Appendix A

Initial Study, Notice of Preparation, Responses to the NOP, Scoping Meeting Comments

City of West Hollywood

8555 Santa Monica Boulevard Mixed-Use Project

Initial Study

September 2022

rincon

Environmental Scientists Planners Engineers

8555 Santa Monica Boulevard Mixed-Use Project

Initial Study

Prepared by:

City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
Contact: Laurie Yelton, Associate Planner, Community Development Department
(323) 848-6475

Prepared with the assistance of:

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September 2022

8555 SANTA MONICA BOULEVARD MIXED-USE PROJECT

INITIAL STUDY

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1. Project Title:

8555 Santa Monica Boulevard Mixed-Use Project

2. Lead Agency Name and Address:

City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216

3. Contact Person and Phone Number:

Laurie Yelton
Associate Planner
Community Development Department
(323) 848-6890

4. Project Location:

The project site is located at 8527-8555 Santa Monica Boulevard and 8532, 8538, 8546, and 8552 West Knoll Drive (site collectively known as 8555 Santa Monica Boulevard) in the City of West Hollywood. The project site encompasses 61,097 square feet (sf) (approximately 1.40 acres) and includes six parcels (APNs: 4339-005-009, 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, and 4339-005-025).

5. Project Sponsor's Name and Contact Information:

Soto Capital, LP
PO Box 17110
Beverly Hills, CA 90209
(818) 905-0283

6. General Plan Designation/Zoning:

The 42,164 square foot portion of the project site that currently contains commercial buildings is zoned and has a General Plan land use designation of Commercial, Community 1 (CC1). This portion of the site is also within the West Hollywood General Plan's Commercial Subarea 2, Transit Overlay Zone, and Mixed-Use Incentive Overlay Zone. The 18,933 square foot portion of the project site on the northeast corner that currently contains single-family residences is zoned Residential, Multi-Family High Density (R4B) and has a General Plan Land Use Designation of High Density Residential (R4B).

7. Description of Project:

The proposed project would involve the demolition of the three existing two-story commercial structures (which total approximately 27,338 square feet) as well as four

existing one-story single-family residences and surface parking areas, and the construction of a mixed-use development on the same site. The proposed development would be 55 feet in height and would include 111 apartment units (17 of which would be designated as affordable housing), 3,938 sf of restaurant and cafe uses, 15,494 sf of live/work use (12 units), 14,488 sf of retail space, a 3,643 sf hair salon, and 6,711 sf of creative office space. Commercial uses would be on the first floor and partially on the second floor. Residential units would be on levels 2, 3, 4, and 5. Apartment units would range in size between 410 and 1,721 square feet (not including patios and balconies).

The project also includes three levels of parking with 346 vehicle parking spaces and 133 bicycle parking spaces. One level of the parking structure would be fully subterranean. The first floor and mezzanine parking levels would be partially subterranean.

The major characteristics of the proposed project are summarized in Table 1.

8. Surrounding Land Uses and Setting:

The project site is located in a neighborhood characterized by a mix of residential and commercial uses. To the west of the project site is the Ramada Plaza Hotel, a four-story hotel building with ground-floor retail. Immediately northwest of the project site is a three-story multi-family condominium building. East of the project site is the one-story commercial store Healthy Spot. Across Santa Monica Boulevard to the south are one to two-story commercial, retail, and restaurant buildings. Across West Knoll Drive to the north are one- to four-story multi-family residential uses.

9. Other Public Agencies Whose Approval Is Required:

The proposed project would require the discretionary approval of the City of West Hollywood Planning Commission. No other public agencies approval is required. If appealed, the City Council would make decisions related to approval prior to initiation of construction. Specifically, the following approvals would be required:

- *Certification of the Final EIR*
- *Approval of Development and Demolition Permits*
- *Approval of a Density Bonus pursuant to WHMC Section 19.22.050(D);*
- *Approval of Affordable Housing Concessions, pursuant to WHMC Section 19.22.050(E), as follows:*
  1) *An additional story, not to exceed 10 feet of total project height (WHMC Section 19.22.050.E.2(a);*
  2) *An extra mezzanine level for residential parking (vehicle and bicycle) consisting of a partial level located above a portion of the first floor and below a portion of the second floor, open to the first floor and partially subterranean, and creating no greater volume in the project's envelope than that authorized under the Code (including height incentive and concession).*
- *Approval of building design and materials, as well as landscaping;*
- *Approval of 10 sharing parking credits to meet project parking requirements;*
- *Any other approvals or permits that would be necessary for construction and operation of the project, including a lot tie agreement and utility relocation permits*

Table 1
Project Characteristics

Project Site Size	61,097 sf (1.40 acres)
Parcel Numbers	4339-005-009, 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, 4339-005-025
Building Floor Area	Commercial Restaurant/Café: 3,938 sf Live/work space: 15,494 sf Retail: 14,488 sf Office: 6,711 sf Hair Salon: 3,643 sf *Subtotal: 44,274 sf* Residential Apartments: 104,066 sf Residential Lobby: 833 sf Residential Recreation Room: 892 sf Residential Storage 4,777 sf *Subtotal: 110,568 sf* Residential and Commercial Circulation (stairs, elevators, corridors, trash chute); waste/recycling; electrical; shower/locker: 3,994 sf **Total Floor Area: 158,836 sf**
Parking	Commercial: 117 Live/Work Single: 0 Live/Work in Tandem: 54 Residential Single: 47 Residential in Tandem: 128 Parking credit needed for spaces: 10 **Total provided: 346 spaces** **Bicycle: 133 spaces**
Unit Summary	Studio: 6 1-bedroom: 41 2-bedroom: 64 **Total Apartment Units: 111 units** **Live Work/Units: 12 units**
Affordable Housing	*Very Low Income Units: ~~6~~9* *~~Low Income Units: 4~~* *Moderate Income Units: ~~7~~8* ***Total Affordable Housing: 17 units (out of the 111 total units)***
Height	55 feet
Floor Area Ratio (FAR)	2.8 (CC1 portion only)
Setbacks	**Commercial Zone** Front (facing SMB): 0 feet Rear: 10 feet & 25 feet Side:5'-0" to15'-0" feet **Residential Zone** Front (facing West Knoll): 14 feet 1 & 1/4 inches Side (facing adjacent multi-family residences): 8 feet

ENVIRONMENTAL FACTORS AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Potentially Significant" or "Less Than Significant With Mitigation Incorporated" as indicated by the checklist on the following pages.

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

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Laurie Yelton
Printed Name

A Notice of Preparation (NOP) of an environmental impact report, along with this Initial Study, was distributed for a 30-day agency and public review period on April 12, 2013. The applicant revised the project and a Draft EIR and revised Initial Study was circulated for a 45-day public review period that began on June 29, 2017 and concluded on August 21, 2017. Since then, the applicant has again revised the project to add an additional residential lot along West Knoll Drive to the project site and revised the proposed project, also incorporating modifications to address some of the neighborhood issues raised. This Initial Study has been updated to reflect these revisions and will be recirculated with the revised Draft EIR.

ENVIRONMENTAL CHECKLIST

I. AESTHETICS Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
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 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 that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a-d) According to Senate Bill (SB) 743, signed into law on September 27, 2013, and effective January 1, 2014, "aesthetics…impacts of a residential, mixed-use, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." A "transit priority area" is defined as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in Section 21064.3 of the California Public Resources Code as a 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.

The proposed project is a mixed-use project on an infill site in the City of West Hollywood. The project site is located with one-half mile (approximately 700 feet) from the intersection of Santa Monica Boulevard and La Cienega Boulevard. Santa Monica Boulevard is served by Metro Line 4 and Metro Rapid Line 704 and La Cienega Boulevard is served by Metro Lines 105 and Metro Rapid Line 705. These Metro Lines all have a service interval of less than 15 minutes during the morning and afternoon peak commute periods. Therefore, the proposed project is within a transit priority area and meets the criteria of SB 743. **As such, aesthetics impacts shall not be considered significant impacts on the environment and further discussion of these issues in an EIR is not warranted.**

II. AGRICULTURE RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

a-e) The project site is within a highly urbanized area in the City of West Hollywood. The City does not contain any agricultural land, agriculturally zoned land, or land under Williamson Act contract (2035 General Plan; California Department of Conservation, 2010). The project would have no effect on forestland or the conversion of farmland to non-agricultural uses. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. 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?	☐	☐	☒	☐

The project site is in the South Coast Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD, the local air quality management agency, is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether or not the standards are met, the air basin is classified as being in "attainment" or "nonattainment." The South Coast Air Basin is in nonattainment for both the federal and state standards for ozone, nitrogen dioxide, and PM_{10}. Thus, the basin currently exceeds several state and federal ambient air quality standards and is required to implement strategies that would reduce the pollutant levels to acceptable standards. This non-attainment status is a result of several factors, the primary ones being the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants, the limited capacity of the local air shed to eliminate pollutants from the air, and the number, type, and density of emission sources within the South Coast Air Basin.

The SCAQMD has adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of state and federal air quality standards. The South Coast Air Basin is classified as being in "attainment" for federal and state carbon monoxide standards (SCAQMD 2016). (Greenhouse gas emissions are addressed below in Section VII, *Greenhouse Gas Emissions*.)

a) A project may be inconsistent with the AQMP if it would generate population, housing or employment growth exceeding the forecasts used in the development of the AQMP because vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. In addition, a project may be inconsistent with the AQMP if it would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

As described in Section XIII, *Population and Housing*, the proposed project is consistent with regional and local population and housing projections. The AQMP for the SCAQMD relies on population data from the Southern California Association of Governments (SCAG). According to SCAG's latest growth forecast (2020-2045 RTP/SCS Final Growth Forecast), the City of West Hollywood is projected to have a population of 42,600 in 2045. According to the City's General Plan EIR (October 2010), the population in General Plan buildout year 2035 is estimated at 44,182.

Development of 119 new units on the project site (111 new apartment units plus 12 live/work units minus the four units that would be demolished as part of the project) could cause a direct increase in the City's population. Using the California State Department of Finance average household size for West Hollywood of 1.52 persons, the 119 units would generate an average resident population of 181 persons (119 units x 1.52 persons/unit) (California Department of Finance 2021). The current City population is approximately 36,125, according to the most recent (May 2021) California Department of Finance estimate. Therefore, the proposed project would result in a total population of approximately 36,306 persons (36,125 + 181). This increase in population would not exceed SCAG's or the City's growth forecast for 2045.

However, as discussed below under checklist items (b) and (c), project construction and operation would generate temporary and long-term emissions, respectively, that could exceed SCAQMD significance thresholds and therefore could result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. As a result, impacts would be potentially significant and will be analyzed further in an EIR.

b, c) Emissions generated by the proposed project would include temporary construction emissions and long-term operational emissions.

Construction activities such as the operation of construction vehicles and equipment over unpaved areas, grading, trenching, and disturbance of stockpiled soils have the potential to generate fugitive dust (PM_{10}) through the exposure of soil to wind erosion and dust entrainment. In addition, exhaust emissions associated with heavy construction equipment would potentially degrade air quality. Emissions could exceed SCAQMD significance thresholds.

Long-term emissions associated with operational impacts would include emissions from vehicle trips, natural gas and electricity use, landscape maintenance equipment, and consumer products and architectural coating associated with onsite development. Emissions could exceed SCAQMD significance thresholds. Long-term vehicular emissions could also result in elevated concentrations of carbon monoxide (CO) at congested intersections in the project site vicinity. **Impacts related to both temporary construction-related air pollutant emissions and long-term emissions would be potentially significant and will be analyzed further in an EIR.**

d) The proposed mixed-use project includes retail, restaurant, and residential uses. Restaurant uses have the potential to generate odors in the form of smells associated with cooking and preparing food. Residential uses have the potential to generate odors associated with cooking, barbequing, or smoking. However, residential, retail, and restaurant uses are not listed on Figure 4-3 of the 1993 SCAQMD CEQA Air Quality Handbook as uses that require analysis of odor impacts. Further, residential, restaurant, and retail uses are not identified on Figure 5-5,

Land Uses Associated with Odor Complaints, of the Handbook. Substantial objectionable odors are normally associated with agriculture, wastewater treatment, industrial uses, or landfills. The proposed project would not generate objectionable odors affecting a substantial number of people. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

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 U.S. 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?	☐	☐	☐	☒

a) The project site is located in a highly urbanized area of West Hollywood and lacks native biological habitats. Therefore, site development would not adversely affect sensitive plant or animal species. The proposed project may involve removal of two trees along West Knoll Drive and would involve removal of trees that are part of the landscaping for the single-family residences along West Knoll. These trees could contain bird nests and birds that are protected under the Migratory Bird Treaty Act (MBTA). Birds protected include all common songbirds, waterfowl, shorebirds, hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts,

martins, swallows and others, including their body parts (feathers, plumes etc.), nests, and eggs. Therefore, the project has the potential to affect nesting birds if construction occurs during the nesting season. Implementation of Mitigation Measure BIO-1 would reduce impacts to nesting birds to a less than significant level by insuring nesting birds are protected should they be present. **With mitigation, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.** This mitigation measure has been carried forward into the Executive Summary of the EIR.

BIO- 1 Nesting/Breeding Native Bird Protection. To avoid impacts to nesting birds, including birds protected under the Migratory Bird Treaty Act, all initial ground disturbing activities shall be limited to the time period between August 31 and January 31 (i.e., outside the nesting season) if feasible. If initial site disturbance, grading, and vegetation removal cannot be conducted during this time period, a pre-construction survey for active nests within the project site shall be conducted by a qualified biologist at the site no more than two weeks prior to any construction activities. If active nests are identified, species specific exclusion buffers shall be determined by the biologist, and construction timing and location adjusted accordingly. The buffer shall be adhered to until the adults and young are no longer reliant on the nest site, as determined by the biologist. Limits of construction to avoid a nest shall be established in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area.

b-f) The project site is located in a highly urbanized area of West Hollywood. The project site lacks native biological habitats, including wetlands. The project would not interfere with the movement of wildlife, nor would it conflict with a local ordinance to protect biological resources or interfere with the provisions of any adopted habitat conservation plan. The project site does not contain any heritage trees defined by the City's Heritage Tree protection program (City of West Hollywood 2019). **No impact would occur and further analysis of this issue in an EIR is not warranted.**

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 §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

a) The project site currently consists of commercial buildings built between 1925 and 1940 and four single-family residences built in the early 1920's that would be demolished to develop the proposed mixed-use building. The residences at 8532, 8538, 8552, and 8546 West Knoll Drive were evaluated for eligibility under the criteria for the National Register of Historic Places, California Register of Historical Resources, and West Hollywood Register of Designated Cultural Resources in 2019 and again in 2020 and were found not to rise to the level of significance to merit listing in any of these registers (Sapphos Environmental, Inc. 2019, 2020). These residences originated during the demand for single-family housing that took place in the City and the greater Los Angeles area in the 1920s and were constructed during the period when the town of Sherman became known as West Hollywood. They are substantially altered vernacular buildings. Therefore, they are not considered historical resources for the purposes of CEQA (Sapphos Environmental, Inc. 2019, 2020).

The existing commercial buildings located at 8531 and 8543 Santa Monica Boulevard were evaluated by GPA Consulting in 2016, and were also found ineligible for listing on the national, state, or local registers through survey evaluation. Therefore, the project would not result in a substantial adverse change in the significance of a historic resources. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

b) Archival research indicates that they are no archaeological resources (prehistoric or historic) resources located within the project site. Additionally, the project site is located in a dense urbanized area that has been highly disturbed by modern human development. The potential for uncovering significant resources on the project site during earthmoving construction activities is unknown. Nevertheless, ground-disturbing activities associated with the proposed project site, where excavation depths could exceed those previously attained, have the potential to encounter prehistoric or historic archaeological resources that may be present below the ground surface. Consequently, damage to newly discovered sub-surface cultural resources, could result in potential significant impacts. The following mitigation measure is required to reduce impacts from development on potential subsurface archaeological and/or Native American cultural resources to less than a significant level.

With mitigation, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

CR-1 **Unanticipated Discovery of Cultural Resources.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find, the archaeologist may simply record the find and allow work to continue. If the qualified archaeologist determines that the discovery is significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, and/or data recovery may be warranted at the discretion of the qualified archaeologist.

c) The project site is in a highly urbanized area. In addition, it has been disturbed to accommodate past and present onsite development and is currently covered with structures and surface parking lots. In the unlikely event that human remains are unearthed during excavation and grading, applicable regulatory requirements pertaining to the handling and treatment of such resources would be followed. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. No impact would occur and further analysis of this issue in an EIR is not warranted.

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?	☐	☐	☒	☐

a) The proposed project would involve the use of energy during the construction and operational phases of the project. Energy use during the construction phase would be in the form of fuel consumption (e.g.: gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to any temporary construction trailers or electric construction equipment. Long-term operation of the proposed project would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. In addition, the increase in vehicle trips associated with the project would increase fuel consumption in the City.

The proposed project would utilize an estimated 1,611 megawatt-hours (MWh) of electricity per year and 2,250 million British thermal units (MMBtu) of natural gas per year (see Tables 5.2 and 5.3 of CalEEMod modeling results in Appendix C to the EIR). The proposed project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11) as well as the City's green building ordinance (WHMC Section 19.20.060). The proposed project is estimated to achieve 90 points on the City's Green Building Point System. In order to reduce energy use, the proposed project would exceed Title 24 energy efficiency standards by 15% and would include Energy Star appliances, lighting and signage. In addition, the project includes a rooftop photovoltaic solar power system to offset a portion of the building's energy use with renewable energy. The solar panels are estimated to generate 87 MWh of electricity per year. The proposed project would also include programmable thermostats and ceiling fans in residential units. These features along with adherence to the City's Energy Efficiency Standards and other energy conservation requirements would ensure

that energy is not used in an inefficient or wasteful manner. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

b) Table 1 provides a project consistency analysis with the City of West Hollywood Climate Action Plan, which includes measures that would reduce energy consumption of the proposed project. As shown therein, the project would be consistent with each applicable policy. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

Table 1
Project Consistency with Applicable West Hollywood Climate Action Plan Reduction Measures

Measure	Project Consistency
Land Use and Community Design	
LU-1.1: Facilitate the establishment of mixed-use, pedestrian- and transit-oriented development along the commercial corridors and in Transit Overlay Zones.	**Consistent** The proposed project is a mixed-use, pedestrian-friendly development located along a commercial corridor and within the General Plan's Transit Overlay Zone.
Transportation and Mobility	
T-1.1: Increase the pedestrian mode share in West Hollywood with convenient and attractive pedestrian infrastructure and facilities.	**Consistent** The proposed project is located within walking distance of retail facilities, restaurants, and public transportation.
T-2.1: Increase the bicycle mode share by providing accessible, convenient, and attractive bicycle infrastructure.	**Consistent** The proposed project is located adjacent to a bike lane along Santa Monica Boulevard and includes 133 bicycle parking spaces for residents, employees, and customers visiting restaurants and retail.
T-2.2: Install bike racks and bike parking in the City where bike parking infrastructure currently does not exist.	**Consistent** The proposed project includes bicycle parking for residents, employees and customers.
Energy Use and Efficiency	
E-2.2: Require all new construction to achieve California Building Code Tier II Energy Efficiency Standards (Section 503.1.2).	**Consistent** The proposed project would exceed California Building Code Energy Efficiency Standards by 15%. This would be achieved through energy efficiency features and installation of solar panels.
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** Residential and commercial units would be sub-metered.
E-3.2: Require the use of recycled materials for 20% of construction materials in all new construction.	**Consistent** As described in the green building checklist for the proposed project, the proposed project would include recycled-content materials in the foundation, insulation, and landscaping. The interior spaces would use materials composed of recycled content or rapidly renewable and sustainably harvested resources. The exact percentage of building materials that would use recycled content is unknown; however, the project is consistent with the intent of this policy.
Water Use and Efficiency	
W-1.1: Reduce per capita water consumption by 30% by 2035.	**Consistent** In order to reduce water use, the proposed project would, install low-flow showerheads, tankless water heaters and water-efficient toilets and faucets. In addition, the proposed project would use drought-tolerant landscaping.

Table 1
Project Consistency with Applicable West Hollywood Climate Action Plan Reduction Measures

Measure	Project Consistency
W-1.2: Encourage all automated irrigation systems installed in the City to include a weather-based control system.	**Consistent** The proposed project would include drought-tolerant, climate appropriate landscaping to reduce the amount of irrigation needed.
Waste Reduction and Recycling	
SW-1.1: Establish a waste reduction target not to exceed 4.0 pounds per person per day (by 2035).	**Consistent** The City of West Hollywood's Public Works Department is responsible for complying with AB 939. The City has enacted numerous programs to achieve the mandated diversion rates and continues to implement projects to reduce per capita waste generation in order to achieve a 4.0 pounds per person per day target (City of West Hollywood, April 2014). In 2007 and 2008, the per capita disposal rate per day in West Hollywood was 5.6 pounds per resident which is below CalRecycle's target of 5.8 pounds per capita per day, meaning that the City is exceeding CalRecycle's target (City of West Hollywood General Plan Final EIR, October 2010). The proposed project would provide space for the collection and storage of recyclables in each unit. In addition, the proposed project would divert at least 80% of construction and demolition waste in accordance with WHMC Section 19.20.060. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future. Therefore, the project would be consistent with City requirements which are designed to help the City achieve the target of 4.0 pounds per person per day.
Urban Forest	
G-1.1: Increase and enhance the City's urban forest to capture and store carbon and reduce building energy consumption.	**Consistent** The proposed project includes landscaping on the sidewalks surrounding the project site, throughout the project site in the pool/spa area in other seating areas, on the roof, using concrete planters where appropriate, in order to increase the amount of landscaping onsite as compared to existing conditions.
G-1.2 Establish a green roof and roof garden program to standardize, promote, and incentivize green roofs and roof gardens throughout the City.	**Consistent** To date, the City has not established a green roof and roof garden program. The City's Green Building Program allows projects to earn up to 6 points on the West Hollywood Green Building Point System Table for projects that install extensive vegetated green roof. Most of the proposed project's rooftop space would be occupied by solar panels in order to achieve the energy reductions in accordance with policy E-2.2. However, the portion of the roof not occupied by solar panels or mechanical equipment would include landscaping. Therefore, some portions of the rooftop would include roof gardens and the project is consistent with this goal to the extent feasible.

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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv) Landslides?	☒	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐	☐
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?	☐	☐	☒	☐
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 or unique geologic feature?	☐	☒	☐	☐

a.i) The project site is not located in an Alquist-Priolo earthquake fault zone as defined by the State Geologist (Beverly Hills Quadrangle, California Department of Conservation, 1986) nor is it located within a known fault. According to the geotechnical study completed by GeoDesign, Inc. in 2011, the closest active fault to the site capable of surface rupture is the Hollywood fault, approximately 700 feet north of the site. A state-designated Alquist-Priolo Earthquake Zone is not established for the active Hollywood Fault. For planning purposes, the City of West Hollywood has established a Fault Precaution (FP) zone along the Hollywood Fault zone. FP Zone 1 requires a site-specific surface fault rupture evaluation and FP Zone 2 requires either a

site-specific surface fault rupture evaluation or foundation strengthening to mitigate up to 2 inches of ground displacement. The project site is not located in FP zone 1 or FP zone 2 (GeoDesign 2011). Therefore, the project would not be exposed to hazards associated with surface fault rupture. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

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

Onsite structures would be required to be constructed to comply with the California Building Code (CBC). With adherence to the CBC, design and construction of the proposed mixed-use 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 would take into consideration the soil type, potential for liquefaction, and the most current and applicable seismic attenuation methods that are available. In addition, project construction would be subject to review and approval by City building and safety officials. Seismic hazard impacts would be **less than significant and further analysis of this issue in an EIR is not warranted**.

a.iii) The project site is in a potential liquefaction zone as identified on the State Hazards map (California Department of Conservation 1999). According to the geotechnical report conducted by GeoDesign Inc. in 2011, the potential for liquefaction exists on-site. **Liquefaction impacts are potentially significant and will be analyzed further in an EIR.**

a.iv) The project is located in a highly urbanized area. The site is not listed or shown as an area prone to slope instability or landslides in the City of West Hollywood 2035 General Plan Safety and Noise Element or the California Department of Conservation Seismic Hazards map (1999). However, an existing approximately 1.5:1 (H:V) gradient (approximately 66.7% slope) , 10- to 15-foot high ascending slope is present at the northwest site boundary between the existing uses and the residential uses to the north. **Impacts related to landslide hazards are potentially significant and will be analyzed further in an EIR.**

b) Temporary erosion could occur during project construction. However, construction activity would be required to comply with West Hollywood Municipal Code Section 15.56.090. The following requirements would apply to the site:

- *Sediment, construction wastes, trash and other pollutants from construction activities shall be reduced to the maximum extent practicable.*
- *Structural controls such as sediment barriers, plastic sheeting, detention ponds, filters, berms, and similar controls shall be utilized to the maximum extent practicable in order to minimize the escape of sediment and other pollutants from the site.*
- *Between October 1 and April 15, all excavated soil shall be located on the site in a manner that minimizes the amount of sediment running onto the street, drainage facilities or adjacent properties. Soil piles shall be bermed or covered with plastic or similar materials until the soil is either used or removed from the site.*

- *No washing of construction or other vehicles is permitted adjacent to a construction site. No water from the washing of construction vehicle of equipment on the construction site is permitted to run off the construction site and enter the municipal storm water system.*
- *Trash receptacles must be situated at convenient locations on construction sites and must be maintained in such a manner that trash and litter does not accumulate on the site nor migrate off site.*
- *Erosion from slopes and channels must be controlled through the effective combination of best management practices.*

This WHMC provision requires storm water runoff containing sediment, construction materials or other pollutants from a construction site to be reduced to the maximum extent practicable and requires that erosion from slopes and channels be controlled. All projects in West Hollywood are subject to these requirements and they have been shown to be successful in reducing substantial soil erosion in the City. Therefore, adherence to these requirements would prevent substantial soil erosion or the loss of topsoil. **This impact would be less than significant and further analysis of this issue in an EIR is not warranted.**

c) 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 hydrocompaction. 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.

The project site is located in an area with a high water table potential liquefaction area and therefore may be located on a geologic unit or soil that is unstable. **Impacts are potentially significant and will be analyzed further in an EIR.**

d) Expansive soils are generally clays that increase in volume when saturated and shrink when dried. According to the City's General Plan FEIR, expansive soils exist in the City but are more prevalent in the southern part of the City, south of Santa Monica Boulevard. According to the geotechnical analysis conducted by GeoDesign Inc. (2011), medium stiff clay and sandy clay soils with trace gravel were encountered at the project site at depths of 4 to 15.5 feet below ground surface (BGS). The clayey soils were underlain by fine to coarse sand with varying amounts of silt and fine travel to the maximum depth explored (120 feet BGS). Clays have the potential to be expansive. However, the California Building Code (CBC) Section 1808.6 requires special foundation design for buildings constructed on expansive soils. If the soil is not removed or stabilized, then foundations must be designed to prevent uplift of the supported structure or to resist forces exerted on the foundation due to soil volume changes or shall be isolated from the expansive soil. Current provisions in building codes are considered suitable for design at sites with expansive soils (West Hollywood General Plan EIR, 2010). Compliance with the CBC requirements would ensure protection of structures and occupants from expansive soils. **Therefore, expansive soil impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

e) The proposed project would be connected to the local wastewater treatment system. Septic systems would not be used. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

f) The paleontological sensitivity of the geologic units that underlie the project site was evaluated using the results of the paleontological locality search and review of existing information in the scientific literature concerning known fossils within those geologic units. Fossil collections records from the University of California Museum of Paleontology (UCMP) online database were reviewed, which contain known fossil localities in Los Angeles County (2019). In addition, a request for a list of known fossil localities from the project site and immediate vicinity (i.e., localities recorded on the United States Geological Survey Beverly Hills, 7.5-minute topographic quadrangle) was submitted to the Natural History Museum of Los Angeles County (NHMLAC).

Following the literature review and museum record search a paleontological sensitivity classification was assigned to the geologic units within the project site. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. The Society of Vertebrate Paleontology (SVP) has developed a system for assessing paleontological sensitivity and describes sedimentary rock units as having high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources (SVP 2010). This system is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present.

The project site is located in the Los Angeles Basin, a northwest-trending lowland plain at the northern end of the Peninsular Ranges Province, which is one of eleven major geomorphic provinces in California (California Geological Survey 2002). The project site is mapped at a scale of 1:100,000 by Yerkes and Campbell (2005) and 1:24,000 by Dibblee and Ehrenspeck (1991). According to the published geologic mapping, the project site is immediately underlain by younger Quaternary alluvium (Qa) and older Quaternary alluvial fan deposits (Qae). The younger Quaternary alluvium consists of Holocene deposits derived from the nearby Santa Monica Mountains and are composed of slightly to poorly-consolidated and poorly-sorted floodplain deposits comprised of clay, silt, and sand. The older Quaternary alluvial fan deposits are middle to late Pleistocene in age and are composed of unconsolidated to moderately consolidated, poorly-sorted, gravel to coarse-grained granitic sand, with slightly to moderately dissected surfaces (Dibblee and Ehrenspeck 1991; Yerkes and Campbell 2005).

A search of the paleontological locality records at the NHMLAC resulted in no previously recorded fossil localities on the project site; however, several vertebrate localities have been recorded south and southeast of the project site within older Quaternary (Pleistocene) alluvium. The closest vertebrate fossil locality, LACM 7673, produced a specimen of fossil horse (*Equus*) near the intersection of Rosewood Avenue and Westbourne Drive. Farther southeast, near the intersection of La Cienega Boulevard and Oakwood Avenue, LACM 7966 yielded fossil specimens of plants, invertebrates, and vertebrates including; bird (Aves), ground sloth (*Paramylodon harlani*), mastodon (*Mammut americanum*), rabbits (*Sylvilagus* and *Lepus californicus*), meadow mouse (*Microtus californicus*), pocket gopher (*Thomomys bottae*), squirrel (Sciuridae), horse (*Equus occidentalis*), and camel (*Camelops hesternus*) at approximately 30 feet below ground surface (bgs). Near the intersection of Colgate Avenue and Drexel Avenue,

LACM 7671 produced fossil specimens of mastodon. Between 3rd Street and San Vicente Boulevard, LACM 7672 produced fossil specimens of deer (Cervidae) and elephantoid (Proboscidea). Near the intersections with Wilshire Boulevard and Orange Street, localities LACM 7669 and LACM 7770, yielded fossil specimens of ground sloth (Xenarthra), elephantoid (Proboscidea), and bison (*Bison*). Just to the west of these latter localities, at the intersection of La Cienega Boulevard and Wilshire Boulevard, LACM 3176, produced fossil specimens of bison (*Bison*) at a depth of 30 feet bgs (McLeod 2019).

Intact Holocene alluvial deposits underlying portions of the project site are too young to preserve paleontological resources (SVP 2010). However, older Quaternary (Pleistocene) alluvial fan deposits underlying the northern portion of the project site have a high paleontological sensitivity and a high potential to contain buried intact paleontological resources because they have proven to yield significant Pleistocene vertebrate fossils near the project site and elsewhere in the Los Angeles Basin. Additionally, the younger Quaternary sediments may grade into older deposits of late Pleistocene age that could preserve fossil remains as shallow as 10 feet bgs (City of West Hollywood 2010). As currently proposed, project ground disturbance would exceed 10 feet bgs during excavation for the subterranean parking structure. Because the project site is underlain by geologic units with a high paleontological sensitivity, paleontological resources may be encountered during ground-disturbing activities associated with project construction (e.g., grading, excavation, or any other activity that disturbs the surface of the site). Construction activities may result in the destruction, damage, or loss of undiscovered scientifically-important paleontological resources. Therefore, impacts to paleontological resources would be potentially significant. Implementation of Mitigation Measure GS-1 during project construction would reduce potential impacts related to paleontological resources to a less than significant level by providing for the recovery, identification, and curation of previously unrecovered fossils. **With implementation of Mitigation Measure GS-1, impacts would be less than significant and further analysis in an EIR is not warranted.**

GS-1 **Paleontological Resources Monitoring.** Prior to the commencement of project construction, a Qualified Paleontologist shall be retained to conduct paleontological monitoring during ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) of previously undisturbed geologic units determined to have a high paleontological sensitivity. A qualified professional paleontologist is defined by the Society of Vertebrate Paleontology (SVP) standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years.

Ground-disturbing activities of previously undisturbed areas within the project site shall be monitored on a full-time basis (i.e., all excavations in undisturbed areas underlain by Qae and excavations exceeding 10 feet bgs within undisturbed areas underlain by Qa). Monitoring shall be supervised by the Qualified Paleontologist and shall be conducted by a qualified paleontological monitor.

The duration and timing of the monitoring shall be determined by the Qualified Paleontologist. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or may recommend that monitoring cease entirely. Monitoring shall be reinstated if any new ground disturbances of previously undisturbed areas are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time.

If a paleontological resource is discovered, the monitor shall have the authority to temporarily divert construction equipment around the find until it is assessed for scientific significance and collected. Once salvaged, significant fossils shall be prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the NHMLAC and UCMP). Curation fees are the responsibility of the project owner.

A final report shall be prepared describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

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 any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a-b) Project construction and operation would generate greenhouse gas (GHG) emissions through the burning of fossil fuels or other emissions of GHGs, thus potentially contributing to cumulative impacts related to global climate change. Emissions could potentially exceed locally adopted significance thresholds and the project could potentially conflict with local and regional plans adopted for the purpose of reduce GHG emissions, including the City's Climate Action and the regional Sustainable Communities Strategy (SCS). **Impacts related to greenhouse gas emissions are potentially significant and will be analyzed further in an EIR.**

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 it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a, b) The proposed project would involve replacement of existing commercial and residential uses with a mix of residential and commercial uses. The proposed uses would not involve the routine transport, use or disposal of hazardous substances, other than minor amounts typically used for cleaning and maintenance. However, construction of the project would involve demolition of the existing onsite structures which, due to their 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). In addition, demolition activity associated with the proposed project would be required to comply with California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. The California Code of Regulations Section 1532.1, requires testing, monitoring, containment, and

disposal of lead-based materials, such that exposure levels do not exceed CalOSHA standards. **Compliance with applicable standards would reduce impacts related to hazardous materials to a less than significant level. Further analysis of this issue in an EIR is not warranted.**

c) The school closest to the project site is the West Hollywood Elementary, which is approximately 0.5 miles west of the project site. Operation of the proposed project would not involve the use or transport of hazardous materials. However, construction of the project would involve demolition of the existing onsite structures, which as described in subsection (a), due to their age, may contain asbestos and lead-based paints and materials. As stated above, 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 CalOSHA regulations regarding lead-based materials. California Code of Regulations Section 1532.1, requires testing, monitoring, containment, and disposal of lead-based materials, such that exposure levels do not exceed CalOSHA standards. **Therefore, impacts related to hazardous emissions or materials affecting school sites would be less than significant and further analysis of this issue in an EIR is not warranted.**

d) The project site does not appear on any hazardous material site list compiled October 1, 2021 for known hazardous materials contamination at the project site:

- *GeoTracker (California State Water Resources Control Board): list of leaking underground storage tank sites*
- *EnviroStor (California Department of Toxic Substances Control): list of hazardous waste and substances sites*
- *Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database*
- *Cortese list of Hazardous Waste and Substances Sites*
- *EnviroMapper (U.S. Environmental Protection Agency)*

The project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The closest listings were two leaking underground storage tank (LUST) cleanup sites located at 1107 La Cienega Boulevard and 958 Hancock Avenue. These properties are approximately 700 and 800 feet from the project site, respectively. However, the status for both listings is "completed-case closed," indicating that no hazards remain. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

e) The project site is not located in the vicinity of a public or private airstrips. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

f) The proposed project involves infill development in a highly urbanized area of West Hollywood. The project would not involve alteration or blocking of emergency response or evacuation routes; therefore, project implementation would not interfere with emergency response or evacuation. No street closures or lane closures are anticipated to occur during construction of the project. Construction of the project may temporarily displace on-street parking located along Santa Monica Boulevard and West Knoll Drive near the project site. Any lane closure requests or requests to displace on-street parking would be submitted to the City for prior approval in accordance with City policies and procedures. The applicant would be responsible for all costs associated with signage and lane closure equipment and for providing flagging as necessary or requested by the City, to ensure the safe operation and movement of

traffic during periods of lane closures or on-street parking displacement. The applicant would be required to provide temporary sidewalks or alternative pedestrian passage for pedestrians should existing sidewalks be closed during construction. Therefore, the project would not interfere with emergency response or evacuation. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

g) The project site is in an urbanized area and is not in a wildland fire hazard area as defined by the City of West Hollywood 2035 General Plan Safety and Noise Element. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

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 groundwater quality?	☐	☐	☒	☐
b) Substantially deplete 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

a, c.i, c.ii, c.iii) The proposed project would not involve alteration of a stream or river and would not substantially alter drainage patterns in the area. During construction of the project, the

drainage pattern could be temporarily altered and erosion could occur. However, as discussed under Section VI, *Geology and Soils*, Item b, construction activity would be required to comply with West Hollywood Municipal Code Section 15.56.090. This section requires storm water runoff containing sediment, construction materials or other pollutants from a construction site to be reduced to the maximum extent practicable. This requirement would reduce temporary erosion-related effects.

The project site is highly urbanized and almost entirely covered with impervious surfaces, and would remain so under the proposed project. Therefore, the project would not substantially increase surface runoff from the site. In addition, the project would be required to comply with Chapter 15.56.096 of the WHMC which requires a Low Impact Development (LID) plan for the proposed project. A 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 (West Hollywood LID Plan Development Guide, no date). The proposed project is required to implement Best Management Practices (BMPs), such as use of flow-through planter boxes, vegetative swales, semi-pervious surfaces, or infiltration trenches, to meet retain runoff from the 85th percentile 24-hour rain event. The proposed project involves a "green" roof that would capture and filter a portion of runoff from the project site. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

b, e) The proposed project involves the construction of a mixed-use development on a site currently occupied for commercial and residential uses and would incrementally increase water consumption. Water would be provided by the Los Angeles Department of Water and Power, which receives approximately 15% of its water from groundwater sources. However, the water demand associated with the proposed project would not be enough to substantially deplete groundwater supply. (Refer to Section XVI, *Utilities and Service Systems*, for further discussion of this impact.) The project site is underlain by the Coastal Plain of Los Angeles - Hollywood Groundwater Basin, for which no groundwater management plan currently exists. **Impacts related to the depletion of groundwater supply would be less than significant and further analysis of this issue in an EIR is not warranted.**

The project site is located in an area where groundwater has been found at depths of 30-49 feet below ground surface (GeoDesign, 2011). The proposed project involves a subterranean parking garage. Excavation and use of the subterranean parking garage may impact groundwater resources. **Impacts related to intrusion of site structures into the groundwater table would be potentially significant and this will be further analyzed in an EIR.**

c.iv, d) Part of the project site is in Flood Zone X, which is an area outside of the 100-year flood zone, and part of the project site is in Flood Zone X shaded, meaning it is either outside the 100-year flood hazard area or protected by levees from 100-year floods (FEMA FIRM Map No. 06037C1585F, 2008). The project would not involve construction of a structure that would impede flood flows. The site is not located within a potential inundation area (City of West Hollywood, 2035 General Plan Safety and Noise Element). The project site is approximately nine miles from the Pacific Ocean and is not located within a seiche or landslide/mudslide hazard zone (California Department of Conservation, 1999). **No impact would occur and further analysis of this issue in an EIR is not warranted.**

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 a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

a) The proposed project involves intensification of the existing land use on the site (commercial and residential), and would not divide an established community. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

b) The project site contains six parcels. Two parcels are zoned and have a General Plan land use designation of Commercial, Community 1 (CC1) and are within General Plan's Commercial Subarea 2 (Santa Monica Boulevard West), Mixed-Use Incentive Overlay Zone and in a Transit Overlay District. Four smaller parcels (the four residences on the northern portion of the project site) are zoned and have a General Plan land use designation of Residential, Multi-Family High Density (R4B). The CC1 designation identifies areas for mixed-use development. R4B designates high-density, multi-family housing types. The proposed project involves a five-story mixed-use building with a FAR of 2.8 (CC1 portion only). The proposed project may be inconsistent with the City's General Plan goals and policies and/or the City's Zoning Ordinance. **Impacts related to conflicts with land use plans are potentially significant and will be discussed further in an EIR.**

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?	☐	☐	☐	☒

a, b) The project site is in a highly urbanized area of West Hollywood that is not used for mineral resource extraction. No state-designated or locally designated mineral resource zones exist in the City (City of West Hollywood General Plan Final EIR, October 2010). The proposed project would not affect mineral resources. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

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

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Because of the logarithmic scale of the decibel unit, sound levels cannot be added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dBA, regardless of the initial sound level. For example, 60 dBA plus 60 dBA equals 63 dBA, and 80 dBA plus 80 dBA equals 83 dBA. However, where ambient noise levels are high in comparison to a new noise source, there will be a small change in noise levels. For example, 70 dBA ambient noise levels are combined with a 60 dBA noise source the resulting noise level equals about 70.4 dBA.

Noise that is experienced at any receptor can be attenuated by distance or the presence of noise barriers or intervening terrain. Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. For acoustically absorptive, or soft sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receiver, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dBA of noise reduction.

The City of West Hollywood adopted the 2035 General Plan Safety and Noise Element in September 2011. The Noise Element provides a description of existing noise levels and sources and incorporates comprehensive goals, policies, and implementing actions. The Noise Element includes several policies on noise and acceptable noise levels. These policies address unnecessary, excessive, and annoying noise levels and sources such as vehicles, construction, special sources (e.g., radios, musical instrument, animals, etc.), and stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.). The Noise Element also establishes land use compatibility categories for community noise exposure. The maximum "normally acceptable" noise level for the exterior of residential areas is 60 dBA CNEL or Ldn. The maximum "normally acceptable" noise level for commercial and professional uses is 65 dBA CNEL or Ldn.

To implement the City's noise policies, the City adopted a Noise Ordinance. The Noise Ordinance is part of the West Hollywood Municipal Code (WHMC). The City of West Hollywood Noise Ordinance has no numerical standards, but restricts unnecessary or excessive noise within the City limits. The operation of any motor may not be audible at more than 50 feet from the source (Section 9.08.050[c]); loading and unloading activities are generally prohibited from 10:00 pm to 8:00 am (Section 9.08.050[e]); and commercial activities may not be plainly audible at any residence between 10:00 pm to 8:00 am (Section 9.08.050[k]).

a) The most common sources of noise in the project vicinity are transportation-related, such as automobiles, trucks, and motorcycles. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to areas sensitive to noise exposure. The primary sources of roadway noise near the project site are automobiles traveling on Santa Monica Boulevard immediately south of the Project site as well as automobile traffic on West Knoll Drive, which borders the project site on its eastern and northern sites. According to the City of West Hollywood General Plan, new construction in the "normally unacceptable" range must include noise insulation features. Due to existing traffic noise levels, project residents may be exposed to unacceptable noise levels.

The project could generate temporary noise increases during construction and long-term increases associated with operation of the proposed uses.

Construction Noise

Noise levels from construction of the project would result from demolition and removal of the existing commercial buildings, residences and surface parking lots currently located on the site, grading and trenching for the proposed structure, construction of the structure, and traffic noise from construction vehicles. As shown in Table 2, noise levels on the project site could reach 89 dBA at 50 feet from the source during construction (Harris, Miller, Miller, and Hanson Inc., May 2006).

Table 2
Typical Noise Levels at Construction Sites

Equipment Onsite	Average Noise Level at 50 Feet
Air Compressor	81 dBA
Concrete Mixer	85 dBA
Saw	76 dBA
Scraper Laying	89 dBA

Source: Transit Noise and Vibration Impact Assessment, Harris Miller, Miller & Hanson Inc., May 2006.

Temporary noise levels shown in Table 2 could affect sensitive receptors near the project site, particularly the multi-family residential uses located immediately to the north of the project site. **Construction noise impacts would be potentially significant and will be analyzed further in an EIR.**

Operational Noise

Noise associated with operation of the proposed project may be periodically audible at adjacent uses. Noise events that are typical of residential developments include music, conversations, and children playing. Commercial, restaurant, and market noise levels would vary depending on how the commercial and retail space is filled. On-site operations are expected to also involve noise associated with rooftop ventilation, heating systems, and trash hauling.

General noise that would be associated with the proposed parking garage includes the movement of vehicles through the garage, the slamming of doors, conversations, and similar activities. It is anticipated that these noises would be reduced due to the placement of most of these activities within the parking garage. Nevertheless, noise associated with the parking garage could potentially be audible at adjacent properties.

Increased traffic on the roadway system would also increase local traffic noise levels. Such increases could be audible at nearby receivers.

Impacts related to operational noise increases would be potentially significant and will be further analyzed in the EIR.

b) The proposed project would involve construction activities such as demolition, asphalt removal, grading, and excavation activities. Each of these is anticipated to result in some vibration that affect nearby residential sensitive receptors. Operation of the proposed project would not perceptibly increase groundborne vibration or groundborne noise on the project site above existing conditions, due to the proposed mixed-use nature of the project.

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

Due to the presence of sensitive noise receptors approximately 25 feet from the project site (the residences northwest of the project site), groundborne vibration could affect these sensitive receptors. **Impacts would be potentially significant and will be further analyzed in an EIR.**

c) The project site is not in the vicinity of any public or private airport. The closest airport is the Santa Monica Airport, located approximately 8 miles southwest of the project site. **Therefore, no impact related to aircraft noise would occur and further analysis of this issue in an EIR is not warranted.**

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 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?	☐	☐	☒	☐

a) Using the California State Department of Finance average household size for West Hollywood of 1.52 persons, the 119 new units (111 new apartment units plus 12 live/work units minus the four units that would be demolished as part of the project) would generate a resident population of 181 persons (119 units x 1.52 persons/unit). The current City population is approximately 36,125, according to the most recent (May 2021) California Department of Finance estimate. Therefore, the proposed project would result in a total population of approximately 36,306 persons (36,125 + 181). The latest SCAG growth forecast (2020-2045 RTP/SCS Final Growth Forecast) projects the population of the City of West Hollywood will be 42,600 in 2045. According to the City's General Plan EIR (October 2010), the population in General Plan buildout year 2035 is estimated at 44,182. The level of population increase associated with the proposed project would be within the SCAG and City of West Hollywood's citywide population forecasts. The proposed project is urban infill so it would not substantially indirectly induce population growth. **Therefore, a less than significant impact would occur and further analysis of this issue in an EIR is not warranted.**

b) The project site is currently occupied by a commercial use, parking areas, and four residences. The proposed project would involve demolition of four existing occupied housing units, but would involve the construction of 111 apartment units and 12 live/work units. The proposed project would not displace housing or people or necessitate the construction of replacement housing, as the project itself involves housing. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

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

a.i) The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services for the City of West Hollywood, which is within LACFD's Battalion 1 service area. The LACFD operates six fire stations within the Battalion 1 area, with 2 fires stations, #7 and #8 located within West Hollywood. The closest fire station to the project site is Fire Station #7, located at 864 N. San Vicente Blvd approximately 0.5 miles west of the project site. The proposed project would involve removal of existing commercial and residential uses and construction of a mixed-use project. The proposed project would increase density on the project site, which would incrementally increase demand for fire protection services.

As identified in Section 14.04.010 of the Municipal Code, the City of West Hollywood 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). The City's Fire code is based on the Los Angeles County Fire Code supplemented by the other fire codes identified. The Fire Code contains regulations related to construction, maintenance and design of buildings and land uses. The project would be required to comply with applicable Fire Codes. With adherence to existing regulations, the proposed project would not result in the need for new or expanded fire facilities (City of West Hollywood General Plan Final EIR, 2010; Capt. Salmo, personal communication, March 6, 2013). **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

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

LACSD has mutual aid agreements with the City of Los Angeles and the City of Beverly Hills police departments.

The proposed project involves removal of existing commercial and residential uses and construction of a mixed-use project. The addition of more residential uses on the project site would incrementally increase demand for police protections services compared to existing uses. According to the City's General Plan FEIR, the City has a ratio of 3.6 sworn officers per 1,000 residents, which far exceeds the average for cities in the Western United States of 1.7 officers per 1,000 residents. The proposed project would add an estimated 181 residents and would not substantially reduce the ratio of officers to residents. Therefore, the proposed project would not affect service ratios such that new or expanded police facilities are needed. In addition, the proposed project would be within the growth projections contained in the City's General Plan and would not place an unanticipated burden on police protection services. The City's General Plan EIR found that impacts related to police protection services would be less than significant with implementation of proposed General Plan policies and required mitigation measures. The mitigation measures require the City to conduct activities to ensure proper police protection levels such as update the City's assessment of impacts of new development on policy services, coordinate with service providers during the Capital Improvement Program process, establish a public safety impact fee, update the West Hollywood Emergency Management Plan, continue public education programs, establish communication protocols, support neighborhood watch programs, and create design recommendations for "eyes on the street." The City is implementing these required mitigation measures. The proposed project and all other projects in the City must comply with the City's requirements and procedures for ensuring proper public services are provided. Therefore, since the project is consistent with the General Plan, the project would not contribute to a cumulative impact. Overall, the proposed project would not affect service ratios such that new or expanded police facilities are needed. At present time, there are no plans for a new police station (City of West Hollywood General Plan Final EIR, October 2010). **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

a.iii) The Los Angeles Unified School District (LAUSD) provides public school services to West Hollywood residents. The proposed project would involve 119 net new units (see Section XIII, *Population and Housing*). Based on LAUSD's student generation rates (see Table 3), the proposed project would generate an estimated 23 elementary school students, 11 middle school students, and 13 high school students.

Table 3
Student Generation Rates

Type of Use	Quantity	Generation Factor	Students Generated
Multi-Family Residential/Live-Work Units	119 Units	0.1966 Elementary School Students Per Unit	23
		0.0935 Middle School Students Per Unit	11
		0.1106 High School Students Per Unit	13
Total Students			**47**

Source: City of West Hollywood 2035 General Plan FEIR, 2010

The proposed project would be served by West Hollywood Elementary School, Bancroft Middle School, and Fairfax Senior High School (LAUSD 2019). Table 4 compares the capacity of these schools to current enrollment. As shown, the middle school and high school have adequate capacity to serve new students generated by the proposed project. The elementary school may be overcapacity depending on enrollment during the operational year of the proposed project.

However, in accordance with State law the applicant would be required to pay school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Thus, payment of the development fees is considered full mitigation for the proposed project's impacts under CEQA**. Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

Table 4
School Capacity and Enrollment

School	Capacity [a]	2018-2019 Enrollment [b]
West Hollywood Elementary School	398	432
Bancroft Middle School	1,601	742
Fairfax Senior High School	3,600	1,827

[a] *Source: City of West Hollywood 2035 General Plan FEIR, 2010*

[b] *Source: California Department of Education. DataQuest: http://dq.cde.ca.gov/dataquest/dataquest.asp*

a.iv) The proposed project would involve the addition of 181 residents and would incrementally increase the demand for usage of existing parks in the City (see Section XV, *Recreation*). The City assesses Quimby Act and public open space development fees for new residential and non-residential development (West Hollywood Municipal Code Chapter 19.64). These fees are intended to be used for the acquisition, improvement, and expansion of public parks and/or recreational facilities. **With payment of park fees, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

a.v) The proposed project would contribute incrementally toward impacts to City Public Services and facilities such as storm drain usage (discussed in Section IX, *Hydrology and Water Quality*), public parks (discussed above in this section), solid waste disposal (discussed in Section XVII, *Utilities and Service Systems*), water usage and wastewater disposal (discussed in more detail in Section XVII, *Utilities and Service Systems*). The project's contribution would be offset through payment of fees that are used to fund storm drain improvements, school facility expansions, etc., as well as by the project specific features described in the individual resource section analyses described in this Initial Study. **The project's contribution, taking into account existing capacities and assuming compliance with existing ordinances, would be less than significant. Further analysis of this issue in an EIR is not warranted.**

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

a, b) West Hollywood has six parks totaling 15.3 acres of parkland (West Hollywood 2035 General Plan FEIR, 2010). Using the City's current population of 36,125, this amounts to a park ratio of 0.42 acres per 1,000 residents. West Hollywood does not specify a park acreage standard. However, the desired standard stated in the 1975 Quimby Act is 3 acres per 1,000 residents. By this standard, West Hollywood is park deficient.

The proposed project would involve 119 net new units (111 residential units and 12 live work units minus the four single-family residences), increasing the City population by approximately 181 residents (see Section XIII, *Population and Housing*). The proposed project would incrementally increase the use of and demand for parks and recreational facilities. However, the proposed project would provide open space and amenities for use by project residents. The proposed project includes common and private open space per City of West Hollywood Municipal Code requirements and the second floor of the building (the first floor of the residential space) would include a residential lobby and a recreation room and 2,000 square feet of common open space that would consist of courtyards and other useable space. The roof top would include a roof deck, pool, spa, and sundeck. Further, the project applicant would be required to pay Quimby Act and Public Open Space Development fees that would be used by the City to acquire parkland as it becomes available and/or to expand and maintain existing recreational facilities (West Hollywood Municipal Code Section Chapter 19.64). Impacts would be less than significant level and **further analysis of this issue in an EIR is not warranted.**

XVII. TRANSPORTATION / TRAFFIC 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) 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) The proposed project would increase traffic compared to existing conditions. Trips generated as a result of the proposed project have the potential to impact area intersections and roadway segments and contribute to cumulative traffic increases. The proposed project may also conflict with applicable plans and policies including the Los Angeles Congestion Management Plan. **Traffic impacts would be potentially significant and will be analyzed further in an EIR.**

b) Section 15064.3(b) of the CEQA Guidelines requires an analysis of vehicle miles traveled (VMT). The proposed project has the potential to increase VMT from new vehicle trips to and from the project site. **VMT impacts would be potentially significant and will be analyzed further in an EIR.**

c) The project includes changing the site circulation and access for the project site. **Impacts would be potentially significant and will be analyzed further in an EIR.**

d) Emergency vehicle access to the project would be provided from Santa Monica Boulevard and West Knoll Drive. The project does not propose any major modifications to the roadway network, circulation patterns or design features that would hinder emergency vehicle access. The project would be required to conform to traffic and safety regulations that specify adequate emergency access measures including the California Fire Code. The site is located along an existing roadway lacking any identified significant safety hazards. Adherence to existing local, state, and federal regulations would reduce potential impacts. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

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)?	☐	☒	☐	☐
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

a, b) Archival research indicates that they are no Tribal Cultural Resources (TCR's) or/and unique archaeological (prehistoric or historic) resources that are associated with TRC's located within the project site. Additionally, the project site is located within an urbanized area that has been highly disturbed by modern human development in the recent past.

In April 2020, the City transmitted seven AB 52 Consultation Notification Letters to the following tribal governments:

- Fernandeno Tataviam Band of Mission Indians
- San Fernando Band of Mission Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrieliño/Tongva Nation
- Gabrieliño Tongva Indians of California Tribal Council
- Gabrieliño-Tongva Tribe

These tribal governments had submitted a request to be notified and to be consultant on CEQA Projects located within the tribes traditional and/or cultural use area, as specified in Public Resources Sections (PRC) 21080.1, 21080.3.1 and 21080.3.2. One tribe, the Gabrieleno Band of Mission Indians-Kizh Nation, requested government to government consultations. During consultations, the tribe identified the project area as being highly sensitive for Native American resources including TCR's and unique archaeological resources and requested specific

mitigation measures from the City to ensure that impacts to TRC's and/or unique archaeological resources are reduced to a less than significant level (see Appendix 1, Tribal Response Letter with Specified Mitigation Measures).

The potential for uncovering significant TCR's and/or unique archaeological resources during earthmoving construction activities is unknown. Nevertheless, ground-disturbing activities associated with the proposed project site, where excavation depths could exceed those previously attained, have the potential to damage or destroy TRC's and/or unique archaeological (prehistoric or historic) resources that may be present below the ground surface. Consequently, damage to or destruction to newly discovered sub-surface TCR's, could result in potential significant impacts.

In the event that Tribal Cultural Resources and/or unique archaeological resources are unearthed during excavation and grading could result in potential significant impacts. The following mitigation measure is required to reduce impacts from development on potential subsurface Traditional Cultural Resources and/or unique archaeological resources to less than a significant level.

With mitigation, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

TCR-1 **Unanticipated Discovery of Traditional Cultural Resources.** In the event that Traditional Cultural Resources and/or unique archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, and/or data recovery may be warranted. Treatment of any such resources shall be completed in consulting with the consulting tribes for the project.

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 construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably 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?	☐	☐	☒	☐

a, b, c) Wastewater

The sewer collection in West Hollywood contains City-owned local sewers and County-owned trunk sewer links. Within the City, there are 39 miles of gravity piping providing sewer service to every parcel in the City. None of the regional trunk sewers are at or near capacity (2035 General Plan FEIR, 2010). Wastewater from the City is carried to the Hyperion Treatment Plant (HTP) in Playa Del Rey. This wastewater treatment plant provides full secondary treatment (LADWP 2019). The HTP has a dry-weather flow capacity of 450 million gallons per day (MGD) for full secondary treatment and an 800 MGD wet weather capacity. Currently, the average wastewater flow to the plant on an average dry weather day is 275 million gallons per day (LADWP 2019). Therefore, the current available capacity of the HTP is 175 MGD.

The proposed project would increase the number of residential units and commercial space on the project site, which would increase wastewater generation within the City. As shown in Table 5 on the following page, the proposed project would generate a net increase of approximately 18,299 gallons of wastewater per day (25,290 gpd – 6,991 gpd). This increase may exceed the capacity of the City's wastewater conveyance system. **Impacts would be potentially significant and will be analyzed further in an EIR.**

Stormwater Drainage

Storm drain infrastructure in the City is owned and operated by the City of West Hollywood or the County of Los Angeles. Currently, the project site contains three commercial buildings, parking areas, and four residential units. The project site is almost entirely impervious except for the yards associated with the residential units, limited landscaping on the sidewalk along West Knoll Avenue, and a small undeveloped slope on the northwest project boundary line. The proposed project would include impervious surfaces comparable to existing conditions and would include a system to capture rainfall to reduce runoff. Therefore, the amount and rate of runoff from the project site would not increase as a result of the proposed project and existing storm drain facilities would not be adversely affected.

The proposed project would be required to comply with Chapter 15.095 of the WHMC which requires a Low Impact Development (LID) plan for redevelopment projects that replace 5,000 square feet or more of impervious surface area on an already developed site. The proposed project would replace over 5,000 square feet of impervious surfaces and therefore is subject to the LID requirements. The proposed project must be "designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest in accordance with the West Hollywood LID Technical Guidance Manual. The proposed project would be required to implement Best Management Practices to reduce runoff and control pollutant loads. **Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted**.

Water

Water service to the project site would be provided by the Los Angeles Department of Water and Power (LADWP). LADWP provides water service to approximately 4 million people in the City of Los Angeles, portions of West Hollywood, Culver City, and other areas. The primary sources of water supply for LADWP are the Los Angeles Aqueduct (average of 31% of total water supply), local groundwater (average 12%), and purchased imported water from the Metropolitan Water District (MWD, average of 57%) (LADWP 2015). LADWP also delivers recycled water for parkland irrigation.

Assuming an industry standard water use assumption that water use is 120% of wastewater generation, the proposed project would use approximately 21,959 gallons of water per day, which equates to 24.6 acre feet per year.

The LADWP addresses issues of water supply in its 2015 Urban Water Management Plan (UWMP). According to the Plan, LADWP has analyzed three different hydrological conditions to determine the reliability of water supplies for the City: average year (50 year average hydrology from FY 1961/92 to 2010/11), single dry- year, and multiple dry-year period. In each of the three hydrological conditions, the projected water demand was calculated taking into account growth in billing data, water conservation efforts, and demographics. The UWMP states that LADWP can reliably meet the projected water demand in each of the hydrological conditions through 2035 (LADWP, 2011).

Table 5
Estimated Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)	Amount (gpd)
Existing Uses			
Restaurant (Indoor Seating)	32 seats	30 gallons/seat	960
Restaurant (Outdoor Seating	37 seats	18 gallons/seat	666
Office	4,211 sf	150 gallons/1,000 sf	632
Gymnasium (Health/Fitness)	4,058 sf	250 gallons/1,000 sf	1,015
Beauty Parlor (Hair Salon/Facial)	6,218 sf	280 gallons/1,000 sf	1,741
Retail Store	10,426 sf	80 gallons/1,000 sf	834
Auto Parking	21,130 sf	20 gallons/1,000 sf	423
Residence: Single-Family Detached, 2-Bedroom	4 units	180 gallons/unit	720
		Existing Wastewater Generation	**6,991gpd**
		Existing Flow Rate	**0.01081 cfs**
		Existing Peak Flow Rate[1]	**0.02703 cfs**
Proposed Project			
Residential Apt 1 BD	47 units	120 gallons/unit	5,640
Residential Apt 2 BD	64 units	160 gallons/unit	10,240
Residential Live/Work	12 units	120 gallons/unit	1,440
Auto Parking	113,225 sf	20 gallons/1000 sf	2,265
Restaurant (Indoor Seating)	98 seats	30 gallons/seat	2,940
Hair Salon	3,643 sf	100 gallons/1000 sf	364
Office	6,711 sf	150 gallons/1000 sf	1,007
Retail	14,488 sf	80 gallons/1000 sf	1,159
Storage	4,777 sf	20 gallons/1000 sf	96
Residential Lobby	833 sf	80 gallons/1000 sf	67
Residential Recreation Room (Lounge)	892 sf	80 gallons/1000 sf	72
		Proposed Project Wastewater Generation	**25,290 gpd**
		Flow Rate (Proposed Project Only)	**0.03913 cfs**
		Peak Flow Rate (Proposed Project Only)[2]	**0.09783 cfs**

Source: VCA Engineers, Inc. (2019) based on land use table from the LA County Sanitation District No 4.
Notes: sf = square feet, gpd = gallons per day, bd= bedroom, cfs = cubic feet per second
[1] Kitchen area excluded from analysis, only seating area included in analysis
[2] To determine the maximum peak flow rate for sewer diameters less than 15 inches, a peaking factor of 2.5 was used per City of West Hollywood requirements

The UWMP states that if a proposed development is consistent with the City's General Plan, the projected water demand of the development is accounted for in the most recently adopted UWMP. The UWMP incorporates the projected demographic data from SCAG. As stated in Sections IV, *Land Use and Planning,* and XIII, *Population and Housing,* the proposed project would be consistent with the West Hollywood 2035 General Plan and population growth associated with the project would be within the SCAG RTP/SCS growth forecast. Thus, the project would not consume water in excess of the water supplies available to the City.

Further, the LADWP, in coordination with the City, would be required to review the proposed project for consistency with water infrastructure requirements established in development plans and agreements, and to ensure that sufficient water infrastructure capacity is available to serve new development prior to approval of the project (City of West Hollywood 2010). **Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

Electric Power, Natural Gas, and Telecommunications

The project site is currently served by local utilities providers for electricity, natural gas, and telecommunications service. This would continue under the proposed project, and the incremental increase in demand for these services is not anticipated to result in the need for new or expanded facilities to adequately serve the project and existing utility customers. **Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

d, e) The City of West Hollywood contracts with Athens Services, a private company to collect, transport, and dispose of solid waste for all residential and commercial uses (City of West Hollywood 2010). Solid waste from West Hollywood is collected by Athens Services and taken to their recycling facility, the City of Industry Materials Recovery Facility (MRF) (Athens Services 2014). Food waste is processed and delivered to their compost facility, American Organics, in Victorville. Waste that cannot be recycled is disposed at the following facilities on a regular basis: Sunshine Canyon Landfill, Simi Valley Landfill, and City of Commerce's Waste to Energy Incinerator. Table 6 summarizes the permitted daily throughput, estimated average waste quantities disposed, and remaining capacity for these facilities.

Eventually, solid waste may be transferred by rail to the Mesquite Regional Landfill in Imperial County (2035 General Plan FEIR, 2010). The Eagle Mountain Landfill project in Riverside County was abandoned by the Sanitation Districts of Los Angeles County in May of 2013. The Mesquite Regional Landfill is permitted to accept 20,000 tons per day. It is not expected to be operational for another 10 years, but will receive up to 12,000 tons per day (Los Angeles County 2017; Scauzillo 2017).

Senate Bill (SB) 1016 requires that the 50% diversion requirement mandated by Assembly Bill (AB) 939 be measured in terms of pounds per person per day, instead of by volume or as an aggregate measure separate from population. CalRecycle sets a target for resident and employee per capita per day disposal rates. The target for residents is 5.8 and 7.7 for employees. In 2015 the per capita disposal rate per day per resident in West Hollywood was 4.2 and 5.6 per employee. West Hollywood has achieved both the resident and employee targets set by CalRecycle.

Table 6
Solid Waste Disposal Facilities

Facility	Permitted Daily Throughput (tons/day)	Average Daily Waste Quantities Disposed (tons/day)	Estimated Remaining Daily Capacity (tons/day)
City of Industry MRF[a]	5,000	2,203	2,797
Sunshine Canyon City/County Landfill [b]	12,100	6,482	5,618
Simi Valley Landfill and Recycling Center [c]	9,250	Not Available	--
Commerce Refuse-to-Energy Facility [d]	1,000	201	799

Sources:
[a] Los Angeles, County of, Department of Public Works. Solid Waste Information Management System website, Fact Sheet: Grand Central Recycling & Transfer Station, July 2017 Report Period. Available at:https://dpw.lacounty.gov/epd/swims/site/factsheet-esri.aspx?id=187&action=2
[b] *Los Angeles, County of, Department of Public Works. Solid Waste Information Management System website, Fact Sheet: Sunshine Canyon City/County Landfill, March 2019October 2014 Report Period. Available: https://dpw.lacounty.gov/epd/swims/site/factsheet-esri.aspx?id=1524&action=2*
[c] Los Angeles, County of, Department of Public Works. Solid Waste Information Management System website, Fact Sheet: Simi Valley Landfill & Recycling Center. Available: https://dpw.lacounty.gov/epd/swims/site/factsheet-esri.aspx?id=704&action=2
[d] *Los Angeles, County of, Department of Public Works. Solid Waste Information Management System website, Fact Sheet: Commerce Refuse-to-Energy Facility, June 2018October 2014 Report Period. Available: https://dpw.lacounty.gov/epd/swims/site/factsheet-esri.aspx?id=8&action=2*

In accordance with the City's green building ordinance, the proposed project would divert at least 80% of construction and demolition waste from being sent to landfills. Therefore, the proposed project would not generate a substantial amount of waste during construction. During operation, as shown in Table 7, the proposed project would generate an estimated 230 pounds, or 0.1 tons, of solid waste per day. The landfills listed in Table 6 have adequate capacity to dispose of waste generated by the proposed project. **Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

Table 7
Estimated Solid Waste Generation

Land Use	Size	Generation Factor*	Total (lbs/day)	Total (tons/day)
Proposed Project				
Residential- Multifamily	123 units**	4 lbs / unit / day	492.0	0.246
Restaurant	3,938 sf	0.005 lbs / sf / day	19.7	0.009
Retail	14,488 sf	0.006 lbs / sf / day	86.9	0.043
Office	6,711 sf	0.006 lbs / sf / day	40.3	0.020
Hair Salon	3,643 sf	0.006 lbs / sf / day***	21.9	0.010
		Subtotal – Proposed Project	660.8	0.328
Existing Uses				
Retail	20,702 sf	0.006 lbs / sf / day	124.2	0.062
Restaurant	2,475 sf	0.005 lbs / sf / day	12.4	0.006
Office	4,211 sf	0.006 lbs / sf / day	25.3	0.013
Single Family Residence	4 unit	10 lbs / unit / day	40	0.020
		Subtotal – Existing Uses	*201.9*	*0.101*
Total Net Solid Waste Generation			**458.9**	**0.227**
Total Solid Waste Sent to Landfill (assuming 50% diversion rate)			**229.45**	**0.1135**

Notes: sf = square feet, lbs= pounds
** CalRecycle Waste Generation Rates, available at: http://www.calrecycle.ca.gov/wastechar/WasteGenRates/default.htm*
*** For the purposes of this analysis, the 12 live/work units are considered residential-multifamily units.*
**** No generation rate for hair salon available, retail generation rate used.*

XX. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity 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 wildfire risks, and thereby expose project occupants to, pollutant concentrations from 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?	☐	☐	☒	☐

a-d) The project site is not located in a State Responsibility Area or Very High Fire Hazard Severity Zone (VHFHSZ). However, the site is approximately 1,500 feet south of the nearest VHFHSZ (CAL FIRE 2007, 2011). The project would not impair emergency vehicle access to the project site or result in conflicts with adopted emergency response or evacuation plans. Additionally, the project would not require the installation of infrastructure that could exacerbate wildfire risk. **Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

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

a) The project site is located within an urbanized area that lacks native biological habitats, as discussed under item IV, *Biological Resources*. Mitigation Measure BIO-1 would reduce impacts associated with removal of on-site trees that could contain nesting birds. As discussed under item V, *Cultural Resources*, there are no historic resources onsite. With Mitigation Measure BIO-1, the proposed project would not significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. **Impacts are less than significant with mitigation incorporated and further analysis of these issues in an EIR is not warranted.**

b) In combination with other planned and pending development in the area, the proposed project could contribute to significant cumulative impacts. In particular, cumulative impacts could occur with respect such issues as transportation, air quality, greenhouse gases, wastewater generation, and noise. **The cumulative effects of the project, in combination with other planned projects in the vicinity, will be evaluated in an EIR.**

c) The proposed project may result in potential adverse impacts to human beings. Impacts related to Hazards and Hazardous Materials were found to be less than significant. **However, impacts to Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hydrology, Land**

Use, Noise, and Transportation would be potentially significant. These impacts will be analyzed further in an EIR.

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REPORT PREPARERS

This Initial Study was prepared by Rincon Consultants, Inc., under contract to the City of West Hollywood. Consultant staff involved in the preparation of the EIR are listed below.

Rincon Consultants, Inc.

Joe Power, AICP, Principal in Charge
Karly Kaufman, MESM, Associate Planner
Aileen Mahoney, Associate Planner
Annaliese Miller, Environmental Planner
Debra Jane Seltzer, Lead Formatting Specialist

City of West Hollywood
California 1984

PUBLIC NOTICE
NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT REPORT & SCOPING MEETING

Pursuant to Public Resources Code Section 21165, the City of West Hollywood is the Lead Agency responsible for preparing an Environmental Impact Report (EIR) addressing potential impacts associated with the proposed project.

Purpose of Notice of Preparation: Under the requirements of the California Environmental Quality Act (CEQA) and its Guidelines, the City is the Lead Agency for environmental review and must evaluate the potentially significant environmental effects of the proposed project. The City has determined that an Environmental Impact Report (EIR) will be prepared to assess the proposed project's effects on the environment, to identify significant impacts, and to identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts. An analysis of alternatives to the proposed project will also be included in the Draft EIR, including the No Project Alternative.

This Notice of Preparation (NOP) is being circulated pursuant to California Resources Code Section 21153(a) and CEQA Guidelines Section 15082. Public agencies and the public are invited to comment on the proposed scope and content of the environmental information to be included in the Draft EIR. A 30-day comment period is provided to return written comments to the City. All comments should be directed to the City at the following address:

Laurie Yelton, Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6216
Fax: (323) 848-6569
E-mail: lyelton@weho.org

Due to the time limits mandated by state law, your response to this NOP should be sent at the earliest possible date, but not later than 30 days after issuance of this notice. **The response deadline is May 13, 2013**.

Project Title: 8555 Santa Monica Boulevard Mixed-Use Project

Project Applicant: Soto Capital, LP - Jeff Seymour, PO Box 17119, Beverly Hills, CA 90209

Project Location: The 1.04-acre project site is located at 8555 Santa Monica Boulevard on the north side of Santa Monica Boulevard at West Knoll Drive in the City of West Hollywood, western Los Angeles County. The site is currently occupied by three two-story commercial buildings, one single-family residence located at 8532 West Knoll Drive, and two surface parking lots.

Project Description: The proposed project involves construction of a mixed-use development. The mixed-use development would be five stories in height and would include: 93 apartment units (19 of which would be designated as affordable housing), approximately 6,720 square feet (sf) of restaurant and cafe uses, approximately 4,708 sf of live/work use, and approximately 27,840 sf of retail uses. Commercial and live/work uses would be on the first two floors and residential units would be on levels 3, 4, and 5. The project also includes four levels of parking with 308 vehicle parking spaces as well as 45 bicycle parking spaces. One level of the parking structure would be subterranean. Primary commercial access to the project site would be located along Santa Monica Boulevard and primary residential access would be located along West Knoll Drive.

Project implementation would require demolition of three existing two-story commercial structures, an existing one-story single-family residence, and surface parking areas on the project site.

Potential Environmental Effects: Potentially significant environmental impacts have been identified in the following issue areas: Aesthetics, Air Quality, Geology and Hydrology, Greenhouse Gas Emissions, Noise, and Transportation and Traffic. These impacts will be addressed in the EIR.

Scoping Meeting: As part of the EIR scoping process, the City of West Hollywood will hold a public scoping meeting on Monday, April 22, 2013, from 5:30 p.m. to 7:00 p.m., at the City Hall Community Conference Room located at 8300 Santa Monica Boulevard in West Hollywood. The purpose of the scoping meeting is to describe the proposed project and provide the public the opportunity to comment on the scope, or what is to be included in the contents of the Draft EIR.

Date: April 12, 2013

Signature: [signature]
Title: Associate Planner
Telephone: (323) 848-6890

From:	Laurie Yelton
To:	Karly Kaufman
Subject:	FW: 8555 Santa Monica Boulevard Mixed-Use Project
Date:	Monday, April 22, 2013 9:33:54 AM

From: Jusuf Lukito [mailto:jslukito@yahoo.com]
Sent: Monday, April 22, 2013 2:09 AM
To: Laurie Yelton
Subject: 8555 Santa Monica Boulevard Mixed-Use Project

Dear Ms. Yelton,

My name is Joseph Lukito and I reside at 8535 West Knoll Drive in West Hollywood.

I have been a homeowner in West Hollywood for over 25 (twenty five) years and I have watched the community go through many changes and have supported the development of the area as West Hollywood has grown as an independent city. However, I feel it is important to voice my disapproval of the newly planned development called "8555 Santa Monica Boulevard Mixed-Use Project".

The excavation planned for the new development poses a structural risk to not only my home on West Knoll Drive, but to neighboring residents throughout the area. Our city government should, first and foremost, be looking out for the safety of the current resident of the city. Even if sufficient studies are done which would show the excavation and construction to be safe, and proper insurance required to guarantee any unexpected property damage to neighboring homeowners, I would still have to strongly urge against the project or at the very least, the current proposal of the project. The density of the immediate area has grown, by any standards, to a dangerous and uncomfortable level. To add a project of this size to this area, on top of all the other development that has gone over the last decade, is to make the area almost unlivable with traffic reaching unbearable levels.

While I understand that growth is a part of any city plan, the size and viability of that growth has to geared toward making sure that the city is still offering its inhabitants a sustainable and enjoyable style of life. This project does not do that and the proposed plans should be modified.

Sincerely yours,
Joseph Lukito

April 19, 2013

Laurie Yelton, Associate Planner
Community Development Dept.
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

Re: **8555 Santa Monica Blvd. Mixed-Use Project**

Dear Ms. Yelton:

I am writing to you with respect to the proposed project at 8555 Santa Monica Blvd. directly across the street from my building located at 8535 West Knoll Dr. I wish to challenge the current plans for this project. There are several components of this proposed project that adversely affect the 8535 West Knoll Dr. building and the surrounding neighborhood.

The following issues must be addressed before proceeding in any way with the proposed project:

- **Building Height**: The number of proposed stories is five and the overall height is 55 feet from the base line of the boulevard. Two levels of subterranean garage going 30 feet below ground are planned. This will have a disastrous effect on the stability of the 8535 West Knoll Dr. building. There is a high water table in the neighborhood and the 8535 West Knoll Dr. building has experienced movement and shifting. The management of the 8535 West Knoll Dr. building will be providing you and the planning commission with engineering reports along with letters and e-mails from 8535 West Knoll Dr. homeowners documenting movement and shifting in their units. Other significant issues that need to be thoroughly addressed are natural conditions and seismic zone, including any and all fault lines, in the area surrounding the proposed project.

- **Ingress and Egress**: The ingress and egress for residential parking for 110 rental units and a separate driveway for the loading dock are planned to be directly across from the 8535 West Knoll Dr. building. This will create an absolute nightmare, taxing the traffic on West Knoll Dr. and causing backups and traffic jams on Santa Monica Boulevard and at the intersection of La Cienega Blvd. and Santa Monica Blvd. These traffic backups and jams will negatively impact the quality of life in the entire neighborhood.

- **Compatibility**: The sheer height and size of the proposed project will negatively impact the 8535 West Knoll Dr. building and the surrounding neighborhood. A five-story, 55-feet-high, 124,850 square-foot mixed-use project is grossly disproportionate to the scale and use of the surrounding buildings. The proposed 8555 Santa Monica Blvd. project's 40,000 square feet of commercial use is roughly three times that of 901 Hancock, the closest mixed-use project in the neighborhood. Of further concern are insets between the windows on the façade of the proposed project which could be used for large-scale advertising.

I understand a project will be built. But I want to make sure it is not the one that is currently proposed. I will be vigorously challenging the proposed project at every phase of the approval process. Please advise the Planning Commission to thoroughly address all of the 8535 West Knoll Dr. building's concerns and issues before making any decision with respect to the proposed project at 8555 Santa Monica Blvd. Thank you for your consideration.

Very truly yours,

Ludovic Pathoux
8535 West Knoll Dr. Unit 308
West Hollywood, CA 90069

Karly Kaufman

From: Laurie Yelton <LYelton@weho.org>
Sent: Monday, April 22, 2013 1:39 PM
To: Karly Kaufman
Subject: FW: 8555 Santa Monica EIR concerns

From: Schneider, Kim [mailto:Kim.Schneider@Sothebyshomes.com]
Sent: Monday, April 22, 2013 1:37 PM
To: Laurie Yelton
Subject: 8555 Santa Monica EIR concerns

Hi Laurie, below are my concerns regarding this project and the items I believe should be included in the EIR:

I. Aesthetics

a) Scenic Vista (additional question)

Question the loss of scenic view of Hollywood Hills as drive/walk along Santa Monica Blvd.

c) Visual Character of site and surrounding

Serious concerns about the scale vis-à-vis surrounding buildings. Massive project that significantly alters the character of the neighborhood.

Lack of compatibility and scale with both the residential structures behind and even with the commercial structures on SMB.

d) Shade

Who will pay for landscape that doesn't survive shadowing?

II. Agricultural Resources

No questions

III. Air Quality

b) Air quality standards

How many loads of soil removed? Will trucks be diesel, gas or low emission?

IV. Biological Resources

No questions

V. Cultural Resources

No questions

VI. Geology and Soils

a) i Rupture of known earthquake fault

What provisions have been made to mitigate any damage due to an earthquake during construction?

a) iv Landslides

Why are there no concerns of a landslide? Tons of soil removed and a three-story hole will be formed at the north edge of the project.

d) Expansive Soil

We believe there is a significant amount of expansive soil under this project and would like to understand the effect of the project on it.

VII. Greenhouse Gas Emissions
No questions

VIII. Hazards and Hazardous Materials
No questions

IX. Hydrology and Water Quality
c-e) Drainage and Runoff (additional questions)
We know that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.

Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.
We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?

Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?
Local experience with the high groundwater table is extensive and spans periods of drought and deluge. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.
These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

We know high water table conditions have interfered with construction on Hancock and West Knoll causing catastrophic structural collapse around the project site within the same watershed.

Similarly many of the residential and commercial buildings in this area require extensive use of sump pumps to attempt to mitigate the effects of the voluminous underground water and high water table and several local buildings have been materially affected by this issue long term. There is substantial concern that the subterranean parking systems, no matter how well shielded, may divert substantial underground water flow onto adjacent properties, with the potential for serious long term damage and injury to those properties.

Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise? How will sump pump and other mitigation systems in nearby buildings be impacted? Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

What happens should the neighborhood to the south, where many mature trees draw from the existing water table, go fallow? What is the projected new route of this water system when it is interrupted with this project? What impact will there be to surrounding properties, streets and major public and private assets? What

protection is needed to warrant surety, completion, and indemnification for potential damages? And how much variability is caused by actual accumulated seasonal rainfall?

What are the long-term effects of the underground conditions on liquefaction and on the water table?
What is the proposed disposal for the discharged groundwater during construction?

X. Land Use and Planning

b) Land Use Plan (additional question)

The current zoning for this location is CC1 for 35 feet. Bonuses have been given to bring the building to a maximum of 55 feet.
Code 19.36.170 Mixed-Use Projects
A. *Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts.* A proposal to consolidate abutting residential and commercial parcels into a unified mixed-use project shall comply with the following standards.

- Minimum Site Area. The proposed parcels shall contain a minimum aggregate area of 60,000 square feet.
- Design Standards. A proposed mixed-use project shall be designed and constructed to:

  - Be compatible with and complement adjacent land uses;
  - Maintain the scale and character of development in the immediate neighborhood;

The project doesn't meet either of these Zoning Code criteria. It is only 45,000 sq. ft. in size and its scale is massive, clearly incompatible with nearby land uses and overpowers the neighborhood.

It is also unclear from the project materials whether a rezoning of the residential parcel is being requested or if a zone text amendment attempting to revise the provisions of Zoning Code Section 19.36.170 is being requested to provide new and different standards for mixed use projects spanning across residential and commercial zones.

XI. Mineral Resources

No questions

XII. Noise

b) Excessive ground-bourne noise and vibration (additional question)

What are the plans to mitigate the excessive noise and vibration during construction? The noise and vibration during construction will have a very serious negative economic impact on the Ramada Hotel and all the commercial businesses in the area. Hotel rooms and facilities near the construction area will become very undesirable during construction and definitively decrease room and other revenues as well as the resulting transit occupancy tax revenues to the City.

Nearby residents will similarly suffer similar serious extended negative impacts to the quiet enjoyment of their homes.
Given the seriousness of the noise and vibration impacts over an extended construction period special well tailored additional mitigation measures and conditions should be imposed to hopefully limit and minimize the deleterious effects.
Also, noise vibration from delivery trucks needs to be studied.

f) Excessive noise from active airstrip affecting residents of project

West Hollywood Sheriff and Cedars Sinai helicopter pads are active airstrips in the vicinity

XIII. Population and Housing

a) Substantial population growth (additional question)

Nearly 10 new apartment/condo and/or mixed use buildings, many of them quite large in scope are either already under construction, entitled or otherwise planned by 2020 and there is concern that the cumulative impacts of all these new residential and mixed use projects will drive the City's population well over the planned 35,100 that the city is estimating by then. What are the exact beds/baths planned for all these projects.

Also this project will literally double the number of residential units in the immediate neighborhood. Will the sudden increase negatively impact the quality of life there and if so how can those impacts be mitigated?

XIV. Public Services

a, b) Fire and Police Protection (additional question)

Doubling the population of the neighborhood puts strain on both police and fire departments and services. The small street of West Knoll will also hamper access to the building during emergencies.

XV. Recreation

No questions

XVI. Transportation/Traffic

a-f) Traffic study

We'd like an in-depth analysis of major streets and all intersections within a half-mile of the project, with such a study based on recent, realistic traffic counts (i.e, not collected during the summer, or on holidays, or on a Sunday). These streets should include Santa Monica, West Knoll, Westbourne, Westmount, Holloway, Fountain, Hancock and Rugby.

The study should specifically address the impacts on the West Knoll cul de sac and explore options to help mitigate those impacts. Also needing study is the u-turn at West Knoll and Santa Monica and the left turn from La Cienega to Santa Monica.

Similarly given the size of this project and the substantial increases in both residential and commercially generated traffic, the impacts on the nearest signaled intersections at Westbourne and Santa Monica, the intersection at Westmount and Holloway (which serves as a major point of ingress and egress for residents in West Hollywood North) the Westmount/West Knoll round about, of course the West Knoll/Santa Monica Boulevard intersection should all be studied, impacts analyzed and mitigation measures considered.

In the previous studies, sometimes they used V/C figures and sometimes they used Delay. This was very confusing and we can only assume they used the number that was the more optimistic/favorable of the two. Please feel free to give us both sets of numbers.

In the previous studies, gross averages were used versus peak-hour level of service. Gross averages do not reveal the peak-hour level of service. Gross averages can actually mask peak impacts. We would specifically request that peak-hour data be provided. We would like to see charts by peak-hour level of service for am and pm.

What is the plan for ingress/egress of retail, retail deliveries and residents?

Given the existing F level of traffic on Santa Monica Boulevard during extended periods of the day, ingress/egress must be carefully studied, impacts analyzed and hopefully some mitigation measures developed. How will vehicles exit the project when traffic is solidly backed up Westbound on Santa Monica Boulevard?

Will there be a resulting substantial increase in traffic at the next major signaled intersection making a right (North) or left (south) on Westbourne Drive to avoid traffic ahead?

Given the F level of traffic on Santa Monica Boulevard, many local residents access their homes from Holloway to the north and it must be anticipated that both new residents and commercial patrons of this project will do the same thing. How if at all can this increased traffic flow on the residential streets be mitigated? Will the roundabout at West Knoll/Westbourne still accommodate and work with the increase in traffic?
Will there be significant impacts at the major La Cienega/Santa Monica Boulevard intersection, especially during rush hours, especially to Westbound lanes of traffic and traffic travelling south on La Cienega making a right turn onto Santa Monica Boulevard? If so, what are the additional traffic mitigation measures?

Will residents be given parking passes for guests?

Will parking places on West Knoll be eliminated?

What is planned for vehicles exiting West Knoll?

Will commercial vehicles be accessing the project from West Knoll? Where are loading and unloading zones and what conditions will be imposed to eliminate impacts of delivery trucks on West Knoll Drive? Given the narrow size of West Knoll large delivery trucks will be unable to properly access the project from West Knoll and/or they will significantly impede residential traffic in the area and potentially block and/or substantial impede access to residents parking in their nearby residential buildings. Can this be mitigated and how?

Should all commercial vehicles be banned on West Knoll Drive?

Guest parking for 8535 WK is open for public viewing and will be a target for visitors at 8555 SM. There will be costs for 8535 to monitor this. How will this be dealt with?

XVII. Utilities and Service System

f) Solid Waste (additional question)

The closing landfills are a concern, there needs to be more study on this subject.

XVIII. Mandatory Findings of Significance

No additional questions.

XIX. Additional Items

Multiple Project Impacts

We request a special section that specifically evaluates comprehensive environmental impacts from concurrent projects (i.e., Gold's Gym, Ramada improvements, Millenium project, etc) located within close proximity to one another and surrounding the same critical intersections.

Staging

What are plans for construction vehicle parking and construction worker parking? Will parking on West Knoll during construction be limited?

Thank you and please let me know if you have any questions.

Kind regards,

Kim Schneider
8604 West Knoll Drive
West Hollywood, CA 90069
310.418.6748

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Karly Kaufman

From: Laurie Yelton <LYelton@weho.org>
Sent: Monday, April 22, 2013 1:56 PM
To: Karly Kaufman
Subject: FW: Environmental and Traffic Issues
Attachments: image.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

From: Eric Ingelson [mailto:attentioneric@gmail.com]
Sent: Monday, April 22, 2013 1:55 PM
To: Laurie Yelton
Cc: WHNNA@la.twcbc.com
Subject: Environmental and Traffic Issues

Ms. Yelton,

Please consider the width of West Knoll Drive. It is dangerous with the current traffic and congestion. I have attached a photo of what us residents on West Knoll experience every day. Illegal parking, terrible congestion, blind spots to oncoming traffic, no set backs to to traffic around corner to Santa Monica Bl.

Development is good, but when it will adversely affect the quality and character of the neighborhood, you must try to avoid a traffic nightmare on this corner. (Of a narrow street)

Is there any other information I can send you or try to make this plea for safety to someone else?

Thank you for your attention.

Eric Ingelson

Karly Kaufman

From: Laurie Yelton <LYelton@weho.org>
Sent: Monday, April 22, 2013 2:28 PM
To: Karly Kaufman
Subject: FW: 8555 SMB

Follow Up Flag: Follow up
Flag Status: Flagged

From: Jacqueline Smith [mailto:jacqueline12446@yahoo.com]
Sent: Monday, April 22, 2013 2:25 PM
To: Laurie Yelton
Subject: 8555 SMB

Dear Ms Yelton;

I am a resident of 8535 West Knoll Drive. I understand the need for the developer to improve his property. I like the idea of a mixed use building. However I have some reservations about the size of the proposed property.

1. West Knoll Drive is a small street. With parking on both sides, traffic is held up when trash, UPS, and other trucks must stop to do their jobs. More than 100 additional cars a day will bring traffic to a halt onto SMB or all the way up to Holloway. We need the on street parking because some current residents do not have an off street space.

2. The noise of the additional people and traffic will make it difficult, if not impossible for those in the front of our building to ever have their windows open. Privacy will be much harder to maintain with the additional stories across the street.

There are other concerns, but these two will do for a start.
Thank you for your time and attention to this matter.

Jacqueline K. Smith

Karly Kaufman

From: Laurie Yelton <LYelton@weho.org>
Sent: Monday, April 22, 2013 4:32 PM
To: Karly Kaufman
Subject: FW: Development at 8555 S.M. Bl and West Knoll Drive
Attachments: image.jpg; image.jpg

From: Eric Ingelson [mailto:attentioneric@gmail.com]
Sent: Monday, April 22, 2013 4:28 PM
To: Laurie Yelton
Subject: Fwd: Development at 8555 S.M. Bl and West Knoll Drive

---------- Forwarded message ----------
From: **Eric Ingelson** <attentioneric@gmail.com>
Date: Mon, Apr 22, 2013 at 2:36 PM
Subject: Development at 8555 S.M. Bl and West Knoll Drive
To: Eric Ingelson <attentioneric@gmail.com>
Cc: WHNNA@la.twcbc.com

Please see the attached pictures that shows just how narrow West Knoll Drive is already.
This street is extremely dangerous with illegal parking, congestion and noise now.
We must do more to mitigate the adverse effects of this monstrous development and the impact it will have on existing residences and businesses.

Thank you for your attention. Please forward to others concerned with the quality of our neighborhood.

Karly Kaufman

From: Laurie Yelton <LYelton@weho.org>
Sent: Thursday, May 02, 2013 7:46 PM
To: Karly Kaufman
Subject: Fwd: 8555 SMB
Attachments: photo.JPG; ATT00001.txt

-------- Original Message --------
Subject: 8555 SMB
From: Smith Jacqueline <jksmith1932@gmail.com>
To: Laurie Yelton <LYelton@weho.org>
CC:

We do not want our block of SMB to look like this. Five story mixed use building going up. Blocks view of the hills too.

Jacqueline Smith
8535 West Knoll

Laurie Yelton, Associate Planner 05/04/2013
Community Development department
City of West Hollywood

Dear Ms. Yelton,

I am writing about the proposed development at 8555 SMBlvd. I have been a resident of this neighborhood for many years. I own and reside at 8561-8563 Rugby Drive. I attended the Environmental Impact Report meeting Monday, April 22nd. I'm concerned about some of the assertions made in the 'initial study' put forth prior to the meeting. The concerns I address herein are directed towards the larger impact of this project finished and in some instances from the perspective of a south facing neighbor. They are not directed at the short-term construction phase. To the point my concerns about the project are as follows:

1) I do not believe the impact of the subterranean water displacement caused by the parking plan can be properly identified. 8535 West Knoll Ave has a partial one-floor subterranean parking structure sustained by originally one sump pump and now two. I'm told they have related hydro-structural sinking issues they have identified in portions of their complex. My neighbors and I live downhill on that same existing water table which will be altered by such a deep sub structure.
******No other building in the area has such a deep sub structure nor should they be granted one.
2) The aesthetic of this building is far too large in relation to all other structures around it. It is too tall for the neighborhood. Everyone South of SMBLVD (and the project) is on a much lower grade and will have unwanted views of the structure instead of the the current views of the hills. The height aesthetic does not fit the neighborhood. Combined with the huge footprint this structure smacks of the unseemly apartment complexes proliferating in the densest areas of Hollywood.
*****The project needs to be lower and of smaller scale.
3) Traffic congestion caused by the additional number of renters, restaurant and retail goers, delivery / trash and utility trucks will be unsustainable. Already traffic here area is too congested. Daily the boulevard is very crowded and a 'parking lot' during rush hours. EG: where are the valets going to park cars for the diners? How much worse will traffic become with added drivers looking for parking that does not exist? How many hours of the day will service/ delivery trucks (for this project) be blocking traffic lanes and on what streets? How is the owner addressing any of these concerns in his Plan? How and why should my neighbors and I deal with the increased volume of displaced cars and noise made by all of the above? Remember, we have a huge project breaking ground on Sunset and La Cienega, which is very high density! 8550 SMBLVD is entitled and newly purchased.
There have been no improvements to our existing public transit nor have we seen any viable proposals to make such changes. How can adding multiple, high density /trafficked structures not worsen an already overburdened traffic condition? West Hollywood needs to take care of the mounting issues these green- lighted projects are creating FIRST and stop worsening the situation.

******The increased strain on the current traffic situation caused by this too dense project is detrimental to the quality of life to the areas residents and we are not willing to put up with it. The density of the proposed project must be lessened.

Note: 8550 SMBLVD is entitled to build and the property was purchased about a year ago by a developer. The remaining nightclub on the property is being closed as the property owners state they are going forward with development.

4) Noise levels caused by the density of the proposed rentals will be considerable. The proposed upper balconies facing South will cause noise levels that will travel south and be heard in my neighborhood. I invite your Environmental impact team to my property on Rugby Dr to measure the current sound levels of the activity on SMBLVD. They will be surprised how much noise on the BLVD carries south
******The height/density needs to be lowered and the outdoor terracing needs to be carefully examined.

I am in full support of responsible development in West Hollywood. I feel this proposed project is inappropriate in scale and plan for the reasons I have stated above. I realize this project proposes new low- income housing and increased commerce. I do not feel it comes close to justifying this incentive in that the quality of life of the majority of the areas residents will be so negatively impacted. It is past time the city takes more responsibility mitigating the serious, negative impact these large- scale developments have on our community. We will not lie down and allow this to continue.
Thank you for taking the time to read my letter.
Very Truly Yours, Kevin Berschinski

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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

GRACE ROBINSON CHAN
Chief Engineer and General Manager

May 9, 2013

Ref. File No: 2566492

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

Dear Ms. Yelton:

8555 Santa Monica Boulevard Mixed-Use Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on April 15, 2013. The proposed development is located within the jurisdictional boundaries of District No. 4. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Sherman Trunk Sewer, located in Santa Monica Boulevard at Huntley Drive. This 12-inch diameter trunk sewer has a design capacity of 3.7 million gallons per day (mgd) and conveyed a peak flow of 0.7 mgd when last measured in 2009.

2. Wastewater generated by the proposed project will be treated by the City of Los Angeles Hyperion Treatment System. Questions regarding sewerage service for the proposed project should also be directed to the City of Los Angeles' Department of Public Works.

3. The expected increase in average wastewater flow from the project site is 23,076 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

4. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific

information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

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

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

Very truly yours,

Grace Robinson Chan

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

c: M. Tremblay
J. Ganz

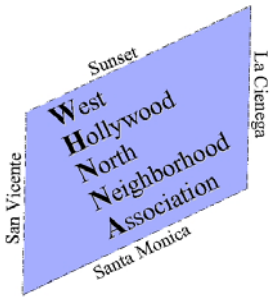
From:	Laurie Yelton
To:	Karly Kaufman
Subject:	FW: 8555 Santa Monica Blvd, Mixed use project
Date:	Friday, May 10, 2013 3:14:38 PM

From: GG Verone [mailto:giftsgalore@gmail.com]
Sent: Friday, May 10, 2013 3:10 PM
To: Laurie Yelton
Subject: 8555 Santa Monica Blvd, Mixed use project

G.G. Verone (President)
1323 Miller Drive
Los Angeles, Ca 90069
Save The Sunset Strip Coalition
323-650-6367
giftsgalore@gmail.com

This is in regard to the overwhelming project that you are considering for the above address. We've been through so many of these and it appears that the City of West Hollywood has lost sight of why people choose to live here. For some unknown reason, except for revenue, there is a desire to destroy the charm of the city and turn it into New York. This project is too large for the proposed location and the impacts it will cause will not only effect WEHO but Los Angeles and Beverly Hills as well. The streets can barely handle the existing traffic and this combined with all the other projects on the board will concentrate a much larger traffic issue. It's not one project but an accumulation of all the projects that effect our city you all seem to be ignoring and they all should come into the equation. The congestion leads to other issues such as safety plus it will put a much larger demand on the infrastructure of the city including the utilities that everyone in the city depends on. Money and development are not everything so please consider these issues and deny this project.

G.G.



May 9, 2013

Laurie Yelton
Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216

RE: 8555 Santa Monica Blvd. Environmental Impact Study

Dear Laurie:

The following is an aggregation of the comments and questions from the residents of West Hollywood North Neighborhood Association regarding the 8555 Santa Monica Blvd. Environmental Impact Study.

While the Initial Study indicates that there is no need to study certain categories, we feel that there will be "Potentially Significant Impact" these additional categories:

- Land use/Planning
- Population/Housing
- Utilities

There are also other concerns in categories already deemed Potentially Significant that haven't been judged as so by Rincon Consultants.

I. Aesthetics

a) Scenic Vista (additional question)
One of the unique aspects of West Hollywood is the vista of the Hollywood Hills rising up above our boulevards. How would the construction of a 5 story building not block this vista? Would a reduction to 3 stories be an alternative that would mitigate this?

c) Visual Character of site and surrounding
This building will be the tallest building on Santa Monica Blvd. with the exception of the historical Emser building. This lack of compatibility and scale with both the residential structures behind and even with the commercial structures on SMB can only be mitigated by a reduction in both size and footprint (please address the requested variances in required setbacks). This is a massive project that significantly alters the character of the neighborhood.

This project has virtually no articulation on 3 sides of the project.

The east side of the building is a solid wall right next to the sidewalk. This is not congruent with the "pedestrian friendly" goals in the General Plan. How can this be mitigated? Can the South East corner of the building be cut at an angle (like the Face Place) and storefront windows installed on the east side?

The west wall is a large concrete surface with very little articulation. The view of this building for every driver and pedestrian eastbound will be far from aesthetically pleasing. The guests of the Ramada will be looking at a large wall. How can this be mitigated? What additional articulation can be incorporated?

Current plans seem to include very large blocks of the building to be devoted to signage? Does this comply with current code for SMB? What will be the impacts of the lighting of such large signs?

While we laud the inclusion of a green roof, what will be the impacts visually and from runoff of a failure to maintain the roof? Will the roof be accessible by residents and if so, how will that impact the ability to maintain the plantings?

d) Shade
Who will pay for landscape that doesn't survive shadowing from the building? What possible materials can be used in green space without available sunlight?

II. Agricultural Resources

No questions

III. Air Quality

b) Air quality standards
This project will more than double the population of a single city block adding hundreds of vehicle trips per day and significantly impacting the air quality. The Initial Study states that the city's current population is 34,822 and that the addition of 141 people would be within the 35,100 projected for 2020 and that "**Impacts would less than significant further analysis of this issue in an EIR is not warranted."** This statement does NOT account for the impacts of all of the projects currently entitled or under construction—significantly Sunset Millennium and Movie Town, which will be hundreds of new residents.

What are the environmental impacts of all of these projects as a whole, not just peeled off and counted one at a time?

What will be the projected emissions and how would this project propose to mitigate them?

During construction, how many loads of soil will be removed?
How many vehicle trips will be involved?
Will trucks be allowed to idle at the construction site?
Will trucks be diesel, gas or low emission?

IV. Biological Resources

No questions

V. Cultural Resources

No questions

VI. Geology and Soils

a) i) Rupture of known earthquake fault
What provisions have been made to mitigate any damage due to an earthquake during construction?

a) iv) Landslides
Tons of soil will be removed and a three-story hole will be formed at the north edge of the project. Why are there no concerns of a landslide?

d) Expansive Soil
"…expansive soils exist in the City but are more prevalent in the southern part of the City." Whether or not expansive soils are "more" prevalent south of SMB, they are significant north of the Blvd. Any number of property owners in the neighborhood can testify to this. We believe there is a significant amount of expansive soil under this project and would like to understand the effect of the project. What does ACTUAL soil testing show to be the facts?

Subsidence
While the Initial Study states that this parking lot will only go down one story, this is only true for the SMB side of the project. The north side of the project will remove at least 3.5 stories of soil from the hillside to build the parking lot. What are the historical impacts of subsidence in this neighborhood? What are the likely impacts of a construction project of this magnitude?

Soil Conditions
Developer has asserted that they will use a "new" technology called Mat Slab to address the water issues. However, it is our understanding that specific soil and geology requirements must exist for this technology to be successful. Does the geology and soils meet these conditions? If not, what are the conditions and what mitigants would be required?

VII. Greenhouse Gas Emissions

How will the significant amount of CO2 emissions from 4 levels of parking be handled?
How will it be vented?
How will neighboring residences be protected?

VIII. Hazards and Hazardous Materials

No questions

IX. Hydrology and Water Quality

a-e) Goundwater, Drainage and Runoff (additional questions)
We know that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.

Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.

We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?

Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?

Local experience with the high groundwater table is extensive and spans periods of drought and deluge. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.

These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

We know high water table conditions have interfered with construction on Hancock and West Knoll causing catastrophic structural collapse around the project site within the same watershed.

Similarly many of the residential and commercial buildings in this area require extensive use of sump pumps to attempt to mitigate the effects of the voluminous underground water and high water table and several local buildings have been materially affected by this issue long term. There is substantial concern that the subterranean parking systems, no matter how well shielded, may divert substantial underground water flow onto adjacent properties, with the potential for serious long term damage and injury to those properties.

How will sump pump and other mitigation systems in nearby buildings be impacted?

Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise? How will sump pump and other mitigation systems in nearby buildings be impacted? Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

What will be the impact on the trees and plantings in the neighborhood to the south where many mature trees draw from the existing water table? What is the projected new route of this water system when it is interrupted with this project? What impact will there be to surrounding properties, streets and major public and private assets? What protection is needed to warrant surety, completion, and indemnification for potential damages? And how much variability is caused by actual accumulated seasonal rainfall?

What are the long-term effects of the underground conditions on liquefaction and on the water table?

What is the proposed disposal for the discharged groundwater during construction?

What are the potential impacts on structures to the south of the Blvd. with the loss of ground water? What are the potentials for sinkholes, settling or other structural impacts?

What is the projected daily volume in gallons of water that will be pumped from this project? What is the current volume pumped from 901 Hancock?

How will this ground water dumping impact the storm drain system?

X. Land Use and Planning

b) Land Use Plan (additional question)
The current zoning for this location is CC1 for 35 feet. Bonuses have been given to bring the building to a maximum of 55 feet.

Code 19.36.170 Mixed-Use Projects
A. *Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts.* A proposal to consolidate abutting residential and commercial parcels into a unified mixed-use project shall comply with the following standards.

- **Minimum Site Area**. The proposed parcels shall contain a minimum aggregate area of **60,000 square feet**.
- Design Standards. A proposed mixed-use project shall be designed and constructed to:
  - **Be compatible with and complement adjacent land uses;**
  - **Maintain the scale and character of development in the immediate neighborhood;**

The project doesn't meet either of these Zoning Code criteria. It is only 45,000 sq. ft. in size and its scale is massive, clearly incompatible with nearby land uses and overpowers the neighborhood.

It is also unclear from the project documents whether a rezoning of the residential parcel is being requested or if a zone text amendment attempting to revise the provisions of Zoning Code Section 19.36.170 is being requested to provide new and different standards for mixed use projects spanning across residential and commercial zones.

"The proposed project is also in the General Plan Mixed-Use Incentive Overlay Zone and in a Transit Overlay District. The Mixed-Use Inventive Zone allows for new development with a mix of residential and commercial uses to receive an additional 0.5 FAR and ten feet in height. The Transit Overlay District identifies sites close to major transit nodes for which modifications to the General Plan's permitted density, height, parking requirements, or other development standards may be considered when projects provide Transportation Demand Management programs."

What "major transit nodes"? Other than a bus line what "major transit" is mitigating this additional density?

Under what law, ordinance or other agency is the 10% reduction in setbacks qualified or allowed? What are the impacts on the neighborhood of these reduced setbacks?

XI. Mineral Resources

No questions

XII. Noise

b) Excessive groundbourne noise and vibration (additional question)
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the planned 35,100 that the city is estimating by then. What are the exact beds/baths and populations counts planned for all these projects COMBINED?

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The sharp angle of the West Knoll entrance will make it very difficult for delivery trucks to enter the building from Santa Monica Blvd.
Will trucks be permitted to drive through the neighborhood for easier access?
How will the impact of this traffic, noise, etc. mitigated?
Should all commercial vehicles be banned on West Knoll Drive?

Parking

Guest parking for 8535 West Knoll is an open , unsecured lot. Given the paucity of guest parking at 8555 SMB and the current restriction against permit parking, this lot will be a target for visitors at 8555 SMB. There will be costs for 8535 to monitor this. How can these costs and disturbances be mitigated?

Will businesses in this project be allowed to apply for C parking permits for their staff to park on neighborhood streets?

What will be the onsite parking demands of the proposed commercial and retail uses of the property? i.e. the "normal" parking demands for a 6,000 sq. ft. restaurant. What would be the peak demand for a "hot" restaurant?

Staging

During construction, how and where will construction vehicles be staged?
During concrete pours, will all street parking on West Knoll be blocked?
How many truck trips will be required?
How many trucks will be allowed to line up at one time?
Will they be allowed to idle indefinitely?
Where will construction workers park?
Will staging be limited to SMB? If so, how will that impact the intersection at La Cienega?

XVII. Utilities and Service Systems

a) Wastewater

Will the evacuated ground water be put through the sewer system? If so, what will be the volume and does this meet Regional Water Quality Control Board requirements?

f) Solid Waste (additional question)
Major landfills are closing in the next year. What will the additional waste requirements of this project do to City's requirements for waste disposal and how will this service be provided?

Electricity
The electrical infrastructure of this neighborhood is severely antiquated in inadequate to current demand. In the past three years there have been at least three transformer explosions within two blocks of this project that put residents at risk for their safety and causing days long power outages. What will be the additional electrical demands for this project? How will they be provided? How will the risks of future transformer explosions be mitigated?

XVIII. Mandatory Findings of Significance

Multiple Project Impacts
We request a special section that specifically evaluates comprehensive environmental impacts from concurrent projects (i.e., Gold's Gym, Ramada improvements, Millenium project, etc) located within close proximity to one another and surrounding the same critical intersections.

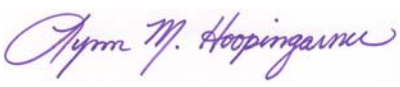
XIX. Additional Items

Alternatives for this project

Reduce size to three stories.
Remove traffic entrance from West Knoll.
Remove balconies facing north.

3 Story mixed use with ground floor retail and second & third stories townhome style two story live/work spaces. Narrow and tall with balconies on the SOUTH side of the building.

Sincerely,



Lynn M. Hoopingarner
Vice President
West Hollywood North Neighborhood Association

Cc: Council Member D'Amico
Council Member Duran
Council Member Heilman
Council Member Land
Council Member Prang

Delivered via email:
lyelton@weho.org
jdamico@weho.org
jduran@weho.org
fsolomon@weho.org
aland@weho.org
jprang@weho.org

Karly Kaufman

From: Laurie Yelton <LYelton@weho.org>
Sent: Monday, May 13, 2013 8:12 AM
To: Karly Kaufman
Subject: FW: Concerns regarding 8555 Santa Monica Blvd. Mixed-Use Development

From: Eric Ingelson [mailto:attentioneric@gmail.com]
Sent: Saturday, May 11, 2013 1:19 PM
To: Laurie Yelton
Subject: Concerns regarding 8555 Santa Monica Blvd. Mixed-Use Development

Dear Ms. Yelton:

I was at the Public Scope Meeting on April 22, 2013.

I was concerned about the people hired to do the environmental impact report. They did not seen very knowledgeable about the plans and layout of this development. The drawings submitted so far are vague and confusing as to the elements such as driveways entrances, lobbys and commercial zones and parking.

1.) Where is the lobby entrance for the residential units? Is it on SMB as the address suggests? Or are they fooling us all, and going to use the little house they bought at 8532 West Knoll Drive as the address for the residences? Please report.

2.) The mouth of the street at West Know Drive and SMB is TOO narrow to support any increase in traffic? It is dangerous now! The street must be widened as is required in new development projects in West Hollywood.

3.) Please show all commercial parking zones and residential driveways to scale to show the true impact traffic will have on West Knoll Drive.

4.) A setback of at least 10-15 feet of development should be required on West Knoll Drive to avoid blind spots from cross traffic on West Knoll Drive.

5.) Traffic Accidents and Congestion will occur much more frequently because the street on West Knoll Drive is too narrow.

6.) The proposed building is just too tall for the neighborhood. It ruins the friendly neighborhood feel and character of this specific area. No where on SMB in central West Hollywood does such a monstrosity sit directly on SMB and a residential street such as West Knoll Drive.

7.) Safety and Congestion and existing structures should be seriously considered, before allowing such a huge development to be built that does not fit into the scale of the neighborhood and its streets.

Thank you for addressing these questions and comments. I lok forward to a reply.

Sincerely, Eric.

Karly Kaufman

From: Laurie Yelton <LYelton@weho.org>
Sent: Monday, May 13, 2013 8:12 AM
To: Karly Kaufman
Subject: FW: 8555 Santa Monica Blvd. Environmental Impact Study

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From: JEFFREY JEROME [mailto:jmjerome@me.com]
Sent: Saturday, May 11, 2013 9:27 AM
To: Laurie Yelton
Cc: Jeffrey Jerome
Subject: 8555 Santa Monica Blvd. Environmental Impact Study

May 11, 2013

Laurie Yelton

Associate Planner

Community Development Department

City of West Hollywood

8300 Santa Monica Boulevard

West Hollywood, California 90069-6216

RE: 8555 Santa Monica Blvd. Environmental Impact Study

Dear Laurie:

The following is an aggregation of the comments and questions from the residents of West Hollywood North Neighborhood Association regarding the 8555 Santa Monica Blvd. Environmental Impact Study.

While the Initial Study indicates that there is no need to study certain categories, we feel that there will be "Potentially Significant Impact" these additional categories:

- Land use/Planning
- Population/Housing
- Utilities

There are also other concerns in categories already deemed Potentially Significant that haven't been judged as so by Rincon Consultants.

I. Aesthetics

a) Scenic Vista (additional question)

One of the unique aspects of West Hollywood is the vista of the Hollywood Hills rising up above our boulevards. How would the construction of a 5 story building not block this vista? Would a reduction to 3 stories be an alternative that would mitigate this?

c) Visual Character of site and surrounding

This building will be the tallest building on Santa Monica Blvd. with the exception of the historical Emser building. This lack of compatibility and scale with both the residential structures behind and even with the commercial structures on SMB can only be mitigated by a reduction in both size and footprint (please address the requested variances in required setbacks). This is a massive project that significantly alters the character of the neighborhood.

This project has virtually no articulation on 3 sides of the project.

The east side of the building is a solid wall right next to the sidewalk. This is not congruent with the "pedestrian friendly" goals in the General Plan. How can this be mitigated? Can the South East corner of the building be cut at an angle (like the Face Place) and storefront windows installed on the east side?

The west wall is a large concrete surface with very little articulation. The view of this building for every driver and pedestrian eastbound will be far from aesthetically pleasing. The guests of the Ramada will be looking at a large wall. How can this be mitigated? What additional articulation can be incorporated?

Current plans seem to include very large blocks of the building to be devoted to signage? Does this comply with current code for SMB? What will be the impacts of the lighting of such large signs?

While we laud the inclusion of a green roof, what will be the impacts visually and from runoff of a failure to maintain the roof? Will the roof be accessible by residents and if so, how will that impact the ability to maintain the plantings?

d) Shade

Who will pay for landscape that doesn't survive shadowing from the building? What possible materials can be used in green space without available sunlight?

II. Agricultural Resources

No questions

III. Air Quality

b) Air quality standards

This project will more than double the population of a single city block adding hundreds of vehicle trips per day and significantly impacting the air quality. The Initial Study states that the city's current population is 34,822 and that the addition of 141 people would be within the 35,100 projected for 2020 and that "**Impacts would less than significant further analysis of this issue in an EIR is not warranted."** This statement does NOT account for the impacts of all of the projects currently entitled or under construction—significantly Sunset Millennium and Movie Town, which will be hundreds of new residents.

What are the environmental impacts of all of these projects as a whole, not just peeled off and counted one at a time?

What will be the projected emissions and how would this project propose to mitigate them?

During construction, how many loads of soil will be removed?

How many vehicle trips will be involved?

Will trucks be allowed to idle at the construction site?

Will trucks be diesel, gas or low emission?

IV. Biological Resources

No questions

V. Cultural Resources

No questions

VI. Geology and Soils

a) i) Rupture of known earthquake fault

What provisions have been made to mitigate any damage due to an earthquake during construction?

a) iv) Landslides

Tons of soil will be removed and a three-story hole will be formed at the north edge of the project. Why are there no concerns of a landslide?

d) Expansive Soil

"…expansive soils exist in the City but are more prevalent in the southern part of the City." Whether or not expansive soils are "more" prevalent south of SMB, they are significant north of the Blvd. Any number of property owners in the neighborhood can testify to this. We believe there is a significant amount of expansive soil under this project and would like to understand the effect of the project. What does ACTUAL soil testing show to be the facts?

Subsidence

While the Initial Study states that this parking lot will only go down one story, this is only true for the SMB side of the project. The north side of the project will remove at least 3.5 stories of soil from the hillside to build the parking lot. What are the historical impacts of subsidence in this neighborhood? What are the likely impacts of a construction project of this magnitude?

Soil Conditions

Developer has asserted that they will use a "new" technology called Mat Slab to address the water issues. However, it is our understanding that specific soil and geology requirements must exist for this technology to be successful. Does the geology and soils meet these conditions? If not, what are the conditions and what mitigants would be required?

VII. Greenhouse Gas Emissions

How will the significant amount of CO2 emissions from 4 levels of parking be handled?

How will it be vented?

How will neighboring residences be protected?

VIII. Hazards and Hazardous Materials

No questions

IX. Hydrology and Water Quality

a-e) Goundwater, Drainage and Runoff (additional questions)

We know that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.

Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.

We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?

Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?

Local experience with the high groundwater table is extensive and spans periods of drought and deluge. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent

dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.

These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

We know high water table conditions have interfered with construction on Hancock and West Knoll causing catastrophic structural collapse around the project site within the same watershed.

Similarly many of the residential and commercial buildings in this area require extensive use of sump pumps to attempt to mitigate the effects of the voluminous underground water and high water table and several local buildings have been materially affected by this issue long term. There is substantial concern that the subterranean parking systems, no matter how well shielded, may divert substantial underground water flow onto adjacent properties, with the potential for serious long term damage and injury to those properties.

How will sump pump and other mitigation systems in nearby buildings be impacted?

Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise? How will sump pump and other mitigation systems in nearby buildings be impacted? Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

What will be the impact on the trees and plantings in the neighborhood to the south where many mature trees draw from the existing water table? What is the projected new route of this water system when it is interrupted with this project? What impact will there be to surrounding properties, streets and major public and private assets? What protection is needed to warrant surety, completion, and indemnification for potential damages? And how much variability is caused by actual accumulated seasonal rainfall?

What are the long-term effects of the underground conditions on liquefaction and on the water table?

What is the proposed disposal for the discharged groundwater during construction?

What are the potential impacts on structures to the south of the Blvd. with the loss of ground water? What are the potentials for sinkholes, settling or other structural impacts?

What is the projected daily volume in gallons of water that will be pumped from this project? What is the current volume pumped from 901 Hancock?

How will this ground water dumping impact the storm drain system?

X. Land Use and Planning

b) Land Use Plan (additional question)

The current zoning for this location is CC1 for 35 feet. Bonuses have been given to bring the building to a maximum of 55 feet.

Code 19.36.170 Mixed-Use Projects

A. *Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts.* A proposal to consolidate abutting residential and commercial parcels into a unified mixed-use project shall comply with the following standards.

- **Minimum Site Area**. The proposed parcels shall contain a minimum aggregate area of **60,000 square feet**.
- Design Standards. A proposed mixed-use project shall be designed and constructed to:
  - **Be compatible with and complement adjacent land uses;**
  - **Maintain the scale and character of development in the immediate neighborhood;**

The project doesn't meet either of these Zoning Code criteria. It is only 45,000 sq. ft. in size and its scale is massive, clearly incompatible with nearby land uses and overpowers the neighborhood.

It is also unclear from the project documents whether a rezoning of the residential parcel is being requested or if a zone text amendment attempting to revise the provisions of Zoning Code Section 19.36.170 is being requested to provide new and different standards for mixed use projects spanning across residential and commercial zones.

"The proposed project is also in the General Plan Mixed-Use Incentive Overlay Zone and in a Transit Overlay District. The Mixed-Use Inventive Zone allows for new development with a mix of residential and commercial uses to receive an additional 0.5 FAR and ten feet in height. The Transit Overlay District identifies sites close to major transit nodes for which modifications to the General Plan's permitted density, height, parking requirements, or other development standards may be considered when projects provide Transportation Demand Management programs."

What "major transit nodes"? Other than a bus line what "major transit" is mitigating this additional density?

Under what law, ordinance or other agency is the 10% reduction in setbacks qualified or allowed? What are the impacts on the neighborhood of these reduced setbacks?

XI. Mineral Resources

No questions

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Will the evacuated ground water be put through the sewer system? If so, what will be the volume and does this meet Regional Water Quality Control Board requirements?

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3 Story mixed use with ground floor retail and second & third stories townhome style two story live/work spaces. Narrow and tall with balconies on the SOUTH side of the building.

Sincerely,

Jeffrey Jerome, 8535 West Knoll Drive #208, West Hollywood, CA 90069

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: JEAN MATHISON

Affiliation: RESIDENT
(resident, businessperson, agency representative, community group member)

Address: 8570/8572 HOLLOWAY

Phone: 310/652-1839

Email: None

Comments:

THIS MONSTROUS PROJECT WILL DESTROY THE AMBIENCE OF THE AREA AND BE A HUGE IMPACT ON WEST HOLLYWOOD,

JUST RECENTLY ON A THURSDAY LATE MORNING I DROVE SANTA MONICA BOULEVARDTO GELSON'S, THE USUAL TRAFFIC. AFTER 12:00 NOON I DEPARTED THE MARKET AND ENTERED SANTA MONICA BOULEVARD WEST BOUND. NEARER LA CIENEGA BLVD.THE TRAFFIC WAS LINED UP FOR BLOCKS. IT TOOK ME FOUR CHANGES OF THE TRAFFIC SIGNAL ON LACIENEGA BEFORE I COULD CROSS THROUGH THE INTERSECTION ENROUTE TO TRADER JOE'S.

ON APRIL 12th ENROUTE TO CITY HALL FOR THE EVIRONMENTAL IMPACT MEETING PULLING OUT OF OUR DRIVEWAY ON HOLLOWAY THE LEFT HAND TURN LANE AT LA CIENGA WAS BACKED UP TWO CARS WEST OF ALTA LOMA!

TODAY RUSH HOUR A.M. AND RUSH HOUR P.M. IS A PARKING LOT ON HOLLOWAY.

THE GARAGE ENTRANCE TO THIS PROJECT IS ON WEST KNOLL.SANTA MONICA IS A DIVIDED STREET, THOSE WANTING ANY DIRECTION OTHER THAN WEST WILL HAVE TO GO UP WEST KNOLL TO WESTMOUNT, MAKE A RIGHT TURN ON BUSY HOLLOWAY, MAKE A LEFT OR RIGHT TURN ON LA CIENEGA OR LEFT TURN TO GO SOUTH,CONTINUE ON HOLLOWAY TO SANTA MONICA TO GO EAST.

AND YOU ARE GOING TO BRING 300 MORE CARS INTO THE AREA!?!

WHAT ABOUT AIR QUALITY, GREENHOUSE GAS EMISSIONS,

NOISE AND OF COURSE THE TRAFFIC.....

Judith H. Mathison

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

May 12 , 2013

Laurie Yelton
Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard, West Hollywood, California 90069-6216

RE: 8555 Santa Monica Blvd. Environmental Impact Study

Dear Laurie:

The following is an aggregation of the comments and questions from the residents of West Hollywood North Neighborhood Association regarding the 8555 Santa Monica Blvd. Environmental Impact Study. As a neighbor to this project and a resident of West Hollywood, **I agree** with **ALL** concerns and questions below.

While the Initial Study indicates that there is no need to study certain categories, we feel that there will be "Potentially Significant Impact" these additional categories:

- Land use/Planning
- Population/Housing
- Utilities

There are also other concerns in categories already deemed Potentially Significant that haven't been judged as so by Rincon Consultants.

I. Aesthetics

a) Scenic Vista (additional question)
One of the unique aspects of West Hollywood is the vista of the Hollywood Hills rising up above our boulevards. How would the construction of a 5 story building not block this vista? Would a reduction to 3 stories be an alternative that would mitigate this?

c) Visual Character of site and surrounding
This building will be the tallest building on Santa Monica Blvd. with the exception of the historical Emser building. This lack of compatibility and scale with both the residential structures behind and even with the commercial structures on SMB can only be mitigated by a reduction in both size and footprint (please address the requested variances in required setbacks). This is a massive project that significantly alters the character of the neighborhood.

This project has virtually no articulation on 3 sides of the project.

The east side of the building is a solid wall right next to the sidewalk. This is not congruent with the "pedestrian friendly" goals in the General Plan. How can this be mitigated? Can the South East corner of the building be cut at an angle (like the Face Place) and storefront windows installed on the east side?

The west wall is a large concrete surface with very little articulation. The view of this building for every driver and pedestrian eastbound will be far from aesthetically pleasing. The guests of the Ramada will be looking at a large wall. How can this be mitigated? What additional articulation can be incorporated?

Current plans seem to include very large blocks of the building to be devoted to signage? Does this comply with current code for SMB? What will be the impacts of the lighting of such large signs?

While we laud the inclusion of a green roof, what will be the impacts visually and from runoff of a failure to maintain the roof? Will the roof be accessible by residents and if so, how will that impact the ability to maintain the plantings?

d) Shade
Who will pay for landscape that doesn't survive shadowing from the building? What possible materials can be used in green space without available sunlight?

II. Agricultural Resources

No questions

III. Air Quality

b) Air quality standards
This project will more than double the population of a single city block adding hundreds of vehicle trips per day and significantly impacting the air quality. The Initial Study states that the city's current population is 34,822 and that the addition of 141 people would be within the 35,100 projected for 2020 and that **"Impacts would less than significant further analysis of this issue in an EIR is not warranted."** This statement does NOT account for the impacts of all of the projects currently entitled or under construction—significantly Sunset Millennium and Movie Town, which will be hundreds of new residents.

What are the environmental impacts of all of these projects as a whole, not just peeled off and counted one at a time?

What will be the projected emissions and how would this project propose to mitigate them?

During construction, how many loads of soil will be removed?
How many vehicle trips will be involved?
Will trucks be allowed to idle at the construction site?
Will trucks be diesel, gas or low emission?

IV. Biological Resources

No questions

V. Cultural Resources

No questions

VI. Geology and Soils

a) i) Rupture of known earthquake fault
What provisions have been made to mitigate any damage due to an earthquake during construction?

a) iv) Landslides
Tons of soil will be removed and a three-story hole will be formed at the north edge of the project. Why are there no concerns of a landslide?

d) Expansive Soil
"...expansive soils exist in the City but are more prevalent in the southern part of the City." Whether or not expansive soils are "more" prevalent south of SMB, they are significant north of the Blvd. Any number of property owners in the neighborhood can testify to this. We believe there is a significant amount of expansive soil under this project and would like to understand the effect of the project. What does ACTUAL soil testing show to be the facts?

Subsidence
While the Initial Study states that this parking lot will only go down one story, this is only true for the SMB side of the project. The north side of the project will remove at least 3.5 stories of soil from the hillside to build the parking lot. What are the historical impacts of subsidence in this neighborhood? What are the likely impacts of a construction project of this magnitude?

Soil Conditions
Developer has asserted that they will use a "new" technology called Mat Slab to address the water issues. However, it is our understanding that specific soil and geology requirements must exist for this technology to be successful. Does the geology and soils meet these conditions? If not, what are the conditions and what mitigants would be required?

VII. Greenhouse Gas Emissions

How will the significant amount of CO2 emissions from 4 levels of parking be handled?
How will it be vented?
How will neighboring residences be protected?

VIII. Hazards and Hazardous Materials

No questions

IX. Hydrology and Water Quality

a-e) Goundwater, Drainage and Runoff (additional questions)
We know that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.

Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.

We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?

Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?

Local experience with the high groundwater table is extensive and spans periods of drought and deluge. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.

These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

We know high water table conditions have interfered with construction on Hancock and West Knoll causing catastrophic structural collapse around the project site within the same watershed.

Similarly many of the residential and commercial buildings in this area require extensive use of sump pumps to attempt to mitigate the effects of the voluminous underground water and high water table and several local buildings have been materially affected by this issue long term. There is substantial concern that the subterranean parking systems, no matter how well shielded, may divert substantial underground water flow onto adjacent properties, with the potential for serious long term damage and injury to those properties.

How will sump pump and other mitigation systems in nearby buildings be impacted?

Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise? How will sump pump and other mitigation systems in nearby buildings be impacted? Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

What will be the impact on the trees and plantings in the neighborhood to the south where many mature trees draw from the existing water table? What is the projected new route of this water system when it is interrupted with this project? What impact will there be to surrounding properties, streets and major public and private assets? What protection is needed to warrant surety, completion, and indemnification for potential damages? And how much variability is caused by actual accumulated seasonal rainfall?

What are the long-term effects of the underground conditions on liquefaction and on the water table?

What is the proposed disposal for the discharged groundwater during construction?

What are the potential impacts on structures to the south of the Blvd. with the loss of ground water? What are the potentials for sinkholes, settling or other structural impacts?

What is the projected daily volume in gallons of water that will be pumped from this project? What is the current volume pumped from 901 Hancock?

How will this ground water dumping impact the storm drain system?

X. Land Use and Planning

b) Land Use Plan (additional question)
The current zoning for this location is CC1 for 35 feet. Bonuses have been given to bring the building to a maximum of 55 feet.

Code 19.36.170 Mixed-Use Projects
A. *Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts.* A proposal to consolidate abutting residential and commercial parcels into a unified mixed-use project shall comply with the following standards.

- **Minimum Site Area**. The proposed parcels shall contain a minimum aggregate area of **60,000 square feet**.
- Design Standards. A proposed mixed-use project shall be designed and constructed to:
  - **Be compatible with and complement adjacent land uses;**
  - **Maintain the scale and character of development in the immediate neighborhood;**

The project doesn't meet either of these Zoning Code criteria. It is only 45,000 sq. ft. in size and its scale is massive, clearly incompatible with nearby land uses and overpowers the neighborhood.

It is also unclear from the project documents whether a rezoning of the residential parcel is being requested or if a zone text amendment attempting to revise the provisions of Zoning Code Section 19.36.170 is being requested to provide new and different standards for mixed use projects spanning across residential and commercial zones.

"The proposed project is also in the General Plan Mixed-Use Incentive Overlay Zone and in a Transit Overlay District. The Mixed-Use Inventive Zone allows for new development with a mix of residential and commercial uses to receive an additional 0.5 FAR and ten feet in height. The Transit Overlay District identifies sites close to major transit nodes for which modifications to the General Plan's permitted density, height, parking requirements, or other development standards may be considered when projects provide Transportation Demand Management programs."

What "major transit nodes"? Other than a bus line what "major transit" is mitigating this additional density?

Under what law, ordinance or other agency is the 10% reduction in setbacks qualified or allowed? What are the impacts on the neighborhood of these reduced setbacks?

XI. Mineral Resources

No questions

XII. Noise

b) Excessive groundbourne noise and vibration (additional question)
What are the plans to mitigate the excessive noise and vibration during construction? The noise and vibration during construction will have a very serious negative economic impact on the Ramada Hotel and all the commercial businesses in the area. Hotel rooms and facilities near the construction area will become very undesirable during construction and definitively decrease room and other revenues as well as the resulting transit occupancy tax revenues to the City.

Nearby residents will similarly suffer similar serious extended negative impacts to the quiet enjoyment of their homes. Many of the residents of this neighborhood work from their homes—this will become untenable during an extended construction period.

Given the seriousness of the noise and vibration impacts over an extended construction period special well tailored additional mitigation measures and conditions should be imposed to hopefully limit and minimize the deleterious effects.

What will be the noise/vibration from delivery trucks?

Will all delivery trucks be required to use the garage entrance or will they be allowed to park on the street. Note: Moving vans and other delivery vehicles use the street at 901 Hancock, significantly impacting neighborhood with sound, vibration, blocked parking and other access issues.

What is the noise impact of 93 condensers on the roof to surrounding homes? Where will the condensers be located given the green roof design?

What will be the noise impacts of the outdoor patio on the west side of the building on the guests of the Ramada?

f) Excessive noise from active airstrip affecting residents of project
West Hollywood Sheriff and Cedars Sinai helicopter pads are active airstrips in the vicinity.

XIII. Population and Housing

a) Substantial population growth (additional question)
Nearly 10 new apartment/condo and/or mixed use buildings, many of them quite large in scope are either already under construction, entitled or otherwise planned by 2020 and there is concern that the cumulative impacts of all these new residential and mixed use projects will drive the City's population well over

the planned 35,100 that the city is estimating by then. What are the exact beds/baths and populations counts planned for all these projects COMBINED?

To our knowledge the list of projects Under Review, Approved or in Construction is well over 2,000 units which would put the population growth at close to 4,000 people which more than a 10% increase in our current population.

Under Construction	
Monarch I &II	371
Courtyard @ La Brea	32
1232 Kings Road	25
Total Under Construction	428

Approved	
Sunset Milennium	190
Movietown	371
Palm Restaurant	42
House of Blues	40
Total Approved	643

Under Review	
Melrose Triangle	191
Faith Plating	166
8555 Santa Monica	102
8899 Beverly (office building conversion)	82
Total Under Review	541

Projects with Less Than 20 Units	414
Total Units	2,026

Not included

Edition Hotel/Condo
9001 SMB

This project will literally double the number of residential units in the immediate neighborhood. Will the sudden increase negatively impact the quality of life there and if so how can those impacts be mitigated?

XIV. Public Services

a,b) Fire and Police Protection (additional question)
Doubling the population of the neighborhood puts strain on both sheriff and fire departments and services. The small street of West Knoll will also hamper

access to the building during emergencies. What are the impacts to safety of the neighborhood and the City as a whole of congestion at La Cienega & SMB and other streets?

XV. Recreation

No questions

XVI. Transportation/Traffic

a-f) Traffic study

We'd like an in-depth analysis of major streets and all intersections within a half-mile of the project, with such a study based on recent, realistic traffic counts (i.e, not collected during the summer, or on holidays, or on a Sunday). These streets should include Santa Monica, West Knoll, Westbourne, Westmount, Holloway, Fountain, Sunset, Hancock and Rugby.

The study should specifically address the impacts on the West Knoll cul de sac and explore options to help mitigate those impacts.

Cars eastbound on SMB will have three choices to enter this project:

1. Wait at the long light on Westbourne, turn left, cut up Westbourne, right on West Knoll and then either into the residential lot or right again on SMB.
2. Make the U turn at the cut in front of Ramada, turn right on Westbourne and then same as 1 above.
3. Go to La Cienega, wait for a long light, make a U turn.

This will put a tremendous strain on Westbourne and West Knoll both in terms of traffic and safety.

What are the trips pre- and post-construction on each of these streets and intersections?

Left turn at Westbourne
U-turn at West Knoll and Santa Monica
U-turn at La Cienega
Left turn from La Cienega to Santa Monica

Similarly given the size of this project and the substantial increases in both residential and commercially generated traffic, the impacts on the nearest signaled intersections at Westbourne and Santa Monica, the intersection at Westmount and Holloway (which serves as a major point of ingress and egress for residents in West Hollywood North) the Westmount/West Knoll round about, and the West Knoll/Santa Monica Boulevard intersection should all be studied, impacts analyzed and mitigation measures considered.

In the previous studies, sometimes they used V/C figures and sometimes they used Delay. This was very confusing and we can only assume they used the number that was the more optimistic/favorable of the two. Please publish both sets of numbers.

In the previous studies, gross averages were used versus peak-hour level of service. Gross averages do not reveal the peak-hour level of service. Gross averages can actually mask peak impacts. We would specifically request that peak-hour data be provided. We would like to see charts by peak-hour level of service for am and pm. This is especially true of Holloway, Fountain, and the La Cienega/SMB intersection in all directions.

What is the plan for ingress/egress of retail, retail deliveries and residents?

The most recent plan shows additional medians in West Knoll, presumably to prevent left turns out of the project. Has this design ever been used on another project? If so, have post construction studies been done to establish the level of success? Given the narrowness of the street, is this feasible? Would it require removing all street parking in the lower section of West Knoll?

Given the existing F level of traffic on Santa Monica Boulevard during extended periods of the day, ingress/egress must be carefully studied, impacts analyzed and hopefully some mitigation measures developed. How will vehicles exit the project when traffic is solidly backed up Westbound on Santa Monica Boulevard?

Will there be a resulting substantial increase in traffic at the next major signaled intersection making a right (North) or left (south) on Westbourne Drive to avoid traffic ahead? i.e. cars trying to cut through the neighborhood to avoid SMB.

Given the F level of traffic on Santa Monica Boulevard, many local residents access their homes from Holloway to the north. It must be anticipated that both new residents and commercial patrons of this project will do the same thing. How, if at all, can this increased traffic flow on the residential streets be mitigated? Will the roundabout at West Knoll/Westbourne still accommodate and work with the increase in traffic?

Will there be significant impacts at the major LaCienega/Santa Monica Boulevard intersection, especially during rush hours, especially to Westbound lanes of traffic and traffic travelling south on LaCienega making a right turn onto Santa Monica Boulevard? If so, what are the additional traffic mitigation measures?

Will residents be given parking passes for guests?

Will parking places on West Knoll be eliminated?

What is planned for vehicles exiting West Knoll?

How will left turns from the exit onto West Knoll be mitigated?

Historically the City has required new developments to widen the street for new developments. Why has that requirement been waived for this project? What will be the impacts of the failure to do so?

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Sincerely,

James Hutchison
8562 West Knoll Drive #4
West Hollywood, CA 90069

Cc: Council Member D'Amico
Council Member Duran
Council Member Heilman
Council Member Land
Council Member Prang

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South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 10, 2013

Laurie Yelton, Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

Notice of Preparation of a CEQA Document for the
8555 Santa Monica Boulevbard Project

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

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Depa7rtment by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: http://www.aqmd.gov/ceqa/models.html.

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

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA

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

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

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

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

The SCAQMD staff is available to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM
LAC130416-08
Control Number

May 13, 2013

Laurie Yelton
Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216

RE: 8555 Santa Monica Blvd. Environmental Impact Study

Dear Laurie:

I agree with the following aggregation of the comments and questions from the residents of West Hollywood North Neighborhood Association regarding the 8555 Santa Monica Blvd. Environmental Impact Study, and would like to see answers to these questions.

While the Initial Study indicates that there is no need to study certain categories, we feel that there will be "Potentially Significant Impact" these additional categories:

- Land use/Planning
- Population/Housing
- Utilities

There are also other concerns in categories already deemed Potentially Significant that haven't been judged as so by Rincon Consultants.

I. Aesthetics

a) Scenic Vista (additional question)
One of the unique aspects of West Hollywood is the vista of the Hollywood Hills rising up above our boulevards. How would the construction of a 5 story building not block this vista? Would a reduction to 3 stories be an alternative that would mitigate this?

c) Visual Character of site and surrounding
This building will be the tallest building on Santa Monica Blvd. with the exception of the historical Emser building. This lack of compatibility and scale with both the residential structures behind and even with the commercial structures on SMB can only be mitigated by a reduction in both size and footprint (please address the requested variances in required setbacks). This is a massive project that significantly alters the character of the neighborhood.

This project has virtually no articulation on 3 sides of the project.

The east side of the building is a solid wall right next to the sidewalk. This is not congruent with the "pedestrian friendly" goals in the General Plan. How can this be mitigated? Can the South East corner of the building be cut at an angle (like the Face Place) and storefront windows installed on the east side?

The west wall is a large concrete surface with very little articulation. The view of this building for every driver and pedestrian eastbound will be far from aesthetically pleasing. The guests of the Ramada will be looking at a large wall. How can this be mitigated? What additional articulation can be incorporated?

Current plans seem to include very large blocks of the building to be devoted to signage? Does this comply with current code for SMB? What will be the impacts of the lighting of such large signs?

While we laud the inclusion of a green roof, what will be the impacts visually and from runoff of a failure to maintain the roof? Will the roof be accessible by residents and if so, how will that impact the ability to maintain the plantings?

d) Shade

Who will pay for landscape that doesn't survive shadowing from the building? What possible materials can be used in green space without available sunlight?

II. Agricultural Resources

No questions

III. Air Quality

b) Air quality standards

This project will more than double the population of a single city block adding hundreds of vehicle trips per day and significantly impacting the air quality. The Initial Study states that the city's current population is 34,822 and that the addition of 141 people would be within the 35,100 projected for 2020 and that "**Impacts would less than significant further analysis of this issue in an EIR is not warranted."** This statement does NOT account for the impacts of all of the projects currently entitled or under construction—significantly Sunset Millennium and Movie Town, which will be hundreds of new residents.

What are the environmental impacts of all of these projects as a whole, not just peeled off and counted one at a time?

What will be the projected emissions and how would this project propose to mitigate them?

During construction, how many loads of soil will be removed?

How many vehicle trips will be involved?
Will trucks be allowed to idle at the construction site?
Will trucks be diesel, gas or low emission?

IV. Biological Resources

No questions

V. Cultural Resources

No questions

VI. Geology and Soils

a) i) Rupture of known earthquake fault
What provisions have been made to mitigate any damage due to an earthquake during construction?

a) iv) Landslides
Tons of soil will be removed and a three-story hole will be formed at the north edge of the project. Why are there no concerns of a landslide?

d) Expansive Soil
"…expansive soils exist in the City but are more prevalent in the southern part of the City." Whether or not expansive soils are "more" prevalent south of SMB, they are significant north of the Blvd. Any number of property owners in the neighborhood can testify to this. We believe there is a significant amount of expansive soil under this project and would like to understand the effect of the project. What does ACTUAL soil testing show to be the facts?

Subsidence
While the Initial Study states that this parking lot will only go down one story, this is only true for the SMB side of the project. The north side of the project will remove at least 3.5 stories of soil from the hillside to build the parking lot. What are the historical impacts of subsidence in this neighborhood? What are the likely impacts of a construction project of this magnitude?

Soil Conditions
Developer has asserted that they will use a "new" technology called Mat Slab to address the water issues. However, it is our understanding that specific soil and geology requirements must exist for this technology to be successful. Does the geology and soils meet these conditions? If not, what are the conditions and what mitigants would be required?

VII. Greenhouse Gas Emissions

How will the significant amount of CO2 emissions from 4 levels of parking be handled?
How will it be vented?
How will neighboring residences be protected?

VIII. Hazards and Hazardous Materials

No questions

IX. Hydrology and Water Quality

a-e) Goundwater, Drainage and Runoff (additional questions)
We know that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.

Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.

We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?

Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?

Local experience with the high groundwater table is extensive and spans periods of drought and deluge. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.

These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

We know high water table conditions have interfered with construction on Hancock and West Knoll causing catastrophic structural collapse around the project site within the same watershed.

Similarly many of the residential and commercial buildings in this area require extensive use of sump pumps to attempt to mitigate the effects of the voluminous underground water and high water table and several local buildings have been materially affected by this issue long term. There is substantial concern that the subterranean parking systems, no matter how well shielded, may divert substantial underground water flow onto adjacent properties, with the potential for serious long term damage and injury to those properties.

How will sump pump and other mitigation systems in nearby buildings be impacted?

Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise? How will sump pump and other mitigation systems in nearby buildings be impacted? Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

What will be the impact on the trees and plantings in the neighborhood to the south where many mature trees draw from the existing water table? What is the projected new route of this water system when it is interrupted with this project? What impact will there be to surrounding properties, streets and major public and private assets? What protection is needed to warrant surety, completion, and indemnification for potential damages? And how much variability is caused by actual accumulated seasonal rainfall?

What are the long-term effects of the underground conditions on liquefaction and on the water table?

What is the proposed disposal for the discharged groundwater during construction?

What are the potential impacts on structures to the south of the Blvd. with the loss of ground water? What are the potentials for sinkholes, settling or other structural impacts?

What is the projected daily volume in gallons of water that will be pumped from this project? What is the current volume pumped from 901 Hancock?

How will this ground water dumping impact the storm drain system?

X. Land Use and Planning

b) Land Use Plan (additional question)
The current zoning for this location is CC1 for 35 feet. Bonuses have been given to bring the building to a maximum of 55 feet.

Code 19.36.170 Mixed-Use Projects
A. *Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts.* A proposal to consolidate abutting residential and commercial parcels into a unified mixed-use project shall comply with the following standards.

- **Minimum Site Area**. The proposed parcels shall contain a minimum aggregate area of **60,000 square feet**.
- Design Standards. A proposed mixed-use project shall be designed and constructed to:
  - **Be compatible with and complement adjacent land uses;**
  - **Maintain the scale and character of development in the immediate neighborhood;**

The project doesn't meet either of these Zoning Code criteria. It is only 45,000 sq. ft. in size and its scale is massive, clearly incompatible with nearby land uses and overpowers the neighborhood.

It is also unclear from the project documents whether a rezoning of the residential parcel is being requested or if a zone text amendment attempting to revise the provisions of Zoning Code Section 19.36.170 is being requested to provide new and different standards for mixed use projects spanning across residential and commercial zones.

"The proposed project is also in the General Plan Mixed-Use Incentive Overlay Zone and in a Transit Overlay District. The Mixed-Use Inventive Zone allows for new development with a mix of residential and commercial uses to receive an additional 0.5 FAR and ten feet in height. The Transit Overlay District identifies sites close to major transit nodes for which modifications to the General Plan's permitted density, height, parking requirements, or other development standards may be considered when projects provide Transportation Demand Management programs."

What "major transit nodes"? Other than a bus line what "major transit" is mitigating this additional density?

Under what law, ordinance or other agency is the 10% reduction in setbacks qualified or allowed? What are the impacts on the neighborhood of these reduced setbacks?

XI. Mineral Resources

No questions

XII. Noise

b) Excessive groundbourne noise and vibration (additional question)
What are the plans to mitigate the excessive noise and vibration during construction? The noise and vibration during construction will have a very serious negative economic impact on the Ramada Hotel and all the commercial businesses in the area. Hotel rooms and facilities near the construction area will become very undesirable during construction and definitively decrease room and other revenues as well as the resulting transit occupancy tax revenues to the City.

Nearby residents will similarly suffer similar serious extended negative impacts to the quiet enjoyment of their homes. Many of the residents of this neighborhood work from their homes—this will become untenable during an extended construction period.

Given the seriousness of the noise and vibration impacts over an extended construction period special well tailored additional mitigation measures and conditions should be imposed to hopefully limit and minimize the deleterious effects.

What will be the noise/vibration from delivery trucks?

Will all delivery trucks be required to use the garage entrance or will they be allowed to park on the street. Note: Moving vans and other delivery vehicles use the street at 901 Hancock, significantly impacting neighborhood with sound, vibration, blocked parking and other access issues.

What is the noise impact of 93 condensers on the roof to surrounding homes? Where will the condensers be located given the green roof design?

What will be the noise impacts of the outdoor patio on the west side of the building on the guests of the Ramada?

f) Excessive noise from active airstrip affecting residents of project
West Hollywood Sheriff and Cedars Sinai helicopter pads are active airstrips in the vicinity.

XIII. Population and Housing

a) Substantial population growth (additional question)
Nearly 10 new apartment/condo and/or mixed use buildings, many of them quite large in scope are either already under construction, entitled or otherwise planned by 2020 and there is concern that the cumulative impacts of all these new residential and mixed use projects will drive the City's population well over the planned 35,100 that the city is estimating by then. What are the exact beds/baths and populations counts planned for all these projects COMBINED?

To our knowledge the list of projects Under Review, Approved or in Construction is well over 2,000 units which would put the population growth at close to 4,000 people which more than a 10% increase in our current population.

Under Construction	
Monarch I &II	**371**
Courtyard @ La Brea	**32**
1232 Kings Road	**25**
Total Under Construction	**428**

Approved	
Sunset Milennium	**190**
Movietown	**371**
Palm Restaurant	**42**
House of Blues	**40**
Total Approved	**643**

Under Review	
Melrose Triangle	**191**
Faith Plating	**166**
8555 Santa Monica	**102**
8899 Beverly (office building conversion)	**82**
Total Under Review	**541**

Projects with Less Than 20 Units	**414**
Total Units	**2,026**

Not Included

Edition Hotel/Condo
9001 SMB

This project will literally double the number of residential units in the immediate neighborhood. Will the sudden increase negatively impact the quality of life there and if so how can those impacts be mitigated?

XIV. Public Services

a,b) Fire and Police Protection (additional question)
Doubling the population of the neighborhood puts strain on both sheriff and fire departments and services. The small street of West Knoll will also hamper access to the building during emergencies. What are the impacts to safety of the neighborhood and the City as a whole of congestion at La Cienega & SMB and other streets?

XV. Recreation

No questions

XVI. Transportation/Traffic

a-f) Traffic study
We'd like an in-depth analysis of major streets and all intersections within a half-mile of the project, with such a study based on recent, realistic traffic counts (i.e, not collected during the summer, or on holidays, or on a Sunday). These streets should include Santa Monica, West Knoll, Westbourne, Westmount, Holloway, Fountain, Sunset, Hancock and Rugby.

The study should specifically address the impacts on the West Knoll cul de sac and explore options to help mitigate those impacts.

Cars eastbound on SMB will have three choices to enter this project:

1. Wait at the long light on Westbourne, turn left, cut up Westbourne, right on West Knoll and then either into the residential lot or right again on SMB.
2. Make the U turn at the cut in front of Ramada, turn right on Westbourne and then same as 1 above.
3. Go to La Cienega, wait for a long light, make a U turn.

This will put a tremendous strain on Westbourne and West Knoll both in terms of traffic and safety.

What are the trips pre- and post-construction on each of these streets and intersections?

Left turn at Westbourne
U-turn at West Knoll and Santa Monica
U-turn at La Cienega
Left turn from La Cienega to Santa Monica

Similarly given the size of this project and the substantial increases in both residential and commercially generated traffic, the impacts on the nearest signaled intersections at Westbourne and Santa Monica, the intersection at Westmount and Holloway (which serves as a major point of ingress and egress for residents in West Hollywood North) the Westmount/West Knoll round about, and the West Knoll/Santa Monica Boulevard intersection should all be studied, impacts analyzed and mitigation measures considered.

In the previous studies, sometimes they used V/C figures and sometimes they used Delay. This was very confusing and we can only assume they used the number that was the more optimistic/favorable of the two. Please publish both sets of numbers.

In the previous studies, gross averages were used versus peak-hour level of service. Gross averages do not reveal the peak-hour level of service. Gross averages can actually mask peak impacts. We would specifically request that peak-hour data be provided. We would like to see charts by peak-hour level of service for am and pm. This is especially true of Holloway, Fountain, and the La Cienega/SMB intersection in all directions.

What is the plan for ingress/egress of retail, retail deliveries and residents?

The most recent plan shows additional medians in West Knoll, presumably to prevent left turns out of the project. Has this design ever been used on another project? If so, have post construction studies been done to establish the level of success? Given the narrowness of the street, is this feasible? Would it require removing all street parking in the lower section of West Knoll?

Given the existing F level of traffic on Santa Monica Boulevard during extended periods of the day, ingress/egress must be carefully studied, impacts analyzed and hopefully some mitigation measures developed. How will vehicles exit the project when traffic is solidly backed up Westbound on Santa Monica Boulevard?

Will there be a resulting substantial increase in traffic at the next major signaled intersection making a right (North) or left (south) on Westbourne Drive to avoid traffic ahead? i.e. cars trying to cut through the neighborhood to avoid SMB.

Given the F level of traffic on Santa Monica Boulevard, many local residents access their homes from Holloway to the north. It must be anticipated that both new residents and commercial patrons of this project will do the same thing. How, if at all, can this increased traffic flow on the residential streets be mitigated? Will the roundabout at West Knoll/Westbourne still accommodate and work with the increase in traffic?

Will there be significant impacts at the major LaCienega/Santa Monica Boulevard intersection, especially during rush hours, especially to Westbound lanes of traffic and traffic travelling south on LaCienega making a right turn onto Santa Monica Boulevard? If so, what are the additional traffic mitigation measures?

Will residents be given parking passes for guests?

Will parking places on West Knoll be eliminated?

What is planned for vehicles exiting West Knoll?

How will left turns from the exit onto West Knoll be mitigated?

Historically the City has required new developments to widen the street for new developments. Why has that requirement been waived for this project? What will be the impacts of the failure to do so?

Will commercial vehicles be accessing the project from West Knoll? Where are all of the loading and unloading zones and what conditions will be imposed to eliminate impacts of delivery trucks on West Knoll Drive? Given the narrow size of West Knoll large delivery trucks will be unable to properly access the project from West Knoll and/or they will significantly impede residential traffic in the area and potentially block and/or substantial impede access to residents parking in their nearby residential buildings.

The sharp angle of the West Knoll entrance will make it very difficult for delivery trucks to enter the building from Santa Monica Blvd.
Will trucks be permitted to drive through the neighborhood for easier access?
How will the impact of this traffic, noise, etc. mitigated?
Should all commercial vehicles be banned on West Knoll Drive?

Parking

Guest parking for 8535 West Knoll is an open , unsecured lot. Given the paucity of guest parking at 8555 SMB and the current restriction against permit parking, this lot will be a target for visitors at 8555 SMB. There will be costs for 8535 to monitor this. How can these costs and disturbances be mitigated?

Will businesses in this project be allowed to apply for C parking permits for their staff to park on neighborhood streets?

What will be the onsite parking demands of the proposed commercial and retail uses of the property? i.e. the "normal" parking demands for a 6,000 sq. ft. restaurant. What would be the peak demand for a "hot" restaurant?

Staging

During construction, how and where will construction vehicles be staged?
During concrete pours, will all street parking on West Knoll be blocked?
How many truck trips will be required?
How many trucks will be allowed to line up at one time?
Will they be allowed to idle indefinitely?
Where will construction workers park?
Will staging be limited to SMB? If so, how will that impact the intersection at La Cienega?

XVII. Utilities and Service Systems

a) Wastewater
Will the evacuated ground water be put through the sewer system? If so, what will be the volume and does this meet Regional Water Quality Control Board requirements?

f) Solid Waste (additional question)
Major landfills are closing in the next year. What will the additional waste requirements of this project do to City's requirements for waste disposal and how will this service be provided?

Electricity
The electrical infrastructure of this neighborhood is severely antiquated in inadequate to current demand. In the past three years there have been at least three transformer explosions within two blocks of this project that put residents at risk for their safety and causing days long power outages. What will be the additional electrical demands for this project? How will they be provided? How will the risks of future transformer explosions be mitigated?

XVIII. Mandatory Findings of Significance

Multiple Project Impacts
We request a special section that specifically evaluates comprehensive environmental impacts from concurrent projects (i.e., Gold's Gym, Ramada improvements, Millenium project, etc) located within close proximity to one another and surrounding the same critical intersections.

XIX. Additional Items

Alternatives for this project

Reduce size to three stories.
Remove traffic entrance from West Knoll.
Remove balconies facing north.

3 Story mixed use with ground floor retail and second & third stories townhome style two story live/work spaces. Narrow and tall with balconies on the SOUTH side of the building.

Sincerely,

Joel Weeks
Condo Owner in the City of West Hollywood

Cc: Council Member D'Amico
Council Member Duran
Council Member Heilman
Council Member Land
Council Member Prang

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May 13, 2013

Laurie Yelton
Associate Planner
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

Re: 8555 Santa Monica Boulevard Project - Additional Comments on Initial Study for EIR

Dear Laurie:

On behalf of my client Ramada Plaza Hotel West Hollywood and in my personal capacity as a local residential homeowner and neighbor of the proposed 8555 Santa Monica Boulevard Mixed-Use Project (the "Project"), we hereby submit the following additional comments and responses to the Initial Study prepared by Rincon Consultants, Inc. We also concur in total with the comments on the Initial Study expressed in the letter dated May 8, 2013 submitted by West Hollywood North Neighborhood Association ("WHNNA") and incorporate those comments herein by reference.

1. **Description of Project** - We are unclear as to which plans for the Project are under consideration and study in the proposed EIR. The Appendix to the Initial Study includes a series of plans that are different than those previously shown to the community and reviewed by the City's Planning Commission Design Subcommittee, with significant variations in numerous respects, including square footage of restaurant and commercial uses, residential unit count, number, layout and location of residential and commercial parking spaces, driveway locations as well as how ingress and egress to the Project will work, loading zones, commercial vs. residential access to the Project, open space, layout of each floor, etc. Moreover, the Appendix does not include any elevations, sections or renderings of the Project so it is impossible to ascertain whether the Project being considered in the EIR will be the same Project previously shown the community or different from the one previously presented and if different, in what respects. Without having the benefit of understanding the details of the Project, how can a viable EIR be crafted and how does the community know that the EIR being prepared properly considers and analyzes the environmental impacts of the ultimate Project being proposed?

2. **General Plan Designation/Zoning** - It is unclear as to which if any provisions of the Zoning Code the Project is relying on in seeking entitlement of this Mixed Use Project which spans across commercial and residential zones. Zoning Code Section 19.36.170, which is the only Zoning Code Section on point, is inapplicable as it specifically applies only to projects with a minimum lot size of 60,000 sq. ft. while the Project appears to be in the range of 45,000 sq. ft. Moreover, the design standards in that Code section require that a project be compatible with and complement adjacent land uses and maintain the scale and character of development in the immediate vicinity. This Project cannot meet any of those criteria. The Project's height, mass, FAR, uses and design vastly dwarf all commercial development in the vicinity. Given the Project's immediate adjacency to single family and low scale multifamily residential to the rear, it is impossible to fathom how a Project of this size and scale can do anything other than overwhelm the residential community behind it. It does not appear that the applicant has properly applied the appropriate setbacks, distance between structure requirements and other general development standards at the rear residential parcel that remains a separate property. There can be no doubt that this Project will significantly negatively impact and change the character and tone of the entire neighborhood.

3. **Parking Demand Study Needed**. The parking layout and plans included in the Appendix to the Initial Study appear to be non-functional and grossly inadequate to properly service the Project nor do they comply with City Code requirements. The plans show triple tandem parking configurations in multiple locations including areas apparently adjacent to commercial loading docks. The project density calculations rely on unprecedented perpendicular parking spaces that are not permitted by Code. Specifically designated loading spaces are required to service all levels of commercial space. The parking plans suggest loading behind other cars in back up zones. It is unclear how vehicles and trucks will be able to successfully maneuver within each parking floor to access parking spaces and loading areas or how commercial and residential tenants in the Project will be able to gain access to goods and items being delivered. Given the proposed mix of uses, the Study should examine how deliveries, site services, trash collection and the staging of both commercial and residential needs will take place without introducing negative impacts to the adjacent residential and commercial streets.

The Project anticipates 6,700 sq. ft. of restaurant space in addition to 27,000 sq. ft of other unnamed commercial uses, yet no valet pickup, drop off, circulation or other attendant parking support is shown in the plans. Moreover, commercial parking is divided between the first and third parking levels with the third parking level (the "Second Floor Plan") being devoted exclusively to commercial parking, requiring most if not all restaurant and commercial patrons and employees of the Project using vehicles to enter the Project via West Knoll a residential street. This could will shunt 100's if not more daily trips onto a quiet residential street. Previous City-approved mixed-use projects have required 7 or 8 car deep on-site queuing spaces for arriving cars to ensure that there is no back-up into traffic. The proposed layout does include

some space off Santa Monica but nothing for the commercial entry off West Knoll. Neither entry is currently acceptable.

It is clear that in addition to the extensive Traffic Study incorporating the items and issues detailed in WHNNA's comment letter, a parking demand study is needed to clarify and resolve whether or not the design and layout of the parking, driveway access, ingress, egress and loading of the Project is adequate to service its demands and to minimize negative impacts on the surrounding community. As a general rule, tandem space layouts or non-conventional parking solutions are worth considering if and only when a hardship exists. In this case if the parking levels were well-designed, the up-sloping site actually has assets for the staging and layout of parking that many other properties do not have. It is difficult to make findings that any hardship exists that the Project necessitates anything other than conventionally parked floor levels.

4. **Employee Parking.** The Initial Study nowhere addresses where the vast number of employees servicing the Project will park. 6700 sq. ft of restaurant space could easily employ 75 to 100 staff and depending on what sort of commercial tenants occupy the Project, 100's of additional employees will need to be park either in or near the Project. The neighborhoods to the north and south are already permit parking districts and there is little if no available public parking in the blocks surrounding the Project. As such, in addition to traffic and parking demand studies, a comprehensive study and plan for employee parking including conditions that will sufficiently incentivize alternative means of transportation should be included in the EIR.

5. **Aesthetics** - The Initial Study fails to properly analyze the adverse effects the Project's aesthetics would have on neighboring residential and commercial properties and the general community. Given the failure to include renderings or elevations in the Initial Study it is impossible to properly analyze aesthetics. However, several concerns include:

a. Neighborhood Character: The renderings and elevations previously shown to the public were problematic in many respects, including relative to the structural flat blank West wall of the Project on Santa Monica Boulevard, which will be unattractive and visually unappealing both when viewed from the Ramada to the West or from Santa Monica Boulevard to the south. The prior plans also showed a large heavy blank concrete block of building on the Northeast portion of the Project, immediately adjacent to, below and across from the residential community to the north, which again would substantially degrade the existing visual character of the area.

b. Shade/Shadow: The Initial Study does not provide any information on shade and shadow effects of the Project and given the height, massing and bulk of the Project, shade and shadow effects could be appreciable, especially to properties to the west and north during morning hours and properties to the east and north in the afternoon and evening hours.

c. Height: The project is proposed on an ascending slope. This slope can be advantageous for new development if such topography is used creatively to situate the project with as little impacts as possible. The adjacent Ramada Hotel and residential structures illustrate how lower scaled, terraced development can still accommodate reasonable density on S. Monica Blvd. In this case, the proposed design solution fails to take full advantage of the sloping conditions with poor choices for access and egress locations. The height measurement method used in the application was introduced into the Code specifically for descending slope purposes in order to mitigate impacts at street level. **When applied to ascending slopes the opposite occurs and rather than mitigate scale impacts the height becomes increased at the sidewalk level from a baseline, pre-incentive height limit of 35 feet to 70 feet at Santa Monica Blvd. This strategy results in a highly dense, stacked solution that extends in a manner clearly out of scale above the sidewalk at Santa Monica Boulevard and irrefutably incompatible with the area.** The new mixed-use project at Santa Monica Blvd. and Hancock accommodated its density in four stories and 45 feet. Other than the historic Emser Tile Building, that pre-dates current General Plan goals and zoning limitations, there is not one other 70 ft. tall structures in the along Santa Monica Boulevard, the City's "Main Street" that under the City's General Plan is supposed to promote pedestrian-scaled development. In this case, application of this height measurement method will have a demonstrable adverse impact on the quality of life at the street, it is contrary to pedestrian activation objectives in the General Plan and results in a significant change of character to the boulevard. Further study is needed to assess the impacts of a 70 foot structure at the street and from the residential community behind.

d. Graphic Signage. Large planes of graphic signage/billboards appear across the Santa Monica Blvd. façade of the Project. This type of signage conflicts with the W. Hollywood community's "Main Street" concept for Santa Monica Blvd. in the city's Code and the Santa Monica Boulevard Streetscape Plan. Such "Supergraphics" signage would substantially change the visual character of this area and would not contribute to the pedestrian walkability of Santa Monica Boulevard as suggested in the General Plan and would set an unintentional undesired precedent for this type of offsite advertising being allowed.

6. **Severe Economic Impacts**. The Initial Study fails to include any discussion concerning the serious deleterious economic impacts the Project will inflict on the local commercial community. During the 18 months of construction alone, with the resulting noise, vibration, traffic impacts and unsightliness of an open construction site, the Ramada Plaza will suffer vast damage to its bottom line with a large number of its units becoming un-saleable or at the very least saleable but at a markedly reduced daily rate. Not only will the Ramada Plaza's income be negatively impacted but the City's Transit Occupancy Taxes and sales and other revenues from the Ramada Plaza and its commercial tenants will be seriously damaged. Staffing will inevitably be cut by the Ramada as well as its commercial tenants with further negative economic impacts reverberating throughout the community.

As mentioned in the WHNNA comment letter, detailed analysis and study and recommendations for new and effective mitigation measures during construction are crucial.

Given the current designs for the Project with its unsightly tall, undifferentiated West Wall, the Ramada Plaza runs the significant risk of long term financial losses as well, due to the shade and shadow and unattractive view of the Project from a large number of its rooms on the east end of the hotel. The EIR should analyze and consider these short and long term negative financial impacts and offer alternatives to the current plan.

7. **Hydrology, Soils and Geological Issues.** WHNNA's letter already suggests that substantial additional study of the local high water table, soils and geology of the neighborhood and how especially the high water table in the area will be impacted by the Project. The Ramada Plaza concurs with these concerns and is uniquely concerned that the 4 levels of subterranean parking and retaining walls cut into the hillside on the north end of the Project site will divert large volumes of underground water onto its and other nearby properties, thrusting significant unexpected water, soils and other geological problems in the area.

Based on adjacent commercial property development to both sides of the subject property, the Project goals of mixed use housing and office over retail can be accommodated without the need to excavate, grade, export and haul massive quantities of earth from the site. The current underground proposal will have substantive negative impacts. Simply by learning from its immediate neighbors, the Project could employ a site work and excavation strategy that would result in less impacts to the soils, geography and subsurface stability of the site and should be considered as an alternative in the EIR. How if at all is the Project design addressing these concerns especially given the overwhelming evidence that water and soils issues are already commonplace in the immediate vicinity?

8. **Cumulative Study of the Project and Pending Projects Across the Street and in Vicinity.** In addition to the Project, new development projects are currently under consideration immediately across the street at the former Athletic Club/Palm Bar site. Although nothing is yet on its plate, the Ramada Plaza may consider revisions to its properties in the next decade. Furthermore, development of the previously approved mixed use project at 9001 Santa Monica Boulevard is apparently now proceeding and the large scale Melrose Triangle project also to the West of the Project site is making its way through the entitlement process now.

The new projects in and around the Project site offers a unique opportunity for the City of West Hollywood to devise a mini-master plan that would study and best resolve planning, traffic, pedestrian and vehicular access, street plan and other impacts and factors on a more neighborhood scale, instead of piecemeal, project by project. Such a combined strategy could easily improve the community in a way that a single project review could not.

Moreover, as per statistics provided by the City's housing department, upwards of 2,000 new residential units are already approved, being constructed or in the pipeline with potentially more on the way. This will result in a spurt of new growth in a fairly short period of time that inevitably will affect traffic and pedestrian patterns and flow throughout the City. In view thereof, study and review of the cumulative impacts of all this new residential and commercial development is appropriate.

9. **Land Use.**

a. Affordable Housing: The Project's requested incentives are based on the development strategy to "max" out perceived development rights that extend beyond General Plan development standards. While all communities should be integrating affordable housing when possible, based on the City's RHNA allocations, this Project could more than make its contribution of new affordable units to the City with a conventional on-grade design and avoid many unnecessary impacts. It is inaccurate to suggest that the City's interest in adding affordable units are best served by introducing unmitigatable negative impacts borne by seeking inappropriate density increases for the purposes of a "maxed" out project. Discretionary review is precisely designed to avoid this unintended result and sometimes "less is more". It is very possible to add affordable units without detrimentally impacting the surrounding area. The EIR study should carefully weigh alternatives including the reduced impacts of the Project if it were to meet affordable units requirements under the current code that already incorporates additional floor area for transit-oriented density bonuses and identify the specific impacts that would occur by doubling up on incentives (State and Local) for affordable housing.

b. **Live/Work:** Live/Work units are proposed on the easterly portion of the site well above grade. If in fact, live/work is to be integrated into the site, in order to reduce impacts it should be accessible to the public and disabled community from the sidewalk. The proposed live/work units are very narrow and unlikely to result in a well functioning and livable environment. Furthermore, such a use should be parked according to code requirements.

c. **Green Building:** As currently proposed, the Project does not appear to be designed in accordance with State CalGreen provisions that place a primacy on performance of the building. The Project's massing and orientation strategy results in extreme and unnecessary excavation, poor light quality, lack of ventilation, lack of landscaping/tree canopy on grade, ill configured live/work units, lack of on- site storm water capture, power generation, etc. The Project's increased density adversely impacts the efficient and effective conformance with the provisions of sustainable design practices.

10. **Air Quality.** As configured, the Project does not address an important air quality consideration. There are four levels of enclosed parking spaces. Enclosed structures require mechanical exhaust systems to remove carbon monoxide. There has been no accommodation

indicated to house the equipment and locate the ducting in a safe manner. The Project must indicate how and where the carbon monoxide will be exhausted in order to avoid any impacts to the adjacent hotel and the residences to the rear.

The greatest challenge with high-density housing is ensuring quality space with nice natural light and ventilation within the living units. There are many excellent examples of new high-density housing in West Hollywood that have resulted in quality living environments. (See Sierra Bonita Apartments (50 ft. high) by the WHCHC for example). This Project situates a large number of units within the core of the project oriented out to small courts or in reality large light wells. The EIR should explore how these interior openings result in adequate natural ventilation to achieve appropriate indoor air quality?

11. **Noise.** The Project roof plans indicate non-occupied green spaces; however, the residential units HVAC systems will likely require roof top condensers. The EIR should examine potential noise impacts to both the hotel rooms and adjacent residences from over 100 condensing units on the roof top.

The submitted drawings also suggest that a common open space area may be located at the westerly parcel on one of the upper floors. This space would be located in close proximity to hotel rooms directly adjacent to this space. There may be unintended impacts to hotel guests due to noise associated with the active use of this space.

12. **Lighting:** Hotel rooms adjacent to the proposed common area may be impacted by improperly located or unshielded exterior lighting. Please study the proposed Project for these impacts and proper mitigations.

Summary:

While we welcome compatible development of this property and believe the neighborhood and street life could be improved by a well-designed and suitable project, thus far the proposed design's inconsistent and unclear documents do not rise to even the lowest acceptable level for development in this situation. The Project seeks to extend beyond maximum allowable density limits by relying on discretionary requests for incentive-based increases. In order to accommodate this density, the Project proposes unreasonable parking configurations, including multiple tandem parking and parallel parking configurations, that may result in severe impacts both to the operation of the restaurant, retail, office and live/work units, as well as the adjacent street flow because of staging necessitated by these unreasonable parking strategies.

Rather than accounting for the adjacent uses, neighboring commercial and residential context, a steeply ascending slope condition, soil stabilization needs, underground water considerations and substantive traffic impacts, the Project instead proposes to situate itself apart from its context

through a misguided attempt to maximize all possible discretionary options in spite of the clear need for restraint, recognition of and addressing impacts and promoting a well-sited, compatible, creative on grade-based development that is characteristic of the adjacent community.

The Project unit count of 93 units represents a substantial increase in population to the neighborhood. It is out of scale, out of character, very poorly parked and misguided in its distribution of the land use density. It is imperative that a comprehensive EIR study include at least two other alternate projects:

Alternate #1: Project that terraces up the hill with on grade parking like its immediately adjacent neighbors; and

Alternate #2: A full block, fully integrated Project that combines the proposed Project at 8555 Santa Monica Blvd. with its neighbor at 8585 Santa Monica (Ramada Hotel) and best relates to the new development at the former Athletic Club property directly across Santa Monica Boulevard by exploring shard driveway access and an internal drive court thoroughfare (between West Knoll and Westmount) and other traffic design and mitigation measures that would best promote better pedestrian street life, create the best possible community and pedestrian friendly environment and mitigate more effectively the traffic and service needs of the entire area.

Thank you for your consideration.

Very truly yours,

Mark E. Lehman, for Ramada Plaza
West Hollywood

cc: Ramada Plaza West Hollywood
Ric Abramson

Laurie Yelton
Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

RE: 8555 Santa Monica Blvd. Environmental Impact Study

Laurie:

The purpose of this correspondence is to voice our concerns, comments and questions regarding the 8555 Santa Monica Blvd. Environmental Impact Study, and the significant changes that this project will have on homeowners and residents of N. West Knoll Drive.

We have owned the single-family home at 8553 N. West Knoll Drive since 1972. I grew up on this street, and have witnessed its transformation from a quiet block filled with single-family homes, with commercial property on both corners at Santa Monica Blvd.. Some years later came the development of the condos at 8535 N West Knoll, followed by the development of the Chamberlain Hotel, and various other condo and apartment projects in the immediate area.

We have witnessed the area's development and transformation, and believe that the growth was managed well by the City of West Hollywood. The proposed development at 8555 SMB is different. We believe that this project will significantly deteriorate the quality of life for residents of this block of N. West Knoll Drive and the immediate neighborhood. This project will literally double the number of residential units in the immediate neighborhood, this rapid increase will negatively impact the quality of life. How will the impact be mitigated?

This is a massive project that significantly alters the character of the neighborhood. This lack of compatibility and scale with both the residential structures behind and even with the commercial structures on SMB can only be mitigated by a reduction in both size and footprint.

The scale of the structure will block the views from the front of our home that we have enjoyed for forty years. 8555 SMB's north facing balconies, will emerge as our new view, additionally noise will increase significantly from activity on 30 balconies.

The neighborhood is very dense and this project will significantly increase traffic. Traffic is already heavy on N West Knoll as many motorists cut through our narrow streets to avoid traffic on SMB. We already have daily trips from commercial truck that park on the street to service the Chamberlain Hotel.

Additional deliveries will only worsen the current situation. Will all delivery trucks be required to use the garage entrance or will they be allowed to park on West Knoll Dr.? if yes, this will significantly impact the neighborhood with sound, vibration, blocked parking and other access issues.

Our questions surrounding the construction phase include:

During construction, how and where will construction vehicles be staged?
During concrete pours, will all street parking on West Knoll be blocked?
How many truck trips will be required?
How many trucks will be allowed to line up at one time?
Will they be allowed to idle indefinitely?
Where will construction workers park?
Will staging be limited to SMB?

Subsidence
While the Initial Study states that this parking lot will only go down one story, this is only true for the SMB side of the project. The north side of the project will remove at least 3.5 stories of soil from the hillside to build the parking lot. What are the historical impacts of subsidence in this neighborhood? What are the likely impacts of a construction project of this magnitude?

Soil Conditions
Developer has asserted that they will use a "new" technology called Mat Slab to address the water issues. However, it is our understanding that specific soil and geology requirements must exist for this technology to be successful. Does the geology and soils meet these conditions? If not, what are the conditions and what mitigants would be required?

Hydrology and Water Quality
a-e) Goundwater, Drainage and Runoff (additional questions)
We know that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.
Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.
We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?
Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra

runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?
Local experience with the high groundwater table is extensive and spans periods of drought and deluge. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.
These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

Similarly many of the residential and commercial buildings in this area require extensive use of sump pumps to attempt to mitigate the effects of the voluminous underground water and high water table and several local buildings have been materially affected by this issue long term. There is substantial concern that the subterranean parking systems, no matter how well shielded, may divert substantial underground water flow onto adjacent properties, with the potential for serious long term damage and injury to those properties.
How will sump pump and other mitigation systems in nearby buildings be impacted?

Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?
Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise? How will sump pump and other mitigation systems in nearby buildings be impacted? Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

What are the long-term effects of the underground conditions on liquefaction and on the water table?

What is the proposed disposal for the discharged groundwater during construction?

Taking into consideration all of these concerns, our request is that alternatives design solutions should be incorporated that would make the impact of 8555 SMB project less severe on the long established neighborhood that is seeks entry into. These include:

Reduce size to three stories.
Remove traffic entrance from West Knoll.
Remove balconies facing north.

3 Story mixed use with ground floor retail and second & third stories townhome style two story live/work spaces. Narrow and tall with balconies on the SOUTH side of the building.

Sincerely,

Pierre Norrington & James Norrington
8553 N West Knoll Drive
West Hollywood, CA 90069

Cc: Council Member D'Amico
Council Member Duran
Council Member Heilman
Council Member Land
Council Member Prang
Delivered via email:
lyelton@weho.org
jdamico@weho.org
jduran@weho.org
fsolomon@weho.org
aland@weho.org
jprang@weho.org

Russ, Linda

Subject: FW: WHNNA : URGENT! 8555 SMB EIR Questions

Laurie Yelton
Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216

RE: 8555 SANTA MONICA BLVD PROPOSED PROJECT

As long time residents and homeowners of six units at 8535 West Knoll Drive, we would like to voice our concerns regarding the proposed behemouth structure planned for 8555 Santa Monica Blvd.

Our major concerns are traffic and congestion on West Knoll and the surrounding residential streets. It is already difficult entering and exiting our building especially when large trucks are traveling on our street. Traffic backs up and cars have to wait to pass. It's almost impossible to exit onto Santa Monica Blvd as well as exiting east or west onto Holloway. This is at all times of the day not just peak hours.

We are concerned about Air Quality during construction and after completion with the increase of cars in such a confined area. We are concerned about the noise not only during construction but the long term impact after contsruction. Will we continue to have quiet emjoyment in our homes?

Will the new structure block the availability of natural light to our building? Will there be shadows cast from such an enormous structure?

The footprint and scale of this project seems to be incompatable with all of the surrounding buildings on Santa Monica Blvd.

There has already been slippage to our building and we are currently experiencing cracks in wall corners and slanting floors. All of the digging for the new project would exacerbate our already existing problems.

We would appreciate your addressing our concerns.

Sincerely,

Linda Russ (Units 304 and 316)
Carol Weiner (Unit 306)
Suzann Brent (309)
Carmen Ulmer (Unit 218)
Derek Boardman (Unit 307)

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: PAUL OPPENHEIM

Affiliation: _____
(resident, businessperson, agency representative, community group member)

Address: 8535 WEST KNOLL

Phone: _____

Email: OPPENHEIMPC@AOL.COM

Comments:

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Paul Oppenheim – re: 8555 Santa Monica Blvd Study 4.22.13

I am here on Earth Day as a citizen of this densely populated city. I have lived at 8535 West Knoll Dr. for 27 years. This small street is already dealing with --

Severe traffic congestion

Increased noise and air pollution

Unstable earth--- in 2001, the City documented an earthquake fault running directly thru the area proposed for construction. Our building has suffered from underground water induced soil erosion.

North West Knoll is such a narrow street, cars from different directions can barely pass each other. Is the street to be widened? Is street parking to be reduced?
Will you put a traffic lights on West Knoll & Santa Monica Blvd as well as Holloway & Westmount?

Views will be destroyed. Sunlight will be diminished.

We already live here & we ask you to carefully monitor the impact of this absurdly out of scale project. thank you

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: Michail Syklanakis

Affiliation: Resident
(resident, businessperson, agency representative, community group member)

Address: 8535 west KNOLL DR
313
CA 90069

Phone:

Email: mihailsik@gmail.com

Comments:

I believe the size of the project is three times the size it should be. Apart from the obvious serious issues of traffic, noise and air quality, it is also aesthetically displeasing for the whole Neighbourhood.

I wish to recommend a significant downsizing of the whole project. No balconies on west knoll drive and no subteranean parking whatsoever. Also no commercial loading or unloading of trucks on the too narrow West Knoll Dr.

Thank you for listening

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: CAROL WEINER

Affiliation: Resident
(resident, businessperson, agency representative, community group member)

Address: 8535 WEST KNOLL DR 306 WEST HOLLYWOOD CA 90069

Phone: 310-291-6055

Email: carol-weiner@yahoo.com

Comments:

(1) Project may out of scale for area

(2) Major impact on traffic, parking - during construction and after construction when building is occupied

(3) noise will increase to an unbearable level.

It is almost impossible to get up + down West Knoll many day because of truck + delivery to Hedley Apts and the Chamberlain Hotel

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: LINDA RUSS *Affiliation:* RESIDENT
(resident, businessperson, agency representative, community group member)

Address: 8535 W. KNOLL DR *Phone:* 323-855-4704

Email: lruss@cbs.com

Comments:

OUT OF SCALE - NOT COMPATIBLE TO OTHER BLDGS IN W.H.

NOISE

TRAFFIC IS ALREADY AT MAXIMUM ON W. KNOLL

PARKING ON WEST KNOLL

BLDG TOO LARGE SCALE - FSOR

~~WEST KNOLL STREET~~

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: Carmen Ulmer

Affiliation: Resident for 27 years
(resident, businessperson, agency representative, community group member)

Address: 8535 W. Knoll Dr. 218 LA CA 90069

Phone:

Email: ulmercdg@earthlink.net

Comments: Project too large - will have tremendous ~~pro~~ NEGATIVE impact on.

1) Traffic
2) Character of the neighborhood (Aesthetics)
4) Earthquakes Risk
5) Pollution (air quality / noise)
6) Parking issues
7) Sewerage
8) Transformer load

Definitely against it -

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: PAUL OPPENHEIM

Affiliation: _____
(resident, businessperson, agency representative, community group member)

Address: 8535 WEST KNOLL

Phone: _____

Email: OPPENHEIMPC@AOL.COM

Comments:

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Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: Michail Syklanakis

Affiliation: Resident
(resident, businessperson, agency representative, community group member)

Address: 8535 west KNOLL DR
313
CA 90069

Phone:

Email: mihailsik@gmail.com

Comments:

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Thank you for listening

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West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

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Name: CAROL WEINER

Affiliation: Resident
(resident, businessperson, agency representative, community group member)

Address: 8535 WEST KNOLL DR 306 WEST HOLLYWOOD CA 90069

Phone: 310-291-6055

Email: carol-weiner@yahoo.com

Comments:

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Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: LINDA RUSS *Affiliation:* RESIDENT
(resident, businessperson, agency representative, community group member)

Address: 8535 W. KNOLL DR *Phone:* 323-855-4704

Email: lruss@cbs.com

Comments:

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PARKING ON WEST KNOLL

BLDG TOO LARGE SCALE - FSOR

~~WEST KNOLL STREET~~

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: Carmen Ulmer

Affiliation: Resident for 27 years
(resident, businessperson, agency representative, community group member)

Address: 8535 W. Knoll Dr. 218 LA CA 90069

Phone:

Email: ulmercdg@earthlink.net

Comments: Project too large - will have tremendous ~~pro~~ NEGATIVE impact on.

1) Traffic
2) Character of the neighborhood (Aesthetics)
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5) Pollution (air quality / noise)
6) Parking issues
7) Sewerage
8) Transformer load

Definitely against it -

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: ADAM KOFFMAN

Affiliation: RESIDENT
(resident, businessperson, agency representative, community group member)

Address: 8535 N WEST KNOLL #305
WEST HOLLYWOOD CA 90069

Phone: 310 435 2213

Email: arkoffman@hotmail.com

Comments:

DURING CONSTRUCTION, WILL THERE BE TRUCKS AND WORKERS AND/OR EQUIPMENT ON WEST KNOLL?

WILL THERE BE ANY HAZARDS TO PEOPLE OR VEHICLES, SUCH AS NAILS IN THE STREET ETC?

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: LINDA RUSS

Affiliation: Resident (Homeowner)
(resident, businessperson, agency representative, community group member)

Address: 8535 W. Knoll DR
Unit 304
West Hollywood, Ca

Phone: 323-855-4704

Email: lruss@cbs.com

Comments:

(1) What is the impact of natural light on the Building across the Street which I live in the front Unit? I don't want to end up with a "dark" Unit! - West Knoll DR

(2) Traffic impact on Street

(3) How many cars do you estimate going in and out of apartments? The Street is Narrow

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: Joan BARTON

Affiliation: Resident
(resident, businessperson, agency representative, community group member)

Address: 1180 ALTA LOMA RD #1406

Phone:

Email: JOANMBARTON@AOL.COM

Comments:

IS the city of West Hollywood out of its collective mind to allow this project that blocks down from the four buildings on Sunset & La Cienega?

Traffic is destroying our once-lovely city. Why is this happening?

Can't West Hollywood ever say "No?"

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: Scott Henrotin

Affiliation: resident / homeowner
(resident, businessperson, agency representative, community group member)

Address: 8535 W. Knoll Dr #308
WeHo 90069

Phone: 213 804 7186

Email: shenrotin@allenmatkins.com

Comments:

*1. Aesthetics – Degradation of visual character of area
- Creation of new light / glare sources affecting views (Hillwood Hills views)
- Shadows on + offsite created by 5 story development

effects of massing and intensity of large structure

2. Greenhouse Gas Emissions

*3. Transportation / Traffic Impacts –
- Increased traffic impacting intersections, roadway segments, etc.
- Cumulative traffic increases
- hazards and inadequate emergency access

*4. Air Quality –
- Exhaust emissions
- Construction related air pollution + emissions + violation of air quality standards
- increased pollution concentrations

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

over

*5. Geology / Soils –
- Seismic related ground failure
- Instability of soil resulting in

possible offsite landslide liquefaction + collapse

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: SUZANN BRENT

Affiliation: RESIDENT
(resident, businessperson, agency representative, community group member)

Address: 8533 WEST KNOLL

Phone: 310 945-2519

Email: SUZBRENTLA@AOL.COM

Comments:

VERY CONCERNED ABOUT GROUND SETTLING.

WHO DO WE SUE WHEN OUR CONDOS EXPERIENCE FLOOR SETTLING AND SLANTING?

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org

Comment Sheet

Please let us know your concerns so we can address them in the Environmental Impact Report.

Name: Darrell Daniel

Affiliation: _____
(resident, businessperson, agency representative, community group member)

Address: _____

_____

_____

Phone: _____

Email: _____

Comments:

Guest Parking & traffic

Please submit to:
Laurie Yelton, Associate Planner
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216
email: lyelton@weho.org