surrounding area. As such, the Project would not result in cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any biological resource mitigation measures. The SCAG 2016-

38 City of West Hollywood General Plan Final EIR, Section 3.3, October 2010.
39 City of West Hollywood General Plan Final EIR, Section 3.3, October 2010.

2040 RTP/SCS Program EIR contained biological resource mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant biological resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. The City has adopted policies and ordinances for the protection of trees. The Heritage Tree Program has been adopted for identifying, promoting awareness, maintaining, and protecting designated Heritage Trees located within the City. However, no Heritage Trees exist on or adjacent to the Project site. Chapter 11.36 of the West Hollywood Municipal Code (WHMC) addresses trees and other plants within the public right-of-way. In particular, Section 11.36.010 prohibits removing or damaging any shade or ornamental tree, hedge, plant, shrub or flower growing in the right of way without a permit. Nine street trees are located along the Santa Monica Boulevard frontage of the site. These trees would remain and would be protected in accordance with the WHMC during construction. No impacts would occur.

Cumulative Impacts

As mentioned previously, the City has adopted policies and ordinances for the protection of certain trees. No protected trees will be removed as a result of this Project. As such, the Project would not contribute to cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any biological resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained biological resource mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant biological resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. There are currently no habitat conservation plans or natural community conservation plans within the City.[40] Therefore, the proposed Project would not conflict with an adopted habitat conservation plan. No impact would occur.

Cumulative Impacts

As mentioned previously, there are currently no habitat conservation plans or natural community conservation plans within the City. No cumulative impacts would occur.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any biological resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained biological resource mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant biological resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

40 City of West Hollywood General Plan Final EIR, Section 3.3, October 2010.

V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to section15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant Impact. The following section summarizes and incorporates by reference information from the *Historical Resource Evaluation* dated September 2018 (Historic Report), prepared by Kaplan Chen Kaplan and included as **Appendix C** of this SCEA. Section 15064.5 of the CEQA Guidelines defines a historic resource as a resource that is (1) listed in, or determined to be eligible for listing in, the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code [PRC]); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC). In addition, a lead agency may determine any objective, building, structure, site area, place, record, or manuscript which a lead agency determines to be historically significant, even if not listed in the State or Local register of historical resources, provided the lead agency's determination is supported by substantial evidence. Generally, a resource may be considered by the lead agency to be historically significant if the resource meets the criteria for listing on the California Register.

The car wash was constructed in 1970 as the Apollo car wash in the Googie architectural style. The Googie style was a popular commercial architectural style in the 1950s and 1960s. The period of significance for the Googie style of architecture is 1935 to 1969. The subject car wash was constructed after the very end of the style's period of significance. Furthermore, the building lacks important elements of the Googie architectural style such as expressive rooflines, prominent signage and futuristic decorative elements such as boomerangs, dingbats and starbursts. A signature feature of Googie style car washes are pylons that project upward in a dramatic manner. The pylons of the subject car wash are not dynamic, and they appear

to have been altered. The car wash building is not a good example of the Googie style of architecture. The linear processing of the car wash and the accompanying technology were well established by the middle of the 20th Century and ubiquitous by 1970. There is no historic significance related to the technology of the car washing system of the subject car wash.

The car wash property is located along the former U.S. Route 66. Route 66 was established in the 1920s and in 1936 the highway alignment followed Santa Monica Boulevard through West Hollywood. In the 1950s and 1960s the Interstate Highway system rerouted interstate travel and U.S, designated highways such as Route 66 became less important. U.S. Route 66 was decommissioned in 1985. The subject car wash, constructed in 1970, is not associated with the historic era of U.S. Route 66. There is no architect associated with the design of the car wash. There is no evidence that the professional engineers, Perlin-Boggio, are of historic importance. There is no evidence that any of the owners of the car wash are of historic significance and ownership itself would not necessarily impart historic significance. There are no historic events associated with the car wash property. The car wash property at 7617 Santa Monica Boulevard does not meet eligibility criteria to be designated as an individual historic resource on the National Register of Historic Places, on the California Register of Historical Resources, as local landmark in the City of West Hollywood, or as a historical resource as defined in Section 15064.5. Additionally, the City's 2016 Commercial Property Historic Resource Survey designated the existing car wash as "6L," a California office of Historical Resource Status Code indicating the property is "ineligible for local listing or designation through local government review process" but "may warrant special consideration in local planning" and therefore ineligible for listing.[41] Therefore, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project is not considered to be a historic or cultural resource according to national, State, and local guidelines. Additionally, the Project site is not part of a historic district and is not bordered or adjacent to other historic resources. Nor would the Project have an impact on off-site historic resources. As such, the Project would not contribute to cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any cultural resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained cultural resource mitigation measures that would apply if a Lead

41 West Hollywood Historic Preservation, "2016 (Commercial and Non-Residential), accessed August 2019, http://www.wehopreservation.org/wp-content/uploads/2016/10/Tile-5-Survey-Results_Recomm.pdf.

Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant cultural resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant with Mitigation Incorporated. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that either meet the criteria for historical resources or constitute unique archaeological resources. The potential for the accidental discovery of archaeological materials is considered low because the Project site is located in an urbanized area that has been subject to grading and development in the past. However, given that the Project proposes the construction of a 2-level subterranean parking garage, the potential exists to uncover subsurface resources beneath the site. The Project would incorporate mitigation measures for Paleontological Resources as discussed in the Geology and Soils section (page 4.0-48) of this Initial Study and for Tribal Cultural Resources, as discussed in the Tribal Cultural Resources section (page 4.0-120). Impacts would be less than significant with these mitigation measures incorporated.

Cumulative Impacts

There are no known archeological resources on the site and the Project would incorporate mitigation measures for the inadvertent discovery of Paleontological Resources and Tribal Cultural Resources, as stated in the Geology and Soils section (page 4.0-48) and the Tribal Cultural Resources section (page 4.0-120). Such measures and State regulations would apply to all similarly situated projects. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any cultural resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained cultural resource mitigation measure MM-CUL-2(B) that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. That measure identified activities similar to those contained in the paleontological mitigation in the Geology and Soils section (page 4.0-48) of this Initial Study and Tribal Cultural Resources mitigation in the Tribal Cultural Resources section (page 4.0-120). As such, the Project incorporates the intend of SCAG mitigation measure MM-CUL-2(B).

Mitigation Measures

The paleontological mitigation in the Geology and Soils section (page 4.0-48) of this Initial Study and Tribal Cultural Resources mitigation in the Tribal Cultural Resources section (page 4.0-120) would be incorporated into the Project. No additional mitigation measures are necessary.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant with Mitigation Incorporated. The Project site is located in a heavily urbanized area and is currently developed. No traditional burial site or other type of cemetery usage has been known to have been present at the Project site. Furthermore, the Project Applicant shall be required to comply with existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 that specify the protocol if human remains are discovered during excavation, grading, or construction activities. If human remains are encountered State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If the County Coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains. Furthermore, the Project would incorporate mitigation measures for Tribal Cultural Resources, as discussed in the Tribal Cultural Resources section (page 4.0-120). With regulatory compliance and incorporation of these mitigation measures, any potential impacts of the Project related to this threshold would be less than significant.

Cumulative Impacts

The Project site is located in a heavily urbanized area and is currently developed. No traditional burial site or other type of cemetery usage has been known to have been present at the Project site. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any cultural resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained cultural resource mitigation measure MM-CUL-2(B) that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. That measure identified activities similar to those contained in the paleontological mitigation in the Tribal Cultural Resources mitigation in the Tribal Cultural Resources section (page 4.0-120). As such, the Project incorporates the intend of SCAG mitigation measure MM-CUL-2(B).

Mitigation Measures

The Tribal Cultural Resources mitigation in the Tribal Cultural Resources section (page 4.0-120) would be incorporated into the Project. No additional mitigation measures are necessary.

VI. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Impact Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The Project would be designed and operated in accordance with the applicable Green Building Code of the City of West Hollywood found in WHMC Section 19.20.060, and State Building Code Title 24, including Part 6, Energy Efficiency Standards, and Part 11, California Green Building (CALGreen) Standards. These code sections impose energy efficiency and other requirements. The majority of the energy usage in the Project consists of lighting and climate control. Adherence to the aforementioned energy requirements will ensure conformance with the State's goal of promoting energy and lighting efficiency. The Project will incorporate CALGreen Tier 2 requirements such as:

- Wood-framed exterior walls with R-21 batt high density insulation providing a greater R-value which improves insulation, reducing heating and cooling energy use;
- Wood-framed roofs with R-38 batt insulation, increasing the R-value and thereby reducing heating and cooling energy use;
- High-reflectance roofing that reflects additional solar heat, reducing cooling energy use;
- Overhanging balconies for solar shading, keeping solar heat out, which reduces cooling energy use;
- High-performance windows with dual-paned low-emissivity glazing, providing additional insulation and heat blocking reducing cooling and heating energy use;
- high efficiency LED lights, reducing outdoor lighting consumption by at least 10% compared with Title 24 allowances;
- Daylighting and occupancy controls for common areas and other indoor, nonresidential spaces, saving energy while maintaining light levels;

- High-efficiency split system heat pumps for heating, ventilating and air-conditioning (HVAC) of residential units that provides heating and cooling while using less electricity to operate;
- Centralized water heating system that is more efficient than individual water heating within units; and
- High-efficiency water fixtures, reducing water and energy use.

Adherence to the aforementioned energy requirements and implementation of the listed design features will ensure conformance with the City and State goals of promoting energy efficiency. As such, impacts of the Project would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would adhere to applicable Green Building Code of the City of West Hollywood found in WHMC Section 19.20.060, and State Building Code Title 24, including Part 6, Energy Efficiency Standards, and Part 11, California Green Building (CALGreen) Standards. These code sections impose energy efficiency and other requirements. The majority of the energy usage in the Project consists of lighting and climate control. Given that the Project is in an urban area, and other Projects within the area would be required to follow the same regulations, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain energy mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR did not contain energy mitigation measures.

Mitigation Measures

No mitigation measures are necessary.

b. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The Project consists of the demolition of the existing car wash and the development of a mixed-use commercial and residential building. As stated above, the Project would be designed and operated in accordance with the with applicable State Building Code Title 24 regulations, the California Green Building code, which impose energy conservation measures, and the West Hollywood Climate Action Plan, as shown in **Table VI-1: Applicable Energy Strategies from the West Hollywood**

Climate Action Plan.[42] Additionally, the city has opted in to a community choice aggregation, which increases the renewable energy usage in the city. As such, impacts of the Project would be less than significant, and no mitigation is required.

Cumulative Impacts

As mentioned previously, the Project will comply with the applicable State Building Code Title 24 regulations and the West Hollywood Climate Action Plan. All Projects within the City will be required to follow the same regulations. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain energy mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR did not contain energy mitigation measures.

Mitigation Measures

No mitigation measures are necessary.

42 City of West Hollywood Climate Action Plan, accessed August 2019, https://www.weho.org/home/showdocument?id=7949.

Table VI-1
Applicable Energy Strategies from the West Hollywood Climate Action Plan

Plan Objectives	Project Consistency
West Hollywood Climate Action Plan	
E-2.2: Require all new construction to achieve California Building Code Tier II Energy Efficiency Standards (Section 503.1.2).	**Consistent.** The proposed Project will be designed according to the California Green Building Code Tier 2 Energy Efficiency standards. Additionally, the Project incorporate additional sustainable landscaping features, such as a rooftop garden, to further reduce energy consumption.
E-3.1: Require that all new construction and condominium conversions be sub-metered to allow each tenant the ability to monitor their own energy and water use.	**Consistent.** The proposed Project will feature sub-meters to allow each tenant access to monitor their own energy and water use as required in the Climate Action Plan.
E-3.2: Require the use of recycled materials for 20% construction materials in all new construction	**Consistent.** The proposed Project would incorporate a minimum of 20% recycled materials for building construction through the use of recycled-content base and backfill materials.
E-3.3: Facilitate installation of solar hot water heating systems on commercial and multi-family buildings.	**Consistent.** The proposed Project will provide pre-plumb and conduits for solar water heating.
E-3.4: Facilitate the installation of solar photovoltaic systems on multi-family residential, commercial, and industrial buildings, and parking lots.	**Consistent.** The proposed Project will reserve 15.5% of the roof area for potential future solar panels.

VII. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?	☐	☒	☐	☐

Impact Analysis

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. Fault rupture is the surface displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey designates faults as active, potentially active, or inactive. The Alquist-Priolo Earthquake Fault Zoning Act establishes standards regulating development adjacent to active faults and areas designated as Earthquake Fault Zones. Several principal active faults are located in the Southern California metropolitan region, including the San Andreas Fault, approximately 35 miles northeast of the City. Several additional active faults are considered to most influence the seismic exposure of the City, including the Hollywood, Santa Monica, Newport-Inglewood, and Upper Elysian Blind Thrust Faults.[43]

No Alquist-Priolo Earthquake Fault Zones are located within the boundaries of the City.[44] The closest active fault to the Project site capable of surface rupture is the Hollywood Fault, located approximately 0.7 miles northwest at the nearest point. For planning purposes, the City has established two fault precaution (FP) zones along the Hollywood Fault Zone. FP Zone 1 requires a site-specific surface fault rupture evaluation and FP Zone 2 requires either a site-specific surface fault rupture evaluation or foundation strengthening to mitigate up to 2 inches of ground displacement. The Project site is not located in either of these FP zones, with the nearest point at a distance of approximately 0.85 miles northwest of the site.[45] Therefore,

43 City of West Hollywood, Final PEIR: West Hollywood General Plan and CAP.
44 City of West Hollywood, Final PEIR: West Hollywood General Plan and CAP.
45 City of West Hollywood, *Final PEIR: West Hollywood General Plan and CAP,* Figure 3.5-2.

the proposed Project would not be exposed to hazards associated with surface fault rupture. No impact would occur.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. The Project site is not located on an active fault and would not increase the potential for the risk of loss, injury, or death resulting from rupture of a known earthquake fault. Since there is not an active fault, it is not anticipated that this and any related projects nearby would have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

ii. Strong seismic ground shaking?

Less than Significant Impact. As with any site in the Southern California region, the Project site is susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby active faults include the Hollywood, Santa Monica, Newport-Inglewood, and Upper Elysian Blind Thrust Faults. These faults can produce strong seismic ground shaking at the Project site. On-site structures would be required to be constructed to comply with the West Hollywood Building Code (WHBC). With adherence to code, design and construction of the proposed development would be engineered to withstand the expected ground acceleration that may occur at the Project site. The calculated design base ground motion for the site consider the soil type, potential for liquefaction, and most current and applicable seismic attenuation methods available. In addition, Project construction would be subject to review and approval by City building and safety officials. As such, impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. Since the Project site is not located on an active fault and would not increase the potential for the risk of loss, injury, or death resulting from ground

shaking, it is not anticipated that this and any related projects nearby would have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low-density, fine, clean, sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

The City does not identify the Project site as being located in a liquefaction hazard zone.[46] However, the proposed Project would be designed in accordance with the City's applicable Building Code, which includes the structural section of the California Building Code that addresses seismic design.[47] The proposed Project is not located in a liquefaction hazard zone and would be designed in accordance with regulatory requirements. As such, impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. Since the Project site is not located on an active fault and would not increase the potential for the risk of loss, injury, or death resulting from ground failure, it is not anticipated that this and any related projects nearby would have a considerable contribution to a cumulative impact.

46 City of West Hollywood, *Final PEIR: West Hollywood General Plan and CAP,* Figure 3.2-3.
47 California Building Code, Chapter 16 Structural Design, Section 1613 Earthquake Loads

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

iv. Landslides?

Less than Significant Impact. The topography of the Project site and surrounding areas is relatively flat and does not contain any distinctive landforms. The City does not identify the Project site to be located within an area with potential for earthquake-induced landslides.[48] Areas within the City subject to hazards from landslides and mudslides are generally limited to the properties at the base of undeveloped or unimproved Hollywood Hills slopes, approximately 1.5 miles west of the Project site. In addition, numerous structures stand between the Hollywood Hills base and the Project site. Therefore, the proposed Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts would occur.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. As mentioned previously, the topography of the Project site and the surrounding areas is relatively flat and does not contain any distinctive landforms. As such, it is not anticipated that this and any related projects nearby would have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a

48 City of West Hollywood, Final *PEIR: West Hollywood General Plan and CAP,* Figure 3.2-3.

project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

c. Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The Project site is developed with impermeable surfaces, and no areas of the site are susceptible to erosion under existing conditions. The Project site and surrounding areas are disturbed and developed; the land is relatively flat, containing minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. Although development of the proposed Project has the potential to result in the erosion of soils during construction activities, erosion would be reduced through implementation of SCAQMD Rule 403—Fugitive Dust to minimize wind- and waterborne erosion at the Project site and compliance with WHMC Section 15.56.090, which outlines requirements for industrial/commercial construction activities.

Furthermore, implementation of the proposed Project would not result in a substantial increase in the amount of impervious surface, and for this reason, the quantity of runoff from the site would not change substantially. All runoff would continue to be conveyed via streets and curbs to storm drain catch basins around the Project site and must comply with local and State requirements related to low-impact development and retaining stormwater on site. As a result, the proposed Project would not require any substantial changes to the existing drainage pattern of the site or area that would cause substantial erosion or loss of topsoil. As such, Project impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. As mentioned previously, implementation of the Project would not result in a substantial increase in the amount of impervious surface, and for this reason, the quantity of runoff from the site would not substantially be impacted. All runoff would continue to be conveyed via streets and curbs to storm drain catch basins around the Project site and must comply with local and State requirements related to low-impact development and retaining stormwater on site. As a result, the proposed Project would not require any substantial changes to the existing drainage pattern of the site or area that would cause substantial erosion or loss of topsoil. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

d. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less than Significant Impact. Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include but are not limited to withdrawal of groundwater; pumping of oil and gas from underground; the collapse of underground mines; liquefaction; and hydro compaction. Lateral spreading is the horizontal movement or spreading of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high, and where relatively soft and recent alluvial deposits exist. Lateral spreading hazards may also be present in areas with liquefaction risks. During a recent site investigation conducted for the Project site, no groundwater was encountered to a maximum depth of 40 feet below ground surface (bgs).[49] The design and construction of the proposed Project would be required to comply with the sections of the applicable building code that address structural design, including earthquake loads and foundation design.[50] Compliance with these requirements would minimize impacts associated with lateral spreading, subsidence, or collapse to less than significant. As such, Project impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. As mentioned previously, during a recent site investigation conducted for the Project site, no groundwater was encountered to a maximum depth of 40

49 Partner Engineering and Science Inc., *Phase II Subsurface Investigation Report*, 7617 Santa Monica Boulevard, West Hollywood, California 90046 (September 36, 2017).

50 California Building Code, Chapter 16 Structural Design, Section 1610 Soil Lateral Loads.

feet bgs. The design and construction of the Project would be required to comply with applicable building codes. Compliance with these requirements would minimize impacts associated with lateral spreading, subsidence, or collapse to less than significant. As such, the Project would not exacerbate existing environmental conditions and therefore would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

e. Be located on expansive soil, as defined in table 18-1-b of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?

Less than Significant Impact. Expansive soils generally result from specific clay minerals that expand when saturated and shrink when dry. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper management, heaving and cracking of both building foundations and slabs on grade could result. Expansive soils exist throughout the City but are more prevalent in the southern part, notably south of Santa Monica Boulevard.[51] CBC Section 1808.6 requires special foundation designs for buildings constructed on expansive soils. Compliance with CBC requirements would ensure protection of structures and occupants from expansive soils, as such Impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. As mentioned previously, CBC Section 1808.6 requires special foundation designs for buildings constructed on expansive soils. This Project as well as other projects within the City would be required to comply with CBC Section 1808.6. Compliance with CBC

51 City of West Hollywood, *PEIR: West Hollywood General Plan and CAP*.

requirements would ensure protection of structures and occupants from expansive soils. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

f. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the proposed Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. As such, no impacts would occur.

Cumulative Impacts

As mentioned previously, the proposed Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. As such, the Project would not have a considerable contribution to a cumulative impact on soils supporting septic tanks or alternative waste disposal systems.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any geologic mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less Than Significant with Mitigation Incorporated. A paleontological resource is defined as any fossilized remains, traces, or imprints of organisms preserved in or on the earth's crust. The Project site has been previously graded and is currently improved with an existing car wash, related facilities, and paved lots. Given that the Project proposes the construction of a 2-level subterranean parking garage, the potential exists to uncover subsurface resources beneath the site. The EIR prepared for the West Hollywood General Plan concluded that "the potential for damage to previously unknown unique paleontological resources during earthmoving activities resulting from implementation of the General Plan is considered a potentially significant impact."[52]

Cumulative Impacts

As previously stated, the EIR prepared for the West Hollywood General Plan concluded that there was a potentially significant impact. As such, the Project could have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The West Hollywood General Plan EIR identified the following mitigation measure for paleontological impacts:

MM – 3.10-1 Paleontological Resources

- If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The project applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the lead agency to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

52 *City of West Hollywood General Plan Final EIR October 2010*, page 3.10-6

With implementation of General Plan **Mitigation Measure 3.10-1**, impacts to paleontological resources would be less than significant.[53]

The SCAG 2016- 2040 RTP/SCS Program EIR contained a paleontological mitigation measure applicable if the Lead Agency identified significant effects. However, the mitigation measures in the SCAG Program EIR are similar to the mitigation identified above from the West Hollywood General Plan EIR and the mitigation measure from the West Hollywood General Plan EIR would adequately mitigate potential impacts. As such, it is not necessary to incorporate the SCAG Program EIR mitigation into the Project.

Mitigation Measures

No additional mitigation measures are necessary.

53 *City of West Hollywood General Plan Final EIR October 2010*, page 3.10-6

VIII. GREENHOUSE GAS EMISSIONS

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

Impact Analysis

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

Less than Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature.

There are no federal, State, or local adopted quantitative thresholds of significance for addressing a project's GHG emissions. In 2008 a SCAQMD staff working group discussed interim CEQA GHG significance thresholds. The SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects such the proposed Project. When no quantitative significance thresholds have been formally adopted by a lead agency, the California Air Pollution Control Officers Association suggests making significance determinations on a case-by-case basis. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional or State agency.

Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of GHG emissions resulting from the Project; (2) a qualitative analysis or performance-based standards; (3) a quantification

of the extent to which the Project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The proposed Project would result in short-term emissions of GHGs during construction. An estimate of GHG emission was prepared utilizing the California Emissions Estimator Model (CalEEMod).[54] Site- or Project-specific data were used in the CalEEMod model where available. Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include construction-related GHG emissions when assessing all of the long-term GHG emissions associated with a project. Current practice, as recommended by SCAQMD, is to annualize construction-related GHG emissions over a project's lifetime in order to include these emissions as part of a project's annualized lifetime total emissions so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. A project lifetime has generally been defined as 30 years; therefore, the proposed Project's estimated construction GHG emissions have been annualized over a 30-year period and are included in the annualized operational GHG emissions. Area source emissions would be generated by the consumption of natural gas for space and water heating devices. The proposed Project would also result in GHG emissions due to area source emissions from natural gas, electricity demand, water consumption, and solid waste generation.

The annual net GHG emissions associated with the construction and operation of the Project are provided in **Table VIII-1: Estimated Construction and Operational Greenhouse Gas Emissions**. As shown in **Table VIII-1**, when compared to the existing car wash facility, the Project would result in a net increase of 1,078 MTCO2e annually. As per Sections 21155.2(b)(1) and 21159.28 of the CEQA Statute, this SCEA is not required to consider mobile source greenhouse gas emissions. However, CalEEMod provides an estimate of mobile source emissions which has been included in **Table VIII-1**.

54 See Appendix B, *Air Quality and Greenhouse Gas Study for the 7617 Santa Monica Boulevard* for modeling results and additional discussion.

Table VIII-1
Estimated Construction and Operational Greenhouse Gas Emissions

GHG Emissions Source	Emissions (MTCO2e/Year)
Construction (amortized)	27
Mobile	880
Area sources	16
Energy	456
Waste	11
Water	56
Annual total	1,448
Existing total	*368*
Net total	**1,078**

Note: These estimates are prior to the incorporation of the mitigation measures described below. Refer to modelling results in ***Appendix B.***

The City has a Climate Action Plan (CAP) which recommends measures and actions that translate the City's vision into on-the-ground action. These measures define the direction that the City will take to accomplish its GHG reduction goals, while actions define the specific steps that City staff and decision-makers will take over time. Overall, the goal of the CAP is to reduce West Hollywood's community-wide GHG emissions by 20 percent to 25 percent below 2008 emission levels by the year 2035. The Project would be consistent with the applicable policies set forth in the CAP, as shown in **Table VI-1**. Therefore, because the project is well within the growth projections and anticipated development for the city under the General Plan and CAP and well below thresholds used by other agencies

In September 2017, the City joined the Clean Power Alliance, which provides customers a greener and more renewable electricity option. The estimate shown in **Table VIII-1** did not account for potential reductions in energy-related emissions if future residents opt for cleaner electricity options. As such, the Project-related emissions likely would be reduced.

Based on the above, construction and operation of the proposed Project would not result in any significant increase in GHG emissions.

Cumulative Impacts

The impact of Greenhouse Gases is cumulative in nature. As such, the determination about that the proposed Project would not result in any significant increase in GHG emissions indicates that the Project

would not have a considerable contribution to a cumulative impact. Additionally, this is the type of project that was envisioned under SB 375,which puts housing near transit and directly supports both State and local goals for GHG reduction strategies.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained mitigation to address the significant Greenhouse Gas impacts associated with buildout of the General Plan. The following General Plan EIR mitigation measure is therefore incorporated into the Project as mitigation:

3.15-1 To further reduce construction-generated GHG emissions, the project applicant(s) of all project phases shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction.

Prior to releasing each request for bid to contractors for the construction of each development phase, the project applicant(s) shall obtain the most current list of GHG reduction measures that are recommended by the City and stipulate that these measures be implemented in the respective request for bid as well as the subsequent construction contract with the selected primary contractor.

The project applicant(s) for any particular development phase may submit to the City a report that substantiates why specific measures are considered infeasible for construction of that particular development phase and/or at that point in time. The report, including the substantiation for not implementing particular GHG reduction measures, shall be approved by the City prior to the release of a request for bid by the project applicant(s) for seeking a primary contractor to manage the construction of each development phase. By requiring that the list of feasible measures be established prior to the selection of a primary contractor, this measure requires that the ability of a contractor to effectively implement the selected GHG reduction measures be inherent to the selection process.

The City's recommended measures for reducing construction-related GHG emissions at the time of writing the General Plan EIR are listed below. The list can be updated as new technologies or methods become available. The project applicant(s) shall, at a minimum, be required to implement the following:

- Improve fuel efficiency of construction equipment:

  - Reduce unnecessary idling (modify work practices, install auxiliary power for driver comfort);
  - Perform equipment maintenance (inspections, detect failures early, corrections);
  - Train equipment operators in proper use of equipment;
  - Use the proper size of equipment for the job; and
  - Use equipment with new technologies (repowered engines, electric drive trains).

- Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power
- Use an ARB-approved low-carbon fuel, such as biodiesel or renewable diesel for construction equipment (emissions of oxides of nitrogen [NO_x] from the use of low carbon fuel must have been reviewed and increases mitigated.) Additional information about low-carbon fuels is available from ARB's Low Carbon Fuel Standard Program (ARB 2010g).
- Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking for construction worker commutes
- Reduce electricity use in the construction office by using compact fluorescent blubs, powering off computers every day, and replacing heating and cooling units with more efficient ones
- Recycle or salvage nonhazardous construction and demolition debris (goal of at least 75% by weight)
- Use locally sourced or recycled materials for construction materials (goal of at least 20% based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials)
- Minimize the amount of concrete used for paved surfaces or use a low carbon concrete option
- Produce concrete on-site if determined to be less emissive than transporting ready mix
- Use EPA-certified SmartWay trucks for deliveries and equipment transport. Additional information about the SmartWay Transport Partnership Program is available from

ARB's Heavy-Duty Vehicle Greenhouse Gas Measure (ARB 2010h) and EPA (EPA 2010f)

- Develop a plan to efficiently use water for adequate dust control. This may consist of the use of non-potable water from a local source.

The emissions estimates provided previously did not include the mitigation listed above. With the incorporation of the West Hollywood General Plan EIR mitigation, the less-than-significant-Project-related emissions would be further reduced.

The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measure applicable if the Lead Agency identified significant effects. The SCAG Program EIR mitigation consists of measures that have been used for projects in the SCAG region. These measures are equivalent to those listed in the mitigation measure from the West Hollywood General Plan EIR and therefore it is not necessary to also incorporate the measure from the SCAG 2016- 2040 RTP/SCS Program EIR.

Mitigation Measures

No additional mitigation measures are necessary.

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

No Impact. AB 32, the California Global Warming Solutions Act of 2006, focuses on reducing GHG emissions in California.[55] GHGs, as defined under AB 32, include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In November 2017, CARB adopted an updated Climate Change Scoping Plan, which details strategies to meet that goal. The Climate Change Scoping Plan[56] also recommends energy-efficiency measures in buildings such as maximizing the use of energy efficient appliances and solar water heating, as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes.[57] In addition, the Climate Change Scoping Plan encourages the use of solar photovoltaic panels and other renewable sources of energy to provide clean energy and reduce fossil fuel–based energy.

The proposed Project would be designed in accordance with the 2016 Title 24 Energy Efficiency Standards, which represent an approximate improvement of 30 percent beyond the 2008 Standards that were used in assumptions for the City's 2013 CAP GHG analysis. Conformance with the 2016 Standards is consistent

55 California Air Resources Board (CARB), "Assembly Bill 32 Overview" (last reviewed August 4, 2014), accessed August 2019, http://www.arb.ca.gov/cc/ab32/ab32.htm.

56 CARB, "AB 32 Scoping Plan" (last reviewed January 8, 2019), accessed August 2019, http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm.

57 California Building Standards Commission, "California Building Standards Code."

with the City's objectives to reduce GHG emissions to meet regional and Statewide emission reduction targets. Therefore, the proposed Project does not interfere with the State's implementation of (i) Executive Order B-30-15 and Senate Bill 32's target of reducing Statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing Statewide GHG emissions to 80 percent below 1990 levels by 2050 because it does not interfere with the State's implementation of GHG reduction plans described in the CARB's updated Scoping Plan.

The proposed Project is considered consistent with the above goals as it is consistent with the policies laid out in the City's CAP. Additionally, the Project would implement Mitigation Measure 3.15-1 from the City of West Hollywood General Plan EIR as described in above. In addition, the Project will be consistent with the City's Green Building Program and would earn 91 points. Therefore, the proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

Cumulative Impacts

The impact of Greenhouse Gases is cumulative in nature. As such, the determination about that the proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the result in any significant increase in GHG emissions of greenhouse gases indicates that the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. As identified under threshold (a), the City of West Hollywood General Plan EIR contained Greenhouse Gas mitigation measures to address the significant impacts associated with buildout of the General Plan. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measure applicable if the Lead Agency identified significant effects. However, the mitigation measure from the West Hollywood General Plan EIR would adequately mitigate potential impacts and therefore the measure from the SCAG 2016- 2040 RTP/SCS Program EIR is not necessary.

Mitigation Measures

As identified under threshold (a), the General Plan EIR mitigation measures shall be incorporated into the Project. No additional mitigation measures are necessary.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Impact Analysis

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

Less than Significant Impact. A Phase II Subsurface Investigation Report was conducted for this Project by Partner Engineering and Science, Inc. on September 26, 2017, included as **Appendix D** in this SCEA. The

following analysis incorporates information from this study. Construction activities associated with the Project would involve the use of those hazardous materials that are typically necessary for construction of an automobile dealership, including vehicle fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. Therefore, construction of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no further analysis of this topic in an EIR is required.

The proposed Project involves the operation of a new mixed-use building consisting of residential and commercial uses. The types and amounts of hazardous materials that would be used during operation of the Project would be typical of those in a mixed-use project (e.g., cleaning solvents, pesticides for landscaping, painting supplies). All potentially hazardous materials would be used and stored in accordance with the manufacturers' instructions and handled in accordance with all applicable federal, State, and local regulations, including but not limited to those set forth by the federal and State Occupational Safety and Health Acts. This includes City review of plans to ensure proper storage of hazardous substances, accident response plans, inspections, and monitoring by the Los Angeles County Fire Department (LACFD) to minimize hazards to an acceptable level. Such requirements include obtaining material safety data sheets from chemical manufacturers; making these data sheets available to employees; labeling chemical containers in the workplace; developing and maintaining a written hazard communication program; and developing and implementing programs to train employees about hazardous materials. In addition, the Project would be required to comply with the City's Low Impact Development ordinance that contains requirements for storm water pollution control measures.[58] Thus, the potential for operation of the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials is low. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, all potentially hazardous materials would be used and stored in accordance with the manufacturers' instructions and handled in accordance with all applicable federal, State, and local regulations, including but not limited to those set forth by the federal and State Occupational Safety and Health Acts. This includes City review of plans to ensure proper storage of hazardous substances, accident response plans, inspections, and monitoring by the Los Angeles County Fire Department (LACFD) to minimize hazards to an acceptable level. Such requirements include obtaining material safety data sheets

58 West Hollywood Municipal Code, Section 15.56.095.

from chemical manufacturers; making these data sheets available to employees; labeling chemical containers in the workplace; developing and maintaining a written hazard communication program; and developing and implementing programs to train employees about hazardous materials. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hazards and hazardous materials mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less than Significant Impact As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. According to the Phase II report as included as **Appendix D** of this SCEA, the three analyzed soil gas samples (B1-SG15, B2-SG15, and B3-SG-15) contained detectable concentrations of tetrachloroethylene (PCE); however, none of the detected PCE concentrations exceeded residential or commercial/industrial Soil Gas Screening Levels (SGSLs). PCE daughter compounds were not detected in soil gas in excess of laboratory Practical Quantitation Limits, which in turn were below their applicable SGSLs. sampled at up to 25 feet bgs in a recent site investigation revealed low levels of tetrachloroethylene (PCE).[59] This condition has been attributed to release of a solvent from the dry-cleaning facility adjacent to the east. However, none of the PCE concentrations were above the screening thresholds and the Phase II report determined that no remediation is required. In addition, soil would be excavated from the Project site for the construction of the subterranean parking garage, which would be approximately 20 feet bgs. The excavated soil would be removed and disposed of

59 Partner Engineering, *Phase II Subsurface Investigation Report*.

in comply with the requirements of the Los Angeles Region Water Quality Control Board (RWQCB), SCAQMD, and Los Angeles County Sanitation Districts Soil Acceptance Program.

As discussed above, operation of the Project would use limited quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning agents and paints. Although it does not propose any industrial uses, the Project would involve uses that typically do not generate large quantities of hazardous materials or wastes; moreover, these materials present a low risk for hazards exposure. Additionally, as with Project construction, all hazardous materials and/or waste on the Project site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, State, and local requirements, such as those administered by the LACFD and the Occupational Safety and Health Administration. Therefore, with implementation of appropriate hazardous materials management protocols on the Project site and compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, as well as adherence to manufacturer's instructions for the safe handling and disposal of hazardous materials, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As such, impacts associated with the use, storage, handling, and disposal would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would use limited quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning agents and paints. All hazardous materials and/or waste on the Project site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, State, and local requirements, such as those administered by the LACFD and the Occupational Safety and Health Administration. Therefore, with implementation of appropriate hazardous materials management protocols on the Project site and compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, as well as adherence to manufacturer's instructions for the safe handling and disposal of hazardous materials, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West

Hollywood General Plan EIR did not contain any hazards and hazardous materials mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less than Significant Impact. The closest school to the Project site is the Fountain Day School, a private preschool and kindergarten located at 1128 Orange Grove Avenue, approximately 0.2 miles northwest of the Project site. As discussed above, construction of the Project would involve the use of those hazardous materials that are typically necessary for construction of a mixed-use building containing residential and commercial uses. As such, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. In addition, construction of the Project would involve the demolition of the existing car wash and related structures, which, due to its age, may contain asbestos and lead-based paints and materials. The removal of any asbestos-containing materials would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities) and Cal/OSHA regulations regarding lead-based paint. Thus, construction activities associated with the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, including the Fountain Day School. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. In addition, construction of the Project would involve the demolition of the existing car wash and related structures, which, due to its age, may contain asbestos and lead-based paints and materials. The removal of any asbestos-containing materials would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities) and Cal/OSHA regulations regarding lead-based paint. Thus, construction activities associated with the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, including the Fountain Day School. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hazards and hazardous materials mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

Less than Significant Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.[60] An existing car wash and related facilities are located on the Project site. A total of five properties within approximately 0.5 miles of the Project site were listed as having leaking underground storage tanks, all of which have been closed. Based on the Phase II ESA prepared for the Project Site, the soil beneath the site does not contain pollutant concentrations in excess of residential or commercial/industrial Soil Gas Screening Levels (SGSLs).[61]

In addition, the State GeoTracker website was reviewed to determine if the site was listed as a current or former RWQCB or DTSC site. Although the Project site is not shown on the database, the adjacent LACFD Station 8 was listed for potential contaminants of concern. As of October 28, 2003, the site case was completed and closed.[62] No other listings appeared on GeoTracker for either agency for the site. Therefore, impacts would be less than significant, and no further evaluation is required in an EIR.

60 These lists include but are not limited to the EnviroStor (http://www.envirostor.dtsc.ca.gov/public/) and GeoTracker (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and SWRCB, respectively.

61 Partner Engineering, *Phase II Subsurface Investigation Report*.

62 State Water Resources Control Board, *GeoTracker*, "LA CO Fire Station #8 T0603799298," accessed August 2019, https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603799298.

As discussed above, the types and amounts of hazardous materials used during operation of the mixed-use building containing residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and batteries. All potentially hazardous materials used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions, and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the types and amounts of hazardous materials used during operation of the mixed-use building containing residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and batteries. All potentially hazardous materials used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions, and handled in compliance with applicable federal, State, and local regulations. Additional projects would be required to comply with applicable federal, State, and local regulations. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hazards and hazardous materials mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. The closest public airport to the Project site is the Santa Monica Municipal Airport, located approximately 7 miles southwest. Given the distance between the Project site, the Project would not have the potential to result in a safety hazard or excessive noise. No impacts would occur.

Cumulative Impacts

The closest public airport to the Project site is the Santa Monica Municipal Airport, located approximately 7 miles southwest of the Project site and no impact would occur. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hazards and hazardous materials mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The Project is located at the intersection of Santa Monica Boulevard and Stanley Avenue, the former of which is an identified disaster route.[63] The majority of construction activities for the Project would be confined to the site. Any work that extends into the right-of-way would be short term and temporary and would be coordinated between the City through approval of an encroachment permit. As such, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Impacts would be less than significant.

63 County of Los Angeles, Department of Public Works, "City of West Hollywood" (2008), http://dpw.lacounty.gov/dsg/disasterroutes/map/west%20hollywood.pdf.

Cumulative Impacts

As mentioned previously, the majority of construction activities for the Project would be confined to the site. Any work that extends into the right-of-way would be short term and temporary and would be coordinated between the City through approval of an encroachment permit. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hazards and hazardous materials mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The City sits at the base of the Hollywood Hills, which includes residential neighborhoods within Los Angeles. The developed portions of the Hollywood Hills are densely populated by single- and multifamily homes. Given the combination of brush cover and the difficult-to-navigate roads, a fire in the Hollywood Hills could easily spread to the northern region of West Hollywood. The Project site is located 0.8 miles south of the Hollywood Hills. According to the Safety and Noise Element, the Project site is not within any fire hazard zone.[64] Therefore, the Project would not subject people or structures to a significant risk or loss, injury, or death as a result of exposure to wildland fires. No impacts would occur.

Cumulative Impacts

As stated previously, the Project site is not within any fire hazard zone. Therefore, the Project would not subject people or structures to a significant risk or loss, injury, or death as a result of exposure to wildland fires. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West

64 City of West Hollywood, *West Hollywood General Plan 2035*, Chapter 10: Safety and Noise, Figure 10-1.

Hollywood General Plan EIR did not contain any hazards and hazardous materials mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

X. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on or off site?	☐	☐	☒	☐
ii Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact.

Construction Impacts

During construction and demolition activities stormwater runoff from the Project site could cause erosion and/or transport sediment off site and into municipal storm drain systems. Thus, pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could result in adverse impacts to water quality. The proposed Project would have to comply with the City of West Hollywood Municipal Code Section 15.56 Storm Water and Urban Runoff Pollution Control, which would ensure that construction of the proposed Project would not violate any water quality standards and/or discharge requirements, or otherwise substantially degrade water quality.

Operation Impacts

Operation of the proposed Project would introduce sources of potential stormwater pollution that are typical of commercial and residential uses. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with Chapter 15.56.095 of the WHMC, which requires a Low Impact Development (LID) Plan. The LID Plan is a document developed to control pollutants, pollutant loads, and runoff volume being released from the Project site by minimizing the impervious surface area and controlling runoff from impervious surfaces; it applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source.

The proposed Project would generate wastewater that would be conveyed via municipal sewage infrastructure maintained by the City of Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP), a public facility subject to the State's wastewater treatment requirements. The proposed Project would generate wastewater similar to that generated by existing mixed-use buildings throughout the City, and pollutant loads would be typical of urban wastewater already processed by the HTP. Thus, operation of the proposed Project would not violate waste discharge requirements.

Compliance with the LID Plan would reduce the amount of surface water runoff leaving the Project site compared to runoff under current conditions. Compliance with existing regulations, such as the LID Plan and MS4, including the implementation of BMPs, would ensure that operation of the proposed Project would not violate any water quality standards or waste discharge requirements. Construction and

operation of the proposed Project would not violate any water quality standards or waste discharge requirements. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, construction activity would be required to comply with WHMC Section 15.56.090, and operation activity would be required to comply with Section 15.56.095 of the WHMC. All related projects in the area would be required to comply with the WHMC Sections 15.56.090 and 15.56.095. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. The Project site is currently developed with an existing car wash and primarily consists of impervious surfaces, with limited landscaping characterized by ornamental trees and shrubs. Implementation of the proposed Project would not result in a substantial change in the amount of pervious and impervious surface across the Project site nor would it impede sustainable groundwater management of the basin. Groundwater was not encountered at the Project site to a maximum depth of 40 feet bgs; moreover, the groundwater depth based on previous reports has usually ranged from approximately 191 to 196 feet bgs.[65] Similar to existing conditions, redevelopment of the Project site would result in a negligible amount of on-site groundwater recharge opportunities and would not impact groundwater wells, change the rate or direction of flow of groundwater, impact groundwater recharge areas, or impede sustainable groundwater management of the basin. While the proposed Project involves the construction of a 2-level subterranean parking garage at a depth of approximately 20 feet, these

65 Partner Engineering, *Phase II Subsurface Investigation Report*.

excavation activities are not likely to interfere with the groundwater table. As such, Impacts would be less than significant.

Cumulative Impacts

As mentioned previously, redevelopment of the Project site would result in a negligible amount of on-site groundwater recharge opportunities and would not impact groundwater wells, change the rate or direction of flow of groundwater, impact groundwater rechange areas, or impede sustainable groundwater management of the basin. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or though the addition of impervious surfaces, in a manner which would:

i. result in substantial erosion or siltation on- or off-site?

Less than Significant Impact. The Project site is located in a highly urbanized area. There are no natural watercourses on the Project site or in the vicinity. As discussed above, the Project site is developed with paved surfaces, and current stormwater runoff flows to the local storm drain system. Additionally, the LID will improve the drainage pattern with less runoff leaving the Project site. As such, the proposed Project would not result in a substantial alteration to the existing drainage pattern or to any drainage course; therefore, no erosion or siltation impacts related to such alterations would occur. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would not result in a substantial alteration to the existing drainage pattern or to any drainage course; therefore, no erosion or siltation impacts related to such alterations would occur. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

Less than Significant Impact. The proposed Project would not result in substantial alteration of existing drainage patterns or any alterations to a drainage course, river, or stream. Grading and construction activities on the Project site may temporarily alter the existing drainage patterns of the site and reduce off-site flows. However, construction and operation of the proposed Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on or off site with the implementation of the LID program. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned above, the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on or off site. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. The proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site currently is and would continue to be collected on the site and directed toward existing storm drains having adequate capacity in the Project vicinity. Pursuant to City code, stormwater retention would be required as part of the LID. As previously mentioned, Chapter 15.56.095 of the WHMC requires the preparation of a LID Plan for the proposed Project. The proposed Project is required to implement BMPs, such as use of flow-through planter boxes, vegetative swales, semi pervious surfaces, or infiltration trenches, to retain runoff from the 85th percentile 24-hour rain event. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, Chapter 15.56.095 of the WHMC requires the preparation of a LID Plan for the Project. The proposed Project is required to implement BMPs, such as use of flow-through planter boxes, vegetative swales, semi pervious surfaces, or infiltration trenches, to retain runoff from the 85th percentile 24-hour rain event. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

iv. impede or redirect flood flows?

No Impact. The proposed Project is not located within a flood zone or within proximity of any river, stream or other waterway. As such it would not impede or redirect flood flows. No impact would occur.

Cumulative Impacts

As mentioned previously, the Project is not located in a 100-year flood hazard area, and as such it would not impede or redirect flood flows. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

d. Would the project risk the release of pollutants in a flood hazard, tsunami, or seiche zone due to project inundation?

No Impact. Due to the distance of the Project site from the Pacific Ocean, which is located approximately 9 miles to the southwest, virtually no risk of on-site hazard due to tsunamis (seismically induced waves) exists. No enclosed water bodies exist near the Project site that could place the site at risk from inundation due to a seiche (large waves that occur within a land-locked water body, such as a lake or a reservoir). While the Project site is approximately 1 mile from the Hollywood Hills, which could be subject to mudslides, the Project site is relatively flat and is surrounded by urban development. Therefore, the risk of mudflows is considered low. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project is located approximately 9 miles away from the Pacific Ocean. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site currently is and would continue to be collected on the site and directed toward existing storm drains having adequate capacity in the Project vicinity. As previously mentioned, Chapter 15.56.095 of the WHMC requires the preparation of a LID Plan for the proposed Project. The proposed Project is required to implement BMPs, such as use of flow-through planter boxes, vegetative swales, semi pervious surfaces, or infiltration trenches, to retain runoff from the 85th percentile 24-hour rain event. As such, impacts would be less than significant.

Cumulative Impacts

The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any hydrology mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Impact Analysis

a. Would the project physically divide an established community?

No Impact. The proposed Project involves the demolition of the existing car wash and related structures, and the construction of a new 4-story, mixed-use residential building on the Project site. Access to the Project site would be provided from an ingress/egress driveway located at the eastern boundary of the site along Santa Monica Boulevard. No operational or structural changes are proposed that would bisect or transect surrounding land uses, nor are any linear features, new roads or other barriers to movement proposed. No impact would occur.

Cumulative Impacts

As mentioned previously, no operational or structural changes are proposed that would bisect or transect surrounding land uses, nor are any linear features, new roads or other barriers to movement proposed. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any land use mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact.

***City of West Hollywood General Plan 2035*.** The General Plan 2035 (adopted in 2011) is the primary means for guiding future change in West Hollywood and provides a guide for land use decision-making. The General Plan includes the following elements: Land Use and Urban Form; Historic Preservation; Economic Development; Mobility; Human Services; Parkes and Recreation; Infrastructure, Resources, and Conservation; Safety and Noise; and Housing. As shown in **Table XI-1: City of West Hollywood Applicable General Plan Consistency**, the proposed Project is consistent with the General Plan and would not impair the implementation of any of the goals, policies, or objectives of the General Plan.

Table XI-1
City of West Hollywood Applicable General Plan Consistency

Plan Objectives	Project Consistency
City of West Hollywood General Plan	
LU-1.1: Maintain a balanced land use pattern and buildings to support a broad range of housing choices, retail businesses, employment opportunities, cultural institutions, entertainment venues, educational institutions, and other supportive urban uses within the City.	**Consistent.** The proposed Project would provide new residential uses, including very low-income and moderate-income affordable housing units, in the City as well as other commercial uses, including retail options on the ground floor, therefore providing additional households and commercial uses for residents and visitors to the City. As such, the Project would be consistent with this policy.
LU-1.3: Encourage new development to enhance the pedestrian experience.	**Consistent.** The proposed Project is located on Santa Monica Boulevard, a main street in West Hollywood. The commercial space will be located on the ground floor, facing Santa Monica Boulevard serving to enhance the pedestrian experience. As such, the Project would be consistent with this policy.
LU-1.5: Encourage the retention and success of existing and the incubation of new, commercial establishments that serve the needs of residents.	**Consistent.** The proposed Project would provide new commercial uses on the ground floor, under residential uses above. The Project will replace the existing car wash and will provide commercial uses to serve the needs of residents. As such, the Project would be consistent with this policy.
LU-1.10: Encourage new non-residential land uses that contribute to a strong and diversified local economy.	**Consistent.** As stated previously, the proposed Project would provide new commercial uses on the ground floor, under residential uses above. The commercial uses of the Project will contribute to the development of a strong and diversified local economy. As such, the Project would be consistent with this policy.
H-1.2: Retain and maintain existing affordable rental housing.	**Consistent.** As mentioned previously, the proposed Project would provide new residential uses, including a very low-income and moderate-income affordable housing units, replacing the existing car wash on the Project site. This Project would expand the amount of

Plan Objectives	Project Consistency
	affordable housing units in the City and does not demolish any existing affordable housing. As such, this Project would be consistent with this policy.
H-2.4: Establish and maintain development standards that support housing and mixed-use developments while protecting and enhancing the quality of life goals.	**Consistent.** The proposed Project will comply with all relevant development standards listed in the West Hollywood Green Building Program. In addition, the Project provides 8,847 square feet of common outdoor space including landscaped/furnished spaces on the second level and a landscaped rooftop pool deck on the fourth floor, to enhance the quality of life for its residents. As such, the Project would be consistent with this policy.
H-3.1: Facilitate the development of a diverse range of housing options including, but not limited to, single-family homes, secondary/accessory units, multi-family rental housing, condominiums and townhomes, live/work units, and housing in mixed use developments.	**Consistent.** As mentioned previously, the proposed Project would provide new residential uses, including very low-income and moderate-income affordable housing units, in the City as well as other commercial uses, including retail options on the ground floor, therefore providing additional households and commercial uses for residents and visitors to the City. As such, the Project would be consistent with this policy.
H-3.3: Continue to implement the Inclusionary Housing Ordinance to ensure that new housing developments to expand affordable housing opportunities for lower and moderate-income households.	**Consistent.** The proposed Project will devote 20%, or 11 units, strictly to very low- and moderate-income housing. As such it would continue to implement the Inclusionary Housing Ordinance to ensure that new housing developments expand affordable housing opportunities for lower and moderate-income households. As such, the Project would be consistent with this policy.
H-4.1: Encourage and provide incentives for the development of housing in mixed use and transit-oriented developments.	**Consistent.** As stated previously, the Project is located within a transit priority area. The Project area is well served by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood CityLine service. Approximately 119 feet south of the Project site is the Santa Monica/Stanley stop. Metro lines serving the Project periphery are 2-302, 4, 217, 218, 780, 704, and the West Hollywood CityLine Blue-Orange line. There are frequent stops with a new bus line coming every 1 to 10 minutes. Moreover, the 2016-2040 RTP/SCS identifies the Project Site as being within a HQTA. Using the SCAG peak-hour period of 6 AM – 9 AM and 4 PM – 7PM, Metro lines 704 and 780 both intersect at Fairfax and Santa Monica Boulevard and include less than 15-minute headways during peak-hour periods. Therefore, the Proposed Project is located within a high-quality transit corridor. As such, the Project would be consistent with this policy.
H-5.1: Provide incentives where feasible to offset or reduce the costs of affordable housing development, including density bonuses and flexibility in site development standards.	**Consistent.** The Project utilizes a density bonus as provided for by California Government Code and WHMC Chapter 19.22

General Plan Land Use and Urban Form Element. The Land Use and Urban Form Element establishes a vision for the City's built environment by establishing goals and policies for the City's land use patterns

and setting guidelines for land use designations. Guidelines include permitted uses, density, design standards, and height for each land use designation.

Land Use and Urban Form Element Santa Monica/Fairfax Transit District. West Hollywood's commercial and other non-residential land uses are mostly located along the City's main thoroughfares and serve the surrounding neighborhoods as well as the region. There are five commercial sub-areas identified for purposes of the General Plan: the Melrose/Beverly District, Santa Monica Boulevard West, the Santa Monica/Fairfax Transit District, the Santa Monica/La Brea Transit District, and Sunset Boulevard. The project site is located in the Santa Monica/Fairfax Transit District, which supports diverse commercial uses that fulfill the needs of the adjacent neighborhoods and transit users. The Santa Monica/Fairfax Transit District is the current location of a substantial number of transit routes and transfer points. This area is characterized by service and retail businesses orientated to the local community.

Land Use and Urban Form Element Transit Overly Zone. The Transit Overlay Zone designation (TOZ) identifies sites close the major transit nodes for which modifications to parking requirements or other development standards may be considered when individual projects provide specified supplemental Transportation Demand Management programs. The TOZ designation is intended to encourage mixed-use development in locations with adequate transit service to reduce the need for auto trips.

Zoning Ordinance. The West Hollywood Municipal Code contains the zoning requirements and ordinances for the City. The goal of a zoning ordinance is to define the different categories of land within a community into "zones" (residential, commercial, agricultural, office, etc.) as well as to establish the range of uses and regulation applicable to each of those zones. The West Hollywood Zoning Ordinance carries out the policies of the West Hollywood General Plan by classifying and regulating the uses of land and structures in the City. It is adopted to protect and to promote the public health, safety, and general welfare.

The proposed mixed-use building would be approximately 45 feet in height to the top of the main roof and would have an FAR of 2.025. The Project is zoned as Commercial, Community 1, which allows for a FAR of 1.5:1, and a height limit of 3 stories/35 feet. However, the WHMC permits a FAR bonus and single-story height incentive/concession for projects that include affordable housing. Per Section 19.22.050 of the WHMC, the Project is eligible for a density bonus by providing affordable housing units. The base number of units for the site would be 53.[66] The Project includes 11 units (21% of the base) designated as affordable, of which 6 units (12% of the base) would be for very low-income and 5 (10% of the base) for moderate-income. Based on the table provided in Section 19.22.050 D. of the WHMC, the Project would therefore be eligible for the maximum 35% density bonus, derived from the following calculation: a 5%

66 Per Section 12.22.050 D.3.c. of the WHMC any calculation resulting in a fractional number shall be rounded up to the next whole number.

bonus for providing 10% moderate-income units, a 20% bonus for providing 5% very low-income units, and 2.5% bonus for each addition 1% of very low-income units, up to the combined maximum of 35%. Per Section 19.22.050 E. of the WHMC, due to the provision of affordable units, the project is also eligible for concessions including an "additional story, not to exceed 10 feet of the total project height".

The front setback would be a minimum of 10 feet from Santa Monica Boulevard, with 0-foot side setbacks, and a minimum 15-foot setback to provide separation between the commercial uses on the Project site and the adjacent residential uses on the back.

As described above, the Project is generally consistent and supportive of applicable land use policies. Additionally, the Project is located within the Santa Monica/Fairfax Transit District. This section of the Santa Monica Boulevard corridor supports diverse commercial uses that fulfill the needs of the adjacent neighborhoods and transit users. The Project is typical in style to the surrounding corridor. Therefore, impacts would be less than significant.

Green Building. Per Section 19.20.060 of the WHMC, all new commercial project and all new residential development projects with three or more units, shall comply with the West Hollywood Green Building Program (Green Building Program). The Project will be consistent with the Green Building Program and would earn 91 points.

***SCAG Regional Comprehensive Plan*.** The Project site is located within the six-county region that comprises the Southern California Association of Governments (SCAG) planning area. The SCAG Regional Comprehensive Plan (RCP) includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity in the region. The guiding principles of the RCP are as follows: (1) Improve mobility for all residents; (2) Foster livability in all communities; (3) Enable prosperity for all people; and (4) Promote sustainability for future generations. Relevant land use goals of the RCP include focusing growth along transportation corridors; targeting growth within walking distance of transit; and injecting new life into under-used areas.

The Project would be consistent with policies set forth in the RCP because it would redevelop an underdeveloped site within an existing urban setting. Further, the Project would place residents, employees, and visitors in proximity to corridors well-served by public transit. The Los Angeles County Metropolitan Transportation Authority (Metro) provide service within comfortable walking distance of the Project site. A consistency analysis of the Project with the SCAG 2016-2040 RTP/SCS is provided below.

Table XI-2
Consistency Analysis 2016–2040 RTP/SCS

Goals and Policies	Consistency Analysis
Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.	**Not Applicable**. This Goal is directed towards SCAG and the City of West Hollywood and would not apply to the Project.
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	**Consistent**. The Project site is located in a highly urbanized area in the City of West Hollywood within a High-Quality Transit Area (HQTA) and a Transit Priority Area (TPA). The Project would develop 71 residential units, including 21 studio units, 31 one-bedroom units, and 19 two-bedroom units. The Project site is well served by public transit with frequency of service intervals of 15 minutes or less during peak commute periods. The proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this goal.
Goal 3: Ensure travel safety and reliability for all people and goods in the region.	**Not Applicable/Consistent**. While not necessarily applicable on a project-specific basis, the Project would support this goal by improving local access to alternative forms of transportation, with appropriate design considerations to ensure travel safety and reliability.
Goal 4: Preserve and ensure a sustainable regional transportation system.	**Not Applicable**. While not necessarily applicable on a project-specific basis, the Project would support this goal by improving the viability of alternative forms of transportation through higher density development, heightened walkability, and increased bicycle infrastructure. A robust variety of transportation options helps to ensure the mobility need of residents and visitors are met. Additionally, as discussed in the Traffic Study, the Project would create a less than significant impact at all of the study intersections.
Goal 5: Maximize the productivity of our transportation system.	**Consistent**. As stated above, the Project includes 71 new multi-family residential units and is located close to a variety of transit options as a mode of transportation to and from the Project site. Thus, the Project would contribute to the productivity and use of the regional transportation system by providing housing near transit. Moreover, as discussed in the Traffic Study, the Project would have a less than significant impact at all of the study intersections.

Goals and Policies	Consistency Analysis
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent**. The proposed Project would place new residential units in a HQTA and a TPA. The Project site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the proposed Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation. Further, the Project would activate street frontages on the ground floor of the building and introduce new landscaping, seating areas, and street furniture, encouraging pedestrian activity. As mentioned previously, the Project would include new bicycle infrastructure, including 21 bicycle parking spaces, to encourage bicycle use.
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	**Consistent**. The Project would comply with the California Green Building Standards Code (CALGreen), and would incorporate eco- friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non- VOC paints/adhesives, drought tolerant planting, and high-performance building envelopment.
Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent**. As stated above, the Project site is located in a highly urbanized area in the City of West Hollywood within a HQTA and a TPA. The Project site is well served by mass transit with more than a dozen of bus lines in walking distance with frequency of service intervals of 15 minutes or less during peak commute periods. The proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. As such, the location of the Project site encourages a variety of transportation options consistent with this goal.
Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Not Applicable**. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system.
Guiding Policy 1: Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable**. This policy is directed towards SCAG in allocating transportation investments rather than individual development projects.
Guiding Policy 2: Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	**Not Applicable**. This policy is directed towards SCAG in allocating transportation system funding. The Project would contribute to a safe, well maintained, and efficient multimodal transportation system. As discussed in the Traffic Study, the Project would create a less than significant impact at the study intersections and at any CMP monitoring location.
Guiding Policy 3: RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Not Applicable**. This Goal is directed towards SCAG and the City of West Hollywood and does not apply to the Proposed Project. The Project Site's location near mass

Goals and Policies	Consistency Analysis
	transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment.
Guiding Policy 4: Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable**. This policy is directed towards transportation investment by SCAG. However, the Project's location within a TPA promotes the use of public transit and pedestrian activity.
Guiding Policy 5: HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	**Not Applicable**. The policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Nevertheless, the Project's location in a HQTA and TPA would facilitate greater use of public transit and pedestrian activity.
Guiding Policy 6: The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable**. This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. However, the Project would support the policy as it is located within a TPA and would support public transportation and other alternative methods of transportation.
Guiding Policy 7: The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run	**Not Applicable**. This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments.
Guiding Policy 8: Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	**Not Applicable**. This policy directed towards SCAG and the City of West Hollywood and not does apply to the Project.
Land Use Policy 1: Identify regional strategies areas for infill and investment.	**Not Applicable**. This policy is directed towards SCAG to identify regional strategic areas. The Project is an infill development in a TPA.
Land Use Policy 2: Structure the plan on a three-tiered system of centers development.	**Not Applicable**. This policy is directed towards SCAG and does not apply to the Proposed Project.
Land Use Policy 3: Develop "Complete Communities"	**Consistent**. SCAG describes the development of "complete communities" to provide areas that encourages households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile. As stated above, the Project would place residential units in a TPA. The Project site's location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety

Goals and Policies	Consistency Analysis
	of transportation options, which include walking, cycling, and the use of public transportation. Therefore, the Project would be consistent with SCAG's goals of increasing mixed commercial/residential uses in transit-rich areas near services, retail, and employment opportunities to reduce vehicles-per- miles traveled.
Land Use Policy 4: Develop nodes on a corridor.	**Not Applicable**. The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and the City goals to identify and develop locations that promote nodes. The Project is located within a TPA. The Project's mixed-use design and location encourages the use of alternative transportation, walking, and bicycling opportunities.
Land Use Policy 5: Plan for additional housing and jobs near transit.	**Consistent**. As stated above, the Project would provide residential units in a TPA. The Project site is located within a quarter mile of a High-Quality Transit Corridor (HQTC) or a Major Transit Stop (defined as the intersection of two bus stops with 15-minute peak-hour headways or less). The Project site is well served by public transit with frequency of service intervals of 15 minutes or less during peak commute periods. This would promote the use of a variety of transportation options, which includes walking and the use of public transportation.
Land Use Policy 6: Plan for changing demand in types of housing.	**Consistent**. The Project would provide 71 residential units, including 11 units designated as deed-restricted affordable units, within the City of West Hollywood. The proposed Project's units would be contributing to a range of housing choice and available to all persons, including existing employees and residents in the City.
Land Use Policy 7: Continue to protect stable, existing single-family areas.	**Not Applicable**. This policy is not applicable to the Project because there are currently no single-family homes on the Project site. Additionally, the Project site is in an area designated for High Density Residential uses in mixed use projects and surrounded by other medium- and high-density mixed residential and commercial development.
Land Use Policy 8: Ensure adequate access to open space and preservation of habitat.	**Not Applicable**. This policy is directed towards SCAG and does not directly apply to the Project. The Project is located within an urbanized area within the City of West Hollywood. Development of the proposed Project would not remove any areas that have significant value as wildlife habitat since the Project Site is fully developed. The Project would provide new outdoor open space including balconies, rooftop garden, and a central green area for large community events.
Land Use Policy 9: Incorporate local input and feedback on future growth.	**Not Applicable**. This policy is directed towards SCAG and does not apply to the Proposed Project.

Goals and Policies	Consistency Analysis
Benefit 1: The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvement, and efficient transportation infrastructure.	**Consistent**. The Project would develop residential units in a TPA. The Project will provide a variety of dwelling units sizes: 21 studio units, 31 one-bedroom units, and 19 two-bedroom units. The Proposed Project is dedicating 15% of proposed units to be restricted as affordable housing.
Benefit 2: The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.	**Not Applicable**. Benefit 2 is directed towards SCAG and not does apply to the Proposed Project. The Project is an infill, mixed use residential project located within a HQTA and a TPA, thereby decreasing time and cost of traveling between places.
Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.	**Consistent**. The Project includes energy-efficient design features, such as ENERGY STAR rated appliances and will comply with the CALGreen Building Code and the City's Green Building Ordinance. The Project's location near various bus and subway lines will provide future residents with affordable transportation options.
Benefit 4: Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.	**Consistent**. The Project would encourage improved access and mobility by providing residential units within an urbanized area of the City of West Hollywood. Dining options on and surrounding the Project site are easily accessible by walking distance and transit options. The Project would provide new outdoor open space including courtyards and community outdoor spaces.

Source: SCAG, 2016–2040 RTP/SCS, April 2016.

Notes:

Not Applicable: Actions/strategies are those that are not identified for implementation of local jurisdictions. The Project's consistency with any actions/strategies identified for implementation by the local jurisdictions is assessed above.

As discussed previously, the Project is located within the Santa Monica/Fairfax Transit District. This section of the Santa Monica Boulevard corridor supports diverse commercial uses that fulfill the needs of the adjacent neighborhoods and transit users. The Project is typical in style to the surrounding corridor. It is the current location of a significant number of transit routes and transfer points. The area is characterized by service and retail businesses oriented to the local community. The uses proposed by the Project would be consistent with the uses permitted by the applicable land use and zoning designations.

Moreover, the Project is located an area well served by public transit provided by the City's free Cityline shuttle service and the Los Angeles County Metropolitan Transportation Authority (Metro). As such, Project implements the goals of the West Hollywood General Plan and the SCAG RTP/SCS.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. As described above, the Project is generally consistent and supportive of the City's General Plan land use policies, which plan for future cumulative growth. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any land use mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XII. MINERAL RESOURCES

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

Impact Analysis

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

No Impact. The Project site is located in a highly urbanized portion of the City and is not used for mineral resource extraction. No State-designated or locally designated mineral resource zones exist in the City.[67] Thus, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of local importance or value to the region or to the residents of the State. No impact would occur.

Cumulative Impacts

As mentioned previously, no State-designated or locally designated mineral resource zoned exist in the City. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any mineral resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

67 City of West Hollywood, *Final PEIR: West Hollywood General Plan and CAP*.

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

No Impact. As noted above, the Project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. The Project site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts would occur.

Cumulative Impacts

As mentioned previously, The Project site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any mineral resource mitigation measures. The SCAG 2016-2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XIII. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
e. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Impact Analysis

a. Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant with Project Mitigation.

Construction Noise

Construction activities that would occur during the construction phases (demolition, site preparation, building construction, architectural coating, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project site. Construction activity associated with the Project could occur as close as 15 feet from the nearest multifamily residence to the north. Typical maximum noise levels and duty cycles of representative types of equipment are presented in **Table XIII-1: Typical Maximum Noise Levels for Project Applicable Construction Equipment.** Construction equipment noise would not be constant because of the variations of power, cycles, and equipment locations. For maximum noise events, this analysis considers equipment operating at the edge of the property line of the Project site.

Table XIII-1
Typical Maximum Noise Levels for Project Applicable Construction Equipment

Equipment Description	Noise Level at 50 feet (dBA)	Typical Duty Cycle (%)
Backhoe	80	40
Compressor (air)	80	40
Concrete mixer truck	85	40
Concrete/Industrial saw	90	20
Dozer	85	40
Forklift	75	10
Grader	85	40
Paver	77	50
Roller	85	20

Source: US Department of Transportation, Federal Highway Administration, Construction Noise Handbook, 9.0 Construction Equipment Noise Levels and Ranges.
Note: kVA = kilovolt-ampere.

Sound generated by the construction noise source typically diminishes at a rate of 6 dBA over hard surfaces, such as asphalt, and 7.5 dBA over soft surfaces, such as vegetation, for each doubling of distance. Barriers—such as walls, berms, or buildings, and elevation differences—can also reduce sound levels by up to 20 dBA.[68]

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. Demolition and grading would be the noisiest phase of construction, lasting approximately one month at various locations throughout the Project site. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on site would operate simultaneously.

Predicted noise levels from Project construction activity as experienced at the closest sensitive receptor are shown in **Table XIII-2: Construction Noise Estimates At Nearest Sensitive Receptor.** Construction equipment operates at its nosiest levels for certain percentages of time during operation. Equipment such as excavators, graders, and loaders would operate at different percentages over the course of an hour.[69]

68 Caltrans, *Technical Noise Supplement (1998),* 33–40, 123–131.
69 Federal Highway Administration, *Traffic Noise Model (2006).*

Table XIII-2
Construction Noise Estimates at Nearest Sensitive Receptor

Receptor ID	Distance from Project Site (feet)	Estimated Construction Noise Level during loudest Phase	Ambient Noise Leq (dBA)	Maximum Noise Exceedance, Leq (dBA)	Estimated Noise Reduction from Mitigation Measure N-1	Increase Over Ambient with Mitigation Measures (dB)
REC-1	15	95.4	64.6	30.8	25	5.8

*Note: Refer to **Appendix E** for construction noise data spreadsheets.*

Receptor 1 (REC-1) are multifamily residential units approximately 15 feet to the north of the Project boundary. When all pieces of equipment are operating at the same time at the edge of the Project boundary without any noise-shielding reductions—a conservative estimate—construction noise levels at this site would increase ambient noise levels by approximately 31 dB.

In adopting the City of West Hollywood General Plan 2035, the City adopted Mitigation Measure 3.9-1 which states that "The City shall use the following thresholds and procedures for CEQA analysis of proposed projects, consistent with policies adopted within the General Plan … A project-related temporary increase in ambient noise levels of 10 dB Leq or greater." As such, Project construction could exceed this threshold by 20.8 dB and impacts would be significant.

Construction activities including the use of heavy equipment would be compliant with Section 9.08.050 of the WHMC, which limits activities to occur between 8:00 AM and 7:00 PM and at no time on Sundays or holidays. However, because construction activities would occur over an extended period of time, noise at the nearby sensitive receptors would constitute a potentially significant temporary noise impact. Noise levels on the Project site would be considered high for intermittent periods of time and would occur during the most-sensitive times during the day (7:30 AM to 3:00 PM).

With implementation of the recommended **Mitigation Measure N-1,** construction activities would include the use of a sound curtain when the use of heavy equipment is prevalent (during the demolition and site clearing phase), which would result in a minimum of 15 dB reduction.[70] Furthermore, optimal muffler systems for all equipment would reduce construction noise levels by approximately 10 dB or more.[71] Limiting the number of noise-generating heavy-duty off-road construction equipment (e.g., backhoes,

70 Behrens and Associates Environmental Noise Control, "Temporary Compressor Sound Walls," http://www.drillingnoisecontrol.com/tempcompressor.html.

71 FHWA, Special Report – Measurement, Prediction, and Mitigation, updated June 2017. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm, accessed August 2019.

dozers, excavators, loaders, rollers, etc.) simultaneously used on the Project site within 50 feet of off-site noise sensitive receptors surrounding the site to no more than two or three pieces of heavy-duty off-road equipment would further reduce construction noise levels. Taken together, these measures would reduce potential noise levels to within 10 dB of ambient. With implementation of these recommended measures and compliance with the City's Noise Ordinance, construction noise levels would not exceed the City's thresholds of significance and impacts would not be considered significant after mitigation.

Roadway Noise

Caltrans has noted that a doubling of roadway traffic would double the sound energy, resulting in a 3 dBA increase in sound level, which is the increase generally detectable by the human ear.[72] As mentioned previously, the Project is estimated to generate approximately 373 daily trips with 73 in the AM Peak Hour and 18 in the PM Peak. The Project-related traffic would not double the existing number of trips on the local roadways. As such, the increase in noise level generated by the Project-related traffic would not be noticeable to the human ear. Therefore, roadway noise impacts would be less than significant, and no mitigation measures are necessary.

Parking Noise

Development of the Project would introduce parking associated with the Project Site. Generally, noise associated with parking lots is not of sufficient volume to exceed community noise standards based on the time-weighted CNEL scale and because the sound is intermittent and to be expected in a fully buildout urban environment and is blocked out by existing ambient urban noise. Parking lots can be a source of annoyance due to automobile engine start-ups and acceleration, and the activation of car alarms. Parking lots can generate Leq noise levels of between 49 dBA Leq (tire squeals) to 74 dBA Leq (car alarms) at 50 feet. Vehicle access to the Project site includes the entrance/exit on Santa Monica Boulevard on the south side of the Project site and a security gate on the alley north of the Project site. The Project is proposing two levels of subterranean parking. As this is underneath the ground, much of the noise associated with parking lot noise sources would be masked. In addition, due to the existing level of traffic noise along area roadways, noise would not likely be audible due to the additional masking of noise by traffic. As such, parking noise impacts would be less than significant, and no mitigation measures are necessary.

Stationary Sources

The Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning (HVAC) systems, which would be located either on the roof, to the side of a structure, or on the ground. This equipment would be screened and integrated in architectural design of the building and

72 Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013, http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf. Accessed September 2019.

would further attenuate sound emanating from the HVAC systems. As such, the use of such equipment would not generate levels that would substantially elevate the ambient noise environment. As such, stationary source impacts would be less than significant, and no mitigation measures are necessary.

Cumulative Impacts

As mentioned previously, the Project may cause a significant impact due to construction noise, however with implementation of General Plan Mitigation Measure 3.9-2, listed below, and compliance with the City's Noise Ordinance, construction noise levels would not exceed the City's thresholds of significance and impacts would not be considered significant after mitigation. The Project would not result in roadway, parking, or stationary noise impacts. As noise dissipates with distance, the related projects are not close enough to result in substantial cumulative construction noise. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The West Hollywood General Plan EIR identified a mitigation measure for significant construction noise impacts. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measure applicable if the Lead Agency identified significant effects. However, the mitigation measure from the West Hollywood General Plan EIR would adequately mitigate potential impacts and therefore the measure from the SCAG 2016- 2040 RTP/SCS Program EIR is not necessary.

Mitigation Measures

As mitigation, the Project shall implement Mitigation Measure 3.9-2 as adopted in the Final EIR for the City of West Hollywood General Plan 2035, which states:

> *The City shall require construction contractors to implement the following measures during construction activities through contract provisions and/or conditions of approval as appropriate:*
>
> *Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc.).*
>
> *Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.*
>
> *Construction operations and related activities associated with the proposed project shall comply with the operational hours outlined in the WHMC Noise Ordinance, or mitigate*

noise at sensitive land uses to below WHMC standards. Construction equipment should not be idled for extended periods of time in the vicinity of noise-sensitive receptors.

Locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers). Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on powered construction equipment.

Where feasible, temporary barriers shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Acoustical barriers shall be constructed of material having a minimum surface weight of 2 pounds per square foot or greater, and a demonstrated STC rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.

Music from a construction site shall not be audible at off-site locations.

With the incorporation of this mitigation measure into the Project, impacts would be less than significant, as determined in the West Hollywood General Plan EIR.

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

Less than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. The range of interest is from

approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction activities for the Project have the potential to generate low levels of ground-borne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels.

Table XIII-3: Construction Vibration Levels Estimates lists the vibration source levels at varying distances of the assumed construction equipment to be used for during construction. As shown in **Table XIII-3**, cement and mortar mixers are capable of producing approximately 0.160 ips PPV at 5 feet and would not generate vibration levels in excess of 0.2 ips PPV. As such, the multifamily residential units (REC-1) located nearest to the Project site with regard to construction vibration activities would not be affected as a result of attenuation of ground-borne vibration. This is a conservative estimate assuming all pieces of equipment are operating at the same time at the edge of the Project boundary without any shielding reductions. Furthermore, construction activities would be restricted to daytime hours when people are the least sensitive to vibration intrusions. No pile driving is planned as part of the construction of the Project. Impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would not generate vibration levels in excess of 0.2 ips PPV. Furthermore, construction activities would be restricted to daytime hours when people are the least sensitive to vibration intrusions. As noise dissipates with distance, the related projects are not close enough to result in substantial cumulative construction noise. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The West Hollywood General Plan EIR identified a mitigation measure for significant vibration noise impacts associate with pike driving. However, no pile driving is planned as part of construction of the Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measure applicable if the Lead Agency identified significant effects. However, the mitigation measure from the West Hollywood General Plan EIR would adequately mitigate potential impacts and therefore the measure from the SCAG 2016- 2040 RTP/SCS Program EIR is not necessary.

Mitigation Measures

No mitigation measures are necessary.

Table XIII-3
Construction Vibration Levels Estimates

	Inches per Second PPV at Adjusted Distance
Equipment	**25 feet**
Air compressor	0.090
Backhoe	0.040
Cement and mortar mixer	0.160
Concrete saw	0.018
Dozer	0.071
Forklift	0.040
Grader	0.071
Paver	0.063
Roller	0.020

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, *FTA-VA-90-1003-06 (May 2006), p. 12-12.*
Note: PPV = peak particle velocity.

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

No Impact. There are no airports within a 2-mile radius of the Project site, nor is the Project site within any airport land use plan or airport hazard zone. The closest airports are the Burbank Airport and Santa Monica Municipal Airport, located approximately 7 miles north and southwest of the Project site, respectively. Therefore, the proposed Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

Cumulative Impacts

As mentioned previously, there are no airports within a 2-mile radius of the Project site. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The West Hollywood

General Plan EIR does not include mitigation measure for airport noise impacts. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measure applicable if the Lead Agency identified significant effects. However, the mitigation measure from the West Hollywood General Plan EIR would adequately mitigate potential impacts and therefore the measure from the SCAG 2016- 2040 RTP/SCS Program EIR is not necessary.

Mitigation Measures

No mitigation measures are necessary.

XIV. POPULATION AND HOUSING

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

Impact Analysis

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

Less than Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. As per Sections 21155.2(b)(1) and 21159.28 of the CEQA Statute, this SCEA is not required to consider growth inducing impacts. However, the following discussion is provided for informational purposes.

SCAG Regional Comprehensive Plan. In October 2008, SCAG approved and adopted the 2008 Regional Comprehensive Plan (RCP) for the SCAG Region—Helping Communities Achieve a Sustainable Future.[73] The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP was intended to serve as an advisory document for local agencies in the SCAG region. The following principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region:

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.
- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.

73 Southern California Association of Governments, 2008 Regional Comprehensive Plan.

- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.
- *Promote sustainability for future generations*. Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG Regional Transportation Plan Sustainable Communities Strategy. In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS).[74] As a designated Metropolitan Planning Organization (MPO) under federal law, SCAG is responsible for developing and adopting a long-range RTP every four years. The plan evolved out of a massive outreach undertaking involving a broad range of stakeholders across the region to update the shared vision for the region's sustainable future. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards set forth by the federal Clean Air Act. The RTP/SCS focuses on the interconnected components of economic, social, and transportation investments required to achieve a sustainable regional multimodal transportation system. The goals and policies of the RTP/SCS require the participation of individual municipalities and multilevel investment of stakeholders throughout the region.

Using the DOF average household size for the City of West Hollywood at 1.55 persons per household.[75] The construction of 71 units would result in an increase of approximately 111 residents in the City of West Hollywood. The current DOF estimated City population as of January 2018 is approximately 36,723 people. Therefore, the proposed Project would represent an increase of less than one percent of the City's current population. According to growth estimates from SCAG's 2016–2040 RTP/SCS, the City had an estimated population of 34,800 people in 2012 and is projected to have a population of 41,800 in 2040.[76] The addition of approximately 111 people would be well within the SCAG's population forecasts for the City. While the commercial space would provide new employment opportunities, the proposed use is not considered a unique use that would draw substantial new residents to the area to fulfill jobs.

The proposed Project is an urban infill project that conforms to the land use types envisioned by the City's General Plan. As such, it would not result in substantial indirect or induced unplanned population growth. Therefore, impacts would be less than significant.

74 Southern California Association of Governments (SCAG), 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016; http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

75 California Department of Finance, Report E-5: Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011–2018, with 2010 Benchmark, accessed August 2019, available at http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

76 SCAG, "Demographics and Growth Forecast" (adopted April 2016), http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

Cumulative Impacts

As mentioned previously, as per Sections 21155.2(b)(1) and 21159.28 of the CEQA Statute, this SCEA is not required to consider growth inducing impacts. Using the DOF average household size for the City of West Hollywood at 1.55 persons per household.[77] The construction of 71 units would result in an increase of approximately 111 residents in the City of West Hollywood. The current DOF estimated City population as of January 2018 is approximately 36,723 people. Therefore, the proposed Project would represent an increase of less than one percent of the City's current population. According to growth estimates from SCAG's 2016–2040 RTP/SCS, the City had an estimated population of 34,800 people in 2012 and is projected to have a population of 41,800 in 2040.[78] Growth is anticipated in both the city's General Plan and the RTP/SCS and the addition of approximately 111 people would be well within the SCAG's population forecasts for the City. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any population and housing mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

No Impact. The Project would develop new housing on a site that is currently occupied by a car wash. No displacement of existing people or housing would occur upon implementation of the Project. No impacts would occur.

77 California Department of Finance, *Report E-5: Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011–2018*, with 2010 Benchmark, accessed August 2019, available at http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

78 SCAG, "Demographics and Growth Forecast" (adopted April 2016), http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

Cumulative Impacts

As mentioned previously, the Project would not result in the displacement of existing housing or people. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any population and housing mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant resource effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

Impact Analysis

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

i. Fire Protection

Less than Significant Impact. The LACFD provides fire protection and emergency medical services for the City, which is within LACFD's Battalion 1 service area.[79] The LACFD operates six fire stations within the Battalion 1 area, with two fire stations (Nos. 7 and 8) located within the City. The closest fire station to the Project site is Fire Station 8, located at 7643 Santa Monica Boulevard, which is immediately west of the site.

The proposed Project involves the removal of an existing car wash and all related structures, and the construction of a new 4-story, mixed-use building consisting of residential and commercial uses. The Project is an infill development within the existing service area of the LACFD. As described under **Section XIV: Population and Housing**, the 111 residents generated by the proposed Project would be within the

79 City of West Hollywood, *Final PEIR: West Hollywood General Plan and CAP*.

growth projections contained in SCAG's 2016–2040 RTP/SCS. Therefore, the proposed Project would not place an unanticipated burden on fire protection services.

As identified in WHMC Section 14.04.010, the City has adopted the 2017 Los Angeles County Title 32 (Fire Code), an amended California Fire Code (2016 edition) and an amended International Fire Code (2015 edition). As such, the City's Fire Code is based on the Los Angeles County Fire Code and supplemented by the other fire codes previously identified, which collectively contain regulations related to construction, maintenance, and the design of buildings and land uses. The proposed Project would be required to adhere to all Fire Code requirements. With adherence to existing regulations, the proposed Project would not result in the need for new or expanded fire facilities. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would be within the growth projections contained in SCAG's 2016–2040 RTP/SCS. Therefore, the Project would not place an unanticipated burden on fire protection services. As such, the Project would not result in cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained public service mitigation measures that are not project specific and therefore are not feasible to incorporate into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

ii. Police Protection

Less than Significant Impact. Law enforcement services in City are provided by contract with the Los Angeles County Sheriff's Department (LASD). Police protection services include emergency and nonemergency police response, routine police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement. The LASD has established the West Hollywood Sheriff's Department and operates two stations: the West Hollywood Station, located at 780 N. San Vicente Boulevard; and the Universal City Walk Sub-Station located at 1000 Universal Studios Boulevard. LASD also has mutual aid agreements with the City of Los Angeles and the City of Beverly Hills police departments. The proposed Project involves the removal of an existing car wash and all related structures and the

construction of a new 4-story, mixed-use building consisting of residential and commercial uses. In addition, as described under **Section XIV,** the proposed Project would be within the growth projections contained in SCAG's 2016–2040 RTP/SCS. Therefore, the proposed Project would not place an unanticipated burden on police protection services. The City has an estimated sworn personnel-to-population ratio of 3.6 sworn personnel to 1,000 people.[80] The proposed Project would add approximately 111 people, which would not substantially reduce the City's service ratio. As such, the proposed Project would not affect service ratios such that new or expanded police facilities are needed. As such, impacts are less than significance.

Cumulative Impacts

As mentioned previously, the Project would be within the growth projections contained in SCAG's 2016–2040 RTP/SCS. Therefore, the Project would not place an unanticipated burden on fire protection services. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained public service mitigation measures that are not project specific. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

iii. Schools

Less than Significant Impact. The Los Angeles Unified School District (LAUSD) provides public school services to City residents for grades kindergarten through 12. The Project site is served by the following LAUSD schools: Gardner Street Elementary, located at 7450 Hawthorn Avenue, which serves grades K–5; Hubert Howe Bancroft Middle School, located at 929 N. La Palmas Avenue, which serves grades 6–8; and Fairfax Senior High, located at 7850 Melrose Avenue, which serves grades 9–12.

The proposed Project would include 71 residential units that would generate approximately 111 residents into the City. As shown in **Table XV-1: Proposed Project Estimated Student Generation,** the proposed Project would generate an estimated total of 18 elementary school students, 6 middle school students,

80 City of West Hollywood, *Final PEIR: West Hollywood General Plan and CAP*.

and 11 high school students. Since this is an estimate based on LAUSD data from its whole district, this is likely high for the City of West Hollywood, which has different demographics than the whole of the LAUSD area. Nevertheless, the Project applicant would be required to pay applicable developer fees for residential and commercial uses, pursuant to LAUSD's current fee schedule, to offset any impacts. With payment of school impact fees, the proposed Project would have less than significant impacts related to schools. No further evaluation is required in an EIR.

Table XV-1
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Multifamily Residential[a]	71 du	16	5	9	30
Commercial[b]	9,240 sq. ft.	2	1	2	5
	Total	**18**	**6**	**11**	**35**

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, Los Angeles School District (March 2018).
Notes: du = dwelling unit; sq. ft. = square feet.
[a] *Student generation rates are as follows for residential uses: 0.2269 elementary, 0.0611 middle, and 0.1296 high school students per unit.*
[b] *Student generation rates for commercial uses are 0.2249 students per employee. The estimated number of employees is approximately 0.00271 employees per average square foot. It was assumed that the ratio of elementary, middle school, and high school students is similar to the residential generation rates.*

Cumulative Impacts

As mentioned previously, the Project would generate an estimated total of 18 elementary school students, 6 middle school students, and 11 high school students. Nevertheless, the Project applicant would be required to pay applicable developer fees for residential and commercial uses, pursuant to LAUSD's current fee schedule, to offset any impacts. Any related projects adding residents to the City would be required to play the applicable developer fees, pursuant to LAUSD's current fee schedule. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained public service mitigation measures that are not project specific. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

iv. Parks

Less than Significant Impact.

The proposed Project would include 71 residential units that would generate approximately 111 residents into the City. This increase in residential population would contribute incrementally toward impacts to the demand for the City's existing parks and recreational facilities. However, the proposed Project would contain open space and recreational amenities for residents, including a rooftop pool and deck, landscaped/furnished space, and other open space. Moreover, any additional demand would be met through payment of Quimby Act and public open space development fees for new residential and nonresidential fees in accordance with WHMC Chapter 19.64. These fees are intended to be used for the acquisition, improvement, and expansion of public parks and/or recreational facilities. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would include 71 residential units that would generate approximately 111 residents into the City. This increase in residential population would contribute incrementally toward impacts to the demand for the City's existing parks and recreational facilities. However, the proposed Project would contain open space and recreational amenities for residents, including a rooftop pool and deck, landscaped/furnished space, and other open space. Moreover, any additional demand would be met through payment of Quimby Act and public open space development fees for new residential and nonresidential fees in accordance with WHMC Chapter 19.64. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained public service mitigation measures that are not project specific. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

v. Other Public Facilities

Libraries

Less than Significant Impact. The proposed Project result in an incremental population increase of 71 residents, which would be within growth projections for the City. Therefore, the proposed Project would not substantially increase demand for public facilities and services, including libraries and City administrative services, that would require the construction of new or expanded facilities. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would not substantially increase demand for public facilities and services, including libraries and City administrative services, that would require the construction of new or expanded facilities. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained public service mitigation measures that are not project specific. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XVI. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Impact Analysis

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

Less than Significant Impact. The City contains six municipal parks with a total acreage of 15.31 acres.[81] Based on the DOF population estimation as of January 2018, there are approximately 36,723 people in the City and, thus, approximately 0.42 acres of parkland per 1,000 residents. The City's Parks and Open Space Background Report identifies that many cities throughout the State use a standard of 3.0 acres of parkland per 1,000 residents as a benchmark for sufficient park space.[82] The City's ratio of approximately 0.42 acres of parkland per 1,000 residents is well below this typical standard; however, West Hollywood is a highly developed, dense, urban area. As stated in the Parks and Open Space Background Report, the City is unlikely to significantly expand park property to meet this standard due to the City's size; the absence of vacant, undeveloped properties; and high land values. Therefore, the City will likely remain below typical parkland acreage standards. However, the City has developed a variety of methods for expanding open space and green space, such as creating open and active spaces on street medians, establishing innovative development agreements, and promoting community gardens.

The Project site is currently developed with a car wash and related structures. Implementation of the proposed Project involves demolition of these existing uses and the construction of a new mixed-use residential with ground-floor commercial space. Construction and operation of the proposed Project would not remove and/or demolish any existing neighborhood or regional parks and/or recreational

81 City of West Hollywood, "West Hollywood General Plan: Parks and Open Space Background Report" (March 2010), Accessed July 2019, https://www.weho.org/Home/ShowDocument?id=5344.

82 City of West Hollywood, "Parks and Open Space Background Report."

facilities. The proposed Project would incrementally increase the use of and demand for parks and recreational facilities. However, the proposed Project would contain open space amenities for residents, including a rooftop pool and deck, landscaped/furnished space, and other open space. In addition, while the proposed Project would have the potential to increase the use of park and recreational facilities, it would not do so to the extent that parks would undergo substantial physical deterioration or require the need for expansion. Furthermore, the Project applicant would be required to pay Quimby Act and public open space development fees in accordance with WHMC Chapter 19.64, which would be used by the City to acquire parkland as it becomes available and/or to expand and maintain existing recreational facilities. Payment of required these development impact fees would reduce any demand on park and recreational facilities. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, West Hollywood is a highly developed, dense, urban area. As stated in the Parks and Open Space Background Report, the City is unlikely to significantly expand park property to meet this standard due to the City's size; the absence of vacant, undeveloped properties; and high land values. Therefore, the City will likely remain below typical parkland acreage standards. However, the City has developed a variety of methods for expanding open space and green space, such as creating open and active spaces on street medians, establishing innovative development agreements, and promoting community gardens.

The proposed Project would incrementally increase the use of and demand for parks and recreational facilities. However, the proposed Project would contain open space amenities for residents, including a rooftop pool and deck, landscaped/furnished space, and other open space. In addition, while the proposed Project would have the potential to increase the use of park and recreational facilities, it would not do so to the extent that parks would undergo substantial physical deterioration or require the need for expansion.

Furthermore, the Project applicant would be required to pay Quimby Act and public open space development fees in accordance with WHMC Chapter 19.64, which would be used by the City to acquire parkland as it becomes available and/or to expand and maintain existing recreational facilities. As such, the Project would not result in cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained recreation mitigation measures that are not project specific, and therefore not feasible to incorporate into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program

EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less than Significant Impact. The proposed Project would contain open space amenities for residents, including a rooftop pool and deck, landscaped/furnished space, and other open space. All recreational facilities associated with the proposed Project would be developed on site and are evaluated as part of the proposed Project. As described above, the proposed Project would contribute to an incremental increase on the City's recreational facilities and would not result in the construction of new or the expansion of existing facilities. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would contribute to an incremental increase on the City's recreational facilities and would not result in the construction of new or expansion of existing facilities. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained recreation mitigation measures that are not project specific, and therefore not feasible to incorporate into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XVII. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

a. Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less than Significant Impact. Trip generation estimates for the Project were calculated based on the latest edition of the Institute of Transportation Engineers' *Trip Generation* manual.[83] The City has adopted a sliding scale for determining significant traffic impacts to intersections. The significant impact criteria are based on a minimum allowable increase in delay attributable to a Project as the overall LOS of the intersection decreases, as shown in **Table XVII-1: City of West Hollywood Significant Impact Criteria**.

83 See **Appendix F** of this Initial Study.

Table XVII-1
City of West Hollywood Significant Impact Criteria

Intersection Conditions with Project Traffic		Project-Related Increase of Delay (seconds)
Level of Service	**Intersection Delay (seconds)**	
Signalized Intersection of Two Commercial Corridors		
D	35.1 – 55.0	≥ 12.0
E or F	> 55.0	≥ 8.0
Other Signalized Intersection		
D	35.1 – 55.0	≥ 8.0
E or F	> 55.0	≥ 8.0
Four-Way Stop-Controlled Intersection		
D	25.1 – 35.0	≥ 8.0
E or F	> 35.0	≥ 5.0
Unsignalized (Two-Way/One-Way Stop-Controlled) Intersection		
D, E or F	> 25.0	≥ 5.0

Source: City of West Hollywood

The Project is expected to generate a total of 373 new trips per day, including 73 morning peak-hour trips and 18 afternoon peak-hour trips. The report analyzed existing (2018) and future (2022, approximate end of construction) AM and PM peak-hour traffic conditions at 9 critical intersections in the vicinity of the Project site. As shown in **Table XVII-2: Existing Plus Project Conditions** and **Table XVII-3: Future Plus Project Conditions**, no significant impacts were identified at any of the intersections evaluated.

Project traffic impacts were also analyzed for Congestion Management Program (CMP) locations. No significant regional traffic impacts were determined for the CMP monitoring intersections or freeway locations. Furthermore, as per Sections 21155.2(b)(1) and 21159.28 of the CEQA Statute, this SCEA is not required to consider vehicle impacts on the regional transportation network. In addition, the Project's transit impacts on the public transit system were analyzed based on existing available transit capacity. No significant transit impacts were identified. The Project's construction trip traffic would be a fraction of the operational traffic, which would not cause any significant impacts at the studied intersection. Therefore, it is not anticipated that construction traffic would contribute to a significant increase in the overall congestion in the Project vicinity.

Table XVII-2
Existing Plus Project Traffic Conditions

			Existing		Existing Plus Project			
No.	**Intersection**	**Peak Hour**	**Delay (sec)**	**LOS**	**Delay (sec)**	**LOS**	**Change in Delay**	**Significant Impact**
1.	Fairfax Avenue &	AM	50.1	D	52.2	D	2.1	NO
	Fountain Avenue	PM	50.7	D	50.8	D	0.1	NO
2a.	Spaulding Avenue (S) &	AM	3.9	A	3.9	A	0.0	NO
	Fountain Avenue	PM	4.5	A	4.5	A	0.0	NO
2b.	Spaulding Avenue (S) &	AM	3.3	A	3.3	A	0.0	NO
	Fountain Avenue	PM	5.7	A	5.7	A	0.0	NO
3.	Gardner Street &	AM	17.1	B	17.4	B	0.3	NO
	Fountain Avenue	PM	18.3	B	18.4	B	0.1	NO
4.	Fairfax Avenue & Santa Monica Boulevard	AM PM	48.4 56.5	D E	49.3 57.1	D E	0.9 0.6	NO
5a.	Genesse Avenue (N) &	AM	5.6	A	5.7	A	0.1	NO
	Santa Monica Boulevard	PM	3.6	A	3.6	A	0.0	NO
5b.	Genesse Avenue (N) & Santa Monica Boulevard	AM PM	3.5 5.5	A A	3.6 5.5	A A	0.1 0.0	NO
6.	Spaulding Avenue &	AM	N/A	N/A	N/A	N/A	N/A	N/A
	Santa Monica Boulevard	PM	20.9	C	21.0	C	0.1	NO
7a.	Curson Avenue (N) &	AM	4.2	A	4.9	A	0.7	NO
	Santa Monica Boulevard	PM	3.9	A	3.9	A	0.0	NO
7b.	Sunset Boulevard &	AM	3.3	A	3.6	A	0.3	NO
	Woodburn Drive	PM	5.2	A	5.3	A	0.1	NO
8.	Gardner Street/Vista Street &	AM	12.8	B	12.9	B	0.1	NO
	Santa Monica Boulevard	PM	15.0	B	15.1	B	0.1	NO
9.	Fairfax Avenue &	AM	23.5	C	23.7	C	0.2	NO
	Willoughby Avenue	PM	20.6	C	20.8	C	0.2	NO

Table XVII-3
Future Plus Project Traffic Conditions

No	Intersection	Peak Hour	Future without Project		Future Plus Project			
			Delay (sec)	LOS	Delay (sec)	LOS	Change in delay	Significant Impact
1.	Fairfax Avenue &	AM	84.2	F	86.5	F	2.3	NO
	Fountain Avenue	PM	106.0	F	106.0	F	0.0	NO
2a.	Spaulding Avenue (S) &	AM	4.4	A	4.4	A	0.0	NO
	Fountain Avenue	PM	4.8	A	4.8	A	0.0	NO
2b.	Spaulding Avenue (S) &	AM	3.4	A	3.4	A	0.0	NO
	Fountain Avenue	PM	7.4	A	7.4	A	0.0	NO
3.	Gardner Street &	AM	48.3	D	49.4	D	1.1	NO
	Fountain Avenue	PM	110.0	F	109.8	F	0.0	NO
4.	Fairfax Avenue &	AM	113.4	F	115.7	F	2.3	NO
	Santa Monica Boulevard	PM	158.1	F	158.7	F	0.6	NO
5a.	Genesse Avenue (N) &	AM	6.9	A	7.1	A	0.2	NO
	Santa Monica Boulevard	PM	5.3	A	5.3	A	0.0	NO
5b.	Genesse Avenue (N) &	PM	4.4	A	4.5	A	0.1	NO
	Santa Monica Boulevard		7.7	A	7.8	A	0.1	
6.	Spaulding Avenue &	AM	N/A	N/A	N/A	N/A	N/A	N/A
	Santa Monica Boulevard	PM	48.5	E	49.0	E	0.5	NO
7a.	Curson Avenue (N) &	AM	5.0	A	5.7	A	0.7	NO
	Santa Monica Boulevard	PM	5.2	A	5.3	A	0.1	NO
7b.	Sunset Boulevard &	AM	4.0	A	4.4	A	0.4	NO
	Woodburn Drive	PM	7.5	A	7.5	A	0.0	NO
8.	Gardner Street/Vista Street &	AM	16.5	B	17.2	B	0.7	NO
	Santa Monica Boulevard	PM	25.6	C	25.7	C	0.1	NO
9.	Fairfax Avenue &	AM	57.9	E	58.6	E	0.7	NO
	Willoughby Avenue	PM	60.5	E	60.8	E	0.3	NO

As shown in the tables above the proposed Project will not result in any change to the LOS of the intersections provided above. As such, the Project would not result in any significant impact.

Cumulative Impacts

As shown in **Table XVII-3**, implementation of the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained transportation measures that are not project specific, and therefore not feasible to incorporate into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. CEQA Guidelines Section 15064.3(b) states that "vehicle miles traveled is the most appropriate measure of transportation impacts," and that "projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact." The Project is along an existing high-quality transit corridor.

PRC §21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC §21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC §21155 (b) states that a "major transit stop" is defined in PRC §21064.3, except that, for purposes of PRC §21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan. The Project area is well served by the Los Angeles County Metropolitan Transportation Authority (Metro) and the West Hollywood CityLine service.

Approximately 119 feet south of the Project site is the Santa Monica/Stanley stop. Metro lines serving the Project periphery are 2-302, 4, 217, 218, 780, 704, and the West Hollywood CityLine Blue-Orange line. There are frequent stops with a new bus line coming every 1 to 10 minutes. Moreover, the 2016-2040 RTP/SCS identifies the Project Site as being within a High-Quality Transit Area (HQTA). Using the SCAG peak-hour period of 6 AM – 9 AM and 4 PM – 7PM, Metro lines 704 and 780 both intersect at Fairfax and Santa Monica Boulevard and include less than 15-minute headways during peak-hour periods. Therefore, the Proposed Project is located within a high-quality transit corridor. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project is located in a transit priority area as well as a HQTA, as such it would encourage public transportation and reduce VMT. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained transportation measures that are not project specific, and therefore not feasible to incorporate into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less than Significant Impact. A significant impact could occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Project would not include unusual or hazardous design features. Impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project would not include unusual or hazardous design features. This Project, as well as related projects will be designed in accordance with City's standards. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained transportation measures that are not project specific, and therefore not feasible to incorporate into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

d. Would the project result in inadequate emergency access?

Less than Significant Impact. A significant impact could occur if the Project design would not provide emergency access meeting the requirements of the LACFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project site or adjacent uses. Development of the Project site may require temporary and/or partial street and sidewalk closures due to construction activities. Any such closures would be temporary in nature and would be coordinated with the City through traffic control plans and/or encroachment permits issued by the City Engineer. Such closures would not be expected to interfere with emergency response or evacuation plans. As described previously, the Project would satisfy the emergency response requirements of the LACFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the site plan review requirements of the LACFD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would less than significant.

Cumulative Impacts

As mentioned previously, development of the Project may require temporary and/or partial street and sidewalk closures due to construction activities. Any such closures would be temporary in nature and would be coordinated with the City through traffic control plans and/or encroachment permits issued by the City Engineer. Such closures would not be expected to interfere with emergency response or

evacuation plans. All other related project would be expected to coordinate with the City. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR contained transportation measures that are not project specific, and therefore not feasible to incorporate into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XVIII. TRIBAL CULTURAL RESOURCES

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

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less than Significant Impact. As described in section **V., Cultural Resources**, there are currently no known tribal resources on the site that are listed or eligible for listing in State or Local registers of historical resources. Therefore, potential impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in intensification of land uses along Santa Monica Boulevard. However, as stated, there are no known tribal resources on the site that are listed or eligible for listing in State or Local registers of historical resources. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Neither the City of West Hollywood General Plan EIR nor the SCAG 2016- 2040 RTP/SCS Program EIR contain Tribal Cultural Resource mitigation measures.

Mitigation Measures

No mitigation measures are necessary.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant with Mitigation Incorporated. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Project if the tribe has submitted a written request to be notified. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. Notices were mailed to Native American tribes known to have resources in the Project area. The City received a response from the Gabrieleno Band of Mission Indians - Kizh Nation ("the Tribe") and conducted consultation with the Tribe regarding the Project. Information provided by the Tribe indicated that the Project site may be located within a tribal village area and in proximity to a traditional trade route. As such, the Project site is considered to have the potential for the presence of subsurface Tribal Cultural Resources. As such, impacts could potentially be significant, and mitigation shall be incorporated into the Project.

Cumulative Impacts

As mentioned previously, notices were mailed to Native American tribes known to have resources in the Project area. The City received a response from the Gabrieleno Band of Mission Indians - Kizh Nation ("the Tribe"). The City consulted with the Tribe regarding the Project as required by CEQA. Information provided by the Tribe indicated that the Project site may be located within a tribal village area and in proximity to a traditional trade route. As such, the Project site is considered to have the potential for the presence of

subsurface Tribal Cultural Resources. With **Mitigation Measure MM TCR-1**, **MM TCR-2**, and **MM TCR-3** implemented, the Project would not result in cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Neither the City of West Hollywood General Plan EIR nor the SCAG 2016- 2040 RTP/SCS Program EIR contain Tribal Cultural Resource mitigation measures. However, the SCAG 2016- 2040 RTP/SCS Program EIR contained archeological resource mitigation measures that contain similar provisions to the mitigation listed below.

Mitigation Measures

Due to the possibility of unearthing tribal cultural resources, the following mitigation measures shall be incorporated into the Project.

TCR-1: Native American Monitor/Consultant:

The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

TCR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources:

Upon discovery of any archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the

Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of a treatment plan established for the resources in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

TCR-3: Native American Monitor/Consultant: Unanticipated Discovery of Human Remains and Associated Funerary Objects:

Upon discovery of any human remains or funerary objects, as defined in defined in PRC 5097.98, the tribal and/or archaeological monitor/consultant shall immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) shall then notify the Tribe and the construction manager who shall call the County Coroner, in accordance with Health and Safety Code 7050.5. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by State law who will then appoint a Most Likely Descendent (MLD).

If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, a treatment plan shall be developed with the Tribe and implemented before continuation of ground disturbing activities. Priority shall be given to respectful reburial of the human remains and/or ceremonial objects within the project site. If reburial within the site is not feasible, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully.

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours.

If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site or at a location agreed upon between the Tribe and the landowner. There shall be no publicity regarding any cultural materials recovered.

With the incorporation of these mitigation measures, impacts would be considered less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water, drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonable foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. Water in the City is supplied by the City of Beverly Hills and the Los Angeles Department of Water and Power (LADWP). The City of Beverly Hills provides water service to the 368 acres within the western portion of the City, while LADWP provides water service to the remaining area of the City, including the Project site.[84] LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks

84 City of West Hollywood, Final PEIR: West Hollywood General Plan and CAP (October 2010).

and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Water entering the Los Angeles Aqueduct Filtration Plant (LAAFP) undergoes treatment and disinfection before being distributed throughout the LADWP's water service area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 240–260 mgd as of March 2018. [85] Therefore, the LAAFP has a remaining capacity of approximately 340-360 mgd, depending on the season.

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. Sewage from the Project site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 362 mgd and has the capacity to treat 450 mgd.[86] This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

The Project site is in a developed, urbanized portion of West Hollywood that is served by existing water and sewer mains. As shown in **Table XIX-1: Estimated Water Demand,** it is estimated that the proposed Project would have a net daily water demand of 10,282 gallons, or 11.6 acre-feet per year (afy). The proposed Project would require approximately 0.01 percent of the remaining capacity of the LAAFP (which currently operates at 60 percent capacity), Therefore, the proposed Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Furthermore, the Project applicant would be required to implement applicable California Green Building Code requirements that would further reduce water demand. Impacts on water treatment facilities would be less than significant, and no further analysis is required in an EIR.

As shown in **Table XIX-2: Estimated Sewage Generation,** below, it is estimated that the proposed Project would generate a net increase of 8,224.7 gpd (9.2 afy) of wastewater. The proposed Project would require approximately 0.01 percent of the remaining capacity of the HTP, which currently operates with 88 mgd of remaining capacity. As such, impacts would be less than significant.

85 Phone conversation with Jeff Shaffen, LAAFP Control Room Operator, March 21, 2018.

86 City of Los Angeles Department of Public Works, Bureau of Sanitation, *Wastewater System Fact Sheet* (2014).

Table XIX-1
Estimated Water Demand

Land Use	Quantity	Demand Factor (gpd/unit)[a]	Daily Demand (gpd)	Annual Demand (afy)
Residential: Studio	21 du	93.8 gpd/du	1,969.8	2.2
Residential: 1-Bedroom	31 du	137.5 gpd/du	4,262.5	4.8
Residential: 2-Bedroom	19 du	187.5 gpd/du	3,562.5	4.0
Commercial	9,240	62.5/1,000 gpd/ksf	577.5	0.7
Total			**10,372.3**	**11.7**
Existing	*1,445*	62.5/1,000 gpd/ksf	*90.3*	*0.1*
Net Total			**10,282**	**11.6**

Notes: du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet.
[a] 125 percent sewage generation loading factor; Los Angeles Bureau of Sanitation, Sewage Generation Factors (April 2012).

Table XIX-2
Estimated Sewage Generation

Land Use	Quantity	Demand Factor (gpd/unit)[a]	Daily Demand (gpd)	Annual Demand (afy)
Residential: Studio	21 du	75 gpd/du	1,575	1.8
Residential: 1-Bedroom	31 du	110 gpd/du	3,410	3.8
Residential: 2-Bedroom	19 du	150 gpd/du	2,850	3.2
Commercial	9,240	50/1,000 gpd/ksf	462	0.5
Total			**8,297**	**9.3**
Existing	*1,445*	*50/1,000 gpd/ksf*	*72.3*	*0.1*
Net Total			**8,224.7**	**9.2**

Notes: du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet.

The Project Site is located in an urbanized location that is currently served by stormwater infrastructure. The Project Site would continue to be predominantly impervious surface. In addition, the Project would be required to demonstrate compliance with the City's Low Impact Development (LID) Ordinance standards. The primary purpose of the LID ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. As such, the volume of stormwater runoff during peak events

would not increase and the construction of new stormwater drainage facilities or expansion of existing facilities would not be required.

The Project Site is located in a developed, urbanized setting that is served by existing electric power, natural gas and telecommunications services. In the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for electrical or telecommunications services. New connections would be established for the Project; however, no substantial electrical, gas, or telecommunications infrastructure is present on or adjacent to the Project site that would need to be relocated to accommodate the Project.

Cumulative Impacts

As mentioned previously, the Project Site is located in a developed, urbanized setting that is served by existing utility systems. The Project represents new residential development that is included in the growth projections of the utility service providers. In the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for electrical or telecommunications services. New connections would be established for the Project; however, no substantial electrical, gas, or telecommunications infrastructure is present on or adjacent to the Project site that would need to be relocated to accommodate the Project. Related Projects are expected to utilize existing electrical power, natural gas, and telecommunication services. As such, the Project would make a considerable contribution to cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR included mitigation measures (Mitigation Measures 3.12-9 through 3.12-13) associated with potential utility impacts. However, these measures are not project specific, rather they address implementation and amendment of plans, policies and ordinances of the City. Therefore, it is not feasible to incorporate these mitigation measures into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impact. Water service on the eastern side of the City, including the Project site, is provided by LADWP. The proposed Project would not directly require or result in the construction of potable water treatment facilities because it would connect into these existing water services.

The LADWP adopted a new Urban Water Management Plan (UWMP) in June 2016[87] which serves as a master plan for water supply and resources management consistent with LADWP goals and policy objectives. The UWMP forecasts expected cumulative growth in water demand and identifies matching water supplies. According to the UWMP, the total forecasted demand for water during a single dry season was 513,540 afy for 2015 and would be 611,800 afy for 2020.[88] The UWMP projects adequate water supplies to meet cumulative forecasted demand through 2040, the planning horizon for the current UWMP. The Project demand of 11.6 afy would be approximately 0.002 percent of the available capacity during a single dry year in 2015. The Project is considered to be within the growth projections used by the LADWP in forecasting cumulative future demand. As such, it is expected that LADWP has sufficient water supplies available to serve the proposed Project.[89] Furthermore, as previously stated, the Project applicant would be required to adhere to current standards, including the California Green Building Code, that would reduce demand on local water supplies. Thus, LADWP has sufficient water supplies available to serve the proposed Project from existing entitlements and resources, and no new or expanded entitlements are needed. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the total forecasted demand for water during a single dry season was 513,540 afy for 2015 and would be 611,800 afy for 2020.[90] The UWMP projects adequate water supplies to meet cumulative forecasted demand through 2040, the planning horizon for the current UWMP. The Project demand of 11.6 afy would be approximately 0.002 percent of the available capacity during a single dry year in 2015. The Project is considered to be within the growth projections used by the LADWP in

87 Los Angeles Department of Water and Power, Urban Water Management Plan 2015, June 7, 2016.

88 City of Los Angeles Department of Water and Power, 2015 City of Los Angeles Urban Water Management Plan [2015 UWMP] (2016), available at https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmp?_adf.ctrl-state=141e2pj32q_4&_afrLoop=362210825746077&_afrWindowMode=0&_afrWindowId=i8eaqt9mu_1#%40%3F_afrWindowId%3Di8eaqt9mu_1%26_afrLoop%3D362210825746077%26_afrWindowMode%3D0%26_adf.ctrl-state%3Di8eaqt9mu_61.

89 LADWP, 2015 UWMP.

90 City of Los Angeles Department of Water and Power, 2015 City of Los Angeles Urban Water Management Plan [2015 UWMP] (2016), available at https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmp?_adf.ctrl-state=141e2pj32q_4&_afrLoop=362210825746077&_afrWindowMode=0&_afrWindowId=i8eaqt9mu_1#%40%3F_afrWindowId%3Di8eaqt9mu_1%26_afrLoop%3D362210825746077%26_afrWindowMode%3D0%26_adf.ctrl-state%3Di8eaqt9mu_61.

forecasting cumulative future demand. As such, the Project would not make a considerable contribution to cumulative impacts.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR included mitigation measures (Mitigation Measures 3.12-9 through 3.12-13) associated with potential utility impacts. However, these measures are not project specific, rather they address implementation and amendment of plans, policies and ordinances of the City. Therefore, it is not feasible to incorporate these mitigation measures into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less Than Significant Impact. Wastewater flows from the Project site would be conveyed to the HTP through existing sewer lines. The HTP is managed by the City of Los Angeles. The City has adopted an Integrated Resources Plan (IRP) that includes a Wastewater Facilities Plan addressing forecasted cumulative system demand and identifying sufficient capacity to meet that demand.[91] Operation of the proposed Project would result in an increase in the amount of wastewater generated on the Project site compared to existing conditions. As stated above, the HTP has capacity to serve the Project's projected wastewater demand, in addition to the provider's existing commitments. Furthermore, the Project is considered to be within the growth projections used in forecasting cumulative future demand. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the City has adopted an Integrated Resources Plan (IRP) that includes a Wastewater Facilities Plan addressing forecasted cumulative system demand and identifying sufficient capacity to meet that demand. the HTP has capacity to serve the Project's projected wastewater demand, in addition to the provider's existing commitments. Furthermore, the Project is considered to be within

91 City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, *City of Los Angeles Integrated Resources Plan Executive Summary*, December 2006.

the growth projections used in forecasting cumulative future demand. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR included mitigation measures (Mitigation Measures 3.12-9 through 3.12-13) associated with potential utility impacts. However, these measures are not project specific, rather they address implementation and amendment of plans, policies and ordinances of the City. Therefore, it is not feasible to incorporate these mitigation measures into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Solid waste generated within the City is disposed of at landfill facilities throughout Los Angeles County. The City contracts with Athens Services to collect, transport, and dispose of solid waste for all residential and commercial uses.[92] The solid waste is collected and taken to Athens's recycling facility, the City of Industry Materials Recovery Facility. Food waste is processed and transported to Athens's compost facility in Victorville, American Organics. Remaining waste that cannot be recycled is disposed on a regular basis to one of four facilities within Los Angeles County.

Table XIX-3: Los Angeles In-County Class III Landfills shows four landfills located in the County that accept waste from the City and, therefore, could serve the Project site. Based on the combined 2016 average daily disposal rate of 14,122 tons per day, the landfills that accept solid waste from the City have a combined estimated remaining capacity of approximately 85.45 million tons, with remaining life spans ranging between 21 and 25 years. The capacity estimates are conservative because they do not reflect expansions that either have been recently approved or are currently being pursued.

Of the various landfills serving the City, Sunshine Canyon Landfill is the largest recipient of nonhazardous solid waste disposal materials (i.e., Class III waste materials). This landfill had a remaining capacity of 62.11

92 City of West Hollywood, *Final PEIR: West Hollywood General Plan and CAP*.

million tons in 2016, with an expected life expectancy of 21 years. The maximum daily capacity for the landfill is 12,100 tons per day, and the 2016 disposal rate was 7,496 tons per day.[93] As shown in **Table XIX-4: Estimated Operational Solid Waste Generation,** the Project's net generation of solid waste is projected to be 649.6 pounds per day, or less than 0.01 percent of the available daily disposal capacity at Sunshine Canyon Landfill.

In addition, the County addresses forecasted cumulative landfill demand and capacity through the preparation of annual County of Los Angeles Integrated Waste Management Plan (CoIWMP) reports. The current CoIWMP has identified sufficient capacity to meet the cumulative forecasted landfill needs within the County. The Project is considered to be within the growth projections used in forecasting cumulative demand. The preparation of each annual CoIWMP report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. As such, construction and operation of the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals. Impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the County addresses forecasted cumulative landfill demand and capacity through the preparation of annual CoIWMP reports. The Project is within the growth projections used in forecasting cumulative demand. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR included mitigation measures (**Mitigation Measures 3.12-9** through **3.12-13**) associated with potential utility impacts. However, these measures are not project specific, rather they address implementation and amendment of plans, policies and ordinances of the City. Therefore, it is not feasible to incorporate these mitigation measures into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

93 County of Los Angeles, *County of Los Angeles Integrated Waste Management Report: 2016 Annual Report* (September 2017), Appendix E-2, Table 1.

Table XIX-3
Los Angeles In-County Class III Landfills

Landfill	Maximum Daily Capacity (tons)	2016 Average Daily Disposal (tons/day)	Total Disposal Yearly Equivalent (million tons)	2016 Remaining Permitted Capacity (million tons)	Remaining Life (years)
Antelope Valley Landfills I and II[a]	1,800	1,582	0.494	12.89	23
Chiquita Canyon Landfill[b]	6,000	4,544	1.418	–	–
Lancaster Landfill	3,000	500	0.172	10.45	25
Sunshine Canyon Landfill[c]	12,100	7,496	2.339	62.11	21
Total	**22,900**	**14,122**	**4.423**	**85.45**	

Source: County of Los Angeles, Countywide Integrated Waste Management Plan: 2016 Annual Report*, (September 2017), Appendix E-2, Table 1.*

[a] *The City of Palmdale approved the expansion of Antelope Valley Landfill, which consolidates Unit 1 and Unit 2, on June 9, 2011.*

[b] *An expansion of the landfill was recently approved by the Los Angeles County Board of Supervisors in July 2017 (Conditional Use Permit [CUP] No. 2004-00042-[5]). CUP limits waste disposal to 12,000 tons per day, Monday through Saturday, for a total maximum disposal capacity of 60 million tons. The CUP expires July 2047 or when the maximum capacity is reached, whichever is sooner.*

[c] *Sunshine Canyon Landfill is located partially within the City of Los Angeles and partially within unincorporated Los Angeles County. Both portions of the landfill accept waste generated within the City of West Hollywood. On December 31, 2008, operations in the Sunshine Canyon County Landfill and the Sunshine Canyon City Landfill were combined into one to what is known as the Sunshine Canyon City/County Landfill.*

Table XIX-4
Estimated Operational Solid Waste Generation

Type of Use	Size	Waste Generation Rate[a] (lb./unit/day)	Total Solid Waste Generated (lb./day)
Residential	71 du	8.6 lb./du	610.6
Commercial	9,240	5 lb./ksf/day	46.2
Total			656.8
Existing	*1,445*	5 lb./ksf/day	*7.2*
Net Total			**649.6**

Notes: ksf = thousand square feet; lb. = pounds.

[a] *CalRecycle, "Estimated Solid Waste Generation Rates" (2018), https://www2.calrecycle.ca.gov/wastecharacterization/general/rates. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*

e. Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. The proposed Project would generate solid waste during both construction and operation that is typical of the development of a mixed-use project comprising residential and commercial uses. The proposed Project would fully comply with all federal, State, and local statutes and regulations regarding proper disposal. The Project would divert a minimum of 80 percent of construction and demolition waste. As such, impacts would be less than significant.

Cumulative Impacts

As mentioned previously, the Project will generate solid waste during construction and operation that is typical of mixed-used commercial and residential developments. This Project, as well as related Project would be required to fully comply with all federal, State, and local statues and regulations regarding proper disposal. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR included mitigation measures (Mitigation Measures 3.12-9 through 3.12-13) associated with potential utility impacts. However, these measures are not project specific, rather they address implementation and amendment of plans, policies and ordinances of the City. Therefore, it is not feasible to incorporate these mitigation measures into the Proposed Project. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

XX. WILDFIRES

If located in or near State responsibility areas or lands classified as very high fire hazard zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Impact Analysis

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. substantially impar an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. The Project would not impar an adopted emergency reasonable plan or emergency evacuation plan. As such, there would be no impact.

Cumulative Impacts

As mentioned previously, the Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Neither the City of

West Hollywood General Plan EIR nor the SCAG 2016- 2040 RTP/SCS Program EIR contain Wildfires mitigation measures.

Mitigation Measures

No mitigation measures are necessary.

b. due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. The Project is located on relatively flat land and would not change or exacerbate current risks of wildfire or pollutant concentrations from a wildfire to project occupants. As such, there would be less a less than significant impact.

Cumulative Impacts

As mentioned previously, the Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Neither the City of West Hollywood General Plan EIR nor the SCAG 2016- 2040 RTP/SCS Program EIR contain Wildfires mitigation measures.

Mitigation Measures

No mitigation measures are necessary.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. The Project would not require the installation or maintenance of any infrastructure or utility improvements or additions. As such impacts related to infrastructure modifications increasing fire risk would not result in any impacts. As such, no impact would occur, and no mitigation measures are necessary.

Cumulative Impacts

As mentioned previously, the Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Neither the City of West Hollywood General Plan EIR nor the SCAG 2016- 2040 RTP/SCS Program EIR contain Wildfires mitigation measures.

Mitigation Measures

No mitigation measures are necessary.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. As previously discussed in sections **IX. Hazards and Hazardous Materials** and **X. Hydrology and Water Quality** the Project is not located near a potential flooding, landslide area, or would result in potential drainage changes. As such, the Project would result in no impact and no mitigation measures are necessary.

Cumulative Impacts

As mentioned previously, the Project is not located in or near State responsibility areas of lands classified as very high fire hazard severity zones. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Neither the City of West Hollywood General Plan EIR nor the SCAG 2016- 2040 RTP/SCS Program EIR contain Wildfires mitigation measures.

Mitigation Measures

No mitigation measures are necessary.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

Impact Analysis

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

Less than Significant. A significant impact could occur only if the Project would have an identified potentially significant impact for any of the environmental topics addressed in this initial study. However, mitigation measures have been included that would reduce these impacts to a less than significant level. The Project is located in a densely populated urban area and would have no significant impacts after mitigation with respect to biological resources and less than significant impacts to cultural resources. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species

(endangered or otherwise), or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses along Santa Monica Boulevard. However, the Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or prehistory. Compliance with all local, State, and federal laws and regulations will be required for this and related projects. Tribal consultant will be required for this and all related projects under CEQA. As such, the Project would not have a considerable contribution to a cumulative impact.

Incorporation of Prior Mitigation

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of West Hollywood General Plan EIR did not contain any applicable mitigation measures. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Mitigation Measures

No mitigation measures are necessary.

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

Less Than Significant with Mitigation Incorporated. Cumulative impacts are addressed within each resource areas above and mitigation measures have been identified where appropriate.

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

Less than Significant. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures noted**.**

5.0 RESPONSE TO COMMENTS

The section includes the comments received during the public review of the Draft Sustainable Communities Environmental Assessment and responses. The comments letters are included in full in **Appendix G**: **Comment Letters**.

1. Department of Transportation District, letter dated November 19, 2019

Comment 1.1

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced DSCEA.

Department of Transportation Summary of Project Description

The proposed project is the construction of a new, 4-story, mixed-use residential building with a Floor Area Ratio (FAR) of 2.025. The building would contain 71 residential units within 48,975 square feet of residential floor area and approximately 9,240 square feet of ground-floor commercial uses. The entire building would be approximately 63,560 square feet in size and would include a 2-level subterranean parking garage with 177 parking spaces and 21 bicycle parking spots. The site currently contains a car wash. The City of West Hollywood is considered the Lead Agency under the California Environmental Quality Act (CEQA).

Response 1.1

This comment correctly described the Project description. This comment is noted.

Comment 1.2

The project is located on State Route 2 (SR-2), also known as Santa Monica Boulevard. As discussed in the DSCEA, the project is well-served by transit and is considered a Transit Priority Project. Specifically, the project is serviced by the West Hollywood Cityline Blue-Orange line and the following Los Angeles County Metropolitan Transportation Authority (Metro) bus lines: 2-302, 4, 217, 218, 780, and 704. Furthermore, during peak periods the 704 and 780 Metro Rapid lines have less than 15-minute headways at the intersection of Fairfax Avenue & Santa Monica Boulevard. This intersection is located less than a ½ mile west of the project site, meaning that the project is in a high-quality transit corridor.

In terms of active transportation facilities serving the project, there are Class II bike lanes on N. Fairfax Avenue, and sidewalks along SR-2, Spaulding Avenue, Stanley Avenue, and Curson Avenue.

Due to the project's infill nature, high quality access to transit, and access to bicycle and pedestrian facilities, Caltrans does not expect project approval to result in a direct adverse impact to existing State transportation facilities.

Response 1.2

This comment correctly described the transit options associated with the proposed Project. This comment is noted.

Comment 1.3

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as providing 21 bicycle parking spaces. Additional TDM strategies that the City of West Hollywood may want to consider integrating into this project include:

- Decrease the amount of vehicle parking provided to be no more than required, which would be approximately 135 spots for this project
- Provide a continuous bicycle facility on Santa Monica Boulevard east of N. Orange Grove Avenue
- Install a HAWK signal and bulb-out at the intersection of N. Spaulding Avenue & Santa Monica Boulevard
- Separate bicycle storage for residents and commercial patrons, and ensure that all bike parking is secure
- Widen the sidewalk and install a bus stop shelter at the Santa Monica Boulevard & N. Genesee Avenue intersection

Please make every attempt to reduce VMT. For additional TDM options that can reduce VMT, please refer to:

The 201O *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, or

Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8) by the Federal Highway Administration (FHWA), available at https://ops.fhwa.dot.gov/publications/fhwahop12035/index.him

Response 1.3

The City is aware and will consider these suggestions. These suggestions do not indicate a deficiency in the analysis done in the Sustainable Communities Environmental Assessment. No possible impact was overlooked, the comments do not change the conclusions made. The comment is noted.

Comment 1.4

As a reminder, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: hllp://opr.ca.gov/docs/20190122- 743 Technical Advisory.pdf.

Response 1.4

The City is currently in the process of developing a VMT methodology consistent with the requirements of Senate Bill 743 that will be in place starting July 1, 2020 as required by the statute. Project Traffic impacts were evaluated under level of service/volume to capacity based on the City's current methodology. However, pursuant to CEQA Guideline Section 15064.3(b) VMT impacts, including those to the State Highway System, are presumed to be less than significant for mixed use (predominantly housing projects) located within one half mile of a Major Transit Stop or a stop along a High Quality Transit Corridor (HQTC). As the project is a mixed-use development located within one half mile of both a Major Transit Stop and a stop along a HQTC, project VMT impacts, including those to the State Highway System, are presumed less than significant. This comment is noted.

Comment 1.5

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic management plan detailing these delays for Caltrans' review.

Response 1.5

This comment states that construction traffic management plan should be submitted to Caltrans if necessary. The comment is noted.

Comment 1.6

In addition, storm water run-off is a sensitive issue for Los Angeles county. Please be mindful that the project needs to be designed to discharge clean run-off water.

Response 1.6

This comment notes that storm water run-off issues should be acknowledged by the city. This comment is noted.

2. County of Los Angeles Fire Department, letter dated November 13, 2019

Comment 2.1

Notice of Availability of a Draft Sustainable Communities Environmental Assessment has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

Planning Division:

We have no comments.

Response 2.1

This comment notes that the County of Los Angeles Fire Department reviewed the Draft Sustainable Communities Environmental Assessment and the Planning Division has no comments. This comment is noted.

Comment 2.2

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants.

Response 2.2

This comment notes that the project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and fire hydrants. This comment is noted.

Comment 2.3

Land Development Unit:

2. Where Fire Apparatus Access Roads or a water supply for fire protection are required to be installed such protection shall be installed and made serviceable prior to and during the time of construction except when approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection where construction of new roadways allows passage by vehicles in accordance with Section 205.2.

3. Where Fire Apparatus Access Roads or a water supply for fire protection are required to be installed such protection shall be installed and made serviceable prior to and during the time of construction except when approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection where construction of new roadways allows passage by vehicles in accordance with Section 205.2.

4. Approved Fire Apparatus Access Roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into or within the jurisdiction. The Fire Apparatus Access Road shall comply with the requirement of this section and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the buildings as measured by an approved route around the exterior of the building or facility.

5. Fire Apparatus Access Roads shall be installed and arranged in accordance with Sections 503.2.1 through 503.2.8 [California Code of Regulations, Title 19, Division 1, §3.05(a)] Fire Department Access and Egress. (Roads) (a)Roads. Required Access Roads from every building to a public street shall be all-weather hard-surfaced (suitable for use by fire apparatus) right-of-way not less than 20 feet in-width. Such right-of-way shall be unobstructed and maintained only as access to the public street.

6. The dimensions of approved fire apparatus roads shall be maintained as originally approved by the fire code official.

Response 2.3

This comment discusses fire safety measures related to roads. There are no new roadways proposed. All roads in the proximity of the Project site will remain the same. This comment is noted.

Comment 2.4

7. The Exterior doors and openings required by this code or the California Building Code shall be maintained readily accessible for emergency access by the fire department. An approved access walkway leading from Fire Apparatus Access Roads to exterior openings shall be provided when required by the fire code official. [California Code of Regulations, Title 19, Division 1, §3.05(b)] Fire Department Access and Egress (Roofs) (b) Roofs. No person shall install or maintain any security barrier such as barbed wire fencing, razor wire fencing, chain link fencing, or any other fencing material cable aerial, antenna, or other obstruction on the roof of any commercial establishment in such a manner as to obstruct or render egress or access hazardous in the event of fire or other emergency.

8. New buildings four or more stories above grade plane, except those with a roof slope greater than four units vertical in 12 units horizontal shall be provided with a stairway to the roof. Stairway access to the roof shall be in accordance with Section 1011.12. Such stairway shall be marked at street and floor levels with a sign indicating that the stairway continues to the roof. Where roofs are used for roof gardens or for other purposes, stairways shall be provided as required for such occupancy classification.

9. Multiple residential and commercial units having entrance doors not visible from the street or road shall have, in addition to the requirements of Section 505.1 above, approved numbers grouped for all units within each structure and positioned to be plainly visible from the street or road. Said numbers may be grouped on the wall of the structure or on a mounting post independent of the structure.

10. Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life saving or firefighting purposes, the fire code official is authorized to require a key box to be installed in an approved location. The key box shall be of an approved type listed in accordance with UL 1037 and shall contain keys to gain necessary access as required by the fire code official.

11. An approved water supply capable of supplying the required fire flow for fire protection shall be provided to premises upon which facilities, buildings, or portions of buildings are hereafter constructed or moved into or within the jurisdiction.

12. Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an approved method or Appendix B. The required fire flow for the proposed development has been calculated to provide a minimum required flow of 2,250 GPM at 20 POUNDS PSI FOR 2 HOURS.

13. Fire hydrant systems shall comply with Sections 507.5.1 through 507.5.6 and Appendix Corby an approved method.

14. When required by the fire code official, a fire hydrant and other firefighting water source shall be identified by the installation of a blue raised reflective pavement marker or identified by other approved means.

15. The fire-flow calculation area shall be the total floor area of all floor levels within the exterior walls, and under the horizontal projections of the roof of a building, except as modified in Section B104.3.

16. The minimum fire-flow and flow duration for buildings other than one- and two-family dwellings, and Group R-3 buildings shall be as specified in Tables B105.2 and B105.1(2).

17. For all occupancies other than one- and two-family dwellings, and Group R-3 buildings, including commercial, industrial, multi-family dwellings, private schools, and institutions, fire hydrant spacing shall be 300 feet (91.44 m). No portion of lot frontage shall be more than 200 feet (60.96 m) from, via vehicular access, a public hydrant. No portion of a building shall be more than 400 feet (121.92 m) from, via vehicular access, a properly spaced public hydrant.

18. The average spacing between fire hydrants shall not exceed that listed in Table CC105.1.

19. For buildings not exceeding three stories or with an eave height not exceeding 30 feet (9144 mm) in height, Fire Apparatus Access Roads shall have an unobstructed width of not less than 26 feet (7925 mm) exclusive of shoulders and an unobstructed vertical clearance of clear to the sky. For buildings exceeding three stories or with an eave height exceeding 30 feet (9144 mm) in height, Fire Apparatus Access Roads shall have an unobstructed width of not less than 28 feet (8535 mm) exclusive of shoulders and an unobstructed vertical clearance of clear to the sky.

Response 2.4

This comment notes standard building codes. The Proposed Project will be designed to code. The Plan Check process will be done by Building and Safety. This comment has been noted.

Comment 2.5

The County of Los Angeles Fire Department Land Development Unit's comments are general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

Response 2.5

This comment notes that the above comments are general requirements. The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment. This comment is noted.

Comment 2.6

Forestry Division – Other Environmental Concerns:

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

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

Response 2.6

This comment notes other environmental concerns made by the Forestry Division. The comment does not apply to the Proposed Project. The comment has been noted.

Comment 2.7

Health Hazardous and Materials Division:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

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

Response 2.8

The comment notes that the Health Hazardous and Materials Division has no comments. The comment is noted.

3. County Sanitation Districts of Los Angeles, letter dated November 25,2019

Comment 3.1

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on October 24, 2019. The proposed project is located within the jurisdictional boundaries of District No. 14. We offer the following comments regarding sewerage service:

Response 3.1

This comment notes that the Sanitation Districts of Los Angeles County received a Draft Environmental Impact Report (DEIR) and they have provided comments. The City processed a Sustainable Communities Environmental Assessment (SCEA) pursuant to California Public Resources Code Sections 21155 and 21155.2, not a Draft Environmental Impact Report (DEIR) as suggested by the commenter. The comment has been noted.

Comment 3.2

The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. Th is connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before this project is permitted to discharge to the Districts' Sewerage System. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. The developer should contact the Districts' Wastewater Fee Public Counter for more specific information regarding the connection fee application procedure and fees.

Response 3.2

This comment discusses the connection fee for wastewater. The Applicant would be required to pay the connection fee. This comment is noted.

Comment 3.3

The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Gardner Avenue Trunk Sewer, located in Gardner Street north of Santa Monica Boulevard. The Districts' 15-inch diameter trunk sewer has a capacity of 1.8 million gallons per day (mgd) and conveyed a peak flow of 0.7 mgd when last measured in 2013. Wastewater generated by the proposed project will ultimately be treated by the City of Los Angeles Hyperion Treatment System.

Response 3.3

This comment discusses where wastewater will flow from the proposed Project, where it will be treated and the available pipeline and water reclamation plant capacity. This comment shows that there is available pipeline and WRP capacity. This comment is noted.

Comment 3.4

Estimated Sewerage Generation - The table describes the proposed project as 21 residential studios, 31 residential I-bedroom units, 19 residential 2-bed room unit s, and 9,240 square feet of commercial space. Based on the Districts' average wastewater generation factors, the expected average wastewater flow from the project site, as described above, is 11 ,443 gallons per day. The demolition of the existing carwash on the project site would decrease the expected average wastewater flow to 7,037 gallons per day.

Response 3.4

This comment notes a slight modification in the Estimated Sewage Generation. The SCEA states that the expected wastewater flow is 8,224.7 gallons per day. The letter states that it is actually decreased to 7,037 gallons per day. This correction does not change the conclusion or make an impact. The comment has been noted.

4. Fred Piegronski and Murray Aronson, letter dated November 19,2019

Comment 4.1

In an August 22, 2019 meeting with the developers and local residents, I brought up my concerns regarding the development. I learned that there would be a fourth floor aquatic center in the west side of the four-story building, and that this aquatic center would consist of a swimming pool and a clubhouse, and that the pool area would not be enclosed, but open to the air.

I asked that the pool and aquatic center be located on the west side of the building overlooking the parking lot where 7-eleven is located.

The reason I ask that the aquatic center be moved is primarily due to our noise concerns-Noise that may arise from loudspeakers, loud music, pool parties, and all other sounds that can emanate from a large open space where people congregate. Especially one that is part of a new commercial enterprise.

The planned aquatic center overlooks at least 21 units in close proximity, directly adjacent and behind the development. Affected would be approximately 30 individuals. This does not include the firemen at the fire station who are directly adjacent to the aquatic Center, and who may also have concerns.

Far fewer people will be affected by a move of the aquatic center to the eastern side of the proposed structure, since there are no large residential apartment buildings adjacent to or directly behind it.

Thank you for considering our concerns in regards to the planning and development of this project.

Response 4.1

This comment discusses concerns regarding noise. The City takes this concern seriously. However, as indicated in the SCEA document, noise would not exceed the thresholds under CEQA. The pool is part of a residential development and would not be open or available for public use. It is meant only for informal resident use and not a community center that would create substantial amounts of noise. Furthermore, the location of the pool has been oriented and positioned towards Santa Monica Boulevard and away from the residences across the alley to reduce operational noise related impacts. The design will stay the same. This comment does not change the analysis made in the SCEA under CEQA.

6.0 MITIGATION MONITORING AND REPORTING PROGRAM

The CEQA Guidelines, Section 15074(d), requires that a lead or responsible agency adopt a mitigation monitoring plan when approving or carrying out a project when an IS/MND identifies changes the lead agency has required in the project or made a condition of approval to mitigate or avoid significant environmental effects. As lead agency for the project, the City is responsible for adoption and implementation of the mitigation monitoring and reporting program (MMRP).

The MMRP is presented in Table 6-1 below and will be in place and effective throughout all phases of the project. The City will be responsible for administering the MMRP and ensuring that all parties comply with its provisions. The City may delegate monitoring activities to staff, consultants, or contractors. The City will also ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The designated environmental monitor will track and document compliance with required measures, note any problems that may result, and take appropriate action to rectify problems.

Table 6-1

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
Air Quality						
General Plan EIR Mitigation 3.2-1: To reduce the amount of fugitive dust that is re-entrained into the atmosphere from parking lots and construction sites, the following measures are required during the construction of all projects to reduce the amount of dust and other sources of PM10 in accordance with SCAQMD Rule 403: • Dust suppression at construction sites using vegetation, surfactants, and other chemical stabilizers; • Wheel washers for construction equipment; • Watering down of all construction areas; • Limit speeds at construction sites to 15 miles per hour; • Cover aggregate or similar material during transportation of material; • Adopt incentives, regulations, and/or procedures to reduce paved road dust emission through targeted street sweeping of roads subject to high traffic levels and silt loadings.	**Project Construction**	**Plan Check prior to permits issuance** **Spot Check during construction**	**Planning and Development Services**			
General Plan EIR Mitigation 3.2-2: The following measures are required to reduce exhaust emissions from construction equipment:	**Project Construction**	**Plan Check prior to permits issuance**	**Planning and Development Services**			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
• Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas-powered electric generators and equipment. • Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set). • To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions. • On-site equipment shall not be left idling when not in use. • The hours of operation of heavy-duty equipment and or the amount of equipment in use at any one time shall be limited. • Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors. • Before construction contracts are issued, the Project Applicants shall perform a review of new technology, in consultation with SCAQMD, as it related to heavy-duty equipment, to determine what (if any) advances in emissions reductions are available for use and are economically feasible. Construction contract and bid specifications shall require contractors to utilize the available and economically feasible technology on an established percentage of the equipment fleet. It is anticipated that in the near future, both NOx and PM10 control equipment will be available.		**Spot Check during construction**				

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
Greenhouse Gas Emissions						
General Plan Mitigation Measure 3.15-1: To further reduce construction-generated GHG emissions, the Project Applicant(s) of all Project phases shall implement all feasible measures for reducing GHG emissions associated with construction that are recommended by the City and/or SCAQMD at the time individual portions of the site undergo construction. Prior to releasing each request for bid to contractors for the construction of each development phase, the project applicant(s) shall obtain the most current list of GHG reduction measures that are recommended by the City and stipulate that these measures be implemented in the respective request for bid as well as the subsequent construction contract with the selected primary contractor. The Project Applicant(s) for any particular development phase may submit to the City a report that substantiates why specific measures are considered infeasible for construction of that particular development phase and/or at that point in time. The report, including the substantiation for not implementing particular GHG reduction measures, shall be approved by the City prior to the release of a request for bid by the project applicant(s) for seeking a primary contractor to manage the construction of each development phase. By requiring that the list of feasible measures be established prior to the selection of a primary contractor, this measure requires that the ability of a contractor to effectively implement the selected GHG reduction measures be inherent to the selection process. The City's recommended measures for reducing construction-related GHG emissions at the time of writing the General Plan EIR are listed below. The list can be updated as new technologies	**Project Construction**	**Plan Check prior to permits issuance** **Spot Check during construction**	**Planning and Development Services**			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
or methods become available. The project applicant(s) shall, at a minimum, be required to implement the following: • Improve fuel efficiency of construction equipment: – Reduce unnecessary idling (modify work practices, install auxiliary power for driver comfort); – Perform equipment maintenance (inspections, detect failures early, corrections); – Train equipment operators in proper use of equipment; – Use the proper size of equipment for the job; and – Use equipment with new technologies (repowered engines, electric drive trains). • Use alternative fuels for electricity generators and welders at construction sites such as propane or solar, or use electrical power. • Use an ARB-approved low-carbon fuel, such as biodiesel or renewable diesel for construction equipment (emissions of oxides of nitrogen [NOx] from the use of low carbon fuel must have been reviewed and increases mitigated.) Additional information about low-carbon fuels is available from ARB's Low Carbon Fuel Standard Program (ARB 2010g). • Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking for construction worker commutes. • Reduce electricity use in the construction office by using compact fluorescent blubs, powering off computers every day, and replacing heating and cooling units with more efficient ones.						

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
• Recycle or salvage nonhazardous construction and demolition debris (goal of at least 75% by weight). • Use locally sourced or recycled materials for construction materials (goal of at least 20% based on costs for building materials, and based on volume for roadway, parking lot, sidewalk, and curb materials). • Minimize the amount of concrete used for paved surfaces or use a low carbon concrete option. • Produce concrete on-site if determined to be less emissive than transporting ready mix. • Use EPA-certified SmartWay trucks for deliveries and equipment transport. Additional information about the SmartWay Transport Partnership Program is available from ARB's Heavy-Duty Vehicle Greenhouse Gas Measure (ARB 2010h) and EPA (EPA 2010). • Develop a plan to efficiently use water for adequate dust control. This may consist of the use of non-potable water from a local source.						
Noise						
General Plan Mitigation Measure 3.9-2: The following measures shall be implemented during construction activities: • Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc.). • Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on power equipment.	**Project Construction**	**Plan Check prior to permits issuance** **Spot Check during construction**	**Planning and Development Services**			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
• Construction operations and related activities associated with the proposed project shall comply with the operational hours outlined in the WHMC Noise Ordinance, or mitigate noise at sensitive land uses to below WHMC standards. Construction equipment should not be idled for extended periods of time in the vicinity of noise-sensitive receptors. • Locate fixed and/or stationary equipment as far as possible from noise-sensitive receptors (e.g., generators, compressors, rock crushers, cement mixers). Shroud or shield all impact tools, and muffle or shield all intake and exhaust ports on powered construction equipment. • Where feasible, temporary barriers shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Acoustical barriers shall be constructed of material having a minimum surface weight of 2 pounds per square foot or greater, and a demonstrated STC rating of 25 or greater as defined by American Society for Testing and Materials (ASTM) Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant. • Music from a construction site shall not be audible at off-site locations.						
Paleontological Resources						
General Plan Mitigation Measure 3.10-1: • If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The Project Applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a	**Project Construction**	**Plan Check prior to permits issuance**	**Planning and Development Services**			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the lead agency to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.		**Spot Check during construction**				
Tribal Cultural Resources						
TCR-1: Native American Monitor/Consultant: The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.	**Project Construction**	**Monitoring during ground disturbance**	**Planning and Development Services**			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
TCR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment, and funding sufficient to allow for implementation of a treatment plan established for the resources in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.	**Project Construction**	**Monitoring during ground disturbance**	**Planning and Development Services**			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
TCR-3: Native American Monitor/Consultant: Unanticipated Discovery of Human Remains and Associated Funerary Objects: Upon discovery of any human remains or funerary objects, as defined in defined in PRC 5097.98, the tribal and/or archaeological monitor/consultant shall immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) shall then notify the Tribe and the construction manager who shall call the County Coroner, in accordance with Health and Safety Code 7050.5. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the findings are determined to be Native American, the coroner will notify the NAHC as mandated by State law who will then appoint a Most Likely Descendent (MLD). If the Gabrieleno Band of Mission Indians—Kizh Nation is designated MLD, a treatment plan shall be developed with the Tribe and implemented before continuation of ground disturbing activities. Priority shall be given to respectful reburial of the human remains and/or ceremonial objects within the project site. If reburial within the site is not feasible, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes	**Project Construction**	**Monitoring during ground disturbance**	**Planning and Development Services**			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Implementing Phase	Monitoring Action	Enforcing Agency	Initials	Date	Comments
and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site or at a location agreed upon between the Tribe and the landowner. There shall be no publicity regarding any cultural materials recovered.						